April 18, 2023

Submitted electronically to: https://calegislation.lc.ca.gov/Advocates/

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Committee on Water, Parks, and Wildlife
1020 N Street, Room 160
Sacramento, CA 95814

RE: AB 1322 (Friedman) Anticoagulant Rodenticides
California Ecosystems Protection Act of 2023: SUPPORT

Dear Chair Bauer-Kahan,

On behalf of the 73 undersigned groups and our hundreds of thousands of members and supporters in California, we are writing to express our strong support for AB 1322—the California Ecosystems Protection Act of 2023—by Assemblymember Laura Friedman, which seeks to implement stronger measures to protect wildlife, children, and pets from unintentional rodenticide poisoning.

AB 1322 extends the existing moratorium on dangerous second-generation anticoagulant rodenticides to include the deadly first-generation anticoagulant diphacinone, and strengthens future restrictions on anticoagulant rodenticides to better protect wildlife, children, and pets. It requires state regulators to develop stronger restrictions on any use of the most dangerous anticoagulant rodenticides. AB 1322 is narrowly targeted to the most dangerous rodenticides until state regulators can develop better safeguards on their use and specifically exempts agricultural activities, public health protections, water supply infrastructure, biotech, and emergency pest infestations.

As noted by the Los Angeles Times in their February 2023 editorial, “[r]at poison continues to be a threat to mountain lions despite a recent law that put a moratorium on the use of toxic second generation anticoagulant rodenticides except for agriculture or to protect public health starting in 2021.” A 2022 study by the California Department of Fish and Wildlife found that 70% of the tested animals were exposed to rodenticides. Greater restrictions are needed.

Anticoagulant rodenticides pose an unreasonable risk to children and pets. The National Poison Data System documented over 2,300 cases of anticoagulant rodenticide poisoning of children under the age of 6 years old in the most recent year of reporting. Rodenticides pose an unreasonable risk to pets and domestic animals as well. More than 100 pets needlessly die each year due to rodenticide exposure. More protections for California families are necessary.

Anticoagulant rodenticides pose an unreasonable risk to wildlife. The California Department of Pesticide Regulation has documented anticoagulant rodenticide poisonings in at least 38 different non-target species in California such as eagles, hawks, falcons, owls, bobcats, mountain lions, and even the imperiled San Joaquin kit fox, northern spotted owl, and California condor. The problem is so severe that over half of wildlife tested in California are exposed to rodenticides. A recent national study found that 96 percent of bald eagles—our national bird—have been
exposed to anticoagulant rodenticides and that 77 percent of golden eagles have been exposed.\textsuperscript{vii}

There is a wide array of cost-effective alternatives available on the market today to better address rodent infestations. Sealing buildings and eliminating food and water sources are a necessary first step. Lethal rodent control strategies that involve snap traps, electric traps, fertility control, and other non-toxic methods can then be implemented to address any infestations. Several types of less toxic rodenticides are available as well. More information on effective and affordable alternatives can be found at www.SafeRodentControl.org.

We respectfully urge you to vote yes on AB 1322 to better regulate these poisons in order to protect children, pets, and wildlife.

Sincerely,

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