



## Santa Susana Mountain Park Association

*Dedicated to the Preservation of the Simi Hills and Santa Susana Mountains*

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October 4, 2013

Ms. Linda Irokawa-Otani  
Regulations Coordinator  
Department of Pesticide Regulation  
1001 I Street, P.O. Box 4015  
Sacramento, California 95812-4015

Dear Ms. Irokawa-Otani and the Department of Pesticide Regulation:

The Santa Susana Mountain Park Association supports newly proposed **DPR Regulation No.13-002 Designating Brodifacoum, Bromadiolone, Difenacoum, and Difethialone as Restricted Materials (Second Generation Anticoagulant Rodenticide Products)**.

We are very concerned about our local higher order predator population (mountain lions, bobcats, birds of prey, etc.) that are being poisoned by household and non-licensed use of rodenticides. In the recent past, two local mountain lions and numerous bobcats have died as a direct result of rodenticides working their way up the local food chain.

The persistence of residue in targeted animals has led to a statewide problem in local wildlife. As advocates for our City, County, State and Federal Parks (especially Santa Susana Pass State Historic Park, Chatsworth Nature Preserve, Simi Hills, Santa Susana Mountains, and Santa Clarita Woodlands), we see a critical need to protect all the fauna of our area and the rest of California. We need to keep our parks healthy and diverse.

The proper mix of prey and predators has a profound positive effect on the natural landscape. As has been demonstrated with the reintroduction of wolves into Yellowstone Park, the original balance created by nature allows for a much wider diversity of both plants and animals. (See Scientific American, "Lessons from the Wolf", June 2004, by Jim Robbins)

The Department of Pesticide Regulation's NOTICE OF PROPOSED REGULATORY ACTION describes the pesticides to be regulated as:

"Rodenticides currently registered for use in California to control aboveground commensal rodents fall into three categories: acute toxicant (nonanticoagulant) rodenticides; first generation anticoagulant rodenticides (FGARs); and SGARs containing the active ingredient brodifacoum, bromadiolone, difenacoum, or difethialone."

We support the action of DPR to add SGARs as California-restricted materials. We also support the requirement that SGARs can only be possessed or used by, or under the direct supervision of, a certified private applicator or a certified commercial applicator.

We further support the prohibition of the placement of aboveground baits containing these active ingredients more than 50 feet from a man-made structure unless there are special circumstances.

We wholly support the conclusions made by DPR in their NOTICE OF PROPOSED REGULATORY ACTION:

“The proposed regulations should benefit the environment and the health of California residents by ensuring that only certified applicators will be able to purchase and apply SGARs thereby reducing nontarget wildlife exposures. These products would still be available to address public health concerns prevalent in many different types of rodent-prone settings, such as food processing facilities and poultry houses.”

Sincerely,



Teena Takata  
President, Santa Susana Mountain Park Association

About **Santa Susana Mountain Park Association:**

Santa Susana Mountain Park Association is a 42 year-old non-profit organization based in Chatsworth, Los Angeles, California.

We represent approximately 700 members and concerned citizens, and we partner with many organizations to promote ecological and recreational quality in Southern California.

**SSMPA's mission** is to preserve and protect the Simi Hills, Santa Susana Mountains, and surrounding open space.

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