



**Friends of Griffith Park**

P.O. Box 27573  
Los Angeles, CA 90027-0573  
friendsofgriffithpark.org

August 27, 2013

Linda Irokawa-Otani, Regulations Coordinator  
Department of Pesticide Regulation  
1001 I Street, Post Office Box 4015  
Sacramento, California 95812-4015

Re: DPR Regulation 13-002

Ms. Irokawa-Otani,

Our organization supports DPR Regulation 13-002, the removal of second generation rodenticides from usage, including Brodifacoum, Bromadiolone, Difenacoum, and Difethialone. However, we have a strong preference to amend the regulation to strengthen its effectiveness even further.

As currently proposed, the regulation only disallows qualified applicators from above-ground placement of these anticoagulant poisons further than 50 feet from buildings. We suggest the regulation be amended to eliminate their usage completely. Unintended exposure to our wildlife will still be at unacceptable levels, unless a complete ban is imposed. A complete ban will also allow easier and better enforcement of the regulation.

In our particular situation in Los Angeles, 4300+ acre Griffith Park is nearly entirely surrounded by residential homes with wildlife often as plentiful as within the park itself, including bobcats, owls, hawks and coyotes. Even within the park, there are many facilities owned by the City of Los Angeles where wildlife may become the unintended victims due to the unrestricted usage of these agents to control rodents near buildings. Alternative means to control rodents near buildings are available, and our organization is active in doing outreach to promote these alternatives.

Secondary cumulative poisoning, as well as direct poisoning, has proven to be devastating to our wildlife. Furthermore, it is not only our mountain lions, bobcats, and other wildlife which we are protecting; a complete ban of these anticoagulant poisons will make it safer for our children and our pets.

Gerry Hans  
President  
[www.friendsofgriffithpark.org](http://www.friendsofgriffithpark.org)  
[gerry@friendsofgriffithpark.org](mailto:gerry@friendsofgriffithpark.org)