



Councilmember Mitch O'Farrell, Chair
Arts, Parks, Health, Aging and River Committee
Los Angeles City Council
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Los Angeles, CA 90012
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October 29, 2014

PUBLIC COMMENT ON COUNCIL FILE 13-1580:

City policies and procedures that dictate the use of poisons to control the rodent population in the parks and hillside areas of Los Angeles

Dear Councilmember O'Farrell:

170 East Cotati Avenue
Cotati, California 94931

I represent the Animal Legal Defense Fund (ALDF), a national nonprofit organization of over 100,000 members whose mission is to protect the lives and advance the interests of animals through the legal system. As a Los Angeles resident and on behalf of ALDF, I write today in support of the City Council's recent efforts to reduce and eliminate the use of anticoagulant rodenticides (ARs) in our City parks and wilderness areas.

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ALDF strongly supports ending the use of all ARs in the City, particularly in parks and other ecologically sensitive areas. As scientists have documented, these dangerous rodent poisons wreak havoc on our native ecosystems as they move up the food chain, indiscriminately sickening and killing large numbers of non-target species, including coyotes, bobcats, raptors, and even famed Griffith Park mountain lion P-22. ARs also pose an unjustifiable risk to pets and children, as evidenced by the accidental poisoning of a dog near the Greek Theater this summer.

ALDF applauds the recent move by the City of Los Angeles Department of Recreation and Parks to phase out second-generation ARs (SGARs), and its commitment to using first-generation ARs (FGARs) only in subterranean squirrel bait stations. However, these steps do not go far enough to combat the problem. Because there is no "safe" use of these poisons for wildlife, ALDF respectfully requests that the City take the following measures.

Winning the case against cruelty

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- Memorialize the Department's commitment to eliminating SGARs and put us on the road to becoming a poison-free Los Angeles by adopting a resolution detailing the dangers of ARs and making it the public policy of the city to decrease and eliminate the use of these poisons in and around our parks and wilderness areas;
- Ask all City departments, including the Department of Recreation and Parks, to work towards measurably decreasing, and ideally phasing out entirely, the use of dangerous FGARs like Diphacinone;
- Work with local organizations, nonprofits, and coalitions like Citizens for Los Angeles Wildlife and Poison Free Malibu to create a public awareness campaign, geared towards homeowners in the canyon and hillside neighborhoods, about the dangers of ARs and the availability of more humane, ecologically sensitive pest control measures;
- With input and data from scientists, researchers, and government agencies, assess the progress of the Department of Recreation and Parks' SGAR phase-out to determine whether it is having a measurable effect on non-target wildlife species, ideally ahead of the Department's progress report in July 2015.

Ultimately, ALDF strongly urges the Council to explore an ordinance banning the sale and use of ARs citywide, particularly their use in and around hillsides, canyons, and other wilderness areas, and within 100 feet of parks, school zones, playgrounds, and play structures. The Council will find ample support for a ban in the myriad evidence supplied by wildlife researchers, neighborhood councils, nonprofit organizations, and other commenters since the Council first requested public participation in 2013. ALDF, of course, incorporates the existing body of evidence on file with the Council into this letter of support.

ALDF commends the Council for its work on rodenticides, and urges the city to continue the job it started and work towards becoming a poison-free Los Angeles, for the benefit of wildlife, pets, and children.

Sincerely,

Kelsey Eberly

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