

Office of Pesticide Programs (OPP) Regulatory Public Docket (7502P)  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, D.C. 20460-0001  
Attn: Kelly Sherman  
Re: Docket Identification Number EPA-HQ-OPP-2006-0955

Dear EPA,

Thank you for this opportunity to submit comments on the critical issue of reducing the negative impact that rodenticides have on our wildlife and children.

Removing cardboard boxes of colored poison pellets from the shelves of supermarkets and hardware stores is necessary to prevent small children from eating these pellets. Thank you for working with industry to design tamper-resistant bait boxes that hold an affixed solid block of poison inside.

I hope that you will also require that second generation rodenticides be labeled for use only in solid block form, affixed within a tamper resistant bait box. This is not currently stated. Primary poisoning of non-target wildlife and children can occur if pellets are spilled from containers either during placement or if disturbed by people or animals.

Thank you also for implementing programs to assist people in low-income housing complexes identify and close rodent entries into buildings, and identify and remove open food sources. More of these programs are needed.

What has not been addressed is the loss of endangered species and the multitude of other non-target species that are dying from secondary poisoning after eating rodents poisoned with second generation "single -feed" rodenticides. This critical problem must be addressed in a substantive manner.

Killing bald eagles, peregrine falcons, endangered California kit foxes, and all other wildlife species that eat rodents or carrion, for the sake of killing rodents just does not make sense, and must not be allowed to continue.

These rodenticides must not be allowed for outdoor use where wildlife are at risk of eating the poisoned rodents. Labeling second generation rodenticides for indoor use only would limit wildlife exposure to only those rodents that are poisoned indoors and die outdoors. This measure is necessary to reduce the terrible problem of secondary poisoning.

Industry will still sell first generation rodenticides for outdoor use. These rodenticides have considerably less negative impact on wildlife and the environment.

The EPA states that poisoning outdoors around open food sources is not an effective means of reducing rodents congregating to eat food left out at night. Closing an open food source is the only solution to removing rodents from the area. Most restaurants and food markets are unaware of the effect the poison they pay to have placed is having on the environment. They rely on the EPA to dictate to industry what products are appropriate to use.

Pest Control Operators/Applicators will continue to refill poison bait boxes with second generation rodenticides around nearly every dumpster across our country unless these rodenticides are restricted to indoor use. Our environment will continue to be littered with the bodies of rodents

toxic enough to kill the animals that eat rodents and carrion unless these rodenticides are restricted to indoor use.

Wildlife rehabilitators were not notified that there was an EPA hotline to report wildlife poisoning incidents. Wildlife rehabilitation centers across the country receive poisoned raptors and mammals. While the symptoms and blood work easily confirms poisoning, some animals that have died have been tested. Brodificoum, difetialone, and bromodiolone are the poisons reported consistently by the labs.

While the vast body of evidence cited in the EPA documents of secondary poisoning of wildlife is surely enough to warrant action to reduce secondary poisoning, it is important to note that the poisoning data of thousands of wildlife rehabilitation centers across our country that receive injured sick and orphaned wildlife has not been included. The problem is of a much greater magnitude.

Thank you for labeling second generation anti-coagulant rodenticides for indoor use only, to save thousands of non-target wild animals lives annually.

Sincerely,