

Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

14 March, 2023

**Subject: Rodenticide PID Follow Up Considerations**

Dear Ms. Reaves and colleagues,

We the undersigned organizations are writing to thank the Pesticide Re-Evaluation Division of the Office of Pesticide Programs under the Environmental Protection Agency for its careful consideration of threats to non-target wildlife from rodenticides. Additionally, we urge your office to take drastic measures to protect wildlife from rodenticides by limiting their use and reducing non-target organism impacts.

By their nature, the rodenticides listed in the Proposed Interim Registration Review Decision (PID)<sup>1</sup> are harmful to wildlife. Many of the chemicals listed below may take up to *four days* to be lethal to target rodents.<sup>2</sup> In that time there is high potential for a poisoned rodent to be consumed by an avian predator.<sup>3</sup> This is particularly problematic for opportunistic hunters such as Red-Tailed Hawks, Ferruginous Hawks, Aplomado Falcons, Great Horned Owls, Barred Owls, and American Kestrels, among others.

	<b>Active Ingredient</b>	<b>Docket Number</b>
<b>First-Generation Anticoagulant Rodenticides</b>	Chlorophacinone	EPA-HQ-OPP-2015-0778
	Diphacinone and its sodium salt	EPA-HQ-OPP-2015-0777
	Warfarin and its sodium salt	EPA-HQ-OPP-2015-0481
<b>Second Generation Anticoagulant Rodenticides</b>	Brodifacoum	EPA-HQ-OPP-2015-0767
	Bromadiolone	EPA-HQ-OPP-2015-0768
	Difenacoum	EPA-HQ-OPP-2015-0769
	Difethialone	EPA-HQ-OPP-2015-0770
<b>Non-Anticoagulant Rodenticides</b>	Bromethalin	EPA-HQ-OPP-2016-0077
	Cholecalciferol	EPA-HQ-OPP-2016-0139
	Strychnine	EPA-HQ-OPP-2016-0140
	Zinc Phosphide	EPA-HQ-OPP-2015-0754

While large amounts of rodenticides can be acutely toxic, small amounts can have sublethal effects on birds including immunosuppression and loss of motor control. These sublethal effects amplify the damaging impact of lead ammunition, disease, and collisions with humanmade objects.<sup>4</sup>

In the recent proposal for listing populations of the California Spotted Owl under the Endangered Species Act, rodenticide poisoning was cited as a specific concern. Though rodenticide poisoning may only affect a few Owls, the listing proposal stated that “the loss of just a few individuals may reduce survival and the population growth rate because the California spotted owl is a long-lived species with low reproductive rates.”<sup>5</sup>

<sup>1</sup> <https://www.regulations.gov/document/EPA-HQ-OPP-2015-0754-0020>

<sup>2</sup> See Proposed Interim Registration Review Decision for Seven Anticoagulant Rodenticides.

<sup>3</sup> Vyas, N., Kuncir, F., and Clinton, C. (2017). Influence of Poisoned Prey on Foraging Behavior of Ferruginous Hawks. *BioOne*, 177(1). <http://dx.doi.org/10.1674/0003-0031-177.1.75>

<sup>4</sup> Vyas, N. et al. (2022). Toxicological responses to sublethal anticoagulant rodenticide exposure in free-flying hawks. *Environmental Science and Pollution Research International*. <https://doi.org/10.1007/s11356-022-20881-z>

<sup>5</sup> <https://www.regulations.gov/document/FWS-R8-ES-2022-0166-0001>

We appreciate the regulations set forth for the Attwater's Prairie Chicken and California Condor and hope that similar approaches will be taken with other threatened and endangered birds and their critical habitat. We strongly urge EPA to go even further and limit chemical rodenticide use within areas threatened and endangered species rely on. There are only 334 California Condors living in the wild;<sup>6</sup> a study published last year found anticoagulant rodenticides in 42% of the studied birds (27 individuals out of 65).<sup>7</sup>

We appreciate the proposed regulations set forth in the PID and hope you will carefully examine the comments made by the groups signed onto this letter, and those who work in concert with them. The proposed regulations are a step in the right direction, but greater action must be taken now to prevent the further loss of wildlife. Birds are facing an inordinate amount of threats at present, so we must do all we can to minimize untimely and unnecessary losses.

Thank you for undertaking this monumental task and please consider exercising extremely conservative measures in future decisions. We look forward to reviewing the upcoming biological assessments, evaluations, and opinions on rodenticides set forth in EPA's plans.

Sincerely,



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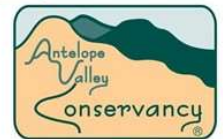
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of North America**



**Friends of  
the Earth**



Maryland  
Pesticide  
Education  
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Orleans  
Audubon  
Society



<sup>6</sup> <https://www.nps.gov/articles/000/caco-world-2021.htm>

<sup>7</sup> Herring, G., et al. (2022). Collateral damage: Anticoagulant rodenticides pose threats to California condors. *Environmental Pollution*, 311. <https://doi.org/10.1016/j.envpol.2022.119925>

### ***Endorsing Organizations***

American Bird Conservancy  
Antelope Valley Conservancy  
Arkansas Valley Audubon Society  
Audubon Colorado Council  
Augusta Bird Club  
Connecticut Audubon Society  
Cottage Codgers  
Endangered Habitats League  
Endangered Species Coalition  
Environmental Protection Information Center- EPIC  
Friends of the Earth  
Iowa Audubon  
John Burroughs Natural History Society  
Klamath Basin Audubon Society  
Klamath Forest Alliance  
Klamath Siskiyou Wildlands Center  
Lehigh Valley Audubon Society  
Magic  
Maryland Ornithological Society  
Maryland Pesticide Education Network  
New Hampshire Audubon  
New Mexico Audubon Council  
Oakland Audubon Society  
Orleans Audubon Society  
Pioneer Alaskan Fisheries Inc  
Portland Audubon  
Presque Isle Audubon Society  
Prince George's County Audubon Society  
Project Eleven Hundred  
Raptors Are The Solution  
Redwood Region Audubon Society  
Rockbridge Bird Club  
Safe Skies Maryland  
Safety Harbor (FL) Owl Team  
San Diego Audubon Society  
Sangre de Cristo Audubon Society  
Save Arlington Wildlife  
Save Our Seabirds  
Seattle Audubon  
Sierra Club  
Soda Mountain Wilderness Council  
South Shore Bird Club  
Tennessee Ornithological Society  
The Linnaean Society of New York  
Whidbey Environmental Action Network

***Endorsing Individuals***

Aniko Totha  
Benton Elliott  
Bill Zuzevich  
Bonnie Williams  
Bruce A. Aird  
Carol Baird Molander  
Carol R. Foss, Ph.D.  
Carolyn Longstreth  
Clinton W. Epps  
Colin Rees  
Conor Gearin  
Constance Melahoures  
Dan O'Brien  
Dave Wilson  
Debra Siefken  
Denise Hughes  
Diane M. Kastel  
Dr. Luke George  
Dr. Terry and Nancy Owen  
Elisa Townshend  
Eric Orff  
Estrella Moon  
Frances Greenlee  
Frances Rove  
Gail Kenny  
George Van Der Aue  
Heidi Hoven  
Hilary Garrett  
individual  
James Cubie  
James R Monroe  
Jean K Mackey  
Jean Marie Naples, MD-Ph.D.  
Jeff Lincer, Ph.D.  
Joshua Bock  
Jovy Jergens  
Judith S Anderson  
June Stephens  
Karen Clifford  
Katherine Riggs  
Katherine S. Wolfthal  
Kathleen Rawdon  
Katie Fite  
Keelin Miller  
Kenneth Copenhaver  
Kerry O'Hare  
Kimberly J. Uyehara  
Kurt R. Schwarz

Linda Putman  
Lindsay Addison  
Lindsay Wilkes  
Iora Losi  
Lucy Weltner  
Lynn Carroll  
Lynn Patra  
Lynne Hertzog  
Marc Liverman  
Marci Desart  
Mark J. Schocken, Ph. D.  
Mary T Schwartz  
Mary T. Vican  
Matthew Schwartz  
Maureen M Webb  
Nalei Kahakalau  
Nancy Kirschbaum  
Nate Marchessault  
Neilia Pierson  
Nikki Nafziger  
Pamela M Piombino  
Patricia Donahue  
Patricia Tice  
Paul Kinnaly  
Ramona N Bearor  
Sally Jacques  
Satah Chisholm  
Steve Holzman  
Stewart Ting Chong  
Sue Knight  
T. Logan  
Tanea Stephens  
Vin Zollo  
Virginia M  
Wendy Hayward  
Willamina Coroka