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May 1, 2012

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Ms. Ann Prichard, Chief
Pesticide Registration Branch
Department of Pesticide Regulation
P.O. Box 4015
Sacramento Ca 95812-4015

RE: Pesticide Product Registration Renewal (DPR Notice 2011-12) –
Rodenticide.

Dear Ms. Prichard:

The Marin County Board of Supervisors respectfully requests that DPR refuse to renew registration of twenty rodenticide products because the products pose unreasonable risks to children, pets and non-target wildlife. We have attached a list of these products that was developed by U.S. EPA. We share U.S. EPA's disappointment that the manufacturers – Reckitt Benckiser Inc. makers of D-Con; Spectrum Group makers of Hot Shot and Rid-a-Rat; and Liphatech Inc. makers of Generation rodent control products - have not voluntarily removed these products from the market.

We have followed U.S. EPA's lengthy and detailed scientific review of rodenticides. We agree with U.S. EPA's finding that these products pose unreasonable risks and that excellent alternative are readily available. We look forward to working with our community to minimize the risks posed by the product by asking local retailers to stop carrying these potentially harmful products and for residents to stop purchasing them.

The scientific basis for the finding of unreasonable risks to children, pets and wildlife has been well documented by U.S. EPA in its Risk Mitigation Decision for Ten Rodenticides (May 28, 2008) (available electronically- <http://tinyurl.com/7389m69>). U.S. EPA recently published updated documentation of ongoing unreasonable risks to children, pets, and non-target wildlife. It is also published updated assessments documenting that effective alternatives are available for a reasonable cost (these recent documents are available in the U.S. EPA online docket EPA-HQ-OPP-2011-0718- <http://tinyurl.com/77caz73>)

California residents should not continue to be exposed to the unreasonable risks posed by these products. We urge DPR to join the state of Kansas and New York in refusing to renew the registration of these products.

Thank you for this opportunity to offer our input regarding the proposed renewal of pesticide product registration.

Sincerely,

Steve Kinsey
4th District
Marin County Board of Supervisors