



November 7, 2025

California Department of Pesticide Regulation
Director Karen Morrison
1001 I Street
Sacramento, California 95814

Subject: Opposition to Anticoagulant Rodenticide Mitigation

Dear Director Morrison:

Please accept the following comments in opposition to the proposed Anticoagulant Rodenticide Mitigation that was formally introduced during the September 24, 2025, public workshop.

GCSAA is the professional association for the men and women who manage and maintain the game's most valuable resource — the golf course. The golf industry recognizes the association as a key contributor in elevating the game and business. Since 1926, with a focus on golf course management, GCSAA has been the top professional association in the United States and worldwide. Headquartered in Lawrence, Kan., it provides education, information, and representation to more than 20,500 members in more than 72 countries. Its mission is to serve its members, advance their profession, and improve communities through the enjoyment, growth, and vitality of the game of golf.

While the golf industry continues to be strongly opposed to the current regulations regarding first and second generation anticoagulant rodenticide prohibitions on non-production agriculture sites in California, including golf courses (the ban on these products creates numerous public safety risks and economic damages), the new proposed mitigations introduced during the recent public workshop have brought to light additional concerns.

Under the proposed **CROSSWALK OF ANTICOAGULANT LEGISLATION AND PROPOSED REGULATIONS** for non-production ag sites, use is not allowed in or around manmade structures unless it meets one of the exceptions. FGARs can only be used away from manmade structures with the 35 consecutive day duration limit (3 times per year) if allowed on the product label.

This proposed regulation creates gaps where facilities cannot legally and safely respond to localized public-health or structure-associated infestations (e.g., clubhouse, restaurants, maintenance, storage buildings). DPR has already prohibited most uses of chlorophacinone and warfarin effective January 1, 2025; the rulemaking should not further restrict practical, narrowly defined uses around structures that protect public health or critical infrastructure.

Rats, mice, gophers, voles, and ground squirrels do not operate on a duration limit of 35 days with a maximum 105 day total. While there are certain times of year these rodents become less active, they can cause a nuisance issue on a year-round basis that proposed mitigation measures do not address.

For example, the inability to control rat populations due to these enhanced regulations could lead to property damage and an increased risk in structural fires. According to the National Fire Protection Association, rodents, such as rats, are estimated to cause 20-25% of “undetermined” structural fires, often starting in wall voids and caused by the gnawing through of insulation on electrical wires, exposing copper conductors. Due to California Air Resources Board Small Off-Road Engine mandates, many golf course maintenance shops now store numerous lithium-ion batteries used in landscaping equipment. Storing multiple batteries in a single location heightens fire risks because proximity enables rapid propagation. Heat from one battery can cascade to others within seconds, creating a chain reaction across shelving and charging stations. Such fires have proven to be intense and explosive, hard to extinguish, and often with the potential to release toxic gases.

Rats also commonly cause insulation damage by shredding fiberglass, foam, or cellulose insulation in walls for nesting purposes. Not only does this damage increase the risk of fire if shredded insulation comes in contact with chewed wires, it also decreases energy efficiency in buildings.

Finally, in addition to numerous other concerns, rodent infestations can have severe impacts on restaurants and dining establishments commonly found at golf courses. The presence of live or dead rodents, and/or their fecal matter can cause bacterial spread, parasite transmission, and contamination in food preparation, commonly resulting in immediate closure if discovered by health inspectors. Damage to food and food packaging requires mandatory discarding of all compromised food stock leading to food waste. Closure of these facilities can cost thousands of dollars in revenue, while pest control repairs and passing inspection before reopening can cost thousands more, not to mention reputational damage caused by such instances.

The proposed mitigation will result in increased public and employee health hazards and we request that DPR allow applications of rodenticides within or adjacent to manmade structures (e.g., clubhouses, restaurants, maintenance shops, storage, pump houses) by licensed applicators upon documentation of an active infestation with no limits on duration or total days in a calendar year.

Sincerely,

Jeff Jensen

Jeff Jensen
Southwest Field Representative
Golf Course Superintendents Association of America/California Golf Course Superintendents Association