

Date of Hearing: April 24, 2023

ASSEMBLY COMMITTEE ON WATER, PARKS, AND WILDLIFE

Rebecca Bauer-Kahan, Chair

AB 1322 (Friedman) – As Amended March 16, 2023

SUBJECT: Pesticides: diphacinone

SUMMARY: Prohibits the use of the rodenticide diphacinone, as specified, until the director of the Department of Pesticide Regulation (DPR) takes specified actions. Specifically, **this bill:**

- 1) Defines "diphacinone" as any pesticide product containing diphacinone.
- 2) Adds diphacinone, a first generation anticoagulant rodenticide (FGAR), to existing statutory restrictions on second generation anticoagulant pesticides (SGARs), including:
 - a) Prohibiting, except as specified, the use of diphacinone in a wildlife habitat area, as defined; and,
 - b) Prohibiting, except as specified, the use of diphacinone in the state until the director of DPR makes a certification that DPR has completed its reevaluation of SGARs and adopted any additional specified restrictions to protect wildlife, as described below.
- 3) Allows the use of diphacinone:
 - a) By any governmental agency employee for mosquito or vector control or for public health activities;
 - b) By any governmental agency employee to protect water supply infrastructure and facilities;
 - c) For the eradication of nonnative invasive species inhabiting or found to be present on offshore islands;
 - d) To control an actual or potential rodent infestation associated with a public health need, as defined, as determined by a supporting declaration from the State Public Health Officer or a local public health officer; and
 - e) For research purposes related to the reevaluation of SGARs, following a specified authorization process.
- 4) Allows the following locations to use diphacinone:
 - a) A medical waste generator;
 - b) A facility for producing drugs or medical devices; and,
 - c) Agricultural activities, as defined.
- 5) Deletes the existing statutory requirement that states that in order for the prohibition on the use of SGARs to be lifted, the director of DPR must certify to the Secretary of State that

DPR has adopted any additional restrictions necessary to ensure that continued use of SGARs is not reasonably expected to result in significant adverse effects to non-target wildlife and those restrictions are operative.

- 6) Requires, instead of the above provision, that in order for the prohibition on the use of SGARs and diphacinone to be lifted, the director of DPR must certify to the Secretary of State that DPR has adopted any additional restrictions necessary to ensure that fewer than 10% of individuals of rare, sensitive, special status, threatened, or endangered species, which are scientifically representative of the diversity of the statewide population of each respective species, have a detectable level of any SGARs, diphacinone, or any of their metabolites in blood samples.
- 7) Specifies that substantial evidence supporting the restrictions above shall include analyses regarding alternatives to anticoagulant rodenticides, exposure pathways, sublethal effects, species sensitivity, and the cumulative and synergistic effects of exposures to registered rodenticides.
- 8) Requires that any restrictions developed in accordance with the provisions above be developed in consultation with the Department of Fish and Wildlife (DFW).
- 9) Makes legislative findings about the importance of wildlife to California and the impacts of rodenticides on non-target wildlife.

EXISTING LAW:

- 1) Authorizes the state's pesticide regulatory program and mandates DPR to, among other things, provide for the proper, safe, and efficient use of pesticides essential for the production of food and fiber; for the protection of public health and safety; and, for the protection of the environment from environmentally harmful pesticides by prohibiting, regulating, or ensuring proper stewardship of those pesticides [Food and Agriculture Code (FAC) § 11401 *et seq.*]
- 2) Defines "second generation anticoagulant rodenticide" (SGAR) as any pesticide product containing any of the following active ingredients: brodifacoum, bromadiolone, difenacoum, or difethialone [FAC § 12978.7(a)].
- 3) Prohibits, except as specified, the use of a SGAR in a wildlife habitat area, as defined [FAC § 12978.7 (b)].
- 4) Prohibits, except as specified, the use of a SGAR in the state until the director of DPR makes a certification that DPR has completed a reevaluation of SGARs and has adopted restrictions to protect wildlife, as specified [FAC § 12978.7 (c)].
- 5) Lists exemptions to the prohibition of the use of SGARs, including for public health activities; to protect water supply infrastructure; for mosquito and vector control; to eradicate nonnative invasive species; for research purposes related to the reevaluation of SGARs; for medical waste generators; for facilities for producing drugs or medical devices; and, for agricultural activities [FAC § 12978.7 (e – f)].
- 6) Defines, for the purposes of the SGAR prohibitions, a "public health need" as an urgent, nonroutine situation posing a significant risk to human health in which it is documented that

other rodent control alternatives, including nonchemical alternatives, are inadequate to control the rodent infestation [FAC § 12978.7 (e)].

- 7) Provides that after the director of DPR determines that all of the following conditions have occurred, the director shall certify to the Secretary of State of that determination that:
 - a) DPR has completed the reevaluation of SGARs, as commenced by DPR on March 12, 2019; and,
 - b) DPR has adopted any additional restrictions necessary to ensure that continued use of SGARs is not reasonably expected to result in significant adverse effects to non-target wildlife and those restrictions are operative [FAC § 12978.7 (g)].
- 8) Requires that any restrictions developed in accordance with the provisions above be developed in consultation with DFW [FAC § 12978.7 (g)].
- 9) Designates as “restricted materials” pesticides containing brodifacoum, bromadiolone, difenacoum, and difethialone (Title 3 California Code of Regulations § 6400).

FISCAL EFFECT: Unknown. This bill is keyed fiscal.

COMMENTS:

- 1) **Purpose of this bill.** This bill modifies existing SGAR prohibitions to also prohibit the use of diphacinone, an FGAR. According to the author, “California needs common-sense restrictions on some of the most dangerous rat poisons to better protect our wildlife and families. There are a range of cost-effective alternatives to the most dangerous rat poisons for sale today that don’t threaten some of California’s most iconic wildlife like mountain lions and eagles.”
- 2) **Background.** Many species of rodents inhabit California, including squirrels, chipmunks, beavers, gophers, rats, and mice. Rodents native to California play an important ecological role and are a major food source for predators and scavengers, including hawks, eagles, foxes, coyotes, and bobcats. Rodents, however, are pests when they infest houses, threaten public health, or destroy property. According to the Centers for Disease Control and Prevention, rats and mice spread more than 35 diseases to humans worldwide. Rodent infestations can also damage or destroy property, crops and food supplies, critical habitat, native plants, and native animals.

Rodent control. According to the United States Environmental Protection (U.S. EPA), the most important and effective steps in eliminating and preventing rodent infestations are keeping living spaces clean; preventing rodent access; and, eliminating potential nesting areas (sanitation and exclusion). Other options to control rodent infestations include lethal traps, live traps, and chemical control (rodenticides).

Rodenticides. Rodenticides are pesticides designed to kill rodents through ingestion, but the ingestion of, or sometimes contact with, rodenticides can have the same type of effect on any mammal. Contact with rodenticides can also affect birds and fish. Additionally, many rodenticides cause secondary poisoning, which can occur if a non-target animal consumes another animal that has been poisoned by a pesticide, and the predator is weakened or dies as

a result of exposure to the poisoned prey.

According to the U.S. EPA, most of the rodenticides used in the United States are anticoagulant compounds, either first or second generation, that interfere with blood clotting and cause death from excessive bleeding. Deaths typically occur between four days and two weeks after rodents begin to feed on the bait.

First-generation anticoagulants (FGARs) include the anticoagulants that were developed as rodenticides before 1970. These compounds are much more toxic when feeding occurs over several successive days rather than on one day only. Chlorpophacinone, diphacinone, and warfarin are FGARs that are registered to control rats and mice in the United States.

Diphacinone is a multiple-dose anticoagulant, where lethality generally requires that an animal consumes multiple doses of the bait over several days. According to the National Pesticide Information Center, diphacinone is one of the rodenticides that pose the greatest secondary poisoning risks for wild mammals, dogs, and cats.

Second-generation anticoagulants (SGARs) were developed beginning in the 1970s to control rodents that were resistant to FGARs. SGARs are more likely than FGARs to kill after a single feeding and tend to remain in animal tissues longer than FGARs. Because of this, SGARs typically pose greater risks to non-target species that might feed on bait only once or that might feed upon animals that have eaten the bait. Due to these risks, SGARs are no longer nationally registered for use in products geared toward consumers and are registered only for the commercial pest control and structural pest control markets. SGARs registered in the United States include brodifacoum, bromadiolone, difenacoum, and difethialone. These four SGARs have been prohibited for most uses in California since January 1, 2021, due to AB 1788 (Bloom), Chapter 250, Statutes of 2020.

The third category of rodenticides consists of those considered acute toxicants. Acute toxicant rodenticides have differing ways of affecting rodents, including affecting the nervous system, causing heart and kidney failure, and reacting to stomach acid to cause rapid death. In this category, bromethalin, zinc phosphide, and strychnine kill rodents after one feeding, often within a few hours. Formulated as baits, they are highly toxic to people, pets, and wildlife. Cholecalciferol, another acute toxicant, usually requires multiple feedings to kill rodents.

Dangers of rodenticides to non-target wildlife. Pesticides do not have to kill an animal to do harm, particularly to non-target animals. Instead, a pesticide may have sublethal effects such as making the animal sick, changing its behavior, or changing its ability to reproduce or survive stress. Pesticides can impact the population of a species due to these direct or indirect, as well as lethal or sublethal, effects. Studies on bobcats in California have shown that anticoagulants, including diphacinone, can cause inflammatory response and immune suppression that can weaken bobcats and increase susceptibility to opportunistic infections, with possible population-level impacts in bobcats. According to DFW, the use of poison baits to control rodents has injured and killed hundreds or thousands of wild animals and pets throughout California.

Numerous other studies show the sublethal impacts of anticoagulant rodenticides (in some cases, diphacinone specifically), such as internal hemorrhaging; notoedric mange; increased

vulnerability to other causes of death, such as vehicular accidents; chronic anemia; and increased parasite and pathogen burden to different non-target wildlife, including owls, kestrels, coyotes, mountain lions, and bobcats.

There is evidence of sublethal effects of diphacinone exposure in several species of predatory animals, including raptors, coyotes, bobcats, and mountain lions. DFW's "2021 Summary of Pesticide Exposures & Mortalities in Non-Target Wildlife," which documents necropsies on wildlife remains, indicates that 70% of wildlife tested in 2021 (post enactment of AB 1788) were exposed to anticoagulant rodenticides. The study showed that diphacinone was one of the three most common rodenticides detected in liver samples in birds, small game mammals, and non-game mammals submitted to the DFW Wildlife Health Laboratory for postmortem examination in 2021.

DPR's November 2018 paper, "An Investigation of Anticoagulant Rodenticide Data Submitted to the Department of Pesticide Regulation," analyzed data submitted to DPR by Raptors Are the Solution (RATS) and Project Coyote, as well as all information and data submitted to DPR by DFW from 2014 to 2018, and found diphacinone in 59% of mountain lions tested; approximately 40% of bobcat liver samples tested; and approximately 30% of bobcat blood samples.

Recent legal action on diphacinone. In December 2017, RATS requested that DPR initiate reevaluation of three FGARs, including diphacinone, and four SGARs and provided evidence of the ongoing harms of anticoagulant rodenticides. On April 18, 2018, DPR announced its decision to renew the specified rodenticides without reevaluation.

In response, RATS filed several petitions against DPR in 2018 for violation of the California Environmental Quality Act (CEQA) and violation of the DPR's own regulations, based on its decision to renew the rodenticides without reevaluation. On November 16, 2018, DPR wrote that it had completed its investigation of the subject rodenticides in response to RATS' request and that it would begin reevaluation of SGARs, but not FGARs. DPR reasoned that its "investigation of the reported impacts found that the rate of FGAR exposure among non-target wildlife is generally decreasing and is lower than for SGARS."

On May 24, 2019, RATS filed a second amended petition that narrowed its challenge to DPR's decision to renew the registration of diphacinone without reevaluation. A trial court heard and denied this petition, and RATS filed an appeal. In October 2022, California's First District Court of Appeals found that DPR failed to examine the effects of diphacinone when used over long periods or in combination with other rodent-killing chemicals and had wrongly classified it as one of a group of older chemicals that needed less scrutiny. The court ruled that DPR should reconsider its 2018 decision not to place diphacinone into reevaluation.¹ DPR is currently re-considering the 2018 decision and available data and expects a public decision on a reevaluation of diphacinone in the next few months.

Recent regulatory and legislative action on SGARs. DPR noticed, on March 12, 2019, its final decision to begin reevaluation of pesticide products containing the SGAR active ingredients brodifacoum, bromadiolone, difenacoum, and difethialone. The SGAR

¹ <https://law.stanford.edu/wp-content/uploads/2022/09/2022-09-27-Opinion.pdf>

reevaluation involves 74 pesticide products and 15 registrants, from whom DPR required submission of existing data related to non-target wildlife exposure. In response to the reevaluation, registrants submitted voluntary cancellations for all three previously registered difenacoum products. As of May 2019, DPR no longer had any difenacoum products registered for use in California. DPR indicates that there is no set time frame for completion of the reevaluation.

According to DPR, reevaluations may have several outcomes. If the data show that use of the pesticide presents no significant adverse effects, DPR closes the reevaluation without added mitigation measures. If new restrictions are necessary, DPR places controls on the use of the pesticide to mitigate the potential adverse effect. DPR may also work with registrants and U.S. EPA to revise labels to mitigate hazards. If the adverse effect cannot be mitigated, DPR suspends or cancels the product registration.

As mentioned above, AB 1788 (Bloom), Chapter 250, Statutes of 2020, prohibits the use of four SGARs — brodifacoum, bromadiolone, difenacoum, and difethialone — throughout the state, with some exemptions, until DPR determines that both of the following conditions have been met:

- DPR has completed the reevaluation of SGARs, as commenced on March 12, 2019; and
- DPR has adopted any additional restrictions necessary to ensure that continued use of SGARs is not reasonably expected to result in significant adverse effects to non-target wildlife and those restrictions are operative.

Alternatives to rodenticides. According to DFW and DPR, the most effective and safest ways to address rodent issues are through exclusion and sanitation – by eliminating factors that allow rodents to reproduce and thrive. DPR notes that rodenticides do not eradicate rodents and may not reduce their numbers for long. If there is an area-wide population of rodents, rodents from the edges move into the available space vacated by the poisoned rodents.

To address these issues, DPR and DFW suggest that people utilize integrated pest management (IPM) principles. According to the University of California Statewide Integrated Pest Management Program, IPM is a process used to solve pest problems while minimizing risks to people and the environment. IPM is an ecosystem-based strategy that focuses on long-term prevention of pests or their resulting damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, use of pest resistant varieties, and deployment of non-pesticide lethal control mechanisms such as traps. Pesticides are used only after monitoring indicates they are needed, according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and non-target organisms, and the environment.

- 3) **Policy considerations.** Even following the enactment of AB 1788, it appears that rodenticide exposure in non-target wildlife is continuing. Why might this be? While it is too soon to determine new trends in uses of, and exposures to, rodenticides post-AB 1788, it is important to note that AB 1788 has numerous exemptions to the prohibition on the use of SGARs. Under AB 1788, the following are exempted uses, which would also apply to the diphacinone prohibition proposed by this bill:

- (1) The use of SGARs by any governmental agency employee who complies with Section 106925 of the Health and Safety Code, who uses SGARs for public health activities.
- (2) The use of SGARs when used by any governmental agency employee for the purposes of protecting water supply infrastructure and facilities in a manner that is consistent with all otherwise applicable federal and state laws and regulations.
- (3) The use of SGARs by a mosquito or vector control district, as specified, to protect the public health.
- (4) The use of any SGAR for the eradication of nonnative invasive species inhabiting or found to be present on offshore islands in a manner that is consistent with all otherwise applicable federal and state laws and regulations.
- (5) The use of any DPR-registered SGAR to control an actual or potential rodent infestation associated with a public health need, as defined, as determined by a supporting declaration from the State Public Health Officer or a local public health officer, when other rodent control alternatives, including nonchemical alternatives, are inadequate to control the rodent infestation.
- (6) The use of any DPR-registered SGAR for research purposes related to the SGAR reevaluation.
- (7) Use of a SGAR at the location of a medical waste generator, as defined in Section 117705 of the Health and Safety Code.
- (8) Use of a SGAR at a facility registered annually and subject to inspection under Section 510 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. Sec. 360 et seq.) and compliant with the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 135 et seq.).
- (9) Use of SGARs for agricultural activities, as defined, which includes the production of any horticultural, viticultural, aquacultural, forestry, dairy, livestock, poultry, bee, or farm product.

Multiple committee analyses for AB 1788, including this Committee's April 5, 2019, analysis and the March 26, 2019, Assembly Environmental Safety and Toxic Materials Committee analysis, emphasized that without requiring IPM practices, it is likely that banning SGARs (and in the case of this bill, an FGAR) will increase the use of other FGARs and acute toxicants to control rodents.

In addition, a piecemeal approach to banning SGARs and diphacinone in some places but exempting their use in many other locations will likely result in continued non-target wildlife exposures. To significantly reduce primary and secondary rodenticide poisoning of non-target wildlife, the state should adopt stringent and comprehensive IPM policies.

This bill deletes the provision from AB 1788 that required that DPR adopt any additional restrictions necessary to ensure that continued use of SGARs is not reasonably expected to result in significant adverse effects to non-target wildlife and those restrictions are operative. Instead, this bill replaces that provisions with a new requirement that DPR adopt restrictions to ensure that fewer than 10% of individuals of rare, sensitive, special status, threatened, or endangered species, which are scientifically representative of the diversity of the statewide population of each respective species, have a detectable level of any SGAR, diphacinone, or any of their metabolites in blood samples. This bill requires that substantial evidence supporting the restrictions include analysis regarding alternatives to anticoagulant rodenticides, exposure pathways, sublethal effects, species sensitivity, and the cumulative and synergistic effects of exposures to registered rodenticides.

It is unclear if, or how, this new provision will be implementable. While a quantitative measurement of non-target wildlife exposures is theoretically possible, it is unlikely that obtaining scientifically representative samples for all of the state's rare, sensitive, special status, threatened, or endangered species is achievable.

- 4) **Suggested committee amendments.** To address the issues noted above regarding IPM and the scientific feasibility of the new requirements, the Committee may wish to amend the bill as follows:

Amendment 1: Define integrated pest management for the purposes of this bill, as defined in Government Code § 14717.

Amendment 2: Amend the required condition for SGARs in (g)(2):

(2) Consistent with the requirements of this division and regulations adopted pursuant to this division, the department has adopted any additional restrictions, *including, but not limited to, a requirement to implement integrated pest management procedures prior to the use of second generation anticoagulant rodenticides, that are necessary to ensure that fewer than 10 percent of a scientifically representative sample of individuals of rare, sensitive, special status, threatened, or and endangered species, which are scientifically representative of the diversity of the statewide population of each respective species, have a detectable level of any second generation anticoagulant rodenticides, diphacinone, or any of their metabolites in blood samples. The department, in concurrence with the Department of Fish and Wildlife, shall make such a finding based upon the best available science, which may include reviewing data and studying samples of certain species and their populations as proxies for all potentially impacted species and populations. Substantial evidence supporting the restrictions shall include analysis regarding alternatives to anticoagulant rodenticides, exposure pathways, sublethal effects, species sensitivity, and the cumulative and synergistic effects of exposures to registered rodenticides.* Any restrictions described in this paragraph shall be developed in consultation with, *and with the concurrence of,* the Department of Fish and Wildlife.

Amendment 3: Prohibit diphacinone use separately from the existing SGAR prohibitions, and require the following for diphacinone in a new subparagraph:

(i) After the director determines that both of the following conditions have occurred, the director shall certify to the Secretary of State that determination:

(1) The department has completed any pending reevaluation of diphacinone.

(2) (a) Consistent with the requirements of this division and regulations adopted pursuant to this division, the department has adopted any additional restrictions necessary to ensure that fewer than 10 percent of a scientifically representative sample of individuals of rare, sensitive, special status, threatened, and endangered species have a detectable level of diphacinone or any of its metabolites in blood samples. The department, in concurrence with the Department of Fish and Wildlife, shall make such a finding based upon the best available science, which may include reviewing data and studying samples of certain species and their populations as proxies for all potentially impacted species and populations. Substantial evidence supporting the restrictions shall include, but is not limited to, analysis regarding:

(i) Exposure pathways, sublethal effects, species sensitivity, and the cumulative and synergistic effects of exposure to anticoagulant rodenticides, including lethal and sublethal effects on rare, sensitive, special status, threatened, or endangered species.

(ii) Alternatives to anticoagulant rodenticides, including a requirement to implement integrated pest management procedures prior to the use of diphacinone.

(b) Any restrictions described in this paragraph shall be developed in consultation with, and with the concurrence of, the Department of Fish and Wildlife.

- 5) **Double referral.** This bill was heard in the Assembly Environmental Safety and Toxic Materials Committee on March 28, 2023, and passed 7-0.
- 6) **Arguments in support.** A large number of wildlife and environmental organization write in support, stating that this bill “requires state regulators to develop stronger restrictions on any use of the most dangerous anticoagulant rodenticides [and] is narrowly targeted to the most dangerous rodenticides until state regulators can develop better safeguards on their use and specifically exempts agricultural activities, public health protections, water supply infrastructure, biotech, and emergency pest infestations.”
- 7) **Arguments in opposition.** Several organizations write in opposition, with the Pest Control Operators of California (PCOC) emphasizing the different uses of diphacinone compared to SGARs, stating that “PCOC agrees with the intent of [this] bill in that the protection of California’s wildlife and precious ecosystems is paramount, but this bill seeks to forego scientific conclusion, and legislate over the established regulatory authorities charged with performing these very investigations.” The Household and Commercial Products Association also opposes this bill, stating that it deviates from already existing scientific processes in place to evaluate pesticide use and fails to acknowledge IPM, among other reasons.
- 8) **Related legislation.** AB 1298 (Bloom), Chapter 479, Statutes of 2021, corrects a drafting error in AB 1788 related to the prohibition on the use of SGARs.

AB 1788 (Bloom), Chapter 250, Statutes of 2020, prohibits the use of SGARs until the director of DPR certifies a completed reevaluation of SGARs and enacts any additional restrictions necessary to ensure that SGARs do not have significant adverse effects on non-target wildlife.

AB 2422 (Bloom) of 2018 would have prohibited the use, except as specified, of any pesticide that contains an anticoagulant. The Assembly Water, Parks, and Wildlife Committee hearing on this bill was cancelled at the request of the author and the bill subsequently died on file.

AB 1687 (Bloom) of 2017 would have prohibited the use of any pesticide that contains one or more of nine specified active ingredients (including all FGARs and SGARs, and some acute toxicants). The Assembly Environmental Safety and Toxic Materials Committee hearing on this bill was cancelled at the request of the author and the bill subsequently died on file.

AB 2596 (Bloom) of 2016 would have prohibited the use of SGARs. The Assembly Environmental Safety and Toxic Materials Committee hearing on this bill was cancelled at the request of the author and the bill subsequently died on file.

AB 2657 (Bloom), Chapter 475, Statutes of 2014, prohibits the use of SGARs in wildlife habitat areas, as defined.

REGISTERED SUPPORT / OPPOSITION:

Support

Amah Mutsun Tribal Band
Animal Legal Defense Fund
Battle Creek Alliance
Brentwood Alliance of Canyons & Hillsides
California Chaparral Institute
California Environmental Health Initiative
California Urban Streams Partnership
California Wildlife Center
California Wildlife Foundation/California Oaks
Center for Biological Diversity
Channel Islands Restoration
Chileno Valley Newt Brigade
Citizens for Los Angeles Wildlife (CLAW)
Coastal Ranches Conservancy
Conservation Society of California, Oakland Zoo
Defiance Canyon Raptor Rescue
Ecologistics
Endangered Habitats League
Felidae Conservation Fund
Friends of Ballona Wetlands
Friends of Griffith Park
Friends of Pleasant Hill Creek
Gold Country Wildlife Rescue
Golden Gate Raptor Observatory
Green Foothills
Hills for Everyone
Hillside Federation
Humane Society of The United States
Humane Wildlife Control
In Defense of Animals
Klamath Siskiyou Connectivity Project
Kyotousa
Laurel Canyon Association
Laurel Canyon Land Trust
Los Padres Forestwatch
Mojave Desert Land Trust
Morro Coast Audubon Society
Mountain Lion Foundation

Mt. Diablo Audubon Society
Natural Resources Defense Council (NRDC)
Ojai Valley Green Coalition
Panthera
Peninsula Open Space Trust
People for The Ethical Treatment of Animals (PETA)
Poison Free Agoura
Poison Free Conejo Valley
Poison Free Malibu
Predator Defense
Preserve Wild Santee
Project Coyote
Protect San Benito County
Raptors are The Solution
Sacramento Heron and Egret Rescue
San Bernardino Valley Audubon Society
Santa Barbara Audubon Society
Santa Clara Valley Audubon Society
Santa Susana Mountain Park Association
Save Open Space & Agricultural Resources
Save Our Seashore
Social Compassion in Legislation
The Big Wild
The Cougar Fund
The River Otter Ecology Project
Urban Wildlife Research Project
Ventana Wilderness Alliance
Voters for Animal Rights
Western Watersheds Project
Wildcare
Wildfutures
Wildlands Network
Wildlife Care of Socal
Wildlife Emergency Services
Wisdom Good Works
Women United for Animal Welfare

Opposition

Croplife America
Household and Commercial Products Association
Pest Control Operators of California
Responsible Industry for a Sound Environment - RISE
Western Plant Health Association

Analysis Prepared by: Keith Cialino / W., P., & W. / (916) 319-2096