March 18, 2019

To: California Assembly Environmental Safety and Toxic Materials Committee

Re: AB 1788 – California Ecosystems Protection Act

Honorable Committee members,

Friends of Griffith Park supports your YES vote for AB 1788 at the upcoming Environmental Safety and Toxic Materials hearing on March 26th. As advocates for urban wildlife and Griffith Park, one of the largest and richest urban habitats in the country, we have seen firsthand the toll potent anticoagulants have taken on non-targeted species.

Friends of Griffith Park has funded many toxicology tests on dead animals from the area, with most results returned as positive for second generation anticoagulants. While second generation agents have been removed from the store shelves, there is no logical reason why pest control companies should continue to use them, except in very special, approved situations (per the legislation).

Besides unintentional lethal poisoning, there is evidence of compromised and disrupted immune systems in exposed wildlife, making them more susceptible to disease. Further, studies have confirmed gene expression changes in bobcats, the same kind of genetic change which caused the mild anticoagulant, warfarin, to become less effective as a rodenticide in earlier decades! (See Fraser/Serieys, 2018, abstract below)

There is little doubt Griffith Park wildlife is adversely affected by the unnecessary use of rodenticides. One of the most graphic examples is that of Griffith Park mountain lion P-22, who luckily survived after being treated for anticoagulant poisoning in 2014. Park bobcats have also suffered with mange during past periods likely due to immunodeficiency.

In addition to wildlife, rodenticides leave pets at unreasonable risk for poisoning and death. Children also are regularly exposed to anticoagulants and require treatment. Compounding risks to children and pets, we see no universal enforcement of bait box labeling and tethering regulations by the pest control companies, in either park or residential settings.

AB 1788 sets down strong control of second generation agents, but provides critical exceptions. California also sets a strong example to its people and the entire nation, by restricting use of all anticoagulants on State lands. The broader emphasis should be on primary control through better sanitation practices and removal of resources such as food and habitat types which enhance rodent populations.

The use of anticoagulants unintentionally kills our natural predators whose population and breeding dynamics are hugely different than rodents. We are now on the brink of finally learning that the balance of nature is being thrown off with the use of anticoagulants, and ironically this loss of natural predators may be causing even more troublesome rodent issues.

Friends of Griffith Park strongly urges your approval of the California Ecosystems Protection Act to reduce non-target lethal and non-lethal toxicity of wildlife. AB 1788 also protects entire ecosystems.

Sincerely,

Gerry Hans
Vice President, Science and Conservation

Marian Dodge
President

Friends of Griffith Park promotes the enlightened stewardship of Griffith Park so it can survive and thrive well beyond the 21st century. Through advocacy, support, education and service, Friends of Griffith Park works to preserve Griffith Park as L.A.’s signature green and open space, place of free recreation, and linchpin in the survival of Southern California’s native ecosystems.