



"Noreen Weeden"
<nwweden@comcast.net>

01/14/2008 11:17 AM

To "Chris Geiger" <Chris.Geiger@sfgov.org>,
<jessian.choy@sfgov.org>
cc "Eli Saddler" <esaddler@goldengateaudubon.org>

bcc

Subject Jan.14, 2007 rodenticide policy review meeting 2-4 pm
SF City Hall - comments from Golden Gate Audubon

Dear Chris Geiger and Jessian Choy:

I am unable to attend the pesticide review meeting this afternoon, so I am submitting these comments in writing and ask that they be added to the record. Dan Murphy represented Golden Gate Audubon at the Integrated Pest Management Technical Advisory Board last April 12, 2007.

Golden Gate Audubon would like to strongly reiterate our position that the City of San Francisco should address the Norway Rat habitat issues, follow the IPM ordinance, and ban rodenticides in our parks and open spaces. We commend the City's Department of the Environment for taking the lead on this issue by implementing the moratorium on the use of rodenticides. We encourage you to retain this innovative policy.

We are interested in obtaining more information on the exemptions that were made since the restrictions on rodenticide use were approved last year. Please let us know about the improvements made to reduce Norway Rat habitat in the City.

We encourage the San Francisco Department of the Environment to remain a leader on this issue by adhering to the ban on the outdoor use of rodenticides and also by following the IPM guidelines for any requests for exemptions.

Please copy Eli Saddler, Conservation Director, Golden Gate Audubon, and myself on any future meeting notices on this topic. Eli's email is saddler@goldengateaudubon.org

Thank you for considering these comments.

Noreen Weeden
San Francisco Conservation Committee, chair
Golden Gate Audubon



"Hungry Owl Project"
<webmaster@hungryowl.org
>

01/14/2008 08:18 AM

To Jessian.Choy@sfgov.org, Chris.Geiger@sfgov.org
cc
bcc
Subject Comments for the record - Jan. 13th IPM Review

Dear Chris Geiger and Jessian Choy:

I am unable to attend the pesticide review meeting this afternoon, so I am submitting my comments in writing and ask that they be added to the record. I attended your meeting 2007, after the incidents with the hawks in Golden Park, as a representative of the Hungry Owl Project (a program of WildCare), along with Melanie Piazza, Director of Animal Care at WildCare.

I would like to strongly reiterate my support for a ban on the use of 2nd generation anti-coagulant rodenticides in San Francisco for outdoor use, and commend you for taking the lead on this issue. Please do not change this innovative policy!

I would like to have had more information on the exemptions that were made since the restrictions on rodenticide use were approved. Were they really necessary? Were all other means of rodent control, specifically sanitation and exclusion, exhausted? Both Laguna Honda and SFO are locations with large food service providers - are these providers using best practices to keep food secure and safe from rodents? Are the outside dumpsters similarly secured and inaccessible to rodents? Are employees trained, and re-trained as needed, to make sure trash is not left on the ground or in anyway accessible by wildlife? Was trapping used before poisons were applied? SFO, in particular, clearly has a wildlife population close by with its proximity to the Bay and sensitive wetland habitat areas. These areas support raptors and other predators, so making this exemption for rodenticide use at SFO is particularly of concern.

Additionally, I would like information on what changes have been made, based on the discussions at the 2007 meeting, to improve sanitation in the parks. As I recall, a number of items were discussed: making sure trash receptacles have closed tops, increasing or changing the trash pick-up schedule, enforcement of bans on feeding wildlife, etc.

I feel that when exemptions were made, and if a potentially poisoned animal is found at the location of the exemption and taken for treatment to a wildlife center, the entity that was using the poison, or the City itself, should cover the



Jo Lynn Taylor
<jolynnt@detayls.com>

01/14/2008 12:30 PM

To Jessian.Choy@sfgov.org

cc JoLynn Taylor <jolynntaylor@wildcarebayarea.org>,
Karen Wilson <karenwilson@wildcaremarin.org>,
Melanie Piazza <melaniepiazza@wildcarebayarea.org>

bcc

Subject

Jessian Choy, Chris Geiger
City Toxics Reduction, IPM
San Francisco Dept. of the Environment
11 Grove Street
San Francisco, CA 94102

Dear Jessian and Chris,

Thank you for addressing the issue of secondary wildlife poisoning with 2nd generation rodenticides. Thank you for placing these poisons on the San Francisco Department of the Environment Restricted Use list.

Speaking for WildCare, a wildlife rehabilitation facility which cares for injured and orphaned wildlife, I can assure you that this measure means a lot to us. Treating wildlife poisoned with anticoagulant poisons is an arduous task, and often the bird or mammal has ingested too much poison to survive. Outdoor use of rodent poisons increases the risk that non target species of wildlife will come across a poisoned rodent and become poisoned after eating the dying or dead rodent.

In 2007 we admitted more than 40 non-target poisoned animals. That number included turkey vultures, squirrels, owls, hawks, gulls, opossums, songbirds and lizards. Only seven survived.

We hope that you will continue to uphold stringent adherence to the requirement that all non-toxic methods have been tried and failed before issuing exemptions for outdoor use of 2nd generation rodenticides.

Thank you again for your leadership on this important environmental issue.

Yours sincerely,

JoLynn Taylor
Membership and Publications Manager
WildCare