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August 22, 2018

City of Los Angeles
Department of Recreation & Parks
Forestry Division
3900 W. Chevy Chase Drive
Los Angeles, CA 90039

Re: Diphacinone use in the Sepulveda Basin

Dear Sir or Madam:

The purpose of this letter is to request that the City of Los Angeles Department of Recreation & Parks (the City) immediately cease the use of anticoagulant rodenticides, including diphacinone, at any location in the Sepulveda Basin. This includes, but is not limited to, the area around Lake Balboa and the large field immediately north of the lake. The Encino Neighborhood Council (ENC) will strongly support alternative methods of rodent control, as described later in this letter.

The Encino Neighborhood Council became aware that at least five (5) ground squirrel bait boxes containing .005% diphacinone were placed adjacent to the Woodley Park Wildlife Area wood-crete fence. These were removed after an outcry from many stakeholders, including observations of a sickened hawk and owl disappearances in the area.

Currently there are at least nine (9) large diphacinone boxes located along the west side of Lake Balboa and the field to the north of the lake. It is obvious that some of them have been placed recently. The ENC recommends that the City immediately and permanently remove all these boxes.

This request is being made because diphacinone has been shown to be highly toxic to raptors, including American Kestrels, owls and hawks (1), in addition to being very toxic to another abundant predator, the coyote. The entire Sepulveda Basin is home to Great Horned Owls, Cooper's and Red-Tailed Hawks, Turkey Vultures, Great Blue Herons, Great Egrets, Ravens, coyotes and more. The reason these specific species are mentioned is they all will prey on ground squirrels and rats (alive or dead), and they all suffer secondary poisoning from eating rats and ground squirrels poisoned with anticoagulant rodenticide. California law prohibits the use of rodent poisons containing second generation anticoagulants brodifacoum, bromadiolone,

difenacoum, and difethialone in California state parks, state wildlife refuges, and state conservancies. Apparently around 2014 the City also phased out the use of second-generation anticoagulant rodenticides at the city parks. That left diphacinone as a usable, but unfortunately not safe, tool to control rodent populations. Sadly, as the Merck Veterinary Manual notes “The “intermediate” anticoagulants (chlorophacinone and in particular diphacinone) require fewer feedings than “first-generation” chemicals, and thus are more toxic to nontarget species.”

We have been informed by Mr. Marty Friedman of Recreation & Parks that the diphacinone bait stations were placed on the advice of the Los Angeles County Environmental Health Vector department which requires suppression of high densities of ground squirrels. We are heartened by Mr. Friedman’s report of a recent meeting with the County Agricultural Department and with wildlife specialist Dr. Quinn on different strategies for ground squirrel suppression. Pursuant to that meeting, the city will be implementing a ground squirrel control protocol using zinc phosphide oat bait and a “Burrow RX Machine”. We thoroughly support the Burrow RX machine which uses carbon monoxide and poses no risk of secondary poisoning.

We would urge caution with the zinc phosphide oat bait, which, while not posing risk of secondary poisoning, poses a definite risk of primary poisoning. Zinc phosphide is very toxic to birds, fish, and other wildlife if it is eaten. Pellets or grain containing zinc phosphide may attract birds in particular. All baits should be placed so they are out of reach of any pets, children, or non-target wildlife. (Jervais, G.; Luukinen, B.; Buhl, K.; Stone, D. 2008. 2,4-D Technical Fact Sheet; National Pesticide Information Center, Oregon State University Extension Services. <http://npic.orst.edu/factsheets/archive/2,4-DTech.html>)

In conclusion, the ENC is requesting that it be kept in “the loop” regarding progress in removing the diphacinone. In particular, we are very interested in the progress in acquisition and use of the Burrow RX machines. We would like to be informed of any assistance we could render in recommending funding for the new program.

Sincerely,

Patricia Bates
On Behalf of Encino Neighborhood Council

Enc.

cc: Sepulveda Basin Wildlife Areas Steering committee
Councilperson Paul Koretz
Councilperson Nury Martinez
Supervisor Sheila Keuhl
Sen. Henry Stern
Assemblyman Jesse Gabriel

Ms. Tanaz Golshan

(1) Comparative Toxicity of Diphacinone to Northern Bobwhite (Colinus virginianus) and American Kestrels (Falco sparverius)

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ABSTRACT: The acute oral toxicity of the anticoagulant rodenticide diphacinone was found to be about 20 times greater to American kestrels (LD50=97 mg/kg) than to northern bobwhite (LD50=2,014 mg/kg). Several precise and sensitive clotting assays (prothrombin time, Russell's Viper venom time, thrombin clotting time) were adapted for use in these species, and this combination of assays is recommended to detect effects of diphacinone and other rodenticides on coagulation. Oral administration of diphacinone over a range of doses (sublethal to the extrapolated LD15) prolonged prothrombin time and Russell's Viper venom time within 24 to 48 hrs post-exposure. Prolongation of in vitro clotting time reflects impaired coagulation complex activity and was detected before or at the onset of overt signs of toxicity and lethality. These data will assist in the development of a pharmaco- dynamic model to assess and predict rodenticide toxicity to non-target avian species

“Notably, diphacinone has been linked to secondary poisoning in raptors (Stone et al. 1999, 2003), and in general, raptors are more sensitive to pesticides than other groups of birds (Wiemeyer and Sparling 1991, Vyas et al. 1998, Mineau et al. 1999). “

Proc. 24th Vertebr. Pest Conf. (R. M. Timm and K. A. Fagerstone, Eds.) Published at Univ. of Calif., Davis. 2010. Pp. 146;5/).