



November 4, 2009

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Dr. Debbie Edwards
Office of Pesticide Programs
Regulatory Public Docket (7502P)
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Re: Docket Number EPA-HQ-OPP-2009-0684, Rozol Prairie Dog Bait

Dear Dr. Edwards,

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, the AVMA is the recognized national voice for the veterinary profession. The association's more than 78,000 members comprise approximately 85% of U.S. veterinarians, all of whom are involved in a myriad of areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

In reference to the *Federal Register* Notice (Docket Number EPA-HQ-OPP-2009-0684) of the Environmental Protection Agency (EPA) accepting public comments about the petition made by the World Wild Life Fund (WWF) regarding Rozol Prairie Dog Bait, I am writing in support of the WWF's June 5, 2009 petition requesting that the EPA suspend the registration of Rozol Prairie Dog Bait based on the following relevant AVMA policies:

Toxicoses

The AVMA supports education, legislation, regulations, research, and other actions that prevent toxicoses in wildlife, domestic animal, and human populations.

Conservation of Wild and Exotic Animals

Expressing concern about the possible extinction of many animal species, the AVMA should join with groups of conservationists and naturalists in working with the appropriate agencies of the United States and other governments, non-governmental organizations (NGOs) and international bodies to establish and

maintain effective procedures for the conservation of these valuable animals in their native countries.

The AVMA recognizes that Black-Tailed Prairie Dog (BTPD) populations in some areas may be problematic and that various control measures with differing levels of effectiveness exist; however, we are concerned about the use of anticoagulants for this purpose because of unintended consequences associated with them. Similarly, the Montana Department of Agriculture (MDA) sent a letter to the EPA on September 14, 2009, stating that "Montana has satisfactory products available for control of prairie dogs, which when used properly are efficacious and considered less hazardous for non-target organisms than anticoagulants."

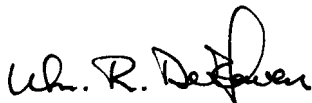
The use of Rozol (chlorophacinone, an anticoagulant) as BTPD bait is concerning because of secondary exposures, intoxications, and deaths of non-target species, including endangered species. This point is discussed in several of the publically available background materials collected on www.regulations.gov for this docket, such as the *Ecological Risk Assessment Evaluating Expanded Uses for Rozol Black Tailed Prairie Dog Bait (Chlorophacinone 0.005%)* by the EPA dated November 6, 2008. One such federally listed species mentioned is the Black-Footed Ferret, which "depends on the Prairie Dogs for food and utilizes Prairie Dog Burrows for shelter," according to the aforementioned Risk Assessment. The document continues by stating that "this label [Rozol] targets the major food source of the Black Footed Ferret within much of its entire historic range, making recolonization and recovery unlikely."

In conclusion, the AVMA supports the World Wildlife Fund's June 5, 2009 petition requesting that the EPA suspend the registration of Rozol Prairie Dog Bait (EPA Reg. No. 7173--286) for the following reasons.

- There are numerous data gaps and unanswered questions which need to be addressed regarding the use of Rozol for this application.
- There are other prairie dog control options which are effective and safer.
- The use of Rozol for this application is associated with deleterious effects on non-target species, including federally listed species.

The AVMA appreciates the opportunity to comment. We also would welcome the opportunity to further provide our insights and feedback. For further clarification on the AVMA's comments, please contact Dr. Kristi Henderson at 800-248-2862 ext. 6651, or at khenderson@avma.org.

Sincerely,



W. Ron DeHaven, DVM, MBA
Executive Vice President
American Veterinary Medical Association