

INITIAL STATEMENT OF REASONS AND PUBLIC REPORT
DEPARTMENT OF PESTICIDE REGULATION

Title 3. California Code of Regulations
Adopt Section 6695

Relating to Carbon Monoxide Pest Control Devices Used to Control Burrowing Rodent Pests

This is the Initial Statement of Reasons required by Government Code section 11346.2 and public report specified in section 6110 of Title 3, California Code of Regulations (3 CCR). Section 6110 meets the requirements of Title 14 CCR section 15252 and Public Resources Code section 21080.5 pertaining to certified state regulatory programs under the California Environmental Quality Act.

SUMMARY OF PROPOSED ACTION/PESTICIDE REGULATORY PROGRAM
ACTIVITIES AFFECTED

The Department of Pesticide Regulation (DPR) proposes to adopt 3 CCR section 6695 to regulate the use of carbon monoxide pest control devices for control of burrowing rodent pests as directed by Food and Agricultural Code (FAC) section 14161. The pesticide regulatory program activities affected by the proposal are those pertaining to enforcement of pest control general standards of care. In summary, this proposed action will ensure that each person using a carbon monoxide pest control device to perform pest control uses a device bearing the U.S. Environmental Protection Agency (U.S. EPA) establishment number; does not use the device inside any structure; uses the device at specified distances away from structures; does not use the device on a burrow known or believed to contain non-target vertebrate animals; and does not use the device for purposes other than to control for burrowing rodent pests. It will also require employers of employees performing pest control for hire or for a local government to ensure protective eyewear is worn by employees, keep records of use, and report any adverse effect that occurs from use of the device.

SPECIFIC PURPOSE AND FACTUAL BASIS

Background

DPR protects human health and the environment through the regulation of pesticide sales and use, and by fostering reduced-risk pest management. DPR's strict oversight begins with product evaluation and registration; and continues through statewide licensing of commercial and private applicators and pest control businesses; environmental monitoring; and residue testing of fresh produce. This statutory scheme is set forth primarily in FAC Divisions 6 and 7.

In 2011, Assembly Bill 634 (Huber, Chapter 407, Statutes of 2011) legalized the use of carbon monoxide pest control devices (CO pest control devices) to control burrowing rodent pests in California. (FAC section 6025.4) This legislation requires CO pest control devices to be labeled with a warning about the toxicity of carbon monoxide; a statement prohibiting the use of a CO pest control device in inhabited structures; and a statement that the devices must be used in accordance with certain provisions of the California Fish and Game Code. Three years later,

Senate Bill (SB) 1332 (Wolk, Chapter 257, Statutes of 2014) directed DPR to regulate the proper, safe, and efficient use of CO pest control devices to control burrowing rodent pests.

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) regulates the marketing of economic poisons and devices. FIFRA section 2(h) defines a device, in part, as an instrument for mitigating any pest, not including equipment used for the application of pesticides when the pesticide is sold separately from the device. States may regulate the sales or use of any federally registered pesticide or device in the State, as long as that sale or use is not federally prohibited (FIFRA section 24). Currently, DPR only regulates structural pest control devices under the authority in FAC section 15302. Devices are not regulated in the same way that pesticides are regulated. They are, however, required to be labeled, cannot be misbranded (FIFRA section 2(q)(1)), and are required to bear the U.S. EPA Establishment Number for each establishment in which they were produced. Additionally, manufacturers must maintain production records, which are reported annually to U.S. EPA (Title 40, Code of Federal Regulations (40 CFR) section 169.2). Several CO pest control devices sold to control burrowing rodent pests in California have been declared devices by U.S. EPA.

Under FAC section 14160, CO pest control devices are defined as any method or instrument using carbon monoxide to prevent, eliminate, destroy, or mitigate burrowing rodent pests. These CO pest control devices are regulated as “pest control” in California. FAC section 11403 defines “pest control” to include the use of any device to control pests, or to prevent, destroy, repel, mitigate, or correct any pest infestation or disorder of plants. As a result, individuals using these devices must follow all laws and regulations specific to pest control. Even without specific regulations for the safe and effective use of CO pest control devices, there are existing laws and regulations that pertain to the use of these devices. Anyone performing pest control for hire, including individuals using CO pest control devices to control burrowing rodent pests, must be licensed by DPR and registered with the county agricultural commissioner (CAC) in any county where they perform pest control. Additionally, this use of carbon monoxide is subject to the requirements of Division 6 (commencing with FAC section 11401) and Division 7 (commencing with FAC section 12500) of the FAC. Other applicable laws and regulations include: FAC sections 11701 through 11701.5 and 11732; and 3 CCR section 6600.

Carbon monoxide (CO) is a poisonous, colorless, odorless, and tasteless gas that can be deadly, especially when confined in enclosed spaces. CO pest control devices use gasoline-powered engines to generate CO, which is compressed and stored until released into the rodent burrow under pressure. The pressurized system allows the CO to move farther through the burrow system than it would with a more passive application such as using a cartridge. Under some testing regimes, two CO pest control devices were found to have utility in managing pocket gophers and California ground squirrels (Baldwin and Meinerz, 2016). By establishing additional requirements that will minimize the risks associated with exposure to CO, DPR can ensure that operators of these devices and the public are protected from the risks of CO. Additionally, aside from the laws and regulations referenced in this section, there are currently no enforceable requirements pertaining to the use of CO pest control devices. Therefore, it is necessary to propose regulations ensuring that the devices will be used safely and efficiently, in an enforceable manner that is more protective than existing laws and practice.

Proposed Regulations

Section 6695(a).

DPR proposes to adopt section 6695(a) to establish requirements for each person using a CO pest control device to perform pest control to ensure the proper, safe, and efficient use of the device. These regulations are necessary for the safety of each person using a CO pest control device to perform pest control and for the protection of public health and safety, and the environment.

Section 6695(a)(1).

DPR proposes to adopt subsection 6695(a)(1), which establishes that CO pest control devices used to control burrowing rodent pests must be federally registered. U.S. EPA-regulated devices must have a U.S. EPA Establishment Number, which is a two-part number that includes a number specific to the manufacturer and a number specific to the establishment where the device is manufactured. Requiring this number is necessary to ensure that both the company and the manufacturing establishment are registered with U.S. EPA (40 CFR section 167.20) and are meeting federal requirements, and that the device falls under federal authority (40 CFR section 152.500). This added provision will also allow enforcement of this requirement by CACs.

Section 6695(a)(2-3).

DPR proposes to prohibit CO pest control devices from being used inside any structure inhabited by people or livestock, whether occupied or not. Non-fire-related CO poisoning is a leading cause of poisoning death and injury in the U.S. Allowing the use of CO pest control devices inside a structure inhabited by people or livestock, whether occupied or not, would create an undue risk to the user and occupants of the structure. Additionally, this requirement is consistent with FAC section 6025.4, which prohibits the use of carbon monoxide devices in structures inhabited by humans or livestock.

The CO produced by CO pest control devices to control burrowing rodent pests is under pressure and will move through a burrow system. While there is no indication that device operators risk asphyxiation while using these devices, there is risk of the gas moving through the burrow system and pooling in nearby structures if the application is conducted too close to the structure. To address this, DPR proposes to prohibit CO pest control devices from being used on a burrow opening that is within a certain distance of a structure inhabited by people or livestock, whether occupied or not. DPR proposes a distance of 50 feet for control of ground squirrels or field mice, 100 feet for control of gophers, and 65 feet for control of all other burrowing rodent pests. The United States Department of Agriculture (USDA) recommends a variety of distances from structures based on the rodent burrow being treated. (Eismann et. al. 2016) Their study found that ground squirrel burrow lengths ranged from less than one foot to 27.4 feet, with the average being less than 20 feet. Field mice burrows vary in length from less than one foot to 27.4 feet, with the average being 4.5 feet. Pocket gopher burrows vary in length, with the average being less than 150 feet. Based on this information, USDA recommends a 50-foot distance from structures when fumigating burrows for ground squirrels or field mice, and a 100-foot distance from structures when fumigating burrows for gophers. These proposed distances are consistent

with distances recommended by USDA. Additionally, because CO pest control devices are used to control burrowing rodent pests other than ground squirrels, field mice, and gophers, it is necessary to establish a minimum distance when using the device to control those pests as well. USDA considers 65 feet to be the minimum distance from an inhabited structure at which a burrow fumigation should be allowed. This is based on the distance CO smoke was observed rising from burrow openings from the point of origin. DPR proposes a distance of 65 feet for control of other burrowing rodent pests to remain consistent with the minimum distance in USDA's study.

Section 6695(a)(4).

California is home to other animals that construct burrows. Grey foxes and Red foxes both construct their own dens for food storage and to house their young. It is also possible for abandoned burrowing rodent pest burrows to be inhabited or used by other, non-target vertebrate animals. The Western Burrowing Owl and the Gophersnake are both known to inhabit abandoned rodent burrows. As a result, DPR proposes to prohibit the use of a CO pest control device on a burrow opening known or believed to contain non-target vertebrate animals. It is necessary to prohibit use on a burrow opening known or believed to contain non-target vertebrate animals to prevent CO exposure to those animals. 3 CCR section 6600 already requires persons performing pest control to practice pest control in a careful and effective manner. This provision will also strengthen that requirement by further specifying when a CO pest control device shall not be used, preventing accidental exposure to non-target vertebrate animals. Additionally, this will help ensure that they are only used as intended – to control burrowing rodent pests as specified in the definition of “carbon monoxide pest control device.” (FAC section 14160)

Section 6695(a)(5).

DPR proposes to prohibit the use of a CO pest control device for purposes other than to control for burrowing rodent pests. By definition in FAC section 14160, a “carbon monoxide pest control device” means “any method or instrument using carbon monoxide to prevent, eliminate, destroy, or mitigate burrowing rodent pests.” In FAC section 12757, “rodent” is defined as “all members of the order *Rodentia* and all rabbits and hares.” Some CO pest control devices are labeled for control of burrowing pests, such as moles, that do not fall within the definition of “rodent.” To ensure these devices are only used to control burrowing rodent pests and for enforcement of this prohibition, it is necessary to limit use of these devices to the control of burrowing rodent pests.

Section 6695(b).

DPR proposes to establish that the provisions set in subsection 6695(b) apply to employers of employees performing pest control for hire or for a local government, including a city, county, city and county, school district, park district, authority, or any other political subdivision of the state.

While CO pest control devices are not considered pesticides, their use has similar potential for risk and DPR treats them as such. Employers of employees performing pest control for hire are

currently required to comply with general safety requirements, such as ensuring protective eyewear is worn by their employees (3CCR section 6738.2) and keeping records of their employee's pesticide use (3CCR section 6723(b)). To maintain consistency with existing requirements, DPR proposes that these provisions in subsection (b) apply to employers of employees operating a carbon monoxide pest control device to perform pest control for hire.

SB 1332 directed DPR to regulate the proper, safe, and efficient use of CO pest control devices to control burrowing rodent pests. According to Senator Wolk, author of SB 1332, these CO pest control devices are being marketed to schools, local governments, and parks districts. Additionally, the analysis for this bill stated that there has been an increased interest in CO pest control devices, and that manufacturers of these devices are marketing them to schools, local governments, and park districts as a cost-effective way to control rodent pests. (Senate Bill Analysis, Senate Bill No. 1332, 2013-2014 Reg. Session (July 31, 2014)) Furthermore, pesticide use at schools require additional reporting and recordkeeping by school employees or pest management professionals who apply on school grounds. CO pest control devices are largely marketed as an alternative pest management option to treat burrowing rodent pests without the use of pesticides, and without the additional recordkeeping and reporting. By regulating the use of these devices when used to perform pest control for a local government, DPR is able to capture most uses of these devices. With these devices growing in popularity, it is necessary to ensure the safety of the device operators and the public, so DPR proposes that these provisions apply to these entities consistent with the intent of SB 1332. In addition, it is necessary to specify that a "local government" includes a city, county, city and county, school district, park district, authority, or any other political subdivision of the state to clarify which entities may be considered a local government. These terms are based on how the term, "local government" is defined for purposes of taxation in the California Constitution (Cal. Cons. article XIII C, section 1(b)).

These requirements are necessary for the safety of employees using a CO pest control device to perform pest control and for the safe and efficient use of these devices to protect public health and the environment.

Section 6696(b)(1).

DPR proposes to require an employer of an employee operating a carbon monoxide pest control device to perform pest control for hire or for a local government, including a city, county, city and county, school district, park district, authority, or any other political subdivision of the state, to ensure that protective eyewear is worn by the employee while the employee operates a CO pest control device. Requiring protective eyewear that meets the recognized national standard American National Standards Institute's (ANSI) Standard for Occupational and Educational Personal Eye and Face Protection Devices ANSI Z87.1-2020 will ensure consistency with the Department of Industrial Relations' Division of Occupational Health's (Cal/OSHA) eye protection standard (8 CCR section 3382). Conforming with Cal/OSHA's eye protection standard is also necessary to ensure an equivalent level of eye protection required for employees operating CO pest control devices as afforded workers in all other industries. CO pest control devices use an internal combustion engine to force pressurized gas into the rodent burrow system. This creates a potential for debris to be sent into the air. The proposed requirement will

also align with Cal/OSHA's requirement of employers providing employees with suitable eye protection anytime there is a risk of receiving eye injuries (8 CCR section 3382). Lastly, while CO pest control devices are not considered pesticides, their use has similar potential for risk and DPR treats them as such. This added provision will maintain consistency with 3 CCR section 6738.2, which holds employers of employees handling pesticides to the same standard when protective eyewear is required.

Section 6695(b)(2)(A-B).

Existing 3 CCR section 6624 requires any person using certain pesticides for an outdoor institution or outdoor industrial use or any person engaged for hire in the business of pest control to maintain specific record information for each pesticide application made. By definition in 3 CCR section 6000, these persons include any business entity or organized group of persons whether incorporated or not. As a part of the recordkeeping requirements, nonproduction agriculture application records include information, such as date of application, name of operator of the property treated, location of property, crop commodity or site treated, and amount used. Additionally, persons engaged for hire in the business of pest control at school sites are required to keep records of pesticide use as provided in section 6624(e). Furthermore, in accordance with Education Code (EDC) section 17611(a), schoolsites are also required to retain records of all pesticide use.

Pesticide use records are used by CACs and DPR during audits and investigations to verify compliance with pertinent laws and regulations. They establish a pesticide use history for each application site and ensure that products are not used more frequently than necessary for efficient use. While CO pest control devices are not considered pesticides, their use has similar potential for risk and DPR treats them as such. DPR proposes to add section 6695(b)(2)(A) to require an employer of an employee using a CO pest control device to perform pest control for hire or for a local government to keep records of CO pest control device use. The addition of proposed section 6695(b)(2)(B) will require the records to include date the device was used, name of the operator of the property treated, address of where the device was used, site at which the device was used, and length of time the device was operated for every treatment. This proposed regulation specifies the information employers are required to retain, and is consistent with existing section 6624 and EDC section 17611(a). To further maintain consistency with section 6624, this proposed section mirrors the current records retention requirements for pesticide use (3 CCR section 6624(g)), requiring employers to maintain records of CO pest control device use for two years and make records available to DPR or the CAC upon request.

Section 6695(b)(3).

DPR proposes to add section 6695(b)(3) to require an employer of an employee using a CO pest control device to perform pest control for hire or for a local government to submit factual or scientific information showing any adverse effect of the device immediately to the Director. While CO pest control devices are not considered pesticides, their use has similar potential for risk and DPR treats them as such. This section is added to maintain consistency with FAC section 15316, which requires reporting of adverse effects of structural pest control devices. Adverse effects reporting of device use will help DPR determine if use of the devices is causing

harm to public health and safety, and the environment. Any report of adverse effects will aid DPR in determining if additional regulations are warranted.

Performance standards were considered where applicable, but were not appropriate for all proposed requirements as specific requirements are necessary for enforcement. The ANSI standard is a performance standard, not a prescriptive requirement. No specific technology or equipment is required as a result of incorporating the ANSI standard. Additionally, use of these devices are voluntary as alternative products are available.

CONSULTATION WITH OTHER AGENCIES

DPR consulted with county agricultural commissioners and industry representatives during the development of the text of the proposed regulations.

Potentially establishing use requirements for CO pest control devices was an agenda item discussed at the March 15, 2019 meeting of the Pesticide Registration and Evaluation Committee (PREC), a committee whose members include representatives from public agencies that have jurisdiction over activities or resources that may be affected by the use of pesticides. A copy of the PREC minutes are contained in the rulemaking file.

ALTERNATIVES TO THE PROPOSED REGULATORY ACTION [GOVERNMENT CODE SECTION 11346.2(b)(4)(B)]

DPR has not identified any feasible alternatives to the proposed regulatory action that would lessen any possible adverse economic impacts, including any impacts on small businesses, and invites the submission of suggested alternatives. The proposed regulations are required by FAC sections 14161.

ECONOMIC IMPACT ON BUSINESSES [GOVERNMENT CODE SECTION 11346.2(b)(5)(A)]

The proposed regulations will not have a significant adverse economic impact directly affecting businesses, including the ability of California businesses to compete with businesses in other states. The proposed action will clarify and add limits for how CO pest control devices must be used. Pest control businesses in California who operate carbon monoxide pest control devices will be required to comply with the proposed regulations. Recordkeeping, reporting of adverse effects, and the use of protective eyewear will be new requirements that will incur minimal costs. DPR estimates these requirements will result in an initial cost of \$100 per business, with annual costs of \$100 per business. However, pest control businesses and other licensed applicators are currently required to keep records and report pesticide use (3 CCR section 6624). Thus, many of these businesses may already keep records of use, so the impact should be minimal. The cost of the eyewear required by these regulations can range from \$5 to \$50 per pair. Pest control businesses and school or local government staff in California who operate carbon monoxide pest control devices will likely already own eyewear that meets the minimum standard, therefore DPR estimates that the impact should be minimal.

The document relied upon to make this determination is the memorandum, “Economic and Fiscal Impacts of Proposed Regulations for Carbon Monoxide Pest Control Devices Used to Control Burrowing Rodent Pests.” This document relied upon to make this determination is listed in the “Documents Relied Upon” section of this Initial Statement of Reasons and is available from DPR.

ECONOMIC IMPACT ASSESSMENT PURSUANT TO SECTION 11346.3(b)

The proposed action would not create or eliminate jobs in California; result in the creation of new businesses or the elimination of existing businesses within the State of California; or result in an expansion of businesses currently doing business with the State of California. This action is consistent with current law and will not significantly restrict or increase the use of carbon monoxide pest control devices. It will clarify and add limits for how CO pest control devices must be used.

This proposal benefits the health and welfare of California residents, worker safety, and the State's environment by creating enforceable requirements that are protective of human health, such as prohibiting use near inhabited structures, thus reducing the potential for accidental human carbon monoxide exposure, and benefit worker safety by requiring protective eyewear for users, reducing the risk of pesticide poisonings and injuries among device users.

IDENTIFICATION OF ANY SIGNIFICANT ADVERSE ENVIRONMENTAL EFFECT THAT CAN REASONABLY BE EXPECTED TO OCCUR FROM IMPLEMENTING THE PROPOSAL

The Secretary of Resources determined that DPR’s pesticide regulatory program, including the adoption, amendment, and repeal of pesticide regulations, qualifies as a certified regulatory program under Public Resources Code section 21080.5 and 14 CCR section 15251(i). This determination means DPR’s pesticide regulatory program is functionally equivalent to California Environmental Quality Act’s (CEQA) requirements for preparing environmental impact reports (EIRs), negative declarations, and initial studies, and is therefore exempt from such requirements. This initial statement of reasons serves as the public report required under 3 CCR section 6110 and satisfies the requirements of DPR’s CEQA certified regulatory program for rulemakings at 3 CCR sections 6110-6116.

DPR’s public report, as the substitute document satisfying CEQA functional equivalency requirements, must include a description of the proposed activity, and either (A) alternatives to the activity and mitigation measures to avoid or reduce any significant effects that the project might have on the environment, or (B) a statement that DPR’s review of the project showed that the project would not have any significant effects on the environment and therefore no alternatives or mitigation measures are proposed to avoid or reduce any significant effects on the environment. (3 CCR section 6110.) DPR shall not adopt a regulation that would cause a significant adverse environmental impact if there is a feasible alternative or mitigation measure that would substantially lessen those significant adverse environmental impacts. (3 CCR section 6116.)

Under existing law, any person may use CO pest control devices to control burrowing rodent pests in California. (FAC section 6025.4.) CO pest control devices must be labeled with a warning that includes language about the toxicity of carbon monoxide, prohibits the use of a CO pest control device in inhabited structures, and that the devices must be used in accordance with certain provisions of the California Fish and Game Code. (*Ibid.*) In addition, the use of carbon monoxide is subject to the requirements of California Fish and Game Code sections 2050 et seq. (California Endangered Species Act), 4002, and 4003, and divisions 6 and 7 of the Food and Agricultural Code. (*Ibid.*) Neither DPR nor any other state or federal agency regulates or enforces these specific existing statutory requirements, although the requirements of the Fish and Game Code, governing take or requiring permits for the take of specified species, are enforced by the California Department of Fish and Wildlife.

The proposed regulations would establish additional limits on the use of CO pest control devices, which are enforceable by DPR, compared with existing law. The proposed regulations require that CO pest control devices bear the U.S. EPA establishment number for the manufacturer of the device, are not used inside any structure, and are used a specified distance away from structures; prohibit use of a device on burrows or dens known or believed to contain non-target vertebrate animals; prohibit use of a device for purposes other than to control for burrowing rodent pests; require protective eyewear for users of CO pest control devices; require records to be kept when CO pest control devices are used; and require submission of any information on adverse effects to DPR. The proposed regulations do not change or alter existing legal requirements prohibiting the take of an endangered species or trapping or killing fur-bearing mammals (as defined) without a permit. (Fish and Game Code sections 2050 et seq., 4002, 4003.) DPR has no evidence and no reason to believe that these regulations would increase the use of CO pest control devices; rather, the regulations are necessary because CO pest control devices are increasing in popularity in the absence of such regulation. (See Senate Bill Analysis, Senate Bill No. 1332, 2013-2014 Reg. Session (July 31, 2014) [“According to the DPR, since the passage of AB 634 (enacting FAC section 6025.4 allowing for the use of CO pest control devices), interest in carbon monoxide devices for pest control has increased.”]) In addition, the proposed regulations would have potential human health benefits by creating enforceable requirements that are protective of human health, such as requiring protective eyewear for users and prohibiting use near inhabited structures, thus reducing the potential for accidental human carbon monoxide exposure. Carbon monoxide is a criteria air pollutant subject to regulation under the Clean Air Act. However, the proposed regulations are not likely to have any positive environmental benefits or negative environmental effects related to carbon monoxide emissions, as the proposed regulations are not expected to increase or decrease the use of the devices or to prevent or allow the use of the devices in a way that would change the release of carbon monoxide being released into the environment that is allowed under existing law.

Against this environmental and regulatory baseline, no possible significant adverse effect to California’s environment can reasonably be expected to occur from implementing the proposed regulations because the proposed regulations limit, rather than authorize or expand, the use of CO pest control devices, and ensure that they will be used safely and efficiently, in an enforceable manner that is more protective of the environment and human health than existing

laws and practice. Therefore, the proposed regulations are categorically exempt from environmental review under 14 CCR section 15061(b)(3).

Because no significant adverse effect to California's environment can reasonably be expected to occur from implementing the proposed regulations, no alternatives or mitigation measures are proposed to lessen any significant adverse effects on the environment.

EFFORTS TO AVOID UNNECESSARY DUPLICATION WITH FEDERAL REGULATIONS

The proposed regulatory action does not duplicate or conflict with the Code of Federal Regulations. Devices are only minimally regulated federally. California law directs DPR to develop regulations for the proper, safe, and efficient use of carbon monoxide pest control devices. This proposal specifies that federal requirements must be met for a CO pest control device to be used to control burrowing rodent pests and sets enforceable standards for use.

DOCUMENTS RELIED UPON

1. Pesticide Registration and Evaluation Committee Meeting Minutes, March 15, 2019.
2. Baldwin and Meinerz. "Assessing the efficacy of carbon monoxide producing machines at controlling burrowing rodents." Final report for Vertebrate Pest Control Research Advisory Committee. Davis, CA 2016
3. Eismann et. al. "The Use of Forced Gas Rodent Burrow Fumigation Systems and the Potential Risk to Humans" 411-418 USDA APHIS WS, Fort Collins, CO 2016
4. Shimizu, Eryn. Economic and Fiscal Impacts of Proposed Regulations for Carbon Monoxide Pest Control Devices Used to Control Burrowing Rodent Pests. Department of Pesticide Regulation. Memorandum dated October 16, 2020.
5. Rupert et. al. "Risk and protective behaviours for residential carbon monoxide poisoning." In Injury Prevention, 119-123. edited by Jeffery Novey, MPH. London, UK 2012.
6. Senate Bill No. 1332. Senate Bill Analysis. 2013-2014 Regular Session, July 31, 2014
7. H&M Gopher Control Manufacturing and Sales. (2020, November 17). PERC: Pressurized Exhaust Rodent Controller. <https://handmgophercontrol.com/>
8. University of California Cooperative Extension. (April 2019.) *Gophers Quick Tips* [PDF file]. Davis, California: University of California Agriculture and Natural Resources. Retrieved from <http://ipm.ucanr.edu/PDF/QT/qtgophers.pdf>.
9. University of California Cooperative Extension. (April 2019.) *Ground Squirrel Quick Tips* [PDF file]. Davis, California: University of California Agriculture and Natural Resources. Retrieved from <http://ipm.ucanr.edu/PDF/QT/qtground squirrel.pdf>.