



National Center for Healthy Housing

January 29, 2007

Kelly Sherman and Laura Parsons
Special Review and Reregistration Division (7508P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Re: EPA Rodenticide Mitigation Decision - EPA-HQ-OPP-2006-0955

Dear Ms. Sherman and Ms. Parsons:

The National Center for Healthy Housing (NCHH), is national nonprofit organization committed to protecting children from environmental health hazards in their homes while preserving affordable housing. As such, we applaud EPA's proposed rodenticide mitigation decision published in the January 17, 2007 *Federal Register*, which will go along way toward protecting children from unnecessary pesticide exposure.

NCHH supports EPA's proposed definition of "tamper-resistant bait stations" and the requirement that all consumer sales of rodenticides be solid baits integrated into the bait station. The use of pellets is unacceptably dangerous.

Rodents present serious dangers to children and families in affordable housing. The U.S. Centers for Disease Control and Prevention reports that as many as 10,000 children are bitten by rats every year, and the majority of those bites occur in sleeping areas of the home. Yet the American Association of Poison Control Centers reported approximately 12,000 to 15,000 rodenticide exposures annually to children six years old or younger. Clearly solving one problem by creating another is not the answer. EPA fairly balances the costs of the additional safeguards and provides practical options that may be used in by affordable housing managers.

NCHH encourages EPA to quickly finalize its decision so children and families can begin realizing the benefits as soon as possible.

Sincerely,

Thomas G. Neltner, JD, CHMM

Building a healthy home environment for all children