

August 7, 2020

Mayor Craig Weaver Town of Kiawah Island 4475 Betsy Kerrison Parkway Kiawah Island, South Carolina 29455

Mayor Weaver,

This serves as an official response to your letter dated July 14, 2020 where the Town of Kiawah Island requested that Clemson consider a one year prohibition on the use of second generation anticoagulant (SGA) rodenticides on the island. This request came as a response to the recent deaths of at least 3 bobcats where toxicology reports from the Southeastern Cooperative Wildlife Disease Study (SCWDS) at the University of Georgia indicated the cause of death was from "anticoagulant rodenticide toxicosis" or secondary exposure to SGA rodenticides used in residential and commercial pest control by licensed companies and to a smaller extent private residents.

Prior to this request, on July 7, 2020, representatives from the Clemson University Division of Regulatory and Public Service Programs, the Clemson Department of Pesticide Regulation (DPR), and the South Carolina Pest Control Association met with the Kiawah Town Council to discuss the issue of bobcat decline on the island. During this discussion, the group agreed that several actions aimed at mitigating the risk to bobcats and other wildlife should be taken. These actions included voluntary removal of SGA rodenticides by pest control companies, the development of educational and outreach programs for residents and non-resident property owners (asking homeowners to discontinue SGA use on their property), and targeted Integrated Pest Management (IPM) educational programs designed to eliminate SGA use by the pest control professionals.

On July 20, the Town hosted a virtual meeting with pest control companies to communicate their concerns and ask for support in helping reduce SGA use on the island. At that time, a few pest control companies had already made a commitment to voluntarily remove SGA's from the island. In addition, during this time, Dr. Eric Benson, the State Urban Entomologist with Clemson University Extension began working on a Rodent Control IPM training program to help educate the pest control industry on several environmentally friendly, yet effective approaches to rodent control. Dr. Benson plans to deliver this program online on August 20, 2020.

Further, on July 27, I received a letter from Mr. Jim Wright, the Executive Director of the South Carolina Pest Control Association (SCPCA) addressed to you which indicated that 3,023 separate pest control accounts had been identified on the Island. Mr. Wright indicated that the pest control companies servicing these 3,023 properties have all voluntarily committed to moving away from using SGA's with several companies already excluding SGA's from their treatment programs.

I also want to mention the great work the Town of Kiawah has done to implement the Bobcat Guardian Program. This is an excellent way to promote this issue and continue to educate residents and pest control companies about alternative options besides SGA rodenticide use.

Office of the Director Regulatory and Public Service Programs



Finally, after conducting a historical review of routine and for cause pesticide inspections and investigations, we have found no trends indicating chronic misuse violations of SGA rodenticides by pest control operators in South Carolina.

With all of this in mind, I have concluded that because the voluntary compliance exhibited by the pest control industry, coupled with our ongoing educational efforts, your requested regulatory action prohibiting the use of SGA rodenticides on the island is premature at this time. Also, as you know, we are only about a month into developing a plan to address this situation and I believe we need to take some time to evaluate the overall effectiveness of these non-regulatory measures.

Although I have come to this conclusion based on the current facts and actions being taken by various groups, I want to make it clear that there continues to be a high level of concern for the bobcats and other wildlife and I plan on continuing to monitor this situation closely and offer continued support and collaboration. For example, increasing targeted compliance inspections by DPR will enhance our regulatory presence on the island through pesticide use review inspections as well as on-site inspections of residential treatments. This will also be an educational opportunity for DPR to provide information and resources for residents on rodenticide use. This is an added regulatory and compliance assistance component designed to ensure compliance by all pest control companies and educational/resource support for residents.

Also, I asked our Clemson University Extension and Research faculty to continue to engage with the town biologist, Jim Jordan in an effort to enhance the existing bobcat research, monitoring, and repopulation efforts. These subject matter experts may include Dr. Eric Benson, State Extension Entomologist, Dr. Cory Heaton, State Extension Wildlife Biologist, Dr. David Jachowski, Wildlife Ecologist and Dr. Thomas Rainwater, Wildlife Toxicologist. Clemson has a strong interest in monitoring the SGA levels in bobcats over the next year and would like to see if voluntary compliance from the pest control industry will result in a decline in SGA's in blood samples over the next year. I will also ask the South Carolina Pest Control Association as well as others to collaborate with these efforts. Together we can facilitate additional projects as needed to address the bobcat population, especially as more residents choose to call Kiawah home and we know this will likely bring additional pressure to the island ecosystem.

In closing, I want to thank you, Kiawah Island Town Administrator, Stephanie Tillerson, Biologist, Jim Jordan and the rest of the Kiawah staff and Town Council for working with us on this issue. Again, we are committed to supporting improvements with the bobcat population in the coming months and hope we can continue to be a resource. If you have any questions or want to discuss, please let me know.

Respectfully,

Stephen E. Cale

Dr. Steve Cole, Director