From:	Brad Fox
To:	Pesticides; Peacock, Alexander R
Cc:	Gayoso, Jose
Subject:	Formal Public Comment for LD 356 Rulemaking Record — Brick Hill Townhouses, South Portland
Date:	Friday, May 8, 2026 10:04:08 AM
Attachments:	Brick_Hill_BPC_Rulemaking_Submission_May2026.pages

Dear Director Peacock,

I am writing to submit a formal public comment for the Board's rulemaking record pursuant to LD 356: Resolve, Directing the Board of Pesticides Control to Prohibit the Use of Rodenticides in Outdoor Residential Settings.

As you may recall, I filed a complaint with your office on August 24, 2025 regarding rodenticide bait station conditions at Brick Hill Townhouses in South Portland. That complaint was inspected by Lou Saucier in September 2025 and subsequently by Jennie Poisson on May 6, 2026. Earlier today, Compliance Manager José Gayoso confirmed in writing that my concerns about child exposure are "very valid" and that BPC is "not aware of any rules that address translocation specifically."

That confirmation — that a documented child safety hazard exists in a space outside current regulatory coverage — is precisely the gap LD 356 exists to close. I am attaching a formal submission that documents the incident record at Brick Hill Townhouses, the professional literature on bait translocation through rodent caching behavior, and five specific recommendations for the Board's consideration.

I am prepared to provide photographs, written records, and testimony if that would be useful to the Board's deliberations.

Respectfully,
Brad Fox
12 Rollins Way, Building 3
South Portland, ME 04106
ibradfox@gmail.com
207-712-0665

SUBMISSION TO THE MAINE BOARD OF PESTICIDES CONTROL

Rulemaking Pursuant to LD 356: Resolve, Directing the Board of Pesticides Control to Prohibit the Use of Rodenticides in Outdoor Residential Settings

A Documented Case Study in Regulatory Gap and Foreseeable Risk

Submitted by: Brad Fox
Tenant, Brick Hill Townhouses, 12 Rollins Way, Building 3, South Portland, ME 04106
ibradfox@gmail.com | 207-712-0664
May 7, 2026

Dear Members of the Board of Pesticides Control,

I am submitting this document as a formal public comment in support of the rulemaking process pursuant to LD 356. I am a tenant at Brick Hill Townhouses, a publicly funded housing complex managed by Avesta Housing in South Portland. Over the past year I have documented a series of rodenticide-related incidents at this property that, I submit, represent precisely the real-world hazard scenario LD 356 is designed to address.

I offer this submission not as a complaint, but as a case study. The Board's own LD 356 Report acknowledges that "the Board has identified that the unregulated community, including homeowners, property owners, renters, and the general public, is the group that needs the most education when it comes to rodenticides and their risks." I would add: residents of publicly funded housing managed by licensed commercial applicators are also a vulnerable population — one for whom the current regulatory framework has proven insufficient.

I. The Regulatory Gap Confirmed by BPC's Own Compliance Manager

On May 7, 2026, BPC Manager of Compliance José Gayoso responded to my complaint regarding rodenticide bait translocation hazards at Brick Hill Townhouses. His response stated directly: "I'm not aware of any rules that address translocation specifically."

Mr. Gayoso also confirmed that my concerns about children being exposed to these chemicals were "very valid," and that BPC "can only enforce existing laws and regulations."

In a single email, BPC's own Compliance Manager confirmed: (1) the child safety concern is valid; (2) the specific hazard mechanism I documented — bait translocation through rodent caching behavior — falls

outside existing regulatory coverage; and (3) the only remedy is legislative or rulemaking action. That is precisely the process now underway.

This submission asks the Board to consider the documented incident record at Brick Hill Townhouses as a case study illustrating what happens in that regulatory gap.

II. The Caching Hazard: What Current Rules Do Not Address

Regulatory responses to date — including BPC's own inspection findings — have focused on whether bait is secured inside tamper-resistant bait stations. This addresses only one pathway of exposure. It does not address the documented biological behavior of rodents — caching — which moves bait beyond the station entirely.

The following independent professional sources document this hazard:

- Texas A&M AgriLife Extension IPM Action Plan for Rodents: rats "hoard and transport food, which can lead to bait translocation — a problem as rodenticide can be dropped and a non-target can pick it up." The same document states: "Pelletized bait should never be used around children or pets, even in a bait station, as these pellets could be dropped in transit to the nest and could be picked up by human or pet." Note: this behavior applies to all bait forms; rodents gnaw pieces from bait blocks and transport them.
- Internet Center for Wildlife Damage Management: "Pelleted bait can more easily be carried by rats to other locations. Hoarding of food by rats may result in bait being moved to where it is undetected or difficult to recover."
- University of Florida IFAS Extension (PI284: Rodenticides): "Pelleted and powdered forms of bait have higher potential for being shaken out, washed out of, or relocated by rodents from" bait stations.
- Soleng, A., Vigre, H., & Eriksen, G.S. (2022). Suspected rodenticide exposures in humans and domestic animals in Norway 2005–2020. BMC Veterinary Research, 18, Article 410: tamper-resistant bait boxes make bait harder to reach, but "as rodents hoard food it gives no guarantees of possible relocation of toxic baits." This peer-reviewed finding directly addresses the limitation of bait station design.

The Board's own LD 356 Report acknowledges that "rodenticides are routinely detected in wildlife" and documents extensive secondary poisoning data. The caching hazard is the same mechanism applied to a residential setting: bait moves beyond the station, enters the environment, and becomes available to non-target animals — including children.

III. The Documented Incident Record: Brick Hill Townhouses, South Portland

The following incidents occurred at a publicly funded residential property under active contract with a licensed commercial applicator (Modern Pest Services). The property is managed by Avesta Housing under MaineHousing oversight.

Timeline of Documented Incidents

- July 30, 2025: A dead mouse or baby rat was found on Rollins Way. Senior Property Manager Alison Collette was personally walked to the location and shown displaced, overturned bait stations. Documented in writing same day to Avesta leadership, South Portland City Manager, Code Enforcement Director, and City Councilor.
- August 1, 2025: The dead rodent remained in place, decomposing with flies actively feeding on it. Formal written notice sent to Avesta management under the subject line: "Rodent Still Not Removed — Immediate Action Required." Copied to Code Enforcement, City Manager, and others.
- August 24, 2025: Formal complaint filed with BPC Director Alexander Peacock with 18 photographic exhibits documenting unsecured, overturned, and child-accessible bait stations. Director Peacock responded August 25 promising inspector follow-up.
- September 5, 2025: BPC Inspector Lou Saucier conducted a site inspection. Result: one bait station was relocated near Building 3. The complaint was closed. No finding was made regarding the caching hazard, child safety at the adjacent bus stop location, or whether bait had already been distributed beyond the stations.
- September 28, 2025 — three weeks after the inspection closed the complaint: A dying mouse rendered immobile by rodenticide was photographed in a common area walkway at Brick Hill Townhouses. A child was observed in direct physical contact with the animal. The child contact was witnessed but could not be photographed. The rodent-control program produced a poisoned, accessible animal in a child-accessible area after BPC had closed the prior complaint as resolved.
- May 6–7, 2026: BPC Inspector Jennie Poisson conducted a second inspection, nine months after the initial complaint. Her response addressed only bait station box design. No assessment was made of the caching hazard. The Compliance Manager subsequently confirmed in writing that no rule addresses translocation specifically.

The Bus Stop Dimension

A dead rodent was photographed near bait stations at 1 Rollins Way, adjacent to the Brick Hill Avenue bus stop serving both South Portland school buses and Metro Transit. The exposure risk is not limited to Brick Hill residents. It extends to the general public, including schoolchildren waiting at a public stop on a daily basis.

The Public Health Dimension

The CDC specifically warns against touching dying or dead rodents. Rodent-borne pathogens transmissible through direct contact include hantavirus, leptospirosis, rat-bite fever, and lymphocytic choriomeningitis virus. The September 28, 2025 incident was a documented pediatric exposure event involving a rodent dying from anticoagulant rodenticide in a publicly funded residential common area.

IV. The Foreseeable Risk Framework

The Board's LD 356 Report notes that "it remains scientifically challenging to determine if the detection of rodenticide(s) in predatory animals causes lethality, presents a contributing comorbidity, or results in an asymptomatic outcome." The human caching exposure pathway presents a different evidentiary standard — not chronic bioaccumulation, but acute foreseeable exposure.

The professional literature explicitly predicts that rodents cache bait and that dying rodents appear in accessible areas. This hazard was described before the deployment at Brick Hill occurred. A licensed commercial applicator deploying brodifacoum at a residential property with children is on constructive notice of exactly what occurred on September 28, 2025.

A child picking up cached brodifacoum or touching a dying rodent is a low-frequency event — but when it occurs, the consequences are potentially severe. Brodifacoum is a second-generation anticoagulant designed for palatability. September 28, 2025 was not hypothetical. The foreseeable event occurred. And it occurred three weeks after a BPC inspection had closed the complaint.

V. Specific Recommendations for the Board's Consideration

The Board's LD 356 Report identifies several potential rulemaking measures. I offer the following recommendations based on the documented experience at Brick Hill Townhouses:

1. Require post-application carcass monitoring in outdoor residential settings. The Board's Report notes EPA's mitigation measure #6 — "mandatory or advisory post-application follow-up statements for carcass search, collection, and disposal." At Brick Hill, a dead rodent sat decomposing for days after management was notified. A dying rodent was accessible to a child three weeks after an inspection closed a complaint. Mandatory carcass monitoring with documented removal timelines would directly address this failure.

2. Require mandatory resident notification for all rodenticide deployments at multi-unit residential properties. The Board's Report notes that rodenticides and rodenticide baits are currently exempt from Maine's notification requirements. Residents at Brick Hill were never informed of the active ingredient (bromadiolone, a SGAR classified as acutely toxic) or the associated hazards. Residents with children and pets had no opportunity to take precautions.

3. Require that licensed commercial applicators at multi-unit residential properties document evidence of rodent activity before deployment, and document monitoring logs with each service visit. The Board's Report identifies "requiring applicators to document types of evidence found for specific rodent types" as a potential measure. At Brick Hill, bait stations multiplied across the property with no documented monitoring, no service logs provided to residents, and no assessment of whether the deployment was producing secondary hazards in common areas.

4. Require that IPM exclusion methods be documented prior to rodenticide deployment at publicly funded residential properties. The Board's Report notes that "more effective strategies employ structural changes that limit rats 'access to food waste." At Brick Hill, structural rot, unsecured trash areas, and invasive species providing rodent harborage were all documented and unaddressed. Rodenticide was deployed without prior exclusion assessment.

5. Consider explicit placement standards for publicly funded multi-unit residential properties that address the caching hazard — not merely box design. No current rule requires that a licensed applicator assess whether bait has been distributed beyond stations through rodent caching behavior. This is the gap Mr. Gayoso confirmed in writing on May 7, 2026. It is also the gap that resulted in a child being in contact with a dying rodent three weeks after a BPC inspection closed a complaint as resolved.

VI. The Question This Case Study Poses to the Board

The Board's LD 356 Report asks, in effect, how to balance rodent control access with public safety. That is the right question. But this case study suggests a more specific question deserves equal attention:

Are bait-station programs evaluated only by whether bait is locked inside the box, or also by whether they produce poisoned, dying, or dead rodents in places where children can touch them?

At Brick Hill Townhouses, the answer to that question — documented across nine months of correspondence with BPC, Avesta Housing, MaineHousing, and South Portland Code Enforcement — is that no regulatory body assessed the second half of it. Each agency found a procedural reason the problem belonged to someone else. Collectively they documented a complete absence of accountability for a foreseeable risk that was then realized.

That is the regulatory gap LD 356 exists to close. I respectfully offer this documentation in support of that effort, and I am prepared to provide photographs, written records, and testimony if that would be useful to the Board's deliberations.

Respectfully submitted,

Brad Fox

12 Rollins Way, Building 3

South Portland, ME 04106

ibradfox@gmail.com | 207-712-0664

May 7, 2026

Peacock, Alexander R

From: Brad Fox <ibradfox@gmail.com>
Sent: Sunday, May 10, 2026 9:15 AM
To: Peacock, Alexander R
Subject: Supplementary Photo Documentation for LD 356 Rulemaking — Peromyscus Identification and Hantavirus Context
Attachments: IMG_1431.jpeg

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Director Peacock,

I am writing to submit supplementary photographic documentation relevant to the Board's June 5th discussion of LD 356 rulemaking.

The attached photograph was taken on September 28, 2025 at 8:27 AM in a common area walkway at Brick Hill Townhouses, 12 Rollins Way, South Portland. It documents a mouse rendered immobile — consistent with rodenticide paralysis — in a location accessible to residents and children. I witnessed a child in direct contact with this animal shortly after this photograph was taken.

The photograph has been reviewed by wildlife identification sources who note that the visible characteristics — white feet and underside, brown back, sharp dorsal/ventral color contrast, large eyes and ears, and thin tail — are consistent with Peromyscus species, either deer mouse or white-footed mouse. This identification matters because Peromyscus mice are the primary hantavirus vector in North America. The CDC specifically advises against touching dying or dead rodents of this type.

This is precisely the translocation and caching hazard that BPC Compliance Manager José Gayoso confirmed in writing has no corresponding rule — the mechanism by which rodents carry bait beyond the station to locations where children and non-target animals encounter them. That gap is also absent from the Board's own draft annual report on LD 356 implementation.

I also have additional photographic documentation — a bait station at the 1 Rollins Way back porch adjacent to the Brick Hill Avenue bus stop dated June 21, 2025, and a dead rodent at that same location dated July 31, 2025 — available on request.

I respectfully ask that this documentation be included in the record before the June 5th meeting.

Brad Fox
12 Rollins Way, Building 3
South Portland, ME 04106

From: Brad Fox
To: Peacock, Alexander R
Subject: Follow-up Documentation — Brick Hill Townhouses Pest Control, South Portland
Date: Tuesday, May 19, 2026 2:15:42 PM
Attachments: Hawkins letter May 19, 2026 at 1.53 PM.pdf

Dear Mr. Peacock,

I am writing to provide additional documentation related to pest control conditions at Brick Hill Townhouses, 12 Rollins Way, South Portland, Maine 04106, a property managed by Avesta Housing.

Attached is a letter dated May 13, 2026, from Jennifer Hawkins, President & CEO of Avesta Housing, responding to safety concerns I raised regarding bait station placement at the property. The letter confirms that Avesta relies on a licensed vendor and characterizes resident safety concerns as "differing perspectives regarding pest control methods."

The Board previously reviewed conditions at this property and found technical label compliance. I am submitting this letter so the Board has a complete record of how Avesta Housing has responded to documented safety concerns — including a child observed in contact with a paralyzed rodent near a bait station, and a young child I personally observed playing with a bait station adjacent to a child's toy in another common area of the property — at a property housing families with young children.

I am happy to provide any additional documentation the Board may find useful.

Respectfully,
Brad Fox
12 Rollins Way, Building 3
South Portland, ME 04106
ibradfox@gmail.com
(207) 712-0664

AVESTA
HOUSING

May 13, 2026

Brad Fox
12 Rollins Way, Building 3
South Portland, ME 04106

Dear Mr. Fox,

Thank you for taking the time to share your concerns regarding pest control measures at Brick Hill Townhouses. I appreciate your continued communication on this matter and understand that you feel strongly about the safety considerations you described.

I have reviewed your correspondence with the property management team and confirmed that the situation has been evaluated. Avesta contracts with a licensed professional pest control vendor to manage rodent control at the property. Our responsibility as a housing provider is to respond to pest activity in a manner intended to protect the health and safety of residents while relying on qualified vendors and established protocols. We understand that residents may have differing perspectives regarding pest control methods, and we appreciate that you have shared your concerns and observations with staff.

If you observe a specific maintenance or safety issue in the future, including concerns about the condition or placement of a bait station, we encourage you to report it directly to the property management office so that it can be reviewed promptly with the pest control contractor as appropriate. Your property manager Alison Collette can be reached at 207-245-3313 or acollette@avestahousing.org.

Thank you again for taking the time to express your concerns.

Sincerely,

Jennifer Hawkins
President & CEO
Avesta Housing

Peacock, Alexander R

From: Beck, Matt <matt.beck@legislature.maine.gov>
Sent: Saturday, May 9, 2026 9:04 AM
To: Peacock, Alexander R
Subject: LD 356 Rulemaking Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Director Peacock,

I am writing to express my concerns about the situation at Brick Hill Townhouses, a MaineHousing-funded property managed by Avesta Housing at 12 Rollins Way in South Portland. Although it is not in my district, my constituents frequently visit friends and family in that complex. Over the past year a resident has documented a series of rodenticide-related incidents at this property, including:

- A dying mouse rendered immobile by rodenticide in a common area walkway, witnessed being handled by a child on September 28, 2025
- A dead rodent left decomposing for days near a bait station at 1 Rollins Way, adjacent to the Brick Hill Avenue bus stop serving South Portland school buses and Metro Transit
- Bait stations found overturned, unsecured, and placed in child-accessible walkways
- Nine months between a formal complaint to the Maine Board of Pesticides Control and an inspection response

Their Compliance Manager José Gayoso confirmed in writing to that resident that concerns about child exposure are "very valid" and that BPC is "not aware of any rules that address translocation specifically" — meaning the mechanism by which rodents carry bait beyond the station to locations where children and pets can encounter it.

I understand that regulatory gap is precisely what LD 356 — Resolve, Directing the Board of Pesticides Control to Prohibit the Use of Rodenticides in Outdoor Residential Settings — is designed to close. I strongly encourage the Board to adopt strong rulemaking that addresses the caching hazard and requires mandatory resident notification for rodenticide deployments at multi-unit residential properties.

Sincerely,

Rep. Matthew Beck
Maine House District 122 (Part of South Portland)

132nd Legislature
Senate of Maine
Senate District 29

Senator Anne Carney
3 State House Station
Augusta, ME 04333-0003
Office (207) 287-1515

May 13, 2026

Dear Members of the Board of Pesticide Control,

My name is Anne Carney, and I represent South Portland, Cape Elizabeth, and part of Scarborough. I write in support of comprehensive regulations to protect people, pets, and wildlife from rodenticide exposure under rulemaking pursuant to LD 356, "Resolve, Directing the Board of Pesticides Control to Prohibit the Use of Rodenticides in Outdoor Residential Settings." I appreciate the thorough work the Board has taken on to systematically review rodenticide exposure risks, regulatory gaps, and implementation considerations.

Secondary exposure to toxins, like the highly potent and widely used second generation anticoagulant rodenticides, poses a serious risk to both human and ecological health. Rodents' caching behavior often results in the translocation of these poisons, heightening risk of direct contact or ingestion by children and animals even with use of targeted, tamper-proof baits. Documented bioaccumulation in wildlife can result in unintended downstream effects to ecosystems and non-target species. I urge the Board to thoughtfully consider regulatory solutions to the human and environmental risks posed by rodenticide translocation, particularly in high-traffic, outdoor residential settings. I believe that systematically prioritizing integrated pest management to reduce reliance on rodenticide application is a necessary piece of the solution.

Rodenticides will inevitably continue to play a role in pest management in many residential and commercial settings, even under greater use restrictions. Given that reality, I ask that the Board work to limit exposure risk by subjecting rodenticides to notice requirements and requiring post-application monitoring in residential settings to improve timely collection and disposal of poisoned rodents.

Thank you for your consideration and work on this issue.

Sincerely,

Anne

Anne Carney
State Senator, Senate District 29
South Portland, Cape Elizabeth, and part of Scarborough

MAINE'S BUILDING TRADES UNIONS
Est. 1956

PO Box 8261 | Portland, ME 04104 | mainebuildingtrades.org | 207-317-1447

May 12, 2026

Mr. Alexander Peacock, Director
Board of Pesticides Control
Maine Department of Agriculture, Conservation & Forestry
22 State House Station
Augusta, ME 04333

RE: LD 356

Dear Director Alexander,

I write today with regard to the rulemaking and regulatory process as outlined in LD 356, that directs the Board of Pesticides Control to formulate a plan to prohibit the use of rodenticides in outdoor residential settings. I have read of the robust work already completed by the Board and staff with interest, especially in light of the lack of state funding that is necessary to operationalize this type of technical, nuanced and critically important work.

I live on Hall Street in South Portland, very near the Brick Hill neighborhood and the housing developments that are a part of it. I have been contacted by my neighbors there expressing their concern for the very issue LD 356 has tasked the Board to explore.

As the Board contemplates how to operationalize that legislation's directives, I wish to express my strong support for fulsome notice requirements of rodenticide use. I feel that it's a non-negotiable responsibility, especially when the state and/or state-funded housing providers are building/operating/managing assets with the benefit of public tax dollars. As such, those dollars should come with the responsibility to model approaches that treat communities as a partner and engage with economically diverse populations with dignity and respect.

Second, upon learning more about what I understand is the possibility, if not probability, of "translocation," (i.e. rodents carrying harmful poison/bait from the area of delivery, elsewhere in the vicinity and beyond), I urge the Board to strongly consider how to fill any gaps in our current regulatory framework with regard to the translocation and caching issue.

As the President of Maine's Building Trades Unions and that of the Southern Maine Labor Council, among other roles in Maine's labor movement, I have the honor to represent tens of thousands of workers - and their families - across the state of Maine. In fact, the labor movement was founded on the premise that workers should arrive home from work in the same condition they left for their shift. Your work in protecting Maine families through thoughtful health and safety-forward regulation ensures they remain safe in their neighborhoods as well.

Please feel free to contact me via phone at 207-317-1447 and/or email: jshedlock@unionsbuildmaine.org with any questions. I look forward to learning about the progress on this important issue. Thank you for your consideration, and for the important work done by the Board and staff every day to keep us safe.

Sincerely,

Jason J. Shedlock
President, Maine's Building Trades Unions
President, Southern Maine Labor Council
Regional Organizer & Secretary-Treasurer, Laborers' International Union, Local 327

Peacock, Alexander R

From: Brad Fox <ibradfox@gmail.com>
Sent: Thursday, May 7, 2026 8:12 AM
To: Poisson, Jennie
Cc: Gayoso, Jose; Peacock, Alexander R
Subject: Material Research Finding — Relevant to Current Brick Hill Inspection
Attachments: Texas_AM_IPM_Rodents_Action_Plan.pdf

Dear Inspector Poisson,

Thank you for visiting Brick Hill Townhouses yesterday, May 6th, and for the time you took to speak with me and tour the property. I appreciated your professionalism and attentiveness.

I am writing to share research that came to my attention last night — after your visit — that I believe is directly material to your current inspection and to the evaluation framework the Board applies to complaints of this nature.

A member of the Rodenticide-Free Maine Coalition, Helena Melone, alerted me to published professional guidance that I have since independently verified from two authoritative sources. I am attaching the Texas A&M AgriLife Extension IPM Action Plan for Rodents for your reference, and summarize the key findings below.

Texas A&M AgriLife Extension's IPM Action Plan for Rodents
(schoolipm.tamu.edu) — a guidance document used to train licensed pesticide applicators — explicitly states the following in its Norway rat biology table:

"Hoards and transports food, which can lead to bait translocation — a problem as rodenticide can be dropped and a non-target can pick up."

The same document states:

"Pelletized bait should never be used around children or pets, even in a bait station, as these pellets could be dropped in transit to the nest and could be picked up by human or pet."

The Internet Center for Wildlife Damage Management (icwdm.org) independently confirms that "pelleted bait can more easily be carried by rats to other locations" and that hoarding behavior "may result in bait being moved to where it is undetected or difficult to recover."
The same source states explicitly: "Tamper-resistant stations are not tamper-proof."

This guidance is not obscure. It is published by a major public university's extension service specifically for professionals working around children, and independently corroborated by a leading wildlife damage management resource.

As you know from your visit, Bell Labs Protecta bait stations containing pelletized rodenticide were deployed at Brick Hill — a federally funded housing property with children present — in unsecured positions in pathways frequented by children. The prior BPC case was closed without finding an actionable violation. On September 28, 2025, I have photographic documentation of a dying rodent in a common area at Brick Hill, and I personally witnessed a child in contact with that animal — three weeks after that prior inspection was closed.

I am sharing this with you now, before your inspection report is complete, so that this published professional standard can inform your evaluation. I am available to answer any questions at your convenience.

Respectfully,
Brad Fox
12 Rollins Way, Building 3
South Portland, ME 04106
ibradfox@gmail.com
207-712-0664

IPM Action Plan for Rodents

Texas A&M AgriLife Extension Service

School Integrated Pest Management Program

schoolipm.tamu.edu

Source: Texas A&M AgriLife Extension Service, School IPM Program
URL: https://schoolipm.tamu.edu/forms/pest-management-plans/ipm-action-plan-for-rodents/
Last Modified: August 5, 2019
Purpose: Guidance document for licensed pesticide applicators and School IPM Coordinators
Retrieved: May 7, 2026

⚠ CRITICAL SAFETY QUOTATIONS FROM THIS DOCUMENT

On Norway rat bait translocation:

> "*Hoards and transports food, which can lead to bait translocation — a problem as rodenticide can be dropped and a non-target can pick up.*"

On pelletized bait near children or pets:

> "*Pelletized bait should never be used around children or pets, even in a bait station, as these pellets could be dropped in transit to the nest and could be picked up by human or pet.*"

General Information

Mice and rats are common problems in and around schools. Rodents cause fires by gnawing on electrical wires, transmit pathogens, and are associated with allergens and asthma triggers. Rodents should not be tolerated in and around schools. Effective, low hazard options are available to eliminate rodents.

Norway rats are burrowers and thrive in environments where there is clutter or garbage. They burrow along foundations and under debris. They are good swimmers and may enter buildings through plumbing access points. The home range of these rats may be as much as 50 yards.

The best approach for rodent control takes an integrated pest management (IPM) approach that includes sanitation, exclusion, lethal control, and occupant education.

> ⚠ **KEY WARNING ON NORWAY RAT BEHAVIOR**
>
> **Note that Norway rats like to hoard food so they may relocate baits.**

Species Biology — Norway Rat (Rattus norvegicus)

Characteristic	Detail
Reproduction	8–9 pups per litter; female may produce 20+ pups annually
Diet	Omnivorous, opportunistic feeder; eats anything humans eat — 0.5–1 oz per day
Food Hoarding	**Hoards and transports food, which can lead to bait translocation — a problem as rodenticide can be dropped and a non-target can pick up.**
Water	Requires 1–2 oz of water daily
Colony	

	Typical family unit: dominant male, breeding female, and up to 12 juveniles

Chemical Control Measures and EPA Requirements

When non-chemical measures are inadequate, rodenticides can be used in a manner that greatly reduces potential for non-target exposure. Place bait-block formulations on rods in tamper-resistant bait stations that are secured so that they cannot be easily moved — such as attached to permanent masonry or 40-pound concrete blocks.

Both U.S. EPA and U.S. FDA have regulations requiring the use of tamper-resistant containers when using rodenticides around food handling areas, children, pets, and other non-target wildlife. EPA requires that:

- Rodent baits must be in block, paste, or pelleted forms and must be used in tamper-resistant bait stations if placed in any indoor or outdoor location to which children under six years of age, pets, or non-target wildlife have access.
- For all applications made outdoors and above ground, rodenticides must be placed in locking tamper-resistant containers.
- Baiting of burrows outdoors is permitted only for pelleted baits placed at least six inches down active rat burrows.

⚠ CRITICAL FINDING — PELLETIZED BAIT PROHIBITION

Despite EPA requirements for tamper-resistant stations, Texas A&M AgriLife Extension explicitly warns:

> "*Pelletized bait should never be used around children or pets, even in a bait station, as these pellets could be dropped in transit to the nest and could be picked up by human or pet.*"

This is because Norway rats characteristically transport food — including pellets — back to their nests, dropping them along travel routes. A tamper-resistant station does not prevent a rat from

carrying a pellet out of the station and dropping it in a child-accessible area.

Rodenticide Classifications

First generation anticoagulants kill by preventing blood from clotting and require multiple feedings. Consumer products must be in block or paste form in ready-to-use stations.

Second generation anticoagulants are much faster acting — in some cases a single night feeding can result in death. Removed from consumer market by EPA. For professional use only, sold in containers of at least 16 pounds.

Bromethalin: Single-dose rodenticide. License required to purchase.

Zinc phosphide: Classified as Restricted Use by U.S. EPA.

Cleanup and Hantavirus Precautions

The risk of contact with rodent-associated pathogens and allergens increases when cleaning areas infested with rodents. Wetting down the site with a 10 percent bleach solution is recommended for hantavirus prevention. Wear appropriate protective equipment including full-face masks with HEPA filters.

Original Source: Texas A&M AgriLife Extension Service, School Integrated Pest Management Program
https://schoolipm.tamu.edu/forms/pest-management-plans/ipm-action-plan-for-rodents/
Last modified August 5, 2019. Retrieved May 7, 2026.
This document reproduces and summarizes content from the above public university extension resource for reference and advocacy purposes.

Peacock, Alexander R

From: Brad Fox <ibradfox@gmail.com>
Sent: Tuesday, May 12, 2026 12:46 PM
To: Peacock, Alexander R
Subject: Re: Boston Globe Article — Plus Today's New York Times Piece

Boston Globe:

OPINION

The system didn't catch the hantavirus threat. Biology saved us.

The cruise ship outbreak reveals how vulnerable the United States remains to infectious diseases despite lessons from COVID.

By Nikki Romanik and Ashish JhaUpdated May 11, 2026, 4:22 p.m.

 This aerial view showed passengers watching as unseen health personnel assisted patients onto a boat from the cruise ship MV Hondius in Cape Verde on May 6. -/AFP via Getty Images

Dr. Ashish K. Jha served as White House COVID-19 Response Coordinator under President Joe Biden and is a physician and public health researcher. Dr. Nikki Romanik served as the deputy director and chief of staff to the White House Office of Pandemic Preparedness and Response Policy. They are co-founders of BioRadar, a public benefit company building pathogen detection infrastructure.

As of Monday, the World Health Organization had reported nine hantavirus cases linked to the expedition cruise ship MV Hondius — with seven confirmed infections of the Andes strain and two probable infections. Three people are dead. The ship, refused entry by port after port, finally docked in the Spanish Canary Islands. The first positive identification of hantavirus infection among ship passengers was May 2, while the first death on the ship was April 11. As of April 24, 25 percent of the passengers had already disembarked.

The Andes strain is the one hantavirus capable of spreading from person to person. North America has its own strain, Sin Nombre (or Unnamed in Spanish), which is not known to spread between people. If there were an outbreak of the Andes strain in rural Nevada or even Washington, D.C., would health officials know? Almost certainly not. Not before it had spread far and wide.

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The gap hantavirus is exposing is not about hantavirus. It is about every pathogen that hasn't come out in the open, moving through the same blind spots, with no guarantee the next one's biology will bail us out.

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Brad Fox
12 Rollins Way, Building 3
South Portland, ME 04106

Peacock, Alexander R

From: Brad Fox <ibradfox@gmail.com>
Sent: Tuesday, May 12, 2026 12:47 PM
To: Peacock, Alexander R
Subject: Re: Boston Globe Article — Plus Today's New York Times Piece

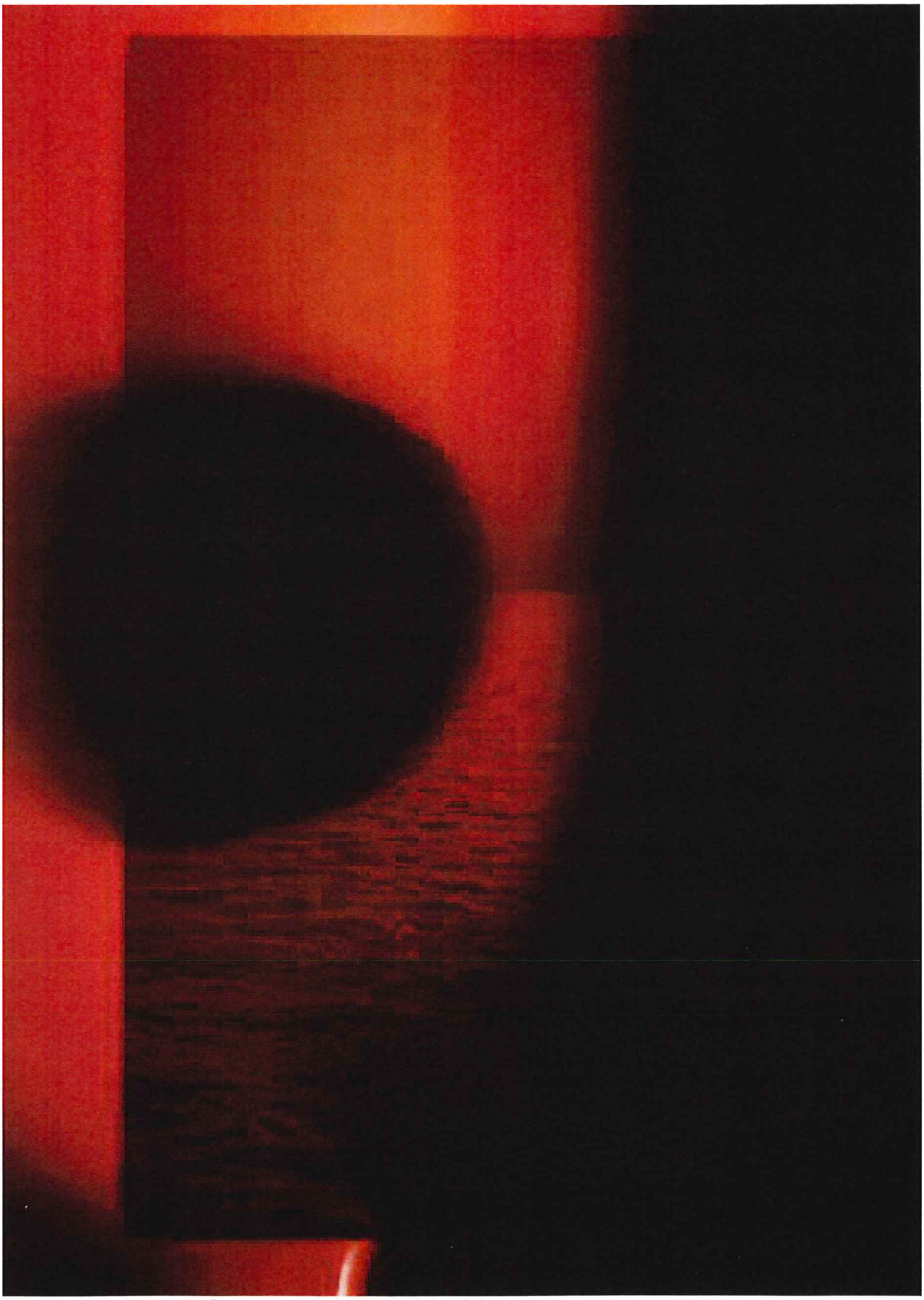
New York Times:

Opinion

Guest Essay

We Should Take Hantavirus More Seriously

May 12, 2026, 5:03 a.m. ET



Credit...Beatrice Salomone/Connected Archives

Listen · 8:42 min

By Zeynep Tufekci

Ms. Tufekci is a contributing Opinion writer.

There's no question that another pandemic will strike, but no one knows when or which virus will be the cause. What we can determine with pretty good clarity is how ready we'll be, how well we're constructing obstacles to slow the path of emerging threats and how fast we're learning lessons from painful experience.

As the final remaining passengers disembarked from the MV Hondius cruise ship, on which at least seven people were confirmed to have been infected with hantavirus traveled, the answers are becoming increasingly clear: We're still leaving a lot to chance, crossing our fingers and hoping for the best.

Consider the history of the Andes strain of the hantavirus. According to a paper in The New England Journal of Medicine, in 2018, a hantavirus outbreak with this strain — the same strain linked to the Hondius cruise — began in Epuyén, Argentina. It started after one infected person attended a birthday party with about 100 guests. He had a fever and was feeling tired, and he left after about an hour and a half. Five people who were in the room — but not necessarily all even sitting right next to him — later sickened.

One of those five partygoers most likely went on to infect six more people, including his spouse, and died 16 days after he became ill. During his wake, 10 more people became infected, from the spouse. It was about then that the public health authorities, realizing how dangerous the situation was, started enforcing strict quarantine measures. That seems to be how it finally died out.

Yet in recent days, the World Health Organization has reassured the public that hantavirus can be transmitted only through "close and prolonged contact" and that, as a result, it is unlikely to spread widely among the population at large. "The one thing with this one is that it's much harder to catch," President Trump said on Monday, echoing W.H.O. and U.S. public health officials. "It seems like it is not easy to spread."

We know fairly little about the Andes strain of the Hantavirus, with an estimated 3,000 human cases over three decades. How could that assertion about it not being easy to spread be true given what we know about the 2018 superspreading event?

I reached out to Gustavo Palacios, the senior author of the study about the Epuyén outbreak. He seemed as baffled by these pronouncements as I was. He told me that the paper he and his fellow researchers wrote used the phrase prolonged or close contact but he explained that, as they had written in their article, they didn't mean solely physical or bodily contact. He told me that they

believed that the virus spread via respiratory secretions. Looking at the same study, an airborne transmission expert, Linsey Marr, told CBC/Radio Canada that "it's strongly suggestive that airborne transmission is happening."

Dr. Palacios also said that he and his co-authors had calculated the median reproduction number of the Andes virus to be 2.1 — meaning that one sick person infected about two other people. That's more than enough for sustained human transmission. That reproduction number is not much lower than the initial strain of SARS-CoV-2, the virus that causes Covid-19, as calculated in February and March of 2020, by the way, so I'm not feeling great about the reassurances from health officials that this will not become a pandemic. How do they know?

Dr. Palacios was also worried about the differences between the previous Andes strain outbreak setting and the current one. Containing an outbreak in a tiny isolated rural village in Patagonia, Argentina, during the dry season is a different prospect than containing one on a cruise ship with ocean humidity conditions or with people traveling onward in planes.

Editors' Picks

At the same time, authorities keep insisting that only symptomatic people can spread the virus. In Dr. Palacios's study, the transmission events that the researchers could trace had indeed occurred while people were displaying symptoms. But he's also said that 48 hours before the onset of symptoms should be considered a high-risk period as well. He told me that people's viral loads rise before symptoms break out, so it's reasonable to assume there is some risk earlier. Besides, with a single study done after the fact, he and his team hadn't been able to pinpoint every exact moment that a person passed the virus to another — many unknowns remained from that outbreak.

The last twist was that his paper shows that the incubation period (the time between virus exposure and symptoms) can be as long as 40 days. Some people get sick more than a month after being exposed, which is an unusually long stretch of time. That's a big deal because it makes managing the outbreak much more challenging.

On April 25, a Dutch cruise passenger took a flight from St. Helena to South Africa while ill, collapsed at the airport after arrival and died soon after. While W.H.O. officials have claimed the risk of spread during the flight or on the ship was low, that incident was just 17 days ago — if incubation can be as long as 40 days, there are 23 days before we'll know if all her contacts are in the clear. As of Monday, South Africa's health minister said that the authorities had identified 97 possible contacts in the

country exposed to the hantavirus and that 90 of them had been reached and advised that they were being monitored. Based on South Africa's guidelines, this meant asking people to perform daily temperature and symptom checks and to contact authorities immediately if they get sick. It's unclear if everyone on the plane has been reached, and we can only hope this is sufficient.

Meanwhile, photographs of crew members while still on the ship show many of them hanging around together in a hallway while waiting to be interviewed by health authorities, covering their mouths and noses with only flimsy masks. In photos that have circulated, one person who had just left the ship can be seen on a bus, still clad in protective gear, but having removed their mask, seen dangling over one ear.

After the Covid pandemic, after the 2002 SARS epidemic, after the Epuyén hantavirus outbreak, we really have learned too little. One key lesson from both SARS and Covid was how much superspreading can play a role. Early on, many infected people spread the virus to few people, which generated comforting statistics on average. But when the circumstances aligned, it turned out that a single person could infect a large number of people all at once, setting off chains of transmission that were difficult to control.

We still don't fully understand why some people superspread and others do not. But if it can happen once, as it did in Epuyén, it can happen again.

During a press conference last week, a W.H.O. official addressed people who had disembarked, asking them to present themselves to health care authorities *if* they were developing symptoms. W.H.O. officials also kept defining transmission as happening through close prolonged contact — intimate partners, household members. Encouragingly, over the weekend, the W.H.O. published new technical documents to clarify its definition of the type of contact that could cause the spread of hantavirus. It now includes "close proximity exposure" as well as "exposure in enclosed or shared spaces."

But even these definitions still suffer from a lack of learning from the Covid experience, such as limiting exposure to being within about six feet for a cumulative period of more than 15 minutes. We know from the study of airborne transmission that that guidance may be too rigid and fail to capture the full risk profile of the virus. The Epuyén outbreak doesn't seem to fit that framework. Still, I would say this is better than nothing, and much better than how slow things were in 2020 and onward. But these guideline changes were done too quietly.

How are people who may have been exposed supposed to protect themselves if they are not told of the modes of transmission and the stakes accurately and loudly, including when the definitions evolve? Public health officials, from the W.H.O. to U.S. officials, would be more helpful if they stopped constantly reassuring people about the likelihood of future events they can't accurately calculate — like the odds of a pandemic occurring or how long this outbreak could last — and just told us more details about the things that matter: mode of transmission, lengthy period of incubation and the inevitable uncertainty of something for which there is little actual knowledge.

If we're lucky, this hantavirus outbreak will peter out, or resemble the 2002 SARS outbreak: It dies out with the help of safety measures and because the virus doesn't adapt fast enough. If we are unlucky? It should be unthinkable, but here we are. And this time Health Secretary Robert F. Kennedy Jr. will be in charge of the U.S. response.

On Tue, May 12, 2026 at 12:45 PM Brad Fox <ibradfox@gmail.com> wrote:

Boston Globe:

OPINION

The system didn't catch the hantavirus threat. Biology saved us.

The cruise ship outbreak reveals how vulnerable the United States remains to infectious diseases despite lessons from COVID.

By Nikki Romanik and Ashish JhaUpdated May 11, 2026, 4:22 p.m.


OCEANWIDE
EXPEDITIONS
Sea Tel

This aerial view showed passengers watching as unseen health personnel assisted patients onto a boat from the cruise ship MV Hondius in Cape Verde on May 6. -/AFP via Getty Images

Dr. Ashish K. Jha served as White House COVID-19 Response Coordinator under President Joe Biden and is a physician and public health researcher. Dr. Nikki Romanik served as the deputy director and chief of staff to the White House Office of Pandemic Preparedness and Response Policy. They are co-founders of BioRadar, a public benefit company building pathogen detection infrastructure.

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South Portland, ME 04106

Peacock, Alexander R

From: Brad Fox <ibradfox@gmail.com>
Sent: Monday, May 18, 2026 8:12 AM
To: Peacock, Alexander R
Subject: RE: Hantavirus Coverage — Prospect Magazine, May 16th

Hi Alex,

One more piece worth adding to your file — this one from Saturday's Prospect Magazine, written by Martin McKee, professor of European public health at the London School of Hygiene & Tropical Medicine.

His framing is the most direct I've seen in connecting rodent control failures to pandemic risk. He makes explicit that the outbreak originated with birdwatchers encountering rodents in Argentina, and that the cruise ship functioned as an amplifier. His broader argument — that this was a near miss and a dress rehearsal — seems directly relevant to the rulemaking work you're doing.

The line I found most applicable: "Inconvenient findings are overlooked in favour of comforting assumptions." He's writing about global health institutions, but the pattern he describes is familiar at every level.

Full text below given the paywall.

Brad Fox
12 Rollins Way, Building 3
South Portland, ME 04106
207-712-0664

We were lucky with Hantavirus—next time we might not be

The outbreak aboard a Dutch cruise ship offers vital lessons for the inevitable next pandemic

By Martin McKee
May 16, 2026

The cruise ship MV Hondius, site of the recent Hantavirus outbreak, docked in the port of Granadilla. Image: AP / Alamy

As so often happens with infectious diseases, the Hantavirus outbreak on the Dutch cruise ship MV Hondius arose from a series of chance encounters. Its rapid containment, meanwhile, depended on a large dose of luck.

Hantaviruses occur worldwide and, while sources differ, there are known to be around 40 known variants (and likely many more), each adapted to coexist with a specific rodent species. Most, though not all, can infect humans, causing illnesses of varying severity. Broadly speaking, variants in Europe, Asia and Africa tend to cause haemorrhagic fever and kidney damage, while those in the Americas primarily affect the heart and lungs. Only one, the Andes virus (ANDV), has been shown to spread from person to person.

Zoonotic outbreaks, in which infections pass from animals to humans, arise for three main reasons. First, genetic changes may confer new advantages for microorganisms, such as the ability to infect humans. Second, changes in animal hosts, such as populations of infected rodents growing, can increase exposure to the disease. Third, and now most common, changes in human behaviour also play a role. History offers many examples, from the emergence of measles following cattle domestication, to the wildlife trade implicated in the Covid-19 pandemic. I first encountered Hantavirus during the war in Bosnia in 1994, when soldiers came into contact with rodent droppings while digging trenches.

In this case, the first couple to be infected were travelling in a region where ANDV is present. There are typically fewer than 100 cases of human infection by ANDV in Argentina each year, but in the past year, that number has increased. As avid birdwatchers, the couple was looking for places where birds would congregate. Unfortunately, these are the same places that rodents also seek out for food. While ornithology is not usually considered a dangerous pastime, in certain circumstances, such as these, it can be.

A second factor also helped the virus to spread, however. Any facility where people are crowded together, especially when they are breathing the same air, can act as an amplifier. We have previously shown how this set of circumstances can create hotspots of tuberculosis in Eastern European prisons and African mines. More recently, in 2020, a cruise ship called the Diamond Princess, quarantined in Yokohama, Japan, had 700 cases and nine deaths from Covid-19 among the 3,700 people on board. The combination of factors that would create both a high risk of infection and a high risk of disease spread proved fatal.

As we now know, on the Dutch ship several passengers fell ill with respiratory symptoms during the cruise. That is nothing unusual, and common things being common, suspicion first fell on possible influenza or Covid. However, once again, chance intervened. When the ship reached the island of St Helena, the widow of the first man to die, along with more than 28 other passengers and crew, disembarked and took the only flight out, to South Africa. She had briefly boarded a plane in Johannesburg, but was removed in light of her medical condition and died soon after. Another passenger, who also fell ill, was evacuated to Ascension island and onwards to South Africa. By great good fortune, both infected individuals who had reached South Africa came to the attention of Lucille Blumberg at South Africa's National Institute for Communicable Diseases. Initial tests for other causes were negative, but, displaying the curiosity that is a core public health attribute, and knowing the ship's path, she and her team tested the pair for Hantavirus. The positive results triggered an extensive international programme to trace all those who had been in contact with people on the ship.

So far, it seems that this outbreak has been contained. Yet, it could so easily have been otherwise, so it offers a good opportunity to reflect on what worked. The first lesson is that we had a much better understanding of how ANDV has spread among humans than in the past. Until 1996, it was thought that infected humans could not spread it further. Then, an investigation of an outbreak in Argentina in 2018 showed that it could be. However, what really made a difference to our understanding was a very detailed paper on another outbreak in Argentina in 2018. We owe an enormous debt to the researchers involved. Their meticulous detective work documented chains of transmission with unusual precision.

The findings were unambiguous. Human-to-human spread of Hantavirus did not require prolonged or intimate contact, and transmission could occur in settings that many would have dismissed as low risk. Unfortunately, some of the early commentators on this latest outbreak seemed not to have read their paper. This was a reminder of a recurring problem in health crises, most recently with Covid: inconvenient findings are overlooked in favour of comforting assumptions.

The second lesson relates to the samples from those affected reaching a laboratory with the tools and expertise to make a diagnosis. This underlines the importance of investing in laboratories and those who work in them.

The third is that there was a highly effective response once the cause of the outbreak was identified. This was led by the World Health Organization (WHO) and the European Centre for Disease Prevention and Control, the latter because all of this started on a Dutch ship. Information was shared, contacts were traced and guidance was coordinated across borders. That matters because it shows that much of the technical machinery built after earlier crises, including the Covid pandemic, still functions.

Yet there are no grounds for complacency. These events unfolded against the backdrop of a weakened global health architecture. Donald Trump's withdrawal of the United States from the WHO, followed by Argentina under Javier Milei, has had both practical and symbolic effects, given that it signals retreat from collective responsibility. The lingering legacy of Covid-19 is evident too, with eroded trust, the emergence of conspiracy theories, and a diminished US role in global health at precisely the moment when coherence is most needed.

This outbreak is best seen as a near miss, which is why it deserves attention. It has functioned as a dress rehearsal for a pathogen with genuine pandemic potential. Some elements worked well: rapid diagnosis, painstaking previous research on the virus and international coordination that prevented wider spread. But we were also very lucky. When the next outbreak arrives—and it will—the stakes may be far higher, and the margin for error much smaller.

Martin Mckeen is professor of European public health at the London School of Hygiene & Tropical Medicine. He chaired the Scientific Advisory Committee for the Pan European Commission on Health and Sustainable Development, which reported to the WHO EURO regional director.

Peacock, Alexander R

From: Brad Fox <ibradfox@gmail.com>
Sent: Saturday, May 23, 2026 12:26 PM
To: Peacock, Alexander R
Subject: Supplemental Documentation — Prior Notice of Bait Station Hazard to Modern Pest Services and Avesta Housing (August 2025)

Dear Director Peacock,

I am writing to supplement the record in connection with the Brick Hill Townhouses pest control complaint, ahead of the June 5 Board meeting.

In reviewing my correspondence files, I want to ensure the record reflects a documented notice-and-inaction timeline that predates BPC's involvement by nine months and is directly relevant to the question of whether existing enforcement frameworks produce timely corrective action.

Timeline of documented notice:

August 18, 2025 — I contacted Modern Pest Services by email regarding unsecured bait stations at Brick Hill, including photographic documentation. Branch Manager Thomas Tripp responded the same day, acknowledged that the stations were in "precarious locations," and committed in writing to inform the service technician to anchor the stations or move them to a non-risk area. Avesta Housing was copied on Tripp's response.

September 11, 2025 — I followed up with a formal written request to Tripp for a comprehensive rodent IPM plan, findings, and timeline. Avesta Housing was again copied.

September 13, 2025 — I wrote again to Tripp regarding structural gaps creating rodent harborage, with Avesta Housing copied.

May 6–7, 2026 — Inspector Poisson visited Brick Hill and, following her inspection, Modern Pest Services committed to anchor the stations and reassess their placement at the next service visit.

Current status — May 23, 2026: This morning I conducted a walkthrough of the property and photographed the bait stations. As of today — 17 days after the commitment made to Inspector Poisson — no stations have been anchored and placement has not been reassessed. This includes stations along the pedestrian walkway between Buildings 3 and 4, and a station at the base of the rear porch at 1 Rollins Way, where the accessible pathway leads directly to the public bus shelter on Brick Hill Avenue — a location frequented by children traveling to and from school.

The corrective action promised by Modern Pest Services in August 2025 was not implemented. It took nine months and direct BPC intervention to produce the same commitment. That commitment, made in the presence of a BPC inspector on May 6, 2026, has also not been honored. Avesta Housing, which was

copied on the original August 2025 correspondence, took no documented action at any point to ensure the promises were kept.

I raise this not to expand the scope of the current complaint, but because it speaks directly to the core policy question before the Board: whether label-compliance standards, without outcome-based verification, reliably protect residents in settings where children are present. In this case, two successive written commitments from the pest control contractor — the first made to a resident, the second made in the presence of a BPC inspector — produced no observable change.

I am available to provide copies of the relevant correspondence and recent photographs if that would be useful to the record.

Respectfully,
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