



March 12, 2026

Members of the Commission
San Francisco Commission of Animal Control and Welfare
City and County of San Francisco

Re: Proposed Glue Trap Ban - CAPMA OPPOSITION

Dear Commissioners: The California Pest Management Association (CAPMA) appreciates the opportunity to provide input regarding the proposal to prohibit glue boards in San Francisco. CAPMA represents licensed pest management professionals across California who are responsible for protecting public health, food safety, housing quality, and sanitation in restaurants, grocery stores, healthcare facilities, schools, workplaces, and residential properties.

As a threshold matter, CAPMA does not support glue trap bans as a regulatory approach. Glue boards are a lawful and widely used pest management tool that help control rodents and monitor pest activity in environments where sanitation and disease prevention are critical. Eliminating this tool would make pest management more difficult in many settings and could create unintended conflicts with existing sanitation and pest prevention requirements.

Glue Boards as a Pest Management Tool

Professional pest management programs rely on multiple tools to safely and effectively control rodents and prevent infestations. Glue boards are frequently used to:

- Confirm and monitor rodent activity
- Control rodents in confined or sensitive environments where other traps cannot be deployed
- Monitor pest populations as part of Integrated Pest Management (IPM) programs
- Address infestations in areas where traditional trapping methods may be impractical

In environments such as restaurants, healthcare facilities, apartment buildings, and food storage facilities, pest control professionals must use a combination of monitoring and control tools to effectively prevent infestations. Removing one of these tools can make rodent infestations more difficult to manage.

Lessons From Other Cities

Several California cities have recently adopted glue trap bans, including West Hollywood, Ojai, and Culver City. These ordinances illustrate a recurring implementation issue: broadly written definitions can unintentionally regulate pest management tools beyond rodent control.

In those cities, glue trap bans defined “animal” to include both vertebrates and invertebrates and defined glue traps as adhesive devices capable of capturing any animal. Under a plain language reading, this language may extend beyond rodent control and potentially capture insect monitoring devices such as crawling insect monitors and adhesive inserts used in insect light traps.

These monitoring tools are widely used in restaurants, hospitals, housing, and workplaces to detect insect activity early and prevent infestations that threaten sanitation and public health. Concerns have been raised in several jurisdictions that glue trap bans written too broadly could unintentionally restrict these essential monitoring tools used in professional pest management programs.

These experiences demonstrate the importance of carefully evaluating the regulatory scope and unintended consequences of glue trap bans.

Potential Issues With Federal Sanitation and Food Safety Requirements

Businesses and institutions in San Francisco operate under numerous federal requirements that mandate proactive pest prevention programs.

For example:

- The **Food Safety Modernization Act (FSMA)** requires food facilities to implement preventive controls designed to prevent contamination before it occurs.
- **FDA regulations under 21 CFR Part 117** require facilities to exclude pests and conduct regular checks for pest activity as part of sanitary operations.
- The **FDA Food Code** requires food establishments to maintain premises free of insects and rodents and to actively control pests through monitoring and trapping practices.
- **OSHA sanitation regulations (29 CFR 1910.141)** require workplaces to prevent pest harborage and maintain effective pest control programs.

Monitoring devices and traps are commonly used to demonstrate compliance with these requirements. Restricting glue boards could make it more difficult for regulated facilities to maintain effective pest prevention programs and document compliance with federal sanitation standards.

Potential Issues With California Public Health and Housing Laws

California law also requires property owners and regulated facilities to maintain pest-free environments.

Examples include:

- The **California Retail Food Code (Health and Safety Code §§114259 and 114259.1)** requires food facilities to prevent the entrance and harborage of insects and rodents and to keep premises free of vermin.
- **Health and Safety Code §17920.3** identifies rodent and insect infestation as a condition that renders buildings substandard and hazardous to health.
- The **Healthy Schools Act** encourages Integrated Pest Management practices emphasizing monitoring and prevention in schools.
- **California healthcare facility licensing regulations (Title 22)** require hospitals and similar institutions to maintain pest-free environments through ongoing pest control programs.

These legal frameworks expect proactive pest monitoring and control. Eliminating commonly used pest management tools could complicate compliance with these requirements.

Conclusion

Rodent infestations pose significant risks to public health, sanitation, housing quality, and food safety. Professional pest management programs rely on a variety of tools, including glue boards, to effectively address these risks.

Glue trap bans are often proposed with the goal of addressing animal welfare concerns, but experience in other jurisdictions demonstrates that such bans can create unintended consequences and regulatory conflicts. Removing a lawful pest management tool can make it more difficult for property owners and businesses to comply with existing health and sanitation requirements.

For these reasons, CAPMA respectfully urges the Commission to oppose a glue trap ban in San Francisco.

Thank you for your consideration.

Sincerely,

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