



Waltham Land Trust, Inc.
P.O. Box 541120
Waltham, MA 02454-1120
www.walthamlandtrust.org
781-893-3355

A non-profit organization dedicated to preserving our community's natural resources through open space advocacy, education, acquisition, and protection.

Board of Directors

Nadene Stein, PhD, *President*
Barbara Jacobs, *Vice-President*
Anna Richardson, *Clerk*
Marc Rudnick, *Treasurer*
Dan Berlin, *Chair*
Erika Bourne
Martha Creedon
Marie Daly
John Dieckmann
Tom Geary
Brian McCormick
Daniel Melnechuk
Debbie von Rechenberg
Lesley Sneddon
Diana Young

Advisory Board

Kate Buttolph
Dr. Laura Goldin
Dr. Eric Olson
Stephen Rourke
Michael Squillante
Mike Tabaczynski
Douglas Waybright
Roger Wrubel

Executive Director

Sonja Wadman

**Protecting
Waltham's land
...forever.**

Written Testimony of Waltham Land Trust

In support of S.540 / H.814 An Act empowering towns and cities to protect residents and the environment from harmful pesticides
and
S.487 / H.825 An Act relative to pesticides

Before the Joint Committee on Environment and Natural Resources on
May 30, 2023

Chair Rausch, Chair Cahill, honorable members of the committee

The Waltham Land Trust is a 501(c)3 organization, the mission of which is to create a legacy of land conservation in Waltham by promoting, restoring, and acquiring the open space that protects plants and wildlife. We urge the committee to support the following bills that will reduce the deaths of birds of prey and mammalian predators from consuming rats poisoned by Second Generation Anti-Coagulant Rodenticides ("SGARs"):

- S.540/H.814 An Act empowering towns and cities to protect residents and the environment from harmful pesticides
- S.487/H.825 An Act relative to pesticides

Waltham is fortunate to have had a robust and varied population of predators that kill and eat thousands of rodents each year. Those predators include multiple raptor and mammalian species, such as red-tailed hawks, barred owls, great horned owls, screech owls, ravens, and more recently, a pair of bald eagles. Peregrine falcons, kestrels and merlins have also been seen regularly, and coyotes and red foxes are often sighted in our parks and open space. Unfortunately, the use of SGARs to combat Waltham's rodent population has had the unintended, but detrimental consequence of also poisoning these other animals. It also poses a significant risk of death or serious injury, such as seizures or stroke, to pets of residents in our community.

The Waltham Land Trust coordinates a robust volunteer stewardship program with over 100 individuals providing regular stewardship of open space throughout the City, including monitoring and reporting on trail conditions, picking up trash, removing invasive species, repairing boardwalks, and other maintenance to ensure trail sustainability. Reports from our trail stewards and hikers in our local parks have revealed an alarming increase of raptor deaths consistent with SGAR consumption following the increased use of these rodenticides in the City. The female of the first pair of breeding bald eagles in Waltham in many years was since found dead and SGAR poisoning was confirmed as the cause.

In addition to the concern this has caused in our community, the inadvertent killing of these apex predators by anticoagulants is actively diminishing a very effective source of rodent control.

Studies have confirmed that rodenticides are adversely affecting birds of prey. SGARs kill rodents and other animals by causing lethal hemorrhaging. A study in 2018 on birds of prey admitted to a wildlife rehab clinic noted these results: “Prolonged clotting time or failure to form a clot altogether was 16 observed in 23.0% of 61 sampled raptors admitted to the rehabilitation facility. **This is a biologically significant proportion of individuals given the fortuitous and likely biased nature by which raptors are found and admitted to rehabilitation facilities.**”

A more recent study conducted by Tufts Wildlife Clinic in eastern Massachusetts notes that there is widespread exposure to SGAR among red-tailed hawks. “100% of birds were positive for ARs, with the SGARs brodifacoum, bromadiolone, and difethialone identified most frequently; 91% of birds had liver residues of 2 to 4 ARs. These findings represent the highest exposure both to ARs overall and to multiple ARs in red-tailed hawks compared to previous studies.”

Restoration of Waltham’s wildlife requires that use of SGARs is significantly reduced, and preferably banned outright. The City of Waltham is now working cease using SGARs on all City-owned properties, a positive step to be sure. However, such targeted actions do not affect the use of SGARs by businesses and private citizens and will have only a limited effect. Moreover, residential applications of a range of pesticides tend to be significantly more excessive than commercial or municipal applications. However, because of the passage of the Massachusetts Pesticide Control Act in 1978, cities or towns in Massachusetts are prohibited from adopting local pesticide ordinances to regulate the use of these products or ensure the most dangerous ones are banned or only available to professionals. Cities and towns currently have no say in which chemicals are used in their communities. We therefore urge the committee to support S.540 / H.814 to permit local control of pesticide use. Certainly, urban rat populations require control, but effective alternatives to the use of SGARs already exist. Other options exist with much lower secondary poisoning potential. Integrated pest management is a comprehensive approach to rodent control that includes sanitation, exclusion, lethal control (snap traps and other non-poisonous means), and education.

We urge the committee to support S.487/H.825 An Act relative to pesticides, which will mandate this approach around schools, decreasing the risk of pesticide poisoning of children. It will also require the Department of Agricultural Resources to use an online database for reporting pesticide use, increasing the efficacy of rodent control data collection.

Sincerely,



Sonja Wadman, Executive Director
Waltham Land Trust