

## Madalyn Letellier

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**From:** Leah Grossman [REDACTED]  
**Sent:** Thursday, March 19, 2026 6:43 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED] Jehlen, Patricia (SEN);  
Public Comments; All City Council; Michael  
**Subject:** Somerville Urban Forestry Committee Letter to the Pesticide Board  
**Attachments:** 20260319\_Pesticide-Board\_Somerville-UFC-Letter.pdf

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To Members of the Pesticide Board Subcommittee,

I am writing to submit the attached letter on behalf of the Somerville Urban Forestry Committee Re: Public Comment in Support of Prohibiting Registration of all Anti-coagulant rodenticides.

Sincerely,  
Leah Grossman + Michael Hendrix, UFC Committee Co-chairs

cc: Somerville City Council, Rep. Christine Barber, Rep. Mike Connolly, Rep. Erika Uytterhoeven, Senator Patricia Jehlen, Senator Rebecca Rausch, Somerville Public Comments



March 19, 2026

Taryn LaScola  
Pesticide Board Subcommittee  
Massachusetts Department of Agricultural Resources  
251 Causeway Street, Suite 500  
Boston, MA 02114

**Re: Public Comment in Support of Prohibiting Registration of all Anti-coagulant rodenticides**

Dear Members of the Pesticide Board Subcommittee,

We, the Somerville Urban Forestry Committee, are an appointed body of 11 who are charged with advising on the management and maintenance of all existing and new trees and shrubs on all public grounds and public ways in Somerville. With trees, shrubs and greenspace comes an ecosystem. The heart of our committee is to protect, preserve and maintain a thriving balanced urban ecosystem with care and equitability, while honoring the co-habitation of all Somerville residents. These residents include our animals who do not have a voice. Our hawks, eagles, falcons, owls, coyotes, foxes, dogs, cats and, yes, even our rats.

So, we will be their voice.

We recognize the imbalance in our urban ecosystem. There are more rats than our predator population can handle which poses a hazard to humans: yet our choice to poison the very creatures who evolved to hunt rodents is the antithesis of what needs to be done. First and second anti-coagulant rodenticides (FGARS and SGARS) bio-accumulate in tissues of animals. Death is not immediate. It may take 2-10 days for a rat to die, if it dies. (According to a 2023 study by the UK Campaign for Responsible Rodenticide Use, 75% of mice and 90% of rats have become resistant to these poisons). When it dies, its death is inhumane. We do not want creatures to suffer. As it suffers, it becomes slower making it more easy to kill. Predators who have not





developed resistance to the poisons do die; and it can take several painful weeks or even months. Then their death can result in the death of their offspring who are no longer being cared for, hastening populations decline.

So instead of continuing to do something that doesn't work by creating new poisons, let us support what nature strives for, a balanced healthy ecosystem with smart rodent control.

We can do this with Integrated Pest Management or IPM. IPM is a combination of strategies that modify the environment and make it less attractive for rodents (Himsworth et al., 2012). These methods include excluding rodents by sealing up entrances with concrete, door sweeps, steel wool and hardware cloth; starving them by properly disposing of garbage, using a compost service, and removing bird feeders; targeting them by using mechanical snap traps, CO in their burrows, and importantly, supporting the habitat of their predators.

This is where the UFC shines. We are helping to get people to plant trees on their property, encouraging green connectivity in our city, and advocating for more natural landscaping, while pushing for the elimination of anti-coagulant rodenticide. At the public hearing on March 18th, we heard that pest management companies feel that a tool is being taken away and that their lives will be made harder if they can no longer use poisons. Some argued that being professionally trained makes the damage they do less; but if poison is being used the consequences are the same. We also know that, although change is difficult, humans are resilient, creative and that other options for rodent management exist that will not harm our ecosystem.

Thankfully, Somerville has ended AR use on municipal property. And Somerville has numerous initiatives to control rodents using non-lethal methods, including rat birth control (Evolve). Our city will help residents, free of charge, rat-proof their homes and, if necessary, use non-AR methods to kill rats (carbon dioxide gas or vitamin D bait), yet with all our efforts poison is still a go-to for pest management.





We ultimately hope that the statewide bills banning anticoagulant rodenticide in the House and Senate Ways and Means Committee pass. Until then the Somerville Urban Forestry Committee urges this Pesticide Subcommittee to prohibit the registration and use of all anticoagulant rodenticides — both first-generation (FGARs) and second-generation (SGARs). This position is firmly grounded in the findings of the October 2025 Anticoagulant Rodenticide Scientific Review commissioned by the Massachusetts Department of Agricultural Resources (MDAR) and prepared by Eastern Research Group, Inc. (ERG)

The evidence is clear: anticoagulant rodenticides pose an unacceptable risk to wildlife, cause painful prolonged deaths while safer alternatives exist and work.

Thank you for your time and your commitment to the communities you serve,

The Somerville Urban Forestry Committee

A handwritten signature in black ink that reads "Leah Grossman".

Leah Grossman co-chair

A handwritten signature in black ink that reads "MH".

Michael Hendrix co-chair

cc: Somerville City Council, Rep. Christine Barber, Rep. Mike Connolly, Rep. Erika Uytterhoeven, Senator Patricia Jehlen, Senator Rebecca Rausch, Somerville Public Comments





Red Tailed Hawk with rat on Virginia Street in Somerville, 2021  
Photo by Jillian Dempsey

