



CCM 2012 Testimony

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ENVIRONMENT COMMITTEE

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The Connecticut Conference of Municipalities (CCM) is Connecticut's statewide association of towns and cities and the voice of local government - your partners in governing Connecticut. Our members represent over 90% of Connecticut's population. We appreciate the opportunity to testify on bills of interest to towns and cities.

CCM opposes Section 3 House Bill 5121 "An Act Concerning the Use of Organic Pesticides on School Property and Authorizing Municipal Regulation of the Use of Pesticides on Residential Property".

Section 3 of this bill would take a fight that has to date been unsuccessful - to ban pesticides statewide - from the state level and create an emotional political tool for IPM opponents to use against municipal officials.

The Department of Energy and Environmental Protection, in conjunction with the US Environmental Protection Agency, already significantly regulate pesticides. Both agencies have the resources and scientific expertise at their disposal to make the needed decisions regarding toxicity and public health. **Local governments do not have those same resources.** Towns and cities are already dealing with huge budget crisis, and balancing trying to continue to meet current local service needs, without now being asked to make scientific decisions on already regulated products.

Instead, municipalities should be reinstated their ability to address pest populations through the use of Integrated Pest Management (IPM) programs, as wisely proposed in **House Bill 5155 "An Act Modifying the Ban on Pesticide Applications on School Grounds"** a **common sense approach to balancing the management of school grounds in Connecticut** - which would reinstate the requirement that Integrated Pest Management plans (IPM) be used on public and private school grounds in Connecticut to manage pest control on fields and facilities, and expand the requirement to include high schools.

BACKGROUND

Public Act 99-165 set in place a requirement that in order to use pesticides on elementary school grounds or preschools, public or private, it could be done only within an Integrated Pest Management (IPM) program approved by the then Department of Environmental Protection, now the Department of Energy & Environmental Protection (DEEP). In 2007, the law was expanded to apply to school properties through eighth grade.

WHAT IS IPM?

IPM is a written plan - submitted to and approved by DEEP - as to how exactly a property owner will maintain fields and facilities with regard to pest populations. This "best management approach" has been in use for decades and has proven to be a solidly effective mechanism. IPMs are structured as a comprehensive

management plan for grounds maintenance and upkeep. They focus on a thorough understanding of pests and pest biology by pest managers; careful inspection and monitoring for pest presence and pest-conducive conditions; pest prevention through effective education, sanitation and facility maintenance; and a restrictive treatment plan *as a last resort*. Such treatment plans call for the use of pesticides **only** when non-chemical measures have been unable to eradicate the problem and, even then, products are selected that minimize toxicity and potential for exposure. *Please keep in mind that all of the chemical products that might be used under an IPM are regulated by the EPA and DEEP.* The philosophy behind this approach is to do the minimal needed to maintain the status of the grounds and not necessitate methods to rehabilitate the grounds after deterioration. Rather than relying on treatment on a case-by-case basis, IPM ensures that a plan is put in place and adhered to in order to maximally manage with minimum treatment – avoiding “emergency” situations.

WHAT IS THE PROBLEM?

A **sunset provision was included in the original bill**, and extended one year in 2009, **to ensure that the State evaluated the effectiveness of the use of IPM** in maintaining fields and grounds, while simultaneously not negatively impacting the environment or the health of the children using such fields.

Beginning in 2009, the year the sunset was originally to take place, and each year thereafter, there have been calls for elimination of the sunset to ensure that IPM continues to be the standard for school grounds going forward. Each time, concrete scientific testimony in support of the use of IPM as the preferred method for schools was given by experts across the issue – the Department of Environmental Protection, Connecticut Agricultural Experiment Station, Connecticut Parks & Recreation Association, and the UConn College of Agriculture and Natural Resources, to name a few. In addition, several years ago **the United States Environmental Protection Agency (EPA) recommended “that schools use IPM to reduce pesticide risks and exposure to children”** and that it is a **“safer” and “less costly option for pest management in a school community.”** The EPA plan **called for all schools to utilize IPM by 2015.** These calls fell on deaf ears and the sunset date passed – effectively banning the use of pesticides across Connecticut, unless in an “emergency situation”.

Since the passing of the sunset of this program, towns and cities across the state have been faced with rapidly deteriorating fields and large expenses in attempts to rehabilitate them. The increased presence of grubs in fields has attracted rodents, who borrow through the soil leaving dangerous tunnels that cave in as players run across them increasing the risk of player injury. As species such as crabgrass have begun to takeover the soil has begun to harden and not respond to aeration also causing an increased risk of player injury. Tens of thousands of dollars are being spent to repair fields that have deteriorated to the point of being unsafe; many requiring complete re-sodding as they are past repair and this is the last resort. *All of this over just the last 20 months* - imagine the conditions of these fields and the increase in pest population as more time passes. It is critical that this situation be rectified and quickly.

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CCM urges the committee to **delete Section 3** of this bill before taking any action on it.

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If you have any questions, please contact Kachina Walsh-Weaver, Senior Legislative Associate of CCM via email kweaver@ccm-ct.org or via phone (203) 498-3026.