Rivers Alliance of Connecticut

ENVIRONMENT COMMITTEE PUBLIC HEARING
March 16, 2012

Dear Senator Meyer, Representative Roy, and Members of the Committee:
Rivers Alliance of Connecticut is the statewide, non-profit coalition of river organizations, individuals, and businesses formed to protect and enhance Connecticut's waters by promoting sound water policies, uniting and strengthening the state's many river groups, and educating the public about the importance of water stewardship. Our 450 members include almost all of the state's river and watershed conservation groups, representing many thousand Connecticut residents.

Thank you for the opportunity to comment on AAC 5121 THE USE OF ORGANIC PESTICIDES ON SCHOOL PROPERTY AND AUTHORIZING MUNICIPAL REGULATION OF THE USE OF PESTICIDES ON RESIDENTIAL PROPERTY. We strongly support enabling towns to regulate pesticides used out-of-doors to control vegetation for cosmetic purposes or simple convenience.

In the past 30 years, thousands of new pesticide products have come on the market, while DEP/DEEP's regulatory resources have shrunk. The agency has good expertise, and makes an effort to review and often to comment on the hundreds of permit applications that are submitted to them each year. But the agency lacks the money and people to get out into field to monitor pesticide applications, investigate impacts on non-target species, or enforce rules.
Rivers Alliance has a special concern for excessive pesticide use because the millions of pounds of pesticides applied in the U.S. each year inevitably end up in aquifers and streams. A study by the U. S. Geological Survey in 2006 made headlines across the nation.

Pesticides in the Nation's Streams and Ground Water (Released: 3/3/2006 9:00:00 AM)
Today, the U.S. Geological Survey released a report describing the occurrence of pesticides in streams and ground water during 1992-2001. The report concludes that pesticides are typically present throughout the year in most streams in urban and agricultural areas of the Nation, but are less common in ground water. The report also concludes that pesticides are seldom at concentrations likely to affect humans. However in many streams, particularly those draining urban and agricultural areas, pesticides were found at concentrations that may affect aquatic life or fish-eating wildlife. [Emphasis added.]

While it was somewhat comforting to read that the concentrations of pesticides were seldom likely to harm humans, this comfort was dispelled within the report by an admission that the concentrations were averaged over a year. Concentrations in certain seasons were much

7 West St., Suite 33, P.O. Box 1797, Litchfield, CT 06759 860-361-9349 FAX: 860-361-9341
email: rivers@riversalliance.org website: http://www.riversalliance.org

higher than the average. Typically the spikes were in warm weather, when people would most be most apt to be in the water.

For those who also care about wildlife, the news was worse. Thus from the same release:

However, pesticides may have substantially greater effects on aquatic ecosystems than on humans based on a screening-level comparison of USGS measurements to water-quality benchmarks for aquatic life and fish-eating wildlife. More than 80 percent of urban streams and more than 50 percent of agricultural streams had concentrations in water of at least one pesticide—mostly those in use during the study period—that exceeded a water-quality benchmark for aquatic life. Water-quality benchmarks are estimates of concentrations above which pesticides may have adverse effects on human health, aquatic life, or fish-eating wildlife.

In Connecticut all fish already are covered by a health advisory limiting consumption. We should not be exposing fish or people to more toxins. Lawn chemicals are a significant and avoidable source of toxins.

Some town wetlands commissions have no real interest in monitoring applications of pesticides. But others feel that they have a responsibility under Connecticut law to safeguard wetlands and surface waters. They want a voice in deciding how pesticides are regulated. They want to be able to limit needless applications that endanger human health and aquatic life.

It is extremely frustrating to a local official to be told that, despite being on the scene and knowing the hydrology and the neighborhood, he or she has to stand by day after day, year after year, as the lawn-treatment trucks lay it on. Their only recourse is to call someone in Hartford.

When resources are pinched, we should be looking to new ways to get work done.

Defenders of the state's regulatory program, believe that it is safe and adequate because operators must be certified; restricted-use chemicals cannot be sold to a non-certified person; the chemicals must be registered by the EPA and CT DEEP, and operators are supposed to follow the label and any conditions in the permit.

All of these safeguards are weak and difficult to enforce long-distance. The EPA registration process is often not rigorous. The political pressure to accommodate industry is extreme. One readily can order and take delivery of restricted-use chemicals through internet transactions. But the greatest problem is the sheer volume of pesticides applied every year. Towns should have the right to try to reduce the associated risk.

Here's validation from *Toxicology and Industrial Health* (1999 Jan-Mar) by P. Short & T. Coburn,
"Pesticide use in the U.S. and policy implications: a focus on herbicides."

Abstract: *This article examines herbicide use in the United States, providing estimates of poundage, land surface covered, distribution, and recent trends based on federal*

and state figures. Herbicides are by far the most widely used class of pesticide in the US, where 556 million lbs of herbicide active ingredients (AIs) were applied in 1995. Agriculture accounts for the majority of herbicide use, totaling 461 million lbs of AIs in 1995. Over 60% of the poundage of all agricultural herbicides consist of those that are capable of disrupting the endocrine and/or reproductive systems of animals. In addition, at least 17 types of 'inert ingredients,' which can equal 90% or more of a pesticide product, have been identified as having potential endocrine-disrupting effects. Atrazine is the predominant herbicide used according to poundage, with 68-73 million lbs of AIs applied in 1995. However, 2,4-D is the most widespread herbicide, covering 78 million acres for agricultural uses alone. Both of these herbicides are reported endocrine disruptors. Acetolactate synthase (ALS) inhibitors, namely the sulfonylureas and imidazolinones, are one of the fastest growing classes of herbicides. Many of these herbicides are 100 times more toxic to select plant species than their predecessors, so they can be applied at rates approximately 100 times lower. Consequently, they can affect plant species at concentration levels so low that no standard chemical protocol can detect them. Due in part to these more potent herbicides, the poundage of herbicides used in the US has decreased since the mid-1980s; however, the available data suggest that the number of treated acres has not significantly declined. A thorough assessment of potential exposure to herbicides by wildlife and humans is limited due to the inaccessibility of production and usage data.

Connecticut residents cannot do much about the alarming global accumulation of pesticides. But they should be able to limit the dispersion of pesticides in their own towns and neighborhoods.

Thank you for your consideration.

Margaret Miner

Margaret Miner
Executive Director