



TESTIMONY FOR THE ENVIRONMENT COMMITTEE
PUBLIC HEARING, FEBRUARY 25, 2013
From
RIVERS ALLIANCE OF CONNECTICUT

To: The Chairmen: Sen. Ed Meyer and Rep. Linda Gentile
And to the 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.

HB 6441 AAC The Dam Safety Program. We support this bill, but request a few changes that we believe will make the program more practical.

In Section 5, we are concerned that the owner of a hazardous dam is required to "develop and implement an emergency action plan"; the plan must be filed with DEEP and the chief executive officer of any municipality that would potentially be affected in an emergency; and the plan must be updated every two years. The exact requirements and cost are not clear (regulations are to be written). But clearly action plans that might affect several or many communities should be developed and coordinated by a government entity. Maybe the owner should be required to submit whatever information is needed for writing and implementing the plan.

Section 5 (1) requires DEEP to develop "criteria and standards for inundation studies and inundation zone mapping." We have urged DEEP to develop a uniform set of standards for extreme storm events for use at all levels of government. One approach in Connecticut might be to use storm data developed by the Natural Resources Conservation Service. The standards should probably be tied to a rolling five-year (or ten-year) average of actual flood events.

In Section 6 (a), we love the dam-removal language.

In Section 6 (d), we strongly urge reinstating the requirement that local commissions receive notice of the work and have the right to comment.

SB 914 AAC The Application of Pesticides at Municipal Parks. We strongly support this bill. Think of families, including pregnant women and toddlers, out for a picnic in park. Think of *Le déjeuner sur l'herbe*. Think of touch-football games. Think of robins in the spring. Think of the groundwater well that may be right below the turf or adjacent parking lot. (See science references below.)

SB 916 AA Authorizing Civil Penalties for the Faulty, Careless or Negligent Application of Pesticides. Support.

SB 917 AAC The Use of Certain Microbial and Biochemical Pesticides and Grub Control Products on School Grounds. Support, on the basis of assurance from Jerry Silbert, M.D., of the Watershed Partnership that the proposed anti-grub products are consistent with standards for safe natural turf care.

HB 6440, AAC Municipalities and the Application of Lawn Care Pesticides [includes herbicides]. We strongly support this bill.

Lawn-care pesticides are not needed in order to have an attractive lawn and are counter-indicated for a healthy lawn. These substances are heavily implicated in harm to bird populations, beneficial insects (such as bees), amphibians, aquatic species, and human beings.

Lawn-care pesticides travel, even when applied carefully. They blow in the wind; get into water; get onto shoes, clothes, and bare feet; get on the paws of pets. They end up inside as well as outside.

The history of pesticide use is one long retreat from claims that pesticides are safe. Every pesticide contaminating soil, groundwater, and surface water in Connecticut was at one time pronounced and promoted as safe.

The presence of pesticides in all the nation's rivers and streams (US Geological Survey, 2006) is a major contributor to the die-off of freshwater species; these creatures are in the vanguard of the mass extinction of species now underway in North America and around the world.

DEEP does not have the resources to manage pesticide use in the field, but has been very reluctant to share authority with the local governments elected by the people who are exposed to pesticides. State pre-emption of a town's right to protect itself is totally unreasonable in this case. The only larger public good served is the interest of the pesticide manufacturers, sellers, and applicators. But most of these are already serving customers who want safe choices, and are prepared to serve more. The development of new, safer products is a good thing, economically and environmentally.

Connecticut has been forward-looking in limiting and regulating pesticide use. But resistance from industry has been “robust,” as they say. The pro-pesticide advocates claim that science is on their side, but that’s not what science research shows. In December 2012, the thoroughly mainstream American Academy of Pediatrics issued a detailed policy statement, titled *Pesticide Exposure in Children*. You can read it at <http://pediatrics.aappublications.org/content/130/6/e1757.full> And we would be glad to supply you a copy.

Here is what the nation’s leading pediatricians say:

“Epidemiologic evidence demonstrates associations between early life exposure to pesticides and pediatric cancers, decreased cognitive function, and behavioral problems.

...

Recommendations:

Three overarching principles can be identified: (1) pesticide exposures are common and cause both acute and chronic effects; (2) pediatricians need to be knowledgeable in pesticide identification, counseling, and management; and (3) governmental actions to improve pesticide safety are needed. Whenever new public policy is developed or existing policy is revised, the wide range of consequences of pesticide use on children and their families should be considered. The American Academy of Pediatrics, through its chapters, committees, councils, sections, and staff, can provide information and support for public policy advocacy efforts. See <http://www.aap.org/advocacy.html> for additional information or contact chapter leadership. “

Other relevant science studies include:

The US Geological Survey study mentioned above, *Pesticides in the Nation's Streams and Ground Water, 1992–2001*. 2006.

An important paper on the effect of Round-Up (glyphosate) on frogs, *THE IMPACT OF INSECTICIDES AND HERBICIDES ON THE BIODIVERSITY AND PRODUCTIVITY OF AQUATIC COMMUNITIES*, by Rick A. Relyea, Department of Biological Sciences, University of Pittsburgh, in *Ecological Applications*, 2005.

A major study of endocrine disruptors (including glyphosate), *Hormones and Endocrine-Disrupting Chemicals: Low-Dose Effects and Nonmonotonic Dose Responses*, By Laura Vandenberg et al, in *Endocrine Reviews*, 2012.

Other studies available on request.

Two billion pounds of pesticides are applied in the USA annually. This is a massive experiment in toxicology. Towns should be permitted to set limits.

HB 6439 AAC The Disposal and Collection of Unused Medication. We support the concept and any means deemed practical. Pharmaceuticals in our water are a global threat to aquatic life and human health. Most come from human excretions and body-care products. But any steps to reduce the total volume will be helpful.

Thank you for your hard work (already done and to come).

Sincerely,

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