



# Town of Glastonbury

2155 MAIN STREET • P.O. BOX 6523 • GLASTONBURY, CONNECTICUT 06033-6523

February 22, 2013

Dear Honorable Members of the Environment Committee:

**RE: Pesticide Legislation**

I am writing on behalf of the Town of Glastonbury in my capacity as Director of Parks & Recreation. My Department employs trained professionals that are responsible for the care and maintenance of public parks, school grounds and municipal properties. My testimony regarding proposed legislation follows. **Please also be advised that both the Connecticut Recreation and Park Association and Connecticut Park Association oppose the proposed legislation.**

## **SB 914 An Act Concerning The Application of Pesticides at Municipal Parks**

Please accept this letter as an expression of **opposition of Raised Bill 914** and its provisions. First, despite what well intentioned proponents of the ban will testify under oath, it is important to understand that the science of organic lawn care has NOT reached the point where it is a viable, practical alternative to the judicious use of Integrated Pest Management (IPM) and EPA approved lawn chemicals. If approved, the bill will create an **UNFUNDED MANDATE** for all of Connecticut's 169 municipalities. The cost of organic means, despite their ineffectiveness, is up to 5 times greater than established methods. The alternate means will result in a significant fiscal impact because the materials are more costly, they are more labor intensive to employ, and specialized equipment will need to be purchased.

I urge you to reject Raised Bill 914. I also request that any fiscal impact report prepared by the Office of Fiscal Analysis (OFA) include the cost of organic means and methods that will need to be used to replace the judicious use of EPA approved herbicides and pesticides currently permitted. **It is simply not accurate to report that there will be no fiscal impact to Connecticut's municipalities because pesticides will no longer be used.** If a fiscal note is requested from OFA, I am willing to serve as a resource to their staff, as would my colleagues from both the CT Park Association and CT Recreation and Park Association, in this regard.

Existing State law already includes protections that are more than sufficient to protect the public and our environment in this regard. Public Act 99-165, approved June 23, 1999, includes the following requirements: (1) all applications are to be made by a State licensed pesticide applicator with supervisory certification under Section 22a-54; (2) school staff and parents/guardians of school children are provided with a written statement of the School Board's policy regarding pesticide applications each year; (3) staff and students may register for PRIOR notification of planned pesticide applications; (4) applications cannot be made during regular school hours or during planned activities; (5) records of all applications are maintained for a period of 5 years; and, MOST IMPORTANTLY, (6) all school systems are required to practice Integrated Pest Management consistent with the model plan developed by DEP under Section 22a-661. This act also includes provisions that extend to and protect child day care centers, group day care homes and family day care homes as defined by Section 19a-77 of the general statutes.

Use of Integrated Pest Management principles and practices dramatically reduce the use of pesticides. Cultural practices associated with growing a vigorous healthy stand of grass include proper mowing height, mowing frequency, watering, aeration, fertilization, maintaining PH balance, scouting and establishing thresholds that must be exceeded before pest treatment becomes actionable. Spot applications are the norm. The days of routine broadcast applications have been gone for years. The continued selective and judicious use of pesticides is needed and is only one tool required to maintain safe athletic fields for the public.

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The provisions of Raised Bill 914 are unnecessarily onerous and will result in an immediate and severe decline in the quality of athletic fields across the State. Again, despite what others will testify, we have already seen a decline at fields located on school grounds in grades K-8 because of the existing ban. Please do not extend these problems to all public parks. The incidence of accidents/injuries to athletes will surely increase.

In closing, let me offer one real world example of a problem created by a ban. Among the scientific community, including proponents of the ban, as well as, scientists from the State's flagship research University of CT, the Agricultural Experiment Station and State DEEP, there is agreement that there is no effective organic treatment for grubs. Do not be fooled by proponents of the ban that advocate the use of nematodes as an effective alternative. We have used them. At times, they can offer limited control, but, by no means are they universally effective. **For these reasons, you need to know that SB 917 does not adequately address this problem.** I would further recommend and request that, before this legislation is advanced any further, that you take full advantage of the expertise available to you from the staff scientists at UCONN, the Agricultural Experiment Station and DEEP. These trained professional scientists are familiar with the scientific method and are trained in how to do an accurate review of scientific literature. It's time that the State stop passing legislation based on emotion, mythology, and stories told by advocates that cherry pick scientific literature to suit their objectives.

Please feel free to contact me directly at (860) 652-7687 or [ray.purtell@glastonbury-ct.gov](mailto:ray.purtell@glastonbury-ct.gov). Thank you for your consideration.



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Town of Glastonbury