CONNECTICUT RECREATION AND PARKS ASSOCIATION

Testimony of The Connecticut Recreation & Parks Association, Inc.
Before the Environment Committee
March 17, 2014

Testimony in Opposition to
SB 443 An Act Concerning Pesticides on
School Grounds, Parks, Playgrounds, Athletic Fields, & Municipal Greens

Good morning. My name is Greg Foran. I am a member of the Connecticut Recreation and Parks Association, Inc. (CRPA), and also the Parks Superintendent and Tree Warden for the Town of Glastonbury. CRPA represents about 600 individual professionals from municipal, nonprofit and private, park, recreation & camp organizations, as well as 128 of the 169 municipal park and recreation departments in Connecticut.

Also, please note that we are joined in our testimony today, by the Connecticut Association of Schools / Connecticut Interscholastic Athletic Conference (CAS/CIAC) which consists of more than 1,000 public and parochial elementary, middle and high schools in addition to charter, magnet and technical schools in Connecticut. CIAC is the portion of the organization which regulates interscholastic athletics.

CRPA must oppose SB 443. The bill neither protects the public nor preserves our fields and recreation areas. This bill as written would eliminate the use of a DEEP approved list of non-toxic pesticides, and expand the prohibition on using even low toxicity products. SB 443 has little basis in science and ignores what CRPA members have told us about the problems with the current ban on K-8 fields in Connecticut. Our members, who are the trained experts in maintaining these fields and areas, know what works and what doesn't. And it should not be overlooked, that our members do not profit from the sale of any such product, whether it be organic or synthetic. Quite frankly, it is ridiculous to argue that our members don't know what they are doing, and are unfamiliar with safe and effective maintenance best practices.

Parks and recreation departments throughout Connecticut are already experiencing difficulty in maintaining the quality of their grounds and fields. For Example, South Windsor has been faced with rapidly declining fields and large expenses in attempts to rehabilitate them. The increased presence of grubs in fields has attracted rodents, which literally tear up turf, leaving dangerous holes and low spots, increasing the risk of player injury. Species, such as crabgrass, invade and the soil in turn hardens. The soil does not always respond to aeration, which also causes an increased risk of injury to young athletes. Additionally, weed infested sidewalks and parking lots have to be treated manually and/or mechanically which is labor intensive, costly, causes reduced life of the pavement and concrete and has extremely short-lived results.

Integrated Pest Management (IPM) is a highly regulated process and uses pesticides only as a last resort. IPM is universally accepted as the Best Management Practice (BMP) of the industry. IPM calls for the prudent use of EPA and DEEP regulated pesticides by trained and licensed individuals when non-chemical measures have

been unable to eradicate the problem. The U.S. Environmental Protection Agency has recommended IPM as a safe and effective method of pest control.

Expanding the ban on IPM presents clear dangers to the public and precludes us from dealing with more than just grubs. We must address the health hazards from numerous other invasives and pests, not the least of which is poison ivy. The emergency application provisions in the event of a total ban on IPM are cumbersome and ineffective at best when it comes to protecting the public.

Consider the cost of taking a child to the doctor to put them on steroids for their reaction to poison ivy and the possible side effects. How many extreme reactions and subsequent cases of blood poisoning will it take before a poison ivy emergency can be declared? It would be far safer to allow the treatment of an infestation with a spot spray of Roundup, when the plants first emerge.

Also consider the long term environmental damage that will be caused by Emerald Ash Borer to ash trees, because we cannot use low toxicity products to control them should the ban on IPM be expanded. IPM is allows treatment when it serves the greater good.

Our members tell us that, across the state, K-8 fields subject to the ban are in significantly poorer condition than high school fields where the use of IPM is permitted in the same town. Moreover, recent case studies in the State of Connecticut validate that athletic fields maintained organically do not hold up nearly as well to heavy utilization and require more recovery time than fields maintained under an IPM plan.

Remember that IPM is designed to reduce the use of toxic substances whether they are organic or synthetic and **contrast this with the application of unregulated organic substances, which in many cases are toxic.**

Finally, do not ignore that there is a direct scientific correlation between the health and thickness of the turf on an athletic field and the number of injuries that occur to children on those fields. Crabgrass, clover and weeds die out quickly leaving bare or thin turf and harder playing surfaces. A healthy field is not just an aesthetic wish. It is a safer playing area.

Please allow us to safely maintain all school grounds as you currently allow us to do with our town halls, town centers, and public parks through safe regulated IPM practices. The United States EPA has recommended IPM as a safe and effective method of pest control. The diligent use of pesticides with a balance of natural techniques under an IPM plan in K-12 schools, both public and private is a reasonable approach.

CRPA supports an education and science based approach to field and ground maintenance. Therefore, we urge the rejection of SB 443. Rejection of SB 443 is necessary to protect our children, our playing areas and the environment.

This completes my testimony. Thank you for your attention.

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