



CCM 2014 Testimony

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COMMITTEE ON PUBLIC HEALTH

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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 92% of Connecticut's population. We appreciate the opportunity to testify on bills of interest to towns and cities.

HB 5330 "An Act Concerning The Application Of Pesticides At Parks, Playgrounds, Athletic Fields And Municipal Greens"

CCM opposes HB 5330.

HB 5330 would expand a costly unfunded mandate on towns and cities. The bill would exacerbate the current problem of addressing pest populations by prohibiting the use of pesticides on high school fields, parks, playgrounds and municipal greens. Towns and cities continue to struggle to maintain safe playing fields for our children at the K-8 level, and HB 5330 would simply extend those same problems and costs to high school fields.

Since the passage of the ban on pesticide use on K-8 school grounds, **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, which burrow through the soil creating dangerous tunnels that cave in as players run across them increasing the risk of player injury.
- Species such as crabgrass have begun to take over the soil, causing it to harden, not respond to aeration, increasing soil density which increases the risk of concussions.

Additionally, HB 5330 would increase costs in both labor and materials, with little hope that the fields can be properly maintained.

- In the Town of Hebron, the cost of maintaining an elementary school field in comparison to a municipal field is almost double, \$17,310 per year vs. \$10,212 per year, and despite the investment of significant labor and resources, the quality of the field is below that of the municipal field maintained through the use of an Integrated Pest Management plan (IPM).

In November 2012, the Federal Environmental Protection Agency (EPA) released its updated strategic plan for implementing school IPM programs citing, **"full implementation of Integrated Pest Management is cost effective, reduces exposure to pests and pesticides, and reduces pesticide use and pest complaints."** Connecticut's restrictions have continued to be in place for several years now, even though EPA has continued to identify IPM as *"a safer, and usually less costly option for effective pest management in the school community,"* which *"employs commonsense strategies to reduce sources of food, water and shelter for pests in your school buildings and grounds,"* further taking *"advantage of all pest management strategies, including judicious careful use of pesticides when necessary."*

The bill attempts to provide some relief to municipalities struggling to maintain safe fields, by allowing the use of certain "organic" grub combating treatments, and pesticides that do not have a product label of "caution", "warning", or "danger"

indication. According to experts in the field, there is only one product that would fit this narrow allowance and have any effectiveness in our climate – Acelepryn.

This would mean that HB 5330 would actively promote the product of one manufacturer. Field and turf maintenance personnel have stated that you cannot utilize the same product over and over, just as doctors do not use the same flu vaccine year in and year out and over time the “cure” loses its effectiveness. Rather, you must rotate the product used in order to maintain its effectiveness.

The bill, as drafted, would provide limited relief to groundskeepers for a few seasons, and ensure that this issue will be back before the Legislature in a few years when towns and cities seek permission to use Acelepryn 2.0

WHAT IS NEEDED? A BALANCED COLLABORATION TO DEVELOP STATE POLICY

It is important to note that municipal officials are second-to-none in ensuring the safety and health of children. Not only are municipal officials parents, but they have a fiduciary duty to protect and defend the public’s interest.

Because of this responsibility, and the continued debate as to whom has the best and right information about these products, **CCM supports the creation of a balanced Advisory Council to thoroughly examine and vet the facts** surrounding field management and provide recommendations as to how specific synthetic and organic pesticides are reviewed and approved for use.

The Municipal Opportunities for Regional Efficiencies (MORE) Mandates working group, recently adopted recommendations to:

1. Utilize the Pesticide Advisory Council, as constituted in CGS Section 22a-65(d) to (a) review all new pesticides on a continuing basis for safety and effectiveness and (b) report their findings to the Commissioner of DEEP for consideration in adopting regulations.
2. Require DEEP, in consultation with the Pesticide Advisory Council, create, publish, and regularly update a set of best practices, including a review of the Massachusetts IPM monitoring website (www.massnrc.org), for use by municipalities regarding the safe and effective use of both synthetic and organic pesticides.

CCM stresses the need for such an entity as the proposed Pesticide Advisory Council to be comprised of individuals representing all facets of the issue and structured in a manner that no one side can walk away citing the results were biased. This will be a hard goal to achieve, but with careful thought and consideration it can be accomplished. This council would remove the politics from the issue, and work to set policy and regulations based on the most current science regarding the safety and effectiveness of pesticides.

CCM urges that HB 5330 be rejected, CCM urges the Committee to establish a Pesticide Advisory Council, as recommended by the MORE Mandates Working Group, to establish a statewide best practices policy for the use and approval of pesticides in order to maintain safe and healthy school grounds and playing fields.

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If you have any questions, please contact Randy Collins, Senior Legislative Associate for CCM, at rcollins@ccm-ct.org or (860) 707-6446.