



Connecticut Parks Association, Inc.

www.ctparks.org

March 2, 2015

To the Member of the Children Committee

Re: [HB0687](#): An Act Concerning the Application of Pesticides at State Operated Parks, Athletic Fields and Playgrounds

As the Legislative Representative of the CT Park Association, I would like to tell you that the Association has been active since 1958. Our purpose is to promote accession, development, maintenance and preservation of our natural resources throughout the state.

Our organization is made up of over 160 park professionals throughout the state. As the demands of the community to have the best and safest fields has risen over the years, many towns have assigned their park departments to the maintenance of school grounds, Towns have turned to their park departments because they have the highest caliber of staff training for proper turf management.

Turf athletic fields, when properly maintained, are more forgiving to athletes when playing. Environmentally, they contribute to the oxygen and gas cycles. Improperly maintained fields can be a contributing factor to pulled muscles, broken bones and even career ending injuries and concessions. (While pesticides are not frequently used on these fields, there are key periods when they are needed. They are used to combat infestation of crabgrass or reduce grub infestation to keep a strong root system.

Our organizations supports Best Management Practices Utilizing Integrated Pest Management (IPM) which is the integration of knowledge and cultural-management systems designed to improve the long-term health of turf-grass (and other crops) through the suppression of problem pests. The overriding goal of IPM is to minimize the impact on humans, the environment and non-target organisms.

Common IPM techniques include the following:

1. Use of unbiased information
2. Quality monitoring
3. Anticipation of pest-population increases
4. Use of naturally occurring biological controls (I.E., use of pest-resistant plant species)
5. Adoption of cultural-management practices
6. Carefully selected applications of products after monitoring and establishing thresholds have been met.

The Organizations believe that although the intent of [HB0687](#) appears to be to allow them to safely and effectively maintain such recreational areas, the bill is so seriously flawed and they cannot support it at this time. [HB0687](#) attempts to legislate the use of a particular product and fails to acknowledge that science is rapidly evolving. CPA recommends that permitted usage be based on a product's toxicity rating rather than whether it contains an EPA caution label.

The Organizations agree that more flexibility is needed to determine which products can be used to maintain fields. Since implementing the ban on the use of integrated pest management on K-8 fields many members have seen their fields deteriorate. [HB0687](#) is an attempt at a partial solution to this problem. Unfortunately, a comprehensive solution is needed and this bill only confuses an already challenging situation.

The Connecticut Park Association supports the formation of The Advisory Council who would provide scientific approach to turf and ornamental management by providing the following guidelines;

- I. Protect the health of children and others who use the lawns and turf
- II. Focus on “use reduction” of pesticides to protect human and environmental health
- III. Maintain the lawns and turf in a manner appropriate to their intended use
- IV. Optimize the use of fertilizers to protect the environment and facilitate the elimination of pesticides
- V. Effectively monitor and enforce the regulations designed to accomplish the above goals
- VI. Periodic review using a scientific approach to make improvements and fine tune
- VII. Train grounds keeping staff so they understand the reasons behind this policy and know how to implement it

An IPM program protects the financial investment Towns have made in school grounds and athletic fields. IPM utilities trained, regulated and licensed professionals

We, as a professional organization, rely on science and the research plan at universities throughout the country and our state to provide us with the scientific facts, as well as the DEEP. Our organization works with UConn, experimental center and the extension centers to provide us with the most updated research and techniques to be used in our profession.

The unintended consequences of [HB0687](#) are not in the public interest. Therefore, CPA collectively and individually asks that you do not favorably support [HB0687](#) .

It is my privilege to offer this testimony on behalf of CPA.

Sincerely,

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Legislative Representative Ct Park Association
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