



**Testimony on behalf of
The Connecticut Recreation and Parks Association, Inc.
Before the Environment Committee
March 11, 2015**

Committee Bill 366 – AA Extending the Ban on the Use of Lawn Care Pesticides to Schools that House Grades Nine through Twelve, Inclusive, and to State Facilities

Raised Bill 1063 – AAC The Application of Pesticides on School Grounds and Certain Public Spaces, Authorizing the Use of Certain Microbials and Reestablishing the Pesticide Advisory Council

The Connecticut Recreation and Parks Association, Inc. (CRPA) is a nonprofit charitable organization whose mission is to provide a network of support to our members through professional development and resources in order to enhance the quality of recreation and parks services in Connecticut. CRPA represents **over 600 individual professionals** from municipal, nonprofit and private, park, recreation & camp organizations, as well as **126 of the 169 municipal park and recreation departments in Connecticut**.

Our organization's members are directly responsible for the safe and effective maintenance and operation of municipal athletic fields, playgrounds, and grounds throughout Connecticut. They are non-profit public servants and have no financial interest in the sale of any product used to maintain such fields and athletic areas. They are trained professionals that know what is safe and effective.

CRPA opposes SB 366 and SB 1063 as it extends the ban on integrated pest management through grade 12 and to all municipal grounds. These bills neither protect the public nor preserve our fields and recreation areas. These bills as written would expand the prohibition on using even low toxicity products. **SB 366 and SB 1063** have little basis in science and ignore what CRPA members have told us about the problems with the current ban on K-8 fields in Connecticut.

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 uses the least toxic products as a first choice. 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. Joining the EPA in its recommendation of advocating for IPM as the most responsible management strategy, are land grant universities throughout the nation. Additionally, here in Connecticut, our own

Department of Energy and Environmental Protection, the CT Agricultural Experiment Station, and the University of Connecticut advocate for IPM as well.

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 noxious and invasive plants 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 for the treatment of an infestation with a spot spray of Roundup, when the plants first emerge.

Invasive plants such as Japanese Knotweed and Oriental Bittersweet pose more potential harm to the environment than the pesticides needed to control them or keep them in check. Speak with seasoned environmentalists and conservationists who have committed decades of service to preserves, and they will tell you the ills of unchecked infestation of non-native invasive species. The longer we wait to check these species and eradicate, the greater the amount of pesticide is needed. The solution is early control, with effective measures. These include systemic pesticides and stump treatments.

Also, consider the long term environmental damage that will be caused by the Emerald Ash Borer to ash trees, because we cannot use low toxicity products to control them should the ban on IPM be expanded. IPM 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 towns. 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.**

Additionally, **SB 1063** attempts to address the issue of grub infestations where organic treatments simply do not work. The bill would allow for the use of a single product, Acelepryn, and fails to acknowledge that science is rapidly evolving. CRPA recommends that permitted usage be based on a product's toxicity rating rather than whether it contains an EPA caution label. A comprehensive solution is needed and this bill only confuses an already challenging situation.

This is troubling for several reasons but most importantly because as science evolves and more products become available Connecticut must rapidly respond by permitting the use of more effective and less toxic products, whether synthetic or organic. This area requires the science based expertise of our regulatory agencies. Timely evaluation of the toxicity and effectiveness of both synthetic and organic products is not within the Legislature's expertise and should be handled by a council of scientists overseen by DEEP. Secondly, even if the EPA does not mandate a caution label on a product, a manufacturer can ask the EPA for a caution label, thereby rendering a safe product unusable in Connecticut.

SB 1063 is further flawed in that it references:

1. "horticultural soap" as an exemption to the ban if it does not contain "any synthetic pesticide or synergist". If this is the same product as an insecticidal soap then no product will fit this description as every insecticidal soap is synthetic.
2. "microbial pesticides" - according to professionals among our members they are unaware of any commercially available that are effective in turf management.

SB 1063 also precludes the treatment of ash trees (outside of municipal greens) from the infestation and devastating effects of the Emerald Ash Borer (EAB). The EAB infestation has been identified by the USDA and DEEP's Department of Forestry as a crisis. Treatment is critical to the survival of ash trees, yet the bill does not allow for these treatments. With this legislation,

historic trees are destined to go the way of chestnuts, elms and hemlocks, and will be lost to future generations. Why should we be able to save these trees on municipal greens and nowhere else?

Finally, CRPA has supported the pesticide advisory council, as recommended by the MORE Commission, as the proper means to develop and implement a science based approach to determining the safe and effective means to maintain our athletic fields and all municipal grounds. However, **SB 1063** bans the use of IPM and then creates the council as a means to examine and recommend furthering the ban. This negates the very purpose for which the council was conceived. The council should provide municipal officials with the tools to make educated decisions as a one size fits all approach does not work for 169 municipalities, each with different populations, field usage, & landscapes.

CRPA supports an education and science based approach to field and ground maintenance. **Therefore, we urge the rejection of SB 366 & SB 1063. Rejection is necessary to protect our children, our playing areas, and the environment.**

Gregory A. Foran

Parks Superintendent & Tree Warden

Town of Glastonbury

CRPA Legislative Committee Member