

March 13, 2015

Senator Ted Kennedy, Co-Chair  
Representative James Albis, Co-Chair  
Environment Committee  
Room 3200  
Legislative Office Building  
Hartford, CT 06106

Re: **SB 366 AA EXTENDING THE BAN ON THE USE OF LAWN CARE PESTICIDES TO SCHOOLS THAT HOUSE GRADES NINE TO TWELVE, INCLUSIVE, AND TO STATE FACILITIES**

Dear Senator Kennedy and Representative Albis:

The Capital Region Development Authority (CRDA) oversees a variety of housing and state office projects geared to renew the downtown Hartford business district. CRDA is also responsible for managing the major state entertainment venues - the Connecticut Convention Center, the XL Center and the Stadium at Rentschler Field.

As you may be aware, the Stadium at Rentschler Field is a 40,000-seat natural grass facility located in East Hartford that serves as the home of the UConn Husky football program. Opening in 2003, the facility plays host to a variety of other turf events, including international soccer, rugby, lacrosse and high school football. The Stadium also hosts a wide range of cultural, entertainment and civic events throughout the year. Global Spectrum, L.P., a nationally-recognized venue management firm, manages the day-to-day operations of the Stadium on our behalf.

I am writing with concern regarding Senate Bill 366, as it will impact our operation of Rentschler Field and could pose unacceptable safety risks. I would also note that our position has been developed in consultation with the University of Connecticut, which has also provided testimony on this bill. We would ask that if this bill is to proceed it be amended to exempt its application to Rentschler Field because of its unique circumstances among State facilities.

Rentschler Field hosts high school and collegiate events, as well as international sporting events at the highest levels. The safety of the student athletes and top caliber professionals is a paramount concern for us, and the condition of our natural grass playing surface is one of the most significant safety factors. Pest infestations can reduce the strength and resilience of athletic turf, affecting footing and playability. The speed and strength of the athletes involved at these levels make this a serious concern. Controlling infestations before this can happen is critical. I expect that this is a concern shared by other State higher education facilities.

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The playing field is maintained by qualified professionals employed by Global Spectrum. Use of turf chemicals at Rentschler is strictly controlled. Global's grounds keepers hold all required certifications, including supervisory licenses. Maintenance is conducted in strict conformance with Integrated Pest Management (IPM) protocols to ensure that pesticides are used only when clearly needed and in the smallest amounts possible. Applications are typically scheduled only when a problem has arisen or when conditions indicate one is imminent. Global files regular reports on such use with the Department of Energy and Environmental Protection. Staff are also in regular communication with faculty in the Turfgrass Management program at UCONN to stay abreast of the latest thinking and techniques. A central focus in such programs in recent years has been finding ways to further reduce chemical applications. But the ability to use these chemicals "when they are needed" is critical to the successful management of the facility.

Damage to the field from uncontrolled pest infestations poses not only a safety risk to players but also a financial risk to the State. NCAA and professional events are scheduled far in advance and involve major logistical issues. Should the field be severely damaged in the run up to a major event it would have to be replaced at a cost in excess of \$150,000 and/or the event can be placed at risk of cancellation or rescheduling with related costs and expenses. Even minor damage is a concern in that international sports federations are very sensitive to facility conditions and will not return to a venue that is in less than top condition.

Finally, Rentschler is designed with most of its parking on pervious grass surfaces to enable infiltration of stormwater and to prevent discharges of pollutants. Runoff collected from the paved areas, as well as drainage from the playing field, is discharged into a system of wetland filters that prevent contaminants from reaching surface waters. Permits issued in conjunction with these systems include requirements for inspection and maintenance, and maintenance includes control of invasive species in and adjacent to these systems. It is unclear if cost effective control will be possible under the conditions of this legislation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Freimuth", is written over the typed name.

Michael Freimuth  
Executive Director

Cc: UConn Athletics