



CCM 2015 Testimony

900 CHAPEL STREET, 9th FLOOR, NEW HAVEN, CT 06510-2807 PHONE (203) 498-3000 FAX (203) 562-6314

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ENVIRONMENT COMMITTEE

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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 156 towns and cities and over 96% of Connecticut's population. We appreciate the opportunity to testify on bills of interest to towns and cities.

SB 366, "An Act Extending The Ban On The Use Of Lawn Care Pesticides To Schools That House Grades Nine To Twelve, Inclusive, And To State Facilities."

SB 1063, "An Act Concerning the Application of Pesticides on School Grounds and Certain Public Spaces, Authorizing the use of Certain Microbials and Reestablishing the Pesticide Advisory Council"

CCM opposes these bills.

SB 366 and SB 1063 would expand a costly unfunded mandate on towns and cities. These bills would exacerbate the current problem of addressing pest populations by prohibiting the use of pesticides on high school fields, parks, playgrounds and other public places. Towns and cities continue to struggle to maintain safe playing fields for our children at the K-8 level, and these proposals would simply extend those same problems and costs to high school fields and municipal grounds.

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, SB 366 and SB 1063 would increase costs in both labor and materials, with little hope that the fields can be properly maintained. The impact to towns and cities will be most pronounced in distressed municipalities and cities, which have limited space to create additional fields, the resources to implement costly yet ineffective organic only maintenance programs, or install artificial turf fields which exceed \$1 million apiece. Passage of these bills would limit the ability of our poorer communities to provide needed athletic programs and organized activities.

- Hebron has calculated the current cost to maintain an elementary school field where IPM practices are prohibited in comparison to a municipal field maintained through an IPM program is almost double, \$17,310 per year vs. \$10,212 per year. 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).
- Bristol has calculated that passage of these bills would increase costs of maintaining their fields from the current \$800 per acre to more than \$2500 per acre using a sustainable turf grass plan utilizing only EPA 25b minimum risk pesticides and an aggressive over seeding program.
- Vernon has indicate that they would lose the use of additional fields in addition to 5 little league at elementary schools already lost. Vernon has stated that they do not have funding to institute an effective organic only treatment program while maintaining safe and playable fields.
- Madison which maintains over 20 acres of fields and grounds, has estimated that the cost of attempting to maintain theses grounds through the use of an organic only program would increase by more than \$45,000 per year, with limited expectations as to the quality of the fields and grounds.

Section 1 of SB 1063, while attempting to address problems faced by municipalities struggling to maintain athletic fields when dealing with an infestation of grubs which destroy these fields, and require significant municipal funding to repair or replace, underscores the key issue, that an organic only program simply does not work.

The bill would allow towns and cities to use a specific synthetic product, Acelepryn based on the fact that it does not have an EPA caution label containing a “signal” word. This solution would provide limited and short-term relief. Proper field maintenance cannot be performed through the use of any single product, synthetic or organic. Just as you would not treat the flu with the same vaccine every year, likewise you cannot treat a pest infestation like grubs with the same product year in and year out without that product losing its effectiveness. Use of the same product year after year will reduce its effectiveness, and simply require towns and cities to come back before the legislature and ask for permission to use Acelepryn 2.0, it does not allow for flexibility, the ability to use new products or create a long-term solution.

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.**”*

WHAT IS NEEDED? A BALANCED COLLABORATION TO DEVELOP STATE POLICY

Additionally, SB 1063 would put the cart before the horse by extending the ban on the use of pesticides, before allowing the recommended Pesticide Advisory Council the opportunity to review the current use of synthetic and organic pesticides using a science based approach and make recommendations based of their findings.

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 has supported the creation of a balanced Advisory Council as recommended by the MORE**

Commission, 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 recommended:

1. The utilization of 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 DEEP, DPH, DoAG, etc. to study all facets of the issue and structured in a manner so 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 SB 366 and SB 1063 be rejected, CCM urges the Committee to establish the Pesticide Advisory Council, as recommended by the MORE commission, 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.



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