



For a thriving New England

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Maine Board of Pesticides Control
Department of Agriculture, Conservation and Forestry
22 State House Station
Augusta, ME 04333

Dear Members of Maine's Board of Pesticides Control:

Thank you for the opportunity to submit comments on pesticide use, including strategies for promoting integrated pest management with homeowners. Proper pest management is critical for the human health and environmental wellbeing of our communities in Maine. We support the letter submitted to the Board of Pesticides Control (BPC) by the Maine Organic Farmers and Gardeners Association on October 30, 2015, and the letter and recommendations from Paul Schlein submitted to the BPC on October 16, 2015.¹ Conservation Law Foundation (CLF) is pleased to submit this letter for consideration at the December 18, 2015, BPC meeting.

Since 1966, CLF has used the law, science, policymaking, and the business market to find pragmatic, innovative solutions to New England's toughest environmental problems. Through our Clean Water Program, our Healthy Communities Program, and our Farm and Food Initiative, CLF is dedicated to safeguarding our region's waters, ensuring our communities—both urban and rural—are thriving, healthy places for all people, and fostering a sustainable, community-based food system.

Pesticide use in and around homes, in residential neighborhoods, and in public places poses a public health and environmental risk to Maine communities. Our state has clearly recognized this. Under Maine law, the BPC must ensure that pesticide use and application is “safe, scientific and proper” while simultaneously “safeguarding the public health, safety and welfare” and protecting the State's natural resources.² To achieve this purpose, Maine's policy is “to work to find ways to use the *minimum* amount of pesticides needed to effectively control targeted pests in all areas of application.”³

Taken together, this statutory purpose and policy mean that the “minimum amount of pesticides” is that which can be applied while still ensuring the public's health, safety, and welfare. Mr. Schlein's letter, the seven-fold increase in residential pesticide use, and pesticides found in and

¹ Included in the November 15, 2015, BPC complete agenda

(http://www.maine.gov/dacf/php/pesticides/documents2/bd_mtgs/nov15/Nov15Agd-rev.pdf).

² See 22 M.R.S. § 1471-A.

³ *Id.* § 1471-X (emphasis added).

around Casco Bay—among many other examples—illustrate poignantly the need for aggressive steps to meet the State’s statutorily defined policy.

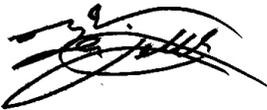
Now is the time for a comprehensive review of how Maine can achieve its state policy under Title 22, section 1471-X. CLF agrees with Mr. Schlein that public education is key. The BPC is in the best position to **ramp up education and training at the statewide level.**

Additionally, CLF reiterates, and urges the BPC to consider, the following actions, most of which have been suggested by MOFGA and the Friends of Casco Bay:

1. Convene a statewide meeting of state agencies and private interest groups to determine how best to realize the State’s policy under Title 22, section 1471-X;
2. Increase the visibility of the successful YardScaping program;
3. Track and report all pesticide sales in Maine;
4. Collaborate with municipalities on education and provide them with critical science-based information on integrated pest management (IPM);
5. Help ensure proper training of pesticide applicators in IPM; and
6. Sample for, and create a robust database of, pesticide presence in watersheds and coastal sediments.

CLF greatly appreciates the work of the BPC and appreciates the opportunity to submit this letter. We look forward to remaining engaged with this issue critical to the health of our communities across the state.

Respectfully submitted,



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Conservation Law Foundation