



BEYOND PESTICIDES

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cc. Edward Brandt, US EPA Headquarters

RE: Environmental Guidelines for Responsible Lawn Care and Landscaping

Thank you for the opportunity to comment on the above noted lawn and environment guidelines. We submit these comments on behalf of Beyond Pesticides and its national membership and co-signer organizations who have reviewed, contributed to and agree with these comments. The co-signers, listed in full at the end of this document, are Washington Toxics Coalition, Defenders of Wildlife, Citizens Campaign for the Environment, Northwest Coalition for Alternatives to Pesticides, TEDX Inc. (The Endocrine Disruption Exchange), New Jersey Environmental Federation, Maryland Pesticide Network, Texans for Alternatives to Pesticides, Grassroots Environmental Education, Environment & Human Health, Inc., California Safe Schools, Safer Pest Control Project, Informed Choices, Jack B. Richman Environmental Coalition, National Center for Environmental Health Strategies, Inc., Toxics Action Center, Citizens for Pesticide Reform, and Pesticide Free Zone Campaign.

We recognize that there have been considerable revisions since the first draft and acknowledge that the document includes some of the concerns of environmental health and environment advocates who were excluded from the original negotiations and therefore submitted comments on the draft guidelines.

However, in incorporating the suggested comments about pest prevention strategies, pesticide hazards, non-target pesticide exposure, chemical fertilizer impacts, and right-to-know, the "Environmental Guidelines for Responsible Lawn Care and Landscaping" as a document is not evenhanded in its approach and construction. The document is biased* and sometimes inaccurate, leaving the impression that pesticides and fertilizers can be used safely and responsibly

*By *bias* we mean bias in favor of the sales and usage of chemical pesticides and fertilizers as opposed to organic or alternative cultural practices. To a large degree, we believe that EPA should be biased—in favor of environmental and health protection. That is in fact the agency's mission. Therefore, the problem is not really that the document is biased, but that it has adopted a bias contrary to the mission of the EPA.

when in fact that conclusion can neither be drawn from the environmental evidence of pesticide pollution nor from the current regulatory and risk assessment review process. The implicit and often explicit bias in the document gives the reader the impression that the chemical lawn care industry (including the “professional” lawn care associations), EPA and USDA are in agreement on the appropriateness of chemical lawn care, safety associated with EPA pesticide regulatory review and registration, protection provided by pesticide label disclosure and compliance, adequacy of risk assessment, and acceptability of secondary adverse effects associated with chemical lawn care. This is contrasted with organic product “advocates,” “those critical of pesticides” or “some groups” that have an opinion about pesticide hazards or risks that, it is implied, may or may not be based in fact.

The Guidelines document misrepresents environmental, human health and wildlife hazards as opinion and not fact. In so doing, EPA and USDA (including the Cooperative Extension Service) have joined with pesticide industry registrants and their representatives in a process that, as we have said in our previous comments, violates the letter, spirit and intent of the *Federal Advisory Committee Act*, which is intended to ensure that regulated entities and their representatives do not develop policy or product, such as the Guidelines, with official government endorsement outside the protections of the Act. The Act provides for public discussion of the issue from the outset of the deliberations, public comment and a public record throughout the process, and the publication and distribution of those dissenting comments.

On the issue of hazard and risk

While there are numerous issues that will be discussed below, one of the striking misrepresentations in the document goes to the discussion of pesticide registration and risk assessment, its meaning and effect. As background, it should be noted that EPA often acknowledges that it does not currently have adequate information to reach safety conclusions, a position not referenced in the Guidelines. Just recently the *Washington Post* reported, “In late September, Linda Sheldon, acting director for the EPA's human exposure and atmospheric sciences division, said the agency has ‘very little information about how children may be exposed to chemicals in household products, whether it's through the air they breathe, food they eat or the surfaces they touch.’” (“Chemical Industry Funds Aid EPA Study Effect of Substances on Children Probed,” Juliet Eilperin, *Washington Post*, October 26, 2004.) This lack of exposure data extends to lawn pesticides, despite the Guidelines stating as fact that, “Chemical pesticides are tested extensively by EPA to determine potential acute (short-term) and chronic (long-term) risk. This testing process takes into account potential risks to “sensitive” populations including infants and children” (p. 20). Testing estimates the hazards associated with pesticide use, but risk is a product of hazard and

exposure. EPA claims to have very little information about how children may be exposed to chemicals, and therefore should assume a high level of exposure in order to carry out its mission. This misrepresentation is presented as fact, yet when “those who are critical of pesticides” reference adverse impact of pesticide on the “environment, wildlife and humans,” it is presented in the Guidelines as opinion. The document continues, “Despite the testing and registration process conducted by EPA, some groups *continue to* raise concerns about the hazards of pesticides,” [emphasis added] which implies again that an outside group is expressing concerns that may or may not be true, and indeed gives the impression that the concerns are unreasonable or contrary to good judgment. The Guidelines document, if it were unbiased and factual, should acknowledge numerous Government Accountability Office (GAO) reports, scientific studies, and other impartial reports that document the shortcomings and limitations of the EPA’s pesticide registration and review process, providing readers with the true story about the limits of the agency’s regulatory review and risk assessments.

On the issue of the need for pesticides in the face of unknowns and documented hazards and pollution

The elements of pest and disease prevention noted throughout the document are not incorporated into an overall strategy for avoiding the use of toxic lawn chemicals particularly because the chemicals are unnecessary and for aesthetic purposes only. The inherent problem of not providing an overall strategy for avoiding the use of toxic lawn chemicals stems from the failure of the document to disclose the facts associated with known pesticide and fertilizer hazards and incomplete safety reviews.

The *Federal, Insecticide, Fungicide, Rodenticide, Act* (FIFRA) contains a definition of “pest” that is dependent on a finding that the pest is “injurious to health or the environment.” Before going forward with any discussion of mitigating “pest” problems, EPA needs to revisit the idea of a pest in a lawn. Frequently, it should be noted that various landscapes can be injurious to the environment. For example, it cannot be denied that the attempt to maintain a green lawn in a desert environment like Phoenix is much more damaging to the local ecosystem, as well as the aquatic ecosystem of the Colorado River, than the maintenance of locally-adapted desert plants, soils and landscapes. If these Guidelines are to honestly address “Responsible Lawn Care And Landscaping” then it is important to acknowledge that wide green lawns are not always geographically and ecologically appropriate and can be supplemented with more varied landscapes. Given the need for EPA to be compliant with FIFRA, how does the agency define a pest in the context of a lawn or landscape that is itself injurious to health and the environment?

Despite its treatment in the document as a discrete activity, pest management is an integral part of a system of land management practices that interact with each other, creating ecological balance that naturally prevents pest infestation and disease. In fact, in a landscape management system, pests are often an indicator and result of stress or improper practices that create the vulnerabilities attractive to pests. While some of the individual contributors to pests are cited in the document, the pest management section offers the readers tools across a range of chemical and non-chemical approaches without taking the critical step (for a Guidelines document) to distinguish between those that are more or less toxic to human health and environment.

Overall, the Guidelines document should not go forward in its current form. The document does little to clarify the hazards of pesticides and fertilizers or encourage the shift away from toxic products. In its current form, the document has the effect of minimizing or not disclosing known and still untested (i.e. potential) adverse effects of lawn pesticides and leaves the impression that any choice in the marketplace can be used safely. The document equivocates and confuses the public. For example, in reference to “weed & feed” herbicide and fertilizer products, the document urges to, “Use combination products only if the timing is appropriate,” but then instructs people to follow label instructions. Yet, the Scotts Weed and Feed, Weed Control Plus Lawn Fertilizer (active ingredients 2,4-D and mecoprop) label states, “Apply any time weeds are actively growing (when daytime temperatures are consistently above 60°F).” Therefore, following the label does not in fact provide the guidance needed for appropriate use of the product. Hence, the Guidelines document is conflicted and working at cross-purposes and therefore is confusing and potentially harmful to the protection of human health, wildlife and the environment.

The imbalance of the Guidelines is also represented by the number of times readers are instructed to contact government, industry or environmental sources: USDA Cooperative Extension Service – 20 times; Landscape or “Professional” companies – 13 times; and environmental groups – 1 time. (More on this later.)

Specific Comments:

Table of Contents

The document needs to be reorganized to ensure that the issue of appropriate land use (i.e. what is appropriate for my site) is tackled at the front end. Is a lawn the most appropriate use of the land or is there some other landscape or lawn and landscape combination that may be more appropriate, given the local ecology and geographical conditions? The issue of pest prevention in the context of land management needs to be discussed right up front in the first section. In some cases, the order of subsections should be reversed. For example, under Part

II: Landscape and Maintenance, Soil section, compost should be discussed as the preferred approach and then the hazards of synthetic fertilizers should be discussed. The concept of “proper” pesticide use is misleading. Mentioning precautions and label compliance when using pesticides is only valuable when the reader understands the hazards associated with pesticide use. Therefore, the Pests subsection must include the concept of pest prevention as a part of land management and at least generally address the actual short and long-term health and environmental hazards associated with the use of pesticides.

Introduction

The fact that the document is not evenhanded is clear from the very beginning in the introduction when it references “responsible lawn care and landscaping practices” and lists ten contributions that they make to the environment. This glosses over the serious problems associated with “irresponsible lawn care,” which should list at least ten factors associated with it, such as the following: Irresponsible toxic chemical lawn care:

- Creates chemical residues on treated areas
- Results in chemicals tracked into the indoors, contaminating indoor surfaces and air
- Is associated with elevated rates of childhood leukemia and soft tissue sarcoma
- Is linked to elevated rates of canine lymphoma
- Results in chemical runoff into waterways and groundwater contamination
- Kills beneficial organisms, including pollinators
- Reduces or destroys soil microorganisms and earthworms, which contribute to soil health and natural fertilization
- Creates drift and involuntary bystander exposure
- Has not been tested by the EPA regulatory review process for impacts on children’s health
- Harms the health of applicators

A sentence should be added to the last paragraph on page 3 which states that pollution prevention in this context should involve the adoption of analytical techniques and planning that go beyond merely attempting to mitigate risks and in addition seek to prevent pest problems and avoid the use of toxic chemicals.

Getting To Know Your Site

An introductory paragraph is needed, as stated above, on appropriate landscape use. The section, **Learn**, should include a reference to beneficial insects, such as honeybees and other pollinators. To the section, **Test**, add evaluation of living organisms in soil, including earthworms, and the use of compost as a first approach to addressing soil health. A section should be added: **Evaluate** conditions that contribute to pest problems and plant disease including poor

drainage, thatch, soil compaction, aeration, soil health and identify appropriate ground cover. Under **Know**, add: When lawn landscape chemicals are used, contaminated runoff is also a problem that is difficult to fully protect against.

Part I: Landscape Design and Installation

The concept of xeriscaping and zero-scaping should be introduced as possible approaches to landscape management from the standpoint of saving water, time, money and protecting against the use of hazardous chemicals.

There are a number of concepts that are discussed in this section outside the context of an approach to lawn and landscape management that can be used to avoid the need for and use of toxic pesticides and fertilizers. Those using the document need to understand that the following concepts in the document should be seriously considered as an approach to avoid using pesticides. They do not need to be used in combination with toxic chemicals. These include:

- Native plants
- Organic mulch
- Beneficial insects
- Nest boxes for cavity-nesting birds
- Roosting boxes for bats
- Native bees
- Nurturing wetlands
- Composts/manures, including depth of quality soil
- Low maintenance grasses or groundcover
- Mulch cover to prevent weed growth
- Aerate
- Water deeply

To this should be added discussion of earthworms and their beneficial fertilization and aeration properties and non-pesticidal natural predators, exclusion techniques for problems with rats, snakes, moles, skunks, groundhogs, etc, and companion planting. It should also be noted that there are insectaries from which natural predators can be purchased and introduced on to the site.

It should be noted that genetically engineered grasses are problematic because of findings that the plant material drifts off-site. This raises serious concerns about genetic drift and contamination off-site, raising biological and liability issues.

Ultimately, this section needs to convey that homeowners in developing the site can build in preventive measures and elements of ecological balance and make pesticides unnecessary, and that the introduction of pesticides can undo or undermine the preventive measures that are touched on in this section and other

parts of the document. Building a sustainable system may take more patience than a quick fix chemical treatment, but there are biological and mechanical methods for immediate problems that will not disrupt the long-term goal of creating a sustainable landscape. Well-researched references may be offered such as Ecologically Sound Lawn Care for the Pacific Northwest, by David McDonald (http://www.ci.seattle.wa.us/util/stellent/groups/public/@spu/@rmb/@csd/@rescons/documents/spu_informative/ecological_200312021255394.pdf), or Seattle/King County's Natural Yardcare booklet (http://www.ci.seattle.wa.us/util/Services/Yard/Natural_Lawn_&_Garden_Care/index.asp).

What should I know about drainage?

The section cites the possibility of liability for “any damages created by water leaving your property.” This should explicitly reference “toxic chemical runoff” resulting from toxic pesticide and fertilizer use.

How do I plant a new lawn and/or landscaping plants?

This section should specifically note that microorganisms and earthworms, important to soil health, can be reduced in activity or killed by the introduction of pesticides and synthetic fertilizers, making the lawn or landscapes more dependent on continued use of increasing amounts of toxic inputs. It should also be noted that trying to reverse the system of chemical dependence can be a difficult task and can be avoided in the initial approach of planting.

Part II: Landscape Maintenance

If needed, how do I choose what fertilizers and supplements to use?

This section reads, “Fertilizers include organic products such as compost or dried manures and chemical formulations that provide different combinations of nitrogen, potassium, and phosphorous.” This sentence leads the reader to infer that all fertilizers contain both organic and chemical formulations. It should be reworded to convey that the two fertilizers are distinctively different, such as: Organic fertilizers may contain compost and dried manures, while non-organic fertilizers contain chemical formulations of different combinations of nitrogen, potassium, and phosphorous.

In this same paragraph, the statement, “Chemical formulations are more varied and can be selected to meet specific nutritional needs of site conditions and plants,” is stated as fact; while the reference to compost being “more likely to” enhance soil microorganisms and earthworms that contribute to soil health is stated as opinion, or “some believe.” This statement reveals the bias in the document and its failure to promote a system or approach that enhances certain preventive strategies, rather than cross-promoting strategies (chemical and organic) which conflict with each other and therefore undermine the value of a

guidelines document. If the Guidelines incorporate an understanding of the value of promoting living systems with microorganisms and earthworms, bees, and birds as integral to it, then it should not also promote the use of toxic chemicals that hurt that living system.

How do I use the fertilizers and supplements?

The “weed & feed” section referred to above is contradictory and misleading. This is a product that simply should not be used in a management system that incorporates any sensitivity to biological systems and appropriate application of organic or chemical inputs. While the document says, “Use combination products only if the timing is appropriate,” and “The need for fertilization and pest control should be determined independently based on plan needs and site conditions,” Scotts Weed and Feed, Weed Control Plus Lawn Fertilizer (active ingredients 2,4-D and mecoprop) label says, “Apply any time weeds are actively growing (when daytime temperatures are consistently above 60°F).” The statement “any time weeds are actively growing” is in conflict with the label limitation of two applications per year. The document sends mixed messages by working at cross-purposes and is therefore confusing and potentially harmful to the protection of human health, wildlife and the environment.

How do I use compost, manures and/or organic amendments (manures)?

To be fair, the document should state that proper application and storage of any fertilizer is important. If it must be stated that improper storage of organic fertilizer may attract unwanted pests (in the case of compost piles), then the statement must be equally applied to chemical fertilizers (in the same section) since improper storage and application of chemical fertilizers can cause serious harm to health and the environment.

It is interesting to note that while the Guidelines document refers the reader to the “Cooperative Extension Service” in virtually every case when it is making a chemical recommendation, it does not refer to extension when talking about compost and manures. It raises the question more generally whether the Extension Service is generally equipped to help the public with a general systems approach to landscape and land management that is not chemical-biased. There are certainly well informed and effective extension agents that have a track record of working with organic approaches, but extension across the board is not equipped to promote and assist with organic approaches. Thus we feel that the number of references to extension services in the document (20 times in 27 pages) is inconsistent with their ability to provide balanced information and effective assistance across the board on nonchemical approaches.

How can I water my lawn responsibly?

As a guidance document, it is important to provide the logic behind the advice so that it is better understood and respected. The statement, "Do not allow water to run onto paths, sidewalks, driveways, and roads" should include the reason why. For example, "Runoff from lawns containing chemical fertilizers and pesticides can cause an unnatural nutrient load and unwanted flora when washed into water ways. Runoff containing these agents also pollute drinking water sources and can damage ecosystems and aquatic life."

PESTS

This section begins to introduce concepts that outside the context of the total document could help people to think about avoiding pesticides. This statement is helpful: "Accurately identify the problem or suspected pest and try to identify the conditions that contribute to the pest infestation." However, then that is contradicted by, "You should remember that pesticides can provide effective control of serious pest problems but they should not be used routinely or indiscriminately." There is no reference back to the range of preventive measures that are scattered throughout the document and no mention of the fact that the introduction of the toxic pesticide could undermine the natural predator population and the compost - which one should aim to nurture and build.

How do I control pests using Integrated Pest Management (IPM)?

The use of the word pest "control" should be stricken in the context of the development of management systems. It should be pest management. While it is good that the document says, "The selection of chemical control strategies should be utilized only when other strategies are inadequate," the definition of IPM that precedes this statement puts "chemical controls" on equal footing with structural, mechanical, cultural and biological approaches. The failure of the document to explain the nature of an integrated system and the priorities within it, make this section wholly inadequate. Toxic chemical use will undermine the management system in ways that may take months or years to repair. That must be explained. Because of this, the goal is not to "reduce" the need to use chemical control in the context of an aesthetic or cosmetic use, the goal is to "eliminate" or "avoid" chemical use.

What should I know about chemical and organic products before choosing to use them?

This section is seriously misleading, as cited earlier. The reference to "extensive testing of pesticides by EPA" misleads the reader into thinking that pesticides and fertilizers in the marketplace are "fully" tested and are tested in combination with other chemicals. The section refers to organic and chemical as equally problematic: "Both chemical and organic pesticides have advantages and disadvantages and both have their proponents and critics." It then goes on to

say: "Organic products may be harder to find, more costly and time consuming to use." Yet there is no reference to the scientific studies that document the secondary costs associated with pesticide use, including hospitalizations, lost pollination, environmental contamination, etc. There is no reference to Government Accountability Office (GAO) studies that document the inadequacies of EPA's regulatory review. Risk assessments' uncertainties and limitations are not even mentioned. It is erroneously implied that testing requirements for sensitive populations, including infants, children and pregnant women, have been applied to all pesticides that are used on lawns and landscapes. Chemicals in wide use have never been fully evaluated for the impacts on children and other sensitive population groups. The section implies that the criticisms of EPA's pesticide registration process and the governing statute are not valid: "Despite the testing and registration process conducted by EPA, some groups continue to raise concerns about the hazards of pesticides." Do "some groups" include GAO and the National Academy of Sciences, as well as many congressional members, university scientists, government scientists, and health care professionals?

The document does not explain that despite a statutory requirement, EPA has not developed the testing protocols for endocrine disruptors, even though many chemicals used on lawns and landscapes are known endocrine disruptors. Instead, the Guidelines document says, "There is some evidence to suggest that endocrine-disrupting pesticides may undermine neurological and behavior development in mammals, fish, amphibians, reptiles and birds." What about humans? The document also states, "Many wildlife and environmental groups are concerned about the impact of pesticides on wildlife, including endangered species and pollinators." Is EPA not also concerned about this? Are other federal agencies not concerned? Indeed, a federal court decision in 2004 reprimanded EPA for precisely the same concern and required a consumer warning on lawn pesticides to this effect along the West coast.

We can only assume that the authors of this document are trying to downplay the current state of EPA's pesticide regulatory review process and rewrite or diminish the impact of the information coming out of scientific journals. EPA should not be a signatory to a document that misinforms and misleads.

If I choose to use pest control products, how do I use them properly?

This is where the document hits its low point. It implies that compliance with the label instructions will ensure safe use, although that point is not made directly. Instead, it says: "The label on a pesticide product is the law and is there for your protection." Are people protected from adverse health effects to themselves, their children, pets and environment if they follow the label? Copious peer-reviewed research tells us that the answer is *no*. This document only serves to blur the

distinction between *safety* and *safe*. Similarly, the document's discussion of the signal word on pesticide product labels (Danger, Warning, Caution) omits any discussion of chronic effects of pesticides (cancer, reproductive toxicity, birth defects, etc.). The document says, "The pesticides' potential acute risk is indicated by the signal word on the label..." but it does not say that the label provides no warning on long-term or chronic effects like cancer. For the uninformed user of a lawn pesticide, this omission is a material misrepresentation of the facts. The language should clearly say: "EPA does not provide any long-term health effect warning on this label. To learn about whether this product is associated with an increased risk of cancer, birth defects, genetic damage, reproductive effects and other long-term damage, consult independent environmental health sources, such as <http://www.environmentalhealthnews.org> or <http://www.pesticideinfo.org>, as well as regional and national environmental organizations who provide information on peer-reviewed scientific literature and focus on lawns, landscapes, pesticides, and alternatives."

GARDEN SERVICES

What lawn & garden services should I purchase?

There are simply no Integrated Pest Management standards for the lawn care industry, so a referral to lawn care companies that commit to some state standards on IPM or are a member of a "professional lawn care organization" offers no protection for the public. This is unfortunately self-promotional material for some of the document's signatories that must be excluded from government-endorsed publications. Consumers can be instructed to ask very straightforward questions of any lawn care company that they are thinking of hiring. Consumers need to ask companies to explain their pest management practices and specifically identify products that are used. Then consumers may evaluate those products with the help of independent sources.

Part V: Additional Information

The cover letter for this version of the Guidelines, dated January 7, 2004, mentions the 2004 survey of the National Gardening Association to underscore the Guidelines' interest in providing information to the "households applying chemical inputs." While that recent survey did show 66 million households use lawn chemicals and fertilizers, it also showed 31 million households are moving toward organic and non-toxic lawn care practices and products. In respect for this fact, we expect that the demonstration projects in Texas and Pennsylvania will exclude the use of pesticides to show how feasible it is to have green, healthy landscapes without the use of toxic chemicals.

These comments have been provided to inform and educate members of the Lawn & Environment initiative as to why our organizations are unable to endorse these guidelines and to highlight the serious flaws and biases that are likely to harm or confuse the public rather than enlighten. Please respect our request not to reference our organizational names in any public document or forum that discusses the guidelines or the process associated with their production, including our commenting on the current or previous draft.

Conclusion

The information in this Guidelines document is fraught with errors, misleading information, gaps in information and bias. While it is scattered with good information, that information is overwhelmed with conflicting recommendations and source references that are oriented to chemical-intensive practices and approaches to lawn and landscape management. The fact that government agencies, including EPA and USDA, would endorse such an effort is disquieting and raises serious questions of governmental abuse. If government is to pursue this project, it must do so under the process afforded the public by the *Federal Advisory Committee Act*. The Guidelines document should not go forward in its current form and further revisions should be subject to a federally authorized process that ensures full public input and participation.

Sincerely,

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