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Statement of
Beyond Pesticides
on
Organic Landscaping Pilot Programs
to
Los Angeles City Council, Health, Education, Neighborhoods, Parks, Arts, and River Committee

June 26, 2020

Thank you for the opportunity to address Los Angeles City lawmakers. Beyond Pesticides is a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to improve protections from pesticides and promote alternative pest management strategies that reduce or eliminate a reliance on toxic pesticides. Our membership spans the 50 states, the District of Columbia, and groups around the world. We are submitting this statement on behalf of our supporters who are residents of Los Angeles.

Beyond Pesticides Supports the Implementation of an Organic Landscaping Pilot Program

Beyond Pesticides strongly encourages the passage of an organic landscaping pilot parks program. This program will help the city shift to sustainable land management practices, ensuring that the products and practices used in Los Angeles are compatible the organic systems that protect people and local ecology. This approach to pesticide reform will effectively stop the unnecessary use of hazardous pesticides applied for aesthetic purposes. While addressing urgent local concerns related to public health and the environment, implementing this program will highlight the ability of organic land care to contribute to reversing the escalating crisis in biodiversity, including pollinator declines and the climate crisis—which is exacerbated by petroleum-based, synthetic pesticides, the release of carbon into the environment, and the lost opportunity to sequester carbon in organic soil systems.

Hazardous Pesticides Threaten Health

Pesticides, such as glyphosate and its formulated products (Roundup) and 2,4-D, both widely used on turf and lawns, can be tracked indoors resulting in long-term exposures. Scientific studies show that pesticides, like 2,4-D, that are applied to lawns drift and are tracked indoors where they settle in dust, air and on surfaces and may remain in carpets.[1,2] Pesticides in these environments may increase the risk of developing asthma, exacerbate a previous asthmatic condition, or even trigger asthma attacks by increasing bronchial hyper-responsiveness.[3] This is especially important as infants crawling behavior and proximity to the floor account for a greater potential than adults for dermal and inhalation exposure to contaminants on carpets, floors, lawns, and soil.[4]

[1] Nishioka, M., et al. 1996. Measuring lawn transport of lawn-applied herbicide acids from turf. Env Science Technology, 30:3313-3320.
[2] Nishioka, M., et al. 2001. "Distribution of 2,4-D in Air and on Surfaces Inside Residences. Environmental Health Perspectives 109(11).
[3] Hernández, AF., Parrón, T. and Alarcón, R. 2011. Pesticides and asthma. Curr Opin Allergy Clin Immunol.11(2):90-6.
[4] Bearer, CF. 2000. The special and unique vulnerability of children to environmental hazards. Neurotoxicology 21: 925-934; and Fenske, R., et al. 1990. Potential Exposure and Health Risks of Infants following Indoor Residential Pesticide Applications. Am J. Public Health. 80:689-693.

A study published in the Journal of the National Cancer Institute finds that household and garden pesticide use can increase the risk of childhood leukemia as much as seven-fold.[5] Similarly, a 2010 meta-analysis on residential pesticide use and childhood leukemia finds an association with exposure during pregnancy, as well as to insecticides and herbicides. An association is also found for exposure to insecticides during childhood.[6] These concerning data, in the least, warrant exploration towards safer organic land care practices.

Healthy Lawn Practices Gaining Momentum

Beyond Pesticides has been involved in implementation organic land care programs by conducting soil analyses on demonstration sites to evaluate soil biology, holding training seminars to teach cultural practices and organic compatible materials (See Products Compatible with Organic Land Management[7]), and producing organic land management plans that build soil microbial life to cycle nutrients naturally. This approach supports turf systems in parks and on playing fields that are more resilient, better able to withstand stress, and less dependent on water resources.

While conventional, chemical-intensive turf and landscape management programs are generally centered on a synthetic product approach that continually treats the symptoms of turf problems with toxic chemicals, the alternative, systems-based approach focuses on the root causes of pest problems, which lie in the soil. These cutting edge land management techniques reveal that toxic pesticides are not needed for successful turf management. Rather, this approach incorporates preventive steps based on supporting soil biology to improve soil fertility and turf grass health, natural or organic products based on a soil analysis that determines need, and specific cultural practices, including mowing height, aeration, dethatching, and over-seeding.

Cost of Organic is on Par with Conventional in the Long-Term

Although there is often significant discussion over the expense of transitioning to an organic land care program, the cost of implementing an organic systems approach is not likely to be substantially more than current costs, and there is likely to be savings in the long-term.

In considering cost, local governments should reflect not only on budget expenditures, but also on the externalities associated with pesticide use, including its effect to reduce the risk of exposure to carcinogens, prevent the contamination of groundwater and surface water, and the poisoning of wildlife. These are costs that residents are already paying for, through hospital visits, expensive clean-ups, and the need for species conservation and habitat restoration. An organic land care program is not only generally on par with and in the long run less expensive than a conventional chemical-based program, it also reduces and in many cases eliminates costly externalities borne by the community at large.

The following provide select examples of the experience of cities and institutions with organic land care programs:

- There is report produced by nationally renowned turfgrass expert and Beyond Pesticides' board member Chip Osborne in coordination with Grassroots Environmental Education, which looks specifically at the cost of conventional and organic turf management on school athletic fields.

[5] Lowengart, R. et al. 1987. Childhood Leukemia and Parent's Occupational and Home Exposures. Journal of the National Cancer Institute. 79:39.
[6] Turner, M.C., et al. 2010. Residential pesticides and childhood leukemia: a systematic review and meta-analysis. Environ Health Perspect 118(1):33-41.
[7] Beyond Pesticides Organic Compatible Product List. 2020. bit.ly/OrganicCompatible.

The report concludes that once established, a natural turf management program can result in savings of greater than 25% compared to a conventional turf management program.[8]

- There is also the research from Harvard University which determined that, ultimately, total operating costs of its organic maintenance program are expected to be the same as the conventionally based program. In a 2009 *New York Times* article,[9] the school determined that irrigation was reduced by 30%, saving 2 million gallons of water a year as a result of reduced irrigation needs. The school was also spending $35,000/year trucking yard waste off site. The university can now use those materials for composting and has saved an additional $10k/year due to the decreased cost and need to purchase fertilizer from off-campus sources. [10]
- The Department of Energy and Environmental Protection in the state of Connecticut, which itself has a successful ban on pesticide use in school playing fields, notes in its information on organic lawn care that, "If your lawn is currently chemically dependent, initially it may be more expensive to restore it. But in the long- term, an organic lawn will actually cost you less money. Once established, an organic lawn uses less water and fertilizers, and requires less labor for mowing and maintenance."[11]
- The experience in South Miami, FL may also be instructive. The city completed a two-year pilot program that limited toxic pesticide use only to organic certified products, the city codified the practice into law. memorandum codifying these practices into law. A memo by the city describes the success of this approach regarding cost. It reads, “Thus-far this initiative has been a qualified success, allowing the city to cut down on its waste-footprint significantly at relatively little expense, and providing a model for other local government to use as guidance.”[12]
- One year after passing and implementing an organic landscape management policy, the City of Irvine California’s fields look “as pristine as ever,” according to the Orange County Register.[13] It notes further, “Weeding by hand and using organic pesticides, which must be applied more frequently, will increase costs by about 5.6 percent in a $21.2 million landscaping budget, according to a city report on implementation of the program.”

While a decade ago the natural systems approach required slightly increased up-front costs and saw savings in the long run, technology and practices have now progressed to the point where parity can often be achieved from the outset. See Beyond Pesticides Cost Comparison: Chemical vs Organic Land Management, for more information.[14]

Communities around the country are taking their experience with organic pilot sites and institutionalizing these safer practices by passing organic ordinances. Beyond Pesticides’ Map of Pesticide Reform Policies highlights over 180 communities that have enacted some level of lawn and landscape pesticide reduction policy.[15]

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[8] Osborne, Charles and Doug Wood. 2010. A cost Comparison of Conventional (Chemical) Turf Management and Natural (Organic) Turf Management on School Athletic Fields. Grassroots Environmental Education. http://www.grassrootsinfo.org/pdf/turfcomparisonreport.pdf

[9] Raver, Anne. 2009. The Grass is Greener at Harvard. http://www.nytimes.com/2009/09/24/garden/24garden.html?_r=2

[10] Harvard University. 2009. Harvard Yard Soils Restoration Project Summary Report. http://www.slideshare.net/harvard_uos/harvard-yard-soils-restoration-project-summary-report-22509-4936446.

[11] Connecticut Department of Energy and Environmental Protection. 2016. Organic Land Care: Your neighbors will “go green” with envy. http://www.ct.gov/deep/cwp/view.asp?a=2708&q=382644#Expensive.

[12] City of South Miami. 2019. City Commission Agenda Item Report: Inter-office Memorandum. https://beyondpesticides.org/assets/media/documents/SouthMiami_FL_Organicordinance.pdf.

[13] Perkes, Courtney. 2017. Irvine Little League mom leads charge to wipe out pesticides on ball fields nationwide. Orange County Register. http://www.ocregister.com/2017/05/24/irvine-group-working-to-get-pesticides-off-city-baseball-fields-nationwide/.

[14] Beyond Pesticides. 2020. Cost Comparison: Chemical vs Organic Land Management. https://beyondpesticides.org/assets/media/documents/documents/Cost%20Comparison.pdf

[15] Beyond Pesticides Map of Pesticide Reform Policies. 2020. https://www.google.com/maps/d/viewer?mid=1VLpVWvifO2JOrgxf1-d1DLyDruE&ll=39.03573413957711%2C-94.19459570507814&z=5

Restricting Hazardous Pesticide Use Promotes Environmental Justice

Earlier this year, The Black Institute, an environmental justice organization based in New York City, released a report finding significant disparities in where pesticides were applied in that city, with low income residents at greatest risk.[16] Because many low-income residents are living in apartment complexes, they have no front or back yard. Thus, they often take their children to public parks for play time. Passage of this law would protect children from exposure to pesticide use at local parks, playgrounds, and playing fields.

As the Black Institute report reads, "It is difficult to keep children happy and health on a miniscule budget. Poisoning parks with toxic chemicals is yet another strike against the Black and Brown community. Enjoying a free, public space should not carry unexpected consequences. The number of cancer cases being reported should be a reminder to city officials that the herbicide [glyphosate] is not safe and should not be treated as such. A chemical that disproportionately impacts people of color is an act of environmental racism. When Black and Brown families that are economically disadvantaged must bear the burden of toxic exposure at a higher rate than white families, there is no argument that can change the racist nature of the subject."[17]

Not only will this law protect low-income communities at local parks, it will also stop hazardous pesticide drift from occurring onto neighboring property, as well as in homeowner associations and condominium complexes where residents often have little say over landscaping practices.

Conclusion

In light of the success and urgent need to move towards safer land management practices, we urge the Los Angeles City Council to approve the implementation of organic pilot sites. In addition to protecting the residents of the city and the surrounding ecosystem that Los Angeles shares with other communities, as lawmakers you play an instrumental role in exploring new ways to tackle inequality and environmental racism, the devastating declines in biodiversity, and reverse climate change by promoting soil carbon sequestration. Thank you for consideration of our comments. We remain available to answer any questions on the hazards of pesticides or benefits of natural land care.

[16] The Black Institute. 2020. Poison Parks. https://theblackinstitute.org/wp-content/uploads/2020/01/TBI_Poison_Parks_Report._010820_FINAL.pdf

[17] Ibid

Appendix A. Health Effects of Commonly Used Pesticides

A Beyond Pesticides Factsheet – A Beyond Pesticides Factsheet – A Beyond Pesticides Factsheet – A Beyond Pesticides Factsheet

Health Effects of 30 Commonly Used Pesticides

Pesticides

	Health Effects						
	Cancer	Endocrine Disruption	Reproductive Effects	Neurotoxicity	Kidney/Liver Damage	Sensitizer/ Irritant	Birth Defects
Herbicides							
2,4-D*	X[4]	X[10]	X[7]	X[8]	X[8]	X[1]	X[11]
Benfluralin					X[1]	X[1]	
Bensulide				X[2]	X[1]	X[2]	
Clopyralid			X[7]			X[2]	X[7]
Dicamba*			X[1]	X[2]	X[2]	X[1]	X[1]
Diquat Dibromide			X[12]		X[11]	X[1]	
Dithiopyr					X[1]	X[1]	
Fluazipop-p-butyl			X[1]		X[1]		X[1]
Glyphosate*	X[12]	X[8]	X[1]		X[8]	X[1]	
Imazapyr					X[7]	X[2]	
Isoxaben	X[3]				X[2]		
MCPA		X[6]	X[2]	X[2]	X[11]	X[1]	
Mecroporp (MCPP)*	Possible[3]	X[6]	X[2]	X[1]	X[9]	X[1]	X[1]
Pelargonic Acid*						X[1]	
Pendimethalin*	Possible[3]	X[6]	X[1]			X[2]	
Triclopyr			X[7]		X[9]	X[1]	X[7]
Trifluralin*	Possible[3]	X[6]	X[1]		X[2]	X[1]	
Insecticides							
Acephate	Possible[3]	X[6]	X[11]	X[9]		X[2]	
Bifenthrin*†	Possible[3]	Suspected[6,10]		X[8]		X[1]	X[9]
Carbaryl	X[3]	X[10]	X[8]	X[1]	X[11]	X[11]	X[7]
Fipronil	Possible[3]	X[6]	X[8]	X[8]	X[8]	X[8]	
Imidacloprid ‡			X[7]		X[2]		X[7]
Malathion*	Possible[3]	X[10]	X[11]	X[9]	X[2]	X[2]	X[2]
Permethrin*†	X[3]	Suspected[6,10]	X[1,7]	X[9,7]	X[9]	X[1]	
Trichlorfon	X[3]	X[6]	X[11]	X[2]	X[2]		X[2]
Fungicides							
Azoxystrobin					X[2]	X[2]	
Myclobutanil		Probable[6]	X[2]		X[2]		
Propiconazole	Possible[3]	X[6]	X[2]		X[1]	X[1]	
Sulfur						X[1]	
Thiophanate methyl	X[3]	X[1]	X[1]	Suspected[1]	X[1]	X[2]	X[1]
Ziram	Suggestive[3]	Suspected[6]		X[2]	X[2]	X[2]	
Totals:	16	17	21	14	25	26	12

**These pesticides are among the top 10 most heavily used pesticides in the home and garden sector from 2006-2007, according to the latest sales and usage data available from EPA (2011), available at http://www.epa.gov/opp00001/pestsales/07pestsales/market_estimates2007.pdf.*
† EPA lists all synthetic pyrethroids under the same category. While all synthetic pyrethroids have similar toxicological profiles, some may be more or less toxic in certain categories than others. See Beyond Pesticides' synthetic pyrethroid fact sheet at bit.ly/TLBuPS for additional information.
‡ Imidacloprid is a systemic insecticide in the neonicotinoid chemical class, which is linked to bee decline.

Description

Most toxicity determinations based on interpretations and conclusions of studies by university, government, or organization databases. Empty cells may refer to either insufficient data or if the chemical is considered relatively non-toxic based on currently available data.

The list of 30 commonly used lawn chemicals is based on information provided by the General Accounting Office 1990 Report, "Lawn Care Pesticides: Risks Remain Uncertain While Prohibited Safety Claims Continue," U.S. Environmental Protection Agency (EPA) National Pesticide Survey (1990), Farm Chemicals Handbook (1989), The National Home and Garden Pesticide Use Survey by Research Triangle Institute, NC (1992), multiple state reports, current EPA Environmental Impact Statements, and Risk Assessments, EPA national sales and usage data, best-selling products at Lowe's and Home Depot, and Beyond Pesticides' information requests.

For more information on hazards associated with pesticides, please see Beyond Pesticides' *Gateway on Pesticide Hazards and Safe Pest Management* at www.beyondpesticides.org/gateway. For questions and other inquiries, please contact our office at 202-543-5450, email info@beyondpesticides.org or visit us on the web at www.beyondpesticides.org.

Citations

1. U.S. EPA. Office of Pesticide Program *Reregistration Eligibility Decisions (REDs), Interim REDS (iREDs)*, and *RED factsheets*. http://www.epa.gov/pesticides/reregistration/.
2. National Library of Medicine, TOXNET, *Hazardous Substances Database*, http://toxnet.nlm.nih.gov/.
3. U.S. EPA. 2012. Office of Pesticide Programs, *Chemicals Evaluated for Carcinogenic Potential*. http://npic.orst.edu/chemicals_evaluated.pdf.
4. California Environmental Protection Agency. *Proposition 65: Chemicals Known to the State to Cause Cancer or Reproductive Toxicity*. Office of Environmental Health Hazard Assessment. http://www.oehha.org/prop65/prop65_list/files/P65single052413.pdf.
5. The Pesticide Management Education Program at Cornell University. *Pesticide Active Ingredient Information*. http://pmep.cce.cornell.edu/profiles/index.html.
6. The Endocrine Disruption Exchange. 2011. *List of Potential Endocrine Disruptors*. http://www.endocrinedisruption.com/endocrine.TEDXList.overview.php.
7. Northwest Coalition for Alternatives to Pesticides (NCAP), *Pesticide Factsheets*. http://www.pesticide.org/get-the-facts/pesticide-factsheets.
8. Beyond Pesticides *ChemWatch Factsheets*, http://www.beyondpesticides.org/pesticides/factsheets/index.htm.
9. U.S. EPA. *Chronic (Non-Cancer) Toxicity Data for Chemicals Listed Under EPCRA Section 313*. Toxic Release Inventory Program. http://www.epa.gov/tri/trichemicals/hazardinfo/hazard_chronic_non-cancer95.pdf.
10. European Union Commission on the Environment. *List of 146 substances with endocrine disruption classifications, Annex 13*. http://ec.europa.eu/environment/endocrine/strategy/substances_en.htm#report2.
11. Extension Toxicology Network (EXTOXNET) *Pesticide Information Profiles*. http://extoxnet.orst.edu/ghindex.html.
12. International Agency for Research on Cancer, World Health Organization (IARC) category 2A, the agent (mixture) is probably carcinogenic to humans based on sufficient evidence of carcinogenicity in laboratory animal studies. http://monographs.iarc.fr/ENG/Classification/index.php.

Last Updated May 2015

Appendix B. Environmental Effects of 30 Commonly Used Lawn Pesticides

Environmental Effects of 30 Commonly Used Lawn Pesticides

Pesticides	Health Effects					
	Detected in Groundwater	Potential Leacher	Toxic to Birds	Toxic to Fish/ Aquatic Organisms	Toxic to Bees	Toxic to Mammals
Herbicides						
2,4-D*	X[1,2,3,4,7]	X[3,4]	X[1,2,3,11]	X[1,2,3,11]	X[1,11]	X[3,4,12]
Benfluralin	X[7]		X[3,11]	X[3,11]	X[5,11]	
Clopyralid	X[2,7]	X[2,11]	X[11]	X[11]	X[11]	
Dicamba	X[2,7]	X[1,2,3]	X[10,11]	X[1,2,3,11]	X[5,10,11]	
Diquat Dibromide		X[5]	X[1,3,11]	X[1,3,11]	X[5,11]	X[1]
Dithiopyr				X[5,6,11]	X[5,11]	
Fluazipop-p-butyl				X[1,4,6,11]	X[1,4]	
Glyphosate*	X[8]	X[5]	X[1,3,11]	X[1,2,11]	X[11]	X[4]
Imazapyr	X[2]	X[2,3]		X[2,5,11]	X[5,11]	
Isoxaben		X[11]	X[11]	X[3,11]	X[11]	
MCPA	X[4,7]	X[1,4,11]	X[1,3,11]	X[1,3,11]	X[5]	X[3]
Mecoprop (MCPP)*	X[4]	X[1,2,3,11]	X[3,11]	X[2]	X[11]	X[3]
Pelargonic Acid*			X[3 §]	X[3 §]	X[5]	
Pendimethalin*	X[3,7]		X[1,3,11]	X[1,3,11]	X[5,11]	X[3]
Triclopyr	X[2,7]	X[1,2,3,11]	X[2,3,11]	X[2,3,11]	X[5,11]	
Trifluralin*	X[4,7]			X[3,11]	X[5,11,12]	
Insecticides						
Acephate		X[1]	X[1,3,10,11]	X[3,11]	X[1,3,10,11]	X[3]
Bifenthrin*†			X[1,10,11]	X[1,10,11]	X[1,10,11]	X[1,4]
Carbaryl	X[1,3,7]	X[11]	X[2,11]	X[1,2,3,11]	X[1,2,3,11]	X[3,11]
Fipronil	X[7]	X[5,11]	X[2,4,10,11]	X[2,4,10,11]	X[2,4,10,11]	X[4]
Imidacloprid ‡	X[7]	X[1,2,10,11]	X[1,2,11]	X[1,2,11]	X[1,2,10,11]	
Malathion*	X[1,2,3,7]	X[1,3,5]	X[1,2,3,10,11]	X[1,2,3,10,11]	X[1,3,10,11]	X[3]
Permethrin*†	X[2,7]			X[1,2,3,11]	X[1,2,3,11]	
Trichlorfon		X[1,3,11]	X[1,3,11]	X[1,3,11]	X[1,11]	X[4‖]
Fungicides						
Azoxystrobin	X[9]	X[3,4,11]	X[11]	X[3,11]	X[11]	
Myclobutanil	X[7]			X[5]		
Propiconazole	X[7]	X[3]		X[3,11]	X[5,11]	X[11]
Sulfur		X[1]	X[11]	X[11]	X[11]	
Thiophanate methyl		X[3]		X[3,11]	X[11]	
Ziram		X[3,4]	X[1,3,11]	X[1,3,11]	X[11]	X[3]
Totals:	19	20	22	30	29	14

**These pesticides are among the top 10 most heavily used pesticides in the home and garden sector from 2006-2007, according to the latest sales and usage data available from EPA (2011), available at http://www.epa.gov/opp00001/pestsales/07pestsales/market_estimates2007.pdf.*
† EPA lists all synthetic pyrethroids under the same category. While all synthetic pyrethroids have similar toxicological profiles, some may be more or less toxic in certain categories than others. See Beyond Pesticides' synthetic pyrethroid fact sheet at bit.ly/TLBuPB for additional information.
‡ Imidacloprid is a systemic insecticide in the neonicotinoid chemical class, which is linked to bee decline.
§ Based on soap salts.
‖ Based on in-vitro mammalian cell study.

Description

Most toxicity determinations based on interpretations and conclusions of studies by university, government, or organization databases. Empty cells may refer to either insufficient data or if the chemical is considered relatively non-toxic based on currently available data. The column labeled "Potential to Leach" refers to a chemical's potential to move into deeper soil layers and eventually into groundwater. The column labeled "Toxic to Mammals" refers to conclusions based on evidence from studies done on non-human mammals.

The list of 30 commonly used lawn chemicals is based on information provided by the General Accounting Office 1990 Report, "Lawn Care Pesticides: Risks Remain Uncertain While Prohibited Safety Claims Continue," U.S. Environmental Protection Agency (EPA) National Pesticide Survey (1990), Farm Chemicals Handbook (1989), The National Home and Garden Pesticide Use Survey by Research Triangle Institute, NC (1992), multiple state reports, current EPA Environmental Impact Statements, and Risk Assessments, EPA national sales and usage data, best-selling products at Lowe's and Home Depot, and Beyond Pesticides' information requests.

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Citations

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