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June 22, 2020

To: CT DEEP

Comment on the 2020 Integrated Water Quality Report to Congress

As dwellers in a coastal state, we have a responsibility to the inhabitants of our state, our country, and our world to safeguard water. We are not living up to that responsibility.

We should encourage sustainable aquaculture, such as the New Haven Oyster Farm. For about two centuries, this local business has been harvesting oysters — and filtering water — in New Haven Harbor and Long Island Sound and reusing empty oyster shells so new oysters will not have to grow on plastic bottles or old sneakers.

We should stop paying for state research into uses of herbicides, such as the exploration of glyphosate (the main ingredient in Roundup) by the Connecticut Agriculture Experiment Station, https://portal.ct.gov/CAES/ABOUT-CAES/Staff-Biographies/Jatinder-S-Aulakh.

We should not allow the Ag Station, the entity that educates pesticide applicators for state licenses, to teach that Roundup — which is in the final phase of a \$9 billion settlement in a class action suit brought by sickened users — is safe, https://usrtk.org/monsanto-roundup-trial-tacker/roundup-cancer-plaintiffs-eagerly-await-settlement-news/.

We should ban herbicides -- which kill much more than weeds; they kill everything.

Since mid March we have documented 37 applications of herbicides and/or chemical fertilizers in my neighborhood, including six of Prodiamine, a product banned for sale to New York; one of products containing Dicamba, which was banned this month in federal court, https://usrtk.org/monsanto-roundup-trial-tacker/panicked-chemical-giants-seek-mercy-from-court-order-banning-their-products/; and three of Dimension, which contains Dithiopyr, a chemical highly toxic to aquatic organisms. Most of these applications were liquid, and most were applied at wind speeds high enough to cause drift — including the most recent, which occurred three houses from mine today and drifted onto the newly planted garden next door.

One (unconfirmed) application occurred at a golf course with a decades-long history of polluting Maltby Lakes, part of our public watershed and a potential drinking water source. This stream on the golf course and Maltby Lakes should be on the impaired waters list - as should any waterbody near a golf course.

We should ban sod grown on farms. Sod growing pollutes the water with nitrogen and herbicides, and sod upkeep requires even more chemicals and causes more water pollution.

We should ban artificial turf fields, which are composed of layers of plastic: plastic fabric, Styrofoam, and carpets of plastic needles. My neighborhood has six artificial turf fields — one each for football, lacrosse, baseball, soccer/track & field, field hockey, and softball — along with plastic turf-covered practice areas. The field hockey field is watered before every game and during half time because the players like the ball to go fast.

We should insist on restoration of the 18 inches of soil -- Mother Nature's filtering system -- that was removed. The plastics that replaced the soil will disintegrate and/or wind up in landfills waiting to catch fire.

Every waterbody near an artificial turf field in Connecticut should be tested for microplastics and added to the impaired waters list.

We should limit the use of sprinklers on grass, especially during drought such as we are currently entering. Overuse of municipal water caused discolored water in New Haven on Friday. That same day, groundskeepers started up the irrigation system on the athletic fields behind my house for the first time this year and ran the sprinklers for hours at midday.

We should plant other grasses, especially native varieties, and other ground cover such as clover to save water and encourage pollinators.

CT DEEP should more closely monitor abuses such as those described above and provide education and encouragement for local mitigation efforts.

Thank you.

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