

**John Webster**  
President  
MANOR OAKS

**Greg Intoccia**  
Executive Vice President  
ASHLEY HOLLOW

**Matt Quinn**  
First Vice President  
CHERRYWOOD

**Bill Calomeris**  
Second Vice President  
OLNEY MILL

**Judy Broseker**  
Recording Secretary  
BROOKEVILLE KNOLLS

**Jackie Benn**  
Corresponding Secretary  
FAIRHILL FARM

**Kathy Curtis**  
Treasurer  
LAKE HALLOWELL

February 19, 2015

To: Montgomery County Council

Subject: Opposition to County Bill 52-14 – Ban on non-essential pesticides

The Greater Olney Civic Association (GOCA) represents over 35 homeowner and civic associations in the Olney Master Plan area. For over thirty years, GOCA has promoted the civic, cultural, and economic welfare of the Olney community.

At its February 10, 2015 meeting, GOCA voted overwhelmingly to pass the following resolution in opposition to County Bill 52-14, which bans the use of non-essential pesticides in the County:

*Whereas the Bill's author cites a 2013 GAO report as a basis for proposing the ban, **GAO did not make any recommendations that restricted or banned pesticides**; instead, the report recommended that EPA automate the tracking of "conditional registrations" of products, install improved manual tracking until an automated system is developed, and review and ensure EPA's website is "clear, concise, and accurate." [GAO Report "EPA Should Take Steps to Improve Its Oversight of Conditional Registrations," GAO-13-145 August 2013];*

*Whereas Montgomery County is facing budget shortfalls and the County Executive has warned residents he will seek to raise property taxes as a result [Washington Post, January 30, 2015, B1], it is irresponsible for the Council to impose a vast and unfunded pesticide regulatory structure on County residents that will require tax increases to be fully funded;*

*Whereas GOCA has received overwhelmingly negative comments on the bill from Olney residents and businesses, including concerns the proposed bill will result in higher taxes; higher consumer prices; higher lawn care prices; excessive weed growth resulting in Montgomery County properties being placed at a disadvantage compared to Howard, Fairfax, and other nearby counties; result in Olney residents relying on ineffective pest control products and ineffective fertilizers that expose Olney properties to pest infestations and sub-quality lawn conditions; and impose onerous requirements on homeowners to display County-approved signage, etc;*

*Whereas both the federal government and the State of Maryland have existing environmental and pesticide regulatory agencies and laws that provide oversight of pesticide applications, and also have well-established testing and compliance resources, there is no justification for Montgomery County creating a costly and redundant regulatory process; further, there is no evidence the County possesses the extensive infrastructure to test and regulate such products; creating such expertise and infrastructure will be expensive, with the costs passed directly to county residents, businesses, and manufacturers;*

*Whereas the purported health risks to children that are the stated premise for the Bill have not been substantiated by any relevant scientific data; further, the cited health risks to children and others from currently marketed products occurs in acute exposure cases (e.g. ingesting the pesticide directly); and further, exempting the significant agricultural areas and golf courses*

*from the ban creates an arbitrary and confusing policy that offers no actual protections for children, the Chesapeake Bay, etc.;*

*Whereas GOCA believes the bill is a costly but ineffective “feel good” proposal based on dubious medical presumptions, that it unnecessarily duplicates existing federal and State regulations, and that it creates a burdensome and costly regulatory oversight program that places both Olney residents and businesses at a disadvantage;*

*Whereas GOCA believes existing federal and State environmental and oversight regulations adequately protect county residents from the potential health hazards that are the objectives of the proposed bill;*

***Now therefore be it resolved that the Greater Olney Civic Association (GOCA) should formally state its strong objections to Bill 52-14, in writing, with the Montgomery County Council.***

GOCA members are especially concerned that this bill will diminish our ability to control ticks and Lyme disease infections in the County. As the Council is no doubt aware, Lyme disease is a serious and growing threat to our residents. GOCA strongly believes that the removal of the very tools used to control the tick population poses a substantial and immediate risk to the health of our children that dwarfs the risks created by the responsible use of those same tools.

Furthermore, GOCA believes that exempting County schools from compliance with the bill will result in the same children the bill seeks to protect being exposed to pesticides on school property. Likewise, exempting agricultural usage of pesticides will result in the bill failing to prevent runoff of pesticides into the watershed, which is another one of the bill’s stated goals. The net result will be an undue burden on Montgomery County home and business owners while few, if any, of the health safeguarding objectives of the bill are met.

From a broader perspective, Montgomery County is but a relatively small jurisdiction in a much larger, heavily populated region. Even if the bill is enacted, Montgomery County residents will still be affected by pesticide use in neighboring jurisdictions. If the Council truly believes that pesticides are damaging the health of County residents, then rather than impose these restrictions solely on the backs of Montgomery County home and business owners, the Council should instead work with the State to seek tighter regulations at the State level.

Respectfully,

John Webster  
President