



TO: Chesapeake Bay Program Partners
DATE: 3/17/14
RE: Toxics Goal Should Be Included in Chesapeake Bay Program Agreement

The Maryland Environmental Health Network is submitting comments to urge the reconsideration of the following recommendation that was submitted last summer but rejected:

Language considered, but rejected:

Toxic Contaminants Research Outcome: Assess planned research and opportunities for new research to improve knowledge of the effects of contaminants of emerging concern on the health of fish and wildlife by 2015 so future strategies can be considered.

This proposed goal was extremely moderate, reasonable, and limited. It is also necessary, timely, and could provide valuable information that is currently lacking to Bay communities and agencies. It would build effectively on the valuable information compiled by the Toxic Contaminants in the Chesapeake Bay and Its Watershed report of December 2012.

The Maryland Environmental Health Network, along with our partner Maryland Pesticide Network, recently did an assessment of the research and the data gaps for just one toxic contaminant in one setting. We looked at Pesticides in the Urbanized Environment. We found that there is very little easily accessible information on this, although the wide consensus of scientists and government officials is that pesticides are a significant contaminant that deserves attention. The lack of research underway or completed, to assess how pesticides in particular are delivered to waterways and what practices are effective in reducing the toxic load on the Bay, should be a serious concern to the Bay Program. The proposed outcome above would make a significant contribution by calling attention to this deficit of research, or uncovering research that would be valuable and could lead to new practices.

We used Baltimore City as a focus and found that Baltimore City's TMDLs do not address pesticides. Part of the rational for not accepting the toxics language and goal proposed was: "Most jurisdictions felt that toxic contaminants are being addressed already through state programs and local TMDLs for contaminants."

The imperative to address toxic contaminants in the bay was fully described in the EPA report that came out in December 2012. The following study illustrates the cause for concern in specific terms regarding the toxic action of pesticides:

Chesapeake Bay watershed pesticide use declines but toxicity increases I. S. Hartwell Toxicol. Chem. 2011; 30:1223–1231

... there is no [Chesapeake] baywide program to track application rates of current-use pesticides in any of the watershed jurisdictions. Watershed studies demonstrate that several pesticides are present in surface and groundwater throughout the region. Between 1985 and 2004...toxicity of the pesticides was tabulated, and the toxic units (TU) of applied active ingredients were calculated for several animal and plant species. The total mass of pesticides being applied to the watershed declined during the survey period. Due to increasing potency of the chemicals, however, total TUs applied have remained static or have significantly increased...

We urge the Bay Program Partners to reconsider and adopt the following proposed language in the Chesapeake Bay Watershed Agreement, which would insure that a much needed assessment would take place and provide the basis for further recommendations to address toxics in the Bay:

Toxic Contaminants Research Outcome: Assess planned research and opportunities for new research to improve knowledge of the effects of contaminants of emerging concern on the health of fish and wildlife by 2015 so future strategies can be considered.

Our Request: Toxics Goal Should Be Included in Chesapeake Bay Program Agreement

Sincerely,

(signed)
Rebecca Ruggles, Director
The Maryland Environmental Health Network