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SENT BY ELECTRONIC MAIL

RE: Public Comment on Proposed Expansion of Atrazine Restrictions

November 4, 2010

Dear Mr. Graham:

We are writing to express our strong support for the proposed expansion of atrazine restrictions in Sauk and Columbia counties. At the same time, while we are very supportive of the proposed actions, we believe that a statewide ban or other significant action is necessary to prevent further exposures and continued contamination of groundwater.

The current approach consistently remands action only after an exposure to unsafe levels of atrazine in residential well water has occurred. We are particularly concerned that this approach may not be protective of pregnant mothers and infants as even short term exposure to high levels of atrazine at a critical time in prenatal and early childhood development may cause significant harm.

According to the federal health agency ATSDR, atrazine may affect pregnant women by causing their babies to grow more slowly than normal. Birth defects and liver, kidney, and heart damage have been seen in animals exposed to high levels of atrazine. In pregnant animals, exposure to atrazine causes a decrease in fetal growth and birth defects. Exposure to high levels of atrazine during pregnancy caused reduced survival of fetuses. It is unclear whether or at what level of exposure this might occur in humans.

Atrazine is a selective herbicide for controlling grasses and broadleaf weeds and is estimated to be the most heavily used herbicide in the United States. Atrazine may be washed from sprayed fields or spill sites into streams and rivers and may migrate into wells used for drinking and bathing.

The use of atrazine, or any farm chemicals containing it, has already been banned in more than 1.2 million acres in Wisconsin. The Wisconsin Department of Agriculture, Trade, and

Consumer Protection (DATCP) has proposed expansion of atrazine restrictions for 1,430 acres in Sauk County near Prairie du Sac and 8,140 acres in the Columbia County towns of Marcellon and Wyocena.

The existing and proposed bans are in themselves evidence that atrazine represents a persistent and growing threat to public health and the environment. Moreover, continued monitoring, testing, and administration of areas outside these ban districts place an undue financial burden on public taxpayers in response to an identifiable non-public source of contamination. In addition to exposure and other hardships, affected families lose measurable property value if their well water is no longer potable.

Pursuant to state groundwater law, DATCP must regulate pesticide use as necessary to *prevent* groundwater contamination and restore groundwater quality. Current law prohibits the use of atrazine but only when contamination of groundwater has attained or exceeded state groundwater enforcement standards which contradicts the State's responsibility to protect public health, quality of life, and groundwater as a resource for safe and healthful drinking water. It is time for a new approach which *prevents* exposures to those most vulnerable to harm -- our children.

Thank you for the opportunity to comment.

Sincerely,

Laura Olah, Executive Director, Citizens for Safe Water Around Badger
Pam Kleiss, Executive Director, Physicians for Social Responsibility Wisconsin
Kimberlee Wright, Executive Director, Midwest Environmental Advocates
J. Gilbert Sanchez, Executive Director, Tribal Environmental Watch Alliance
Al Gedicks, Executive Secretary, Wisconsin Resources Protection Council
Hiroshi Kanno, President, Concerned Citizens of Newport
Judy Miner, Wisconsin Network for Peace and Justice
John E. Peck, Executive Director, Family Farm Defenders
Edie Ehlert, Coordinator, Crawford Stewardship Project
Don Timmerman and Roberta Thurstin Timmerman, Milwaukee, Wisconsin
Marcia Halligan, Kickapoo Peace Circle
Karen Etter Hale, Executive Secretary, Madison Audubon Society
Amie Mink, Board Member, Healthy Lawn Team
Eric Uram, Chair, John Muir Chapter of the Sierra Club (*added November 6*)

CC: State Senator Mark Miller

Dr. Henry A. Anderson, Wisconsin Division of Public Health