

## Charlene Dindo

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**From:** Robert T. Ackland <ackland.rt@gmail.com>  
**Sent:** Tuesday, December 6, 2022 11:19 AM  
**To:** Virginia Lyons; Christopher Bray; Mark MacDonald; Carol Ode; Trevor Squirrell; Charlene Dindo  
**Subject:** [External] Please object to the revised Pesticide Regs on Dec. 15

[External]

Dear Members of the LCAR Committee:

We urge you as a member of LCAR to join the Conservation Law Foundation, VT PFAS/Military Poisons Coalition, individuals and groups concerned about pesticides, and other environmental advocates in **objecting** to the revised Pesticide Regs on Dec. 15 at 10 AM, at your next LCAR meeting, on three (3) grounds and send them back for correction. These rules have not been revised in 31 years, and they need to be done right as they may stand for another 30+ years.

- The rules are arbitrary and inconsistent;
- The rules are contrary to Legislative intent regarding pollinator protection; and
- The filing fails to describe adequately or accurately the true environmental impact of these regulations, including the impacts on global warming, the significant and dangerous bio-accumulative effects of PFAS contamination in pesticides on ecological and human health, and the importance of integrated pest management in avoiding toxins in our state.

Sincerely,  
Robert T. Ackland  
Winooski, VT

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## Charlene Dindo

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**From:** Marguerite Adelman <madel51353@gmail.com>  
**Sent:** Tuesday, December 6, 2022 11:06 AM  
**To:** Virginia Lyons; Christopher Bray; Mark MacDonald; Carol Ode; Trevor Squirrell; Charlene Dindo  
**Subject:** [External] Pesticide Regs at LCAR on Dec. 15

[External]

Dear Members of the LCAR Committee:

We urge you as a member of LCAR to join the Conservation Law Foundation, VT PFAS/Military Poisons Coalition, individuals and groups concerned about pesticides, and other environmental advocates in **objecting** to the revised Pesticide Regs on Dec. 15 at 10 AM, at your next LCAR meeting, on three (3) grounds and send them back for correction. These rules have not been revised in 31 years, and they need to be done right as they may stand for another 30+ years.

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Sincerely,  
Marguerite Adelman, Coordinator  
VT PFAS/Military Poisons Coalition  
Winooski, VT

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**Charlene Dindo**

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**From:** carol spencer <francescawf49@gmail.com>  
**Sent:** Tuesday, December 6, 2022 1:00 PM  
**To:** Christopher Bray  
**Subject:** [External] Rules about Pesticide Use -- a request to the LCAR

[External]

Dear Chris and other Members of the LCAR Committee:

In a contested Addison County race, I am gratified to tell you that Chris Bray dominated his opponent(s). Chris, congratulations.

I am one of your enthusiastic and grateful constituents. I also belong to a (first local, then regional) group of active supporters of achieving and then maintaining a clean Lake.

I am writing to urge you members of LCAR to join the VT PFAS/Military Poisons Coalition, individuals and groups concerned about pesticides, and other environmental advocates in **objecting** to the revised Pesticide Regs on Dec. 15 at 10 AM, at your next LCAR meeting, on three (3) grounds and send them back for correction. These rules have not been revised in 31 years, and they need to be done right as they may stand for another 30+ years.

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- The filing fails to describe adequately or accurately the true environmental impact of these regulations, including the impacts on global warming, the significant and dangerous bio-accumulative effects of PFAS contamination in pesticides on ecological and human health, and the importance of integrated pest management in avoiding toxins in our state.

Sincerely,  
Dr. Carol Spencer  
Ferrisburgh VT

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**e plu·ri·bus u·num**

/ē ˌplʊərəbəs ˈ(y)oʊnəm/: out of many, one

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## Charlene Dindo

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**From:** Chris Anderson <candersonzumba@gmail.com>  
**Sent:** Monday, December 12, 2022 5:46 PM  
**To:** Charlene Dindo  
**Subject:** [External] Letter to the LCAR regarding Vt Regulation for Control of Pesticides

[External]

Dear Members of the LCAR Committee:

I urge you as members of LCAR to join the Conservation Law Foundation, VT PFAS/Military Poisons Coalition, individuals and groups concerned about pesticides, and other environmental advocates in **objecting** to the revised Vermont Regulation for Control of Pesticides on Dec. 15 at 10 AM, at your next LCAR meeting. These rules have not been revised in 31 years, and they need to be done right as they may stand for another 30+ years.

In the past 30 years, the use of pesticides in Vermont has increased markedly. A Pesticide Advisory Council was established in 1986; one of the Council's missions was to reduce the use of pesticides. That council did not meet the goal of pesticide reduction. This past session, Act 49 established the Agriculture Innovation Board, again with a mission to reduce the use of pesticides in Vermont. It is doubtful that this Board will be successful since the VAAFM does not consider the reduction of pesticide use one of its mission. This is obvious in the new regulations being proposed. Three grounds for objection to the regulations are:

- The rules are arbitrary and inconsistent;
- The rules are contrary to Legislative intent regarding pollinator protection; and
- The filing fails to describe adequately or accurately the true environmental impact of these regulations, including the impacts on global warming, the significant and dangerous bio-accumulative effects of PFAS contamination in pesticides on ecological and human health, and the importance of integrated pest management in avoiding toxins in our state.

Please consider that over the years various bills to reduce or ban specific pesticides have been proposed by legislators at the behest of their constituents. For those bills that have actually made it into committee, legislators have heard testimony from Vermonters on the reasons why the use of pesticides in this state need to be curtailed to protect our soils, our water, our pollinators and ourselves. Please vote to object to these regulations as proposed by the VAAFM.

Thank you.

Christine Anderson  
Manchester Center, member of Earth Matters

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## Charlene Dindo

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**From:** Mary Ellen Tamulonis <mejat3@gmail.com>  
**Sent:** Sunday, December 11, 2022 3:32 PM  
**To:** Virginia Lyons; Christopher Bray; Mark MacDonald; Carol Ode; tsquirrel@leg.state.vt.us; Charlene Dindo  
**Subject:** [External] Pesticide Regs Need Updated Corrections

[External]

Dear Members of the LCAR Committee:

We urge you as a member of LCAR to join the Conservation Law Foundation, VT PFAS/Military Poisons Coalition, individuals and groups concerned about pesticides, and other environmental advocates in **objecting** to the revised Pesticide Regs on Dec. 15 at 10 AM, at your next LCAR meeting, on three (3) grounds and send them back for correction. These rules have not been revised in 31 years, and they need to be done right as they may stand for another 30+ years.

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- The filing fails to describe adequately or accurately the true environmental impact of these regulations, including the impacts on global warming, the significant and dangerous bio-accumulative effects of PFAS contamination in pesticides on ecological and human health, and the importance of integrated pest management in avoiding toxins in our state.

Sincerely,

Mary Ellen Tamulonis  
Colchester, VT

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**Charlene Dindo**

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**From:** mike bald <choosewiselyvt@gmail.com>  
**Sent:** Tuesday, December 13, 2022 9:40 AM  
**To:** Charlene Dindo  
**Subject:** [External] Re: PFAS in pesticides

[External]

Dear Legislative Committee on Administrative Rules,

Thank you again for your work on the issue of Pesticides.

I know the Rules are opposed as currently written for being arbitrary and inconsistent.

I want to simply add that the world of pesticide registration, regulation, and usage is layers upon layers of "Arbitrary and Inconsistent."  
How do we explain that tolerance levels for pesticides in food have been bumped upward at least two times that I'm aware of.

From a corporate / profit standpoint, if we anticipate pesticides becoming a problem with the food supply, we can take one of two paths:

1. Reduce our pesticide usage, and / or spend big money refining the techniques and protocols.
2. Or simply write a note to the EPA declaring that internal corporate research shows that minimum tolerance levels can actually go up by a factor of 10. This occurred interestingly just prior to the huge market push behind the rollout of RoundUp.

Clearly, a bump-up on acceptable quantities in the food supply is the cheaper alternative here.

Especially when the studies are secret, proprietary and not performed with any kind of scientific rigor.

Thank you,  
Mike

Michael Bald  
Royalton, VT

On Thu, Dec 1, 2022 at 10:45 AM mike bald <[choosewiselyvt@gmail.com](mailto:choosewiselyvt@gmail.com)> wrote:

Thank you for giving the pesticide rule your attention today Senators. I cannot believe how we simply continue to call PFAS content an "emerging issue."

Simply unreal.

Wow, please do the right thing here.

IT's a simple Yes or No question as to whether the PFOA / PFAS compounds are present in pesticides.

If their presence is some kind of corporate secret, we have a real problem.

And Mr. Giguere is basically saying the plan is to test biosolids and compost at higher priority than pesticide locations.

Interesting work-around.... and it sounds to me like the test person is not hired yet.

I think we need to test these products directly, since the companies don't intend to do it.

Even their Material Safety Data Sheets are outdated and full of "Date not Available" statements.

How can you have a pesticide in existence for almost 50 years and still not have information on basic questions.

Odd. And troubling.

Thank you again.

Mike

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Mike Bald

*Got Weeds?*

<http://choosewiselyvt.wordpress.com>

Royalton, VT

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Mike Bald

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