



Supporting Learners & Leaders

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To: House Education
From: Jay Nichols/VPA
Subject: PCB's
Date: March 23, 2022

I want to stress that I am no expert whatsoever on PCB's and want to acknowledge that right up front. My testimony is focused on pragmatics to do with the operation of schools and making sure that students receive the educational services they need and are entitled to as part of a Free and Appropriate Public Education.

I recently had the opportunity attend a mtg. with Commissioner's Walke and Levine and Sec. French, and Patricia Coppolino on this issue. It is clear to me that the Department of Environmental Conservation, the Health Department, and the Secretary of Education are working collaboratively to address issues around PCB's in our schools. It appears that the plan will be to test the schools most likely to have dangerous PCB levels first based on the year or years in which the school was constructed. This makes perfect sense.

My concerns are pretty simple and straight forward.

1. The first is the timeline. I think that it is unlikely that all of the necessary testing in question could be done in the two year window – I understand that there is a proposal to move that to four years. Given the difficulty of the work, the fact that a PCB project manager hasn't been able to be hired yet so that one person is serving as both project manager and coordinator and the amount of logistical work involved extending the testing timeline makes sense.
2. I'm also concerned about the potential costs of mitigation and who will bear the cost of that mitigation. If we are looking at thousands of dollars school districts can figure that out. If we are looking at hundreds of thousands or millions that is untenable at the local level. As this is a public health issue, one that Vermont seems to be the only state addressing at these contamination levels, I think it is important that any significant remediation costs have an adequate funding source.
3. Finally, I'm worried about what to do with students in classrooms that might not be able to be used or in some cases perhaps significant parts of buildings. When Burlington had to shutter, they at least could eventually pivot to Macy's – very few school buildings will have any option like that. In most towns, any buildings that are empty are probably in

much worse shape than the local school. Some discussion has been around the idea that students could simply move from one classroom or classrooms to other rooms in the building if some classrooms are deemed below the allowed PCB Level and others are not. Unfortunately, this is a lot harder than it sounds. You can't just have the fourth graders join the third graders or the Spanish class to share a classroom with the Calculus class. There is a lot of complexity here and going fully remote should be the last option on the table since we know how ineffective and inequitable that is for the majority of our students.