

Testimony: April 11 re H.706

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My name is Sylvia Knight. Thank you very much for this time to testify. As a resident of Burlington, I live downstream from Burlington Country Club and Vermont National Golf Course, and drink Burlington's water, drawn from Lake Champlain. I do support passage of H.706 this year.

Please *oppose* exemptions for golf courses from limits on the use of neonicotinoid pesticides required by H. 706. They are toxic to pollinators, birds, bats, soil organisms, aquatic invertebrates, mobile and persistent in water. They act as endocrine disruptors that cause harm at tiny amounts.

Two neonics - clothianidin and imidacloprid - are included in Agency of Agriculture's (the Agency) list of pesticides recommended for golf course permits. I urge language in H.706 requiring removal of neonics from this list. The Agency's contact on golf course pesticides is David Huber. I would like to thank David for providing me with information about golf course permits, pesticides, and use reports from several golf courses.

In 2021, June - October, US Geological Services tested a wide range of contaminants at 5 monitoring stations at 4 streams and Burlington wastewater treatment facility (WWTF).

The neonic clothianidin was detected at high amounts in Potash Brook for 3 months in 2021:

June, 4.8; August, 10.2; October, 8.2 (parts per billion)

The neonic imidacloprid was detected at *high amounts* in *Potash Brook*: June, **60.4**; July, **8.9**; August, **13** (parts per billion)

Only 1.2 pounds of imidacloprid was used in 2021 by VT National Golf Course. Given the high detections, it may have been used also at the adjacent condominiums.

Imidacloprid was detected at **2.6 ppb** at the confluence of *Englesby Bk* and Lake Champlain at Oakledge Park where people often swim in the summer. That doesn't sound like much, but EPA has set a guideline of **1.05 ppb** to protect aquatic invertebrates, as they are a major food source for waterfowl. (Basley 2018). <https://doi.org/10.1007/s11356-017-1125-5>

A different insecticide was used at the BCC in 2021. Chlorantraniliprole is not a neonic but an anthranilic diamide, that works by interrupting normal muscle contraction. It is persistent and mobile in soil and water, and is toxic to aquatic invertebrates.

Chlorantraniliprole detections in *Englesby Brook* in 2021 were as follows:
(ppb = parts per billion)

July: 23.3 ppb; August: 108 ppb; October: 72.6 ppb

Chlorantraniliprole detections in *Potash Brook* in 2021 included these:
June: 3.1; July: 7.4; August: **19.2**; October: **11.7 ppb** .

The significant movement of this pesticide downstream is a warning about land uses and inadequate buffers upstream.

While researching pesticides used by BCC in 2021, I found that several contained components described as polymers, which are highly likely to be **PFAS**. Current legislation - S.25 - is attempting to address the issue of PFAS in pesticides. Spreading pesticides with PFAS is a bad idea.

High amounts of these neonics and other pesticides found in effluent from the Burlington Waste-water Treatment Facility indicate that such facilities *cannot filter out pesticides from water*. Are they being used on UVM or Champlain College campuses?

Golf course permits issued by the Agency stipulate only **25ft** buffers to flowing waters going beyond property boundaries. Test data from USGS above indicate that such buffers are *not effective* in preventing downstream contamination of waters used by the public.

The Agency has stated that they claim no responsibility to enforce the 500 ft buffers called for in Burlington's Pesticide Ordinance. I would urge a compromise on the buffers in order to protect waters downstream.

In summary, please support and vote soon on H.706 favorably to enable its passage this year to protect pollinators essential for food production. Please do *not add exemptions* to H.706 that would allow golf courses to use neonics. Please require the Agency to remove neonics from their list of approved golf course pesticides. Thank you for this opportunity to testify.