



Razelle,

Please post these comments on VPAC's SharePoint Site.

Thank you!

Barbara Burnett

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Vermont Pesticide Advisory Council (VPAC)  
Razelle Hoffman-Contois, Chair  
November 3, 2015

#### Comments on Non-Toxic Methods of Vegetation Control on Railroad Beds

I wholeheartedly support "Standin'(sic) Together for Healthy Solutions" and the City of Montpelier in their efforts to ensure that alternatives to herbicides for railroad vegetation management are used within the Montpelier city limits.

This would protect both human and ecological health. The Washington County railroad line in Montpelier runs adjacent to a public recreational bike and pedestrian path, to the Peace Park, to the high school, a day care center, the River Rock alternative school, the Monteverdi music school, a senior center (which prepares and serves meals to seniors and which also contains apartments for seniors), the City's Recreation Center, several businesses including several food manufacturing facilities, several restaurants and the Hunger Mountain Food Co-op. There are also numerous single family and multi-family homes--many with vegetable gardens--an apartment building for low income, elderly and disabled persons, a community house for marginalized members of the community (which also has a very large veggie garden), a block of condos, etc. It is also the home of at least one severely chemically sensitive resident as well as several cancer survivors.

In addition, the tracks are right next to the Winooski River at some spots, and actually cross the North Branch of the Winooski in downtown Montpelier.

I ask that VPAC members also take into consideration the following information as well (outlined in a recent paper submitted to VPAC by Sylvia Knight):

\*Railway herbicides have been founds in the waters of VT, in violation of ROW permits.

\*The US Geological Service has found that glyphosate has moved into aquifers and streams in the Midwest. It has also found glyphosate in atmospheric and rain samples. Glyphosate doesn't simply disappear--it moves far from it's target area and pollutes adjacent land, water, and air.

\*In addition to the landmark WHO study released in the spring of 2015, which declared glyphosate to be a probable carcinogen, I would also ask the members of the VPAC to also consider the following:

After the WHO study was released, nations began to ban the use of glyphosate by consumers. First in Germany, then in France, and now across Europe, nations are pulling the herbicide from store shelves as a way to begin to protect the health of their citizens.

In the US multiple lawsuits have recently been filed at the request of a number of individuals (farm workers, etc.) who claim that exposure to glyphosate has resulted in severe health problems for them. The number of cases is growing rapidly.

It appears clear to me that the tide is beginning to turn against herbicides in general and against glyphosate in particular. The only question seems to be how long it will actually take for the herbicide to be banned in the U.S.--first for consumers and finally by commercial agriculture and other interests.

Vermont is in the same position it was in when it took a stand against GMO's. Vermont has another opportunity to be a leader by banning the use of glyphosate in the state: whether by railroads for weed control or by agricultural interests or by consumers.

Why should we procrastinate until other states have already banned glyphosate--especially when exposure to it as well as other herbicides is thought to severely affect the health of the public as well as that of the environment.

Therefore, as a start, I would suggest that the VPAC takes steps to initiate legislation to forbid the use of glyphosate and other herbicides on the 2 1/2 miles of railroad track within the City limits.

#### Need for Major Repairs in Road Beds

I would also concur with Sylvia Knight's recommendation that VTrans Rail Program should assist VT Rail Systems in obtaining a grant to create a GIS map of weed communities in the Barre-Montpelier section of Washington County RR.

In addition, I support many of the recommendations made in the report on railroads and vegetation management study submitted to VPAC by Sylvia Knight very recently.

Railroad construction and maintenance have a huge influence on the presence or absence of weeds in the rail bed. VT Railway and Washington County railroad need to maintain their railroads a lot better than they do and stop relying on herbicides as a short-term maintenance fix.

VT Rail Program and/or Legislature should require a significant structural upgrade of the 2/12 miles of track in Montpelier to rid the track of dirt and provide a properly supporting ballast for trains carrying heavy loads of stone. This will contribute greatly to weed reduction and to rail safety.

The Montpelier City Council and STHS should request inspection records from the VT Rail Division for the Washington County Railroad (Barre-Montpelier) for the last 10 years and compare to FRA requirements.

#### Frostbite as an Option for Non-Toxic Weed Control

Using frostbite (condensed CO2) is one possible non-toxic method of weed control. But the railroad has to get rid of the soil in the rail bed and create a stone ballast bed, preferably on top of an asphalt layer to stop the weeds. That's going to be expensive and put the line out of operation for several months. Cleaning out the soil and putting down stone ballast would be a beginning.

Then VPAC should organize a demonstration of the Frostbite system and to use it on a portion of the railroad in Montpelier that was not treated with herbicides in 2015.

Depending on the demonstration results, they should authorize the purchase of the Frostbite system to use in all areas off-limits to herbicides.

VPAC has a vital role to play in finding a suitable non-toxic solution/s especially in heavily populated or agricultural areas or near waterways.

By law, VPAC is supposed to establish benchmarks by which pesticides will be reduced--but after several years of languishing in bureaucratic limbo this has not yet been completed. It should be completed ASAP. The VPAC should be actively working toward decreasing and then eliminating herbicide use in the state--not rewarding the railroad by allowing them to continue to use herbicides while they refuse to work with the public to find workable alternatives.

Respectfully submitted,

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