Comments for VT Citizens Advisory Council (CAC) 1/8/24

My name is Sylvia Knight. I live in the Winooski River/ Lake Champlain watershed, and am a member of the VT Pesticide and Poison Action Network.

On 12/23/24 I was troubled to see a distinctly brown color in Lake Champlain's water south of the Rt 2 causeway, noticeably different from the color of the water *north* of the causeway. Several inches of rain had fallen on the watershed on Dec.18, and the Winooski Delta was flooded. I received many notices of Combined Sewer Overflows (CSOs): 7 on 12/18; **17 on 12/19**; 2 on12/20; 1 on 12/21.

Relaying this concern to folks at DEC, I received a reply that the CSOs had ceased by 12/21 and were back to normal. But a broad expanse of lake water colored brown 5 days after a storm is not normal, and it is deeply concerning. There are too many persistent, toxic contaminants released in WWTF CSO effluent to accept as *normal*.

DEC staff claim that all VT municipalities with CSOs have submitted Long Term Control Plans, received ARPA funds, and are working to implement the plans.

How can CAC improve water quality when CSOs are permitted by DEC to discharge thousands of gallons of untreated or partially treated sewage containing PFAS, heavy metals, priority pollutants into streams in the L. Champlain watershed? We know that the wastewater treatment systems are *unable to remove these substances* from water before it is discharged to rivers or to farmland as sludge.

CAC was formed "to bring together people with diverse interests in the Lake to create a comprehensive pollution prevention, control, and restoration plan for protecting the future of the Lake Champlain Basin", a resource of national significance. We *cannot* achieve these goals without working "*upstream*" on what goes *into* WWTFs, stop toxins at their source, and create systemic responsibility for toxic materials used in our economy or eliminate them. Toxic contaminants are not acceptable in the lake or on farm land as sludge, now green-washed as "bio-solids".

Recommendations: 1) request a comprehensive report from ANR/DEC on the municipalities' WWTF Long Term Control Plans, sources of toxins, and expenditure of ARPA funds; 2) urge monitoring for PFAS, heavy metals and priority pollutants after repeated CSOs; 3) support legislation to remove PFAS from our economy.

Thank you for your consideration of my comments.