



Ed DeWitt
Executive Director

May 24, 2012

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Michael McClean
Director, Rights of Way Programs, Pesticide Bureau
Massachusetts Department of Agricultural Resources
251 Causeway Street, Suite 500
Boston, MA 02114

RE: 2012 Massachusetts Coastal Railroad Yearly Operational Plan

Dear Mr. McClean:

The Association to Preserve Cape Cod (APCC), the Cape's leading nonprofit environmental advocacy and education organization, has reviewed the 2012 Massachusetts Coastal Railroad Yearly Operational Plan (YOP) for vegetation management and submits the following comments.

As part of its ongoing mission, one of APCC's primary areas of focus is protection of Cape Cod's sensitive water resources. The Cape's sandy, porous soils make the region's groundwater especially vulnerable to contamination. Therefore, APCC is particularly concerned about potential threats to the Cape's groundwater and surface water resources.

In reviewing the YOP and the corresponding maps of towns where the application of pesticides is being proposed, it is unclear what sources were used in identifying sensitive areas, and in particular, the location of private wells. It is also unclear what degree of effort was made to ensure that all private well locations have been accounted for. Consequently, APCC cannot rely on a reasonable assumption that the information on the maps is accurate or complete.

In the absence of alternative non-chemical means to control vegetation, APCC strongly encourages the applicant to consult with affected towns and the Cape Cod Commission prior to commencement of the program in order to ensure that pesticide application crews are provided with the most accurate and up-to-date information.

However, there have been several recent developments and studies in the use of non-chemical vegetation management options for railroad rights of way. The Transportation Research Board has published a number of papers that

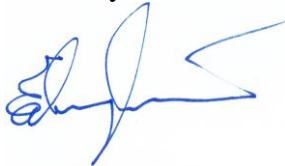
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point toward alternatives which are as effective and cost efficient as using pesticides. Some of these studies have occurred in New England and seem compatible with railroad operations on Cape Cod. APCC believes that it is past time for the Massachusetts Coastal Railroad, together with the Massachusetts Department of Agricultural Resources, to investigate the adoption of polices that reflect new approaches in vegetation management that are more responsive to environmental and human health concerns.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ed DeWitt', with a stylized flourish at the end.

Ed DeWitt
Executive Director

cc: Kyle Fair, TEC Associates
Scott Michaud, Cape Cod Commission