



March 12, 2015

**Ed DeWitt**  
*Executive Director*

John Lebeaux, Commissioner  
Massachusetts Department of Agricultural Resources  
251 Causeway Street, Suite 500  
Boston, MA 02114-2151

**BOARD OF DIRECTORS**

**Robert Cunningham**  
*President*

RE: Eversource Energy 2015 Yearly Operational Plan

**Kristin Andres**  
*Vice President*

Dear Commissioner Lebeaux:

**Robert Summersgill**  
*Treasurer*

The Association to Preserve Cape Cod (APCC) submits the following comments regarding Eversource Energy's Yearly Operational Plan (YOP) for 2015.

**Thomas Huettner**  
*Clerk*

Founded in 1968, APCC is the largest regional non-profit environmental organization on Cape Cod. Representing more than 5,000 members, APCC's mission is to promote policies and programs that foster the preservation of the Cape's natural resources. APCC focuses its efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

**Barbara Brennessel**

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**Elizabeth Jenkins**

**Blue Magruder**

**Eliza McClennen**

**Elizabeth Nill**

**Donald Palladino**

**Daniel Webb**

The 2015 YOP submitted by Eversource states that it will conduct an Integrated Vegetation Management (IVM) program on its transmission lines in the Cape Cod towns of Barnstable, Bourne, Chatham, Dennis, Eastham, Falmouth, Harwich, Mashpee, Orleans, Sandwich, Truro, Wellfleet and Yarmouth. In conducting its IVM, Eversource states that it intends to apply herbicides as a means to control vegetation growing along the utility's rights-of-way (ROW).

As has been pointed out numerous times in public comments submitted over the past several years by APCC, other environmental organizations, municipalities, elected officials and concerned citizens, Cape Cod has an abundance of sensitive habitats that support rare plant and animal species. Its sandy soils are highly permeable, allowing contaminants to easily leach through. The groundwater that flows beneath the surface is hydrologically connected to the Cape's many freshwater ponds and wetlands, and is also the source for the region's private and public drinking water supplies. These fragile resources are found on, and are in close proximity to, Eversource's ROW.

Eversource's continued use of herbicides as part of its IVM has the potential to adversely affect the Cape's sensitive habitats and water resources, as well as pose human health risks from exposure to herbicides. However, clear-cut mowing using large machinery, which Eversource has stated is its alternative method to control vegetation, can be devastating to those same sensitive habitats and rare species mentioned above.

Clearly, there are other methods of vegetation management that can be utilized that will not introduce toxic chemicals to the environment or result in a blanket leveling of all habitats within the ROW.

Manual removal of vegetation is one of those methods. Hand removal of targeted woody vegetation along the ROW has been successfully demonstrated by volunteer groups in

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several Cape Cod towns. For example, in 2013 and 2014 the Brewster Conservation Trust and the Harwich Conservation Trust each conducted vegetation management programs on their respective Brewster and Harwich properties along the ROW. Both organizations showed that undesirable vegetation can be effectively removed with a small group of volunteers using only hand tools. The effort achieved the same objective as Eversource's IVM, but without the risk of herbicides or the destruction of clearcutting.

Once again, APCC urges Eversource to be more responsive to the concerns expressed by the broad spectrum of Cape Cod citizens, elected officials and organizations opposed to the utility's current IVM policies. Eversource should work closely with community leaders to actively seek out viable low-impact options for vegetation management, such as hand removal, that will not compromise Cape Cod's fragile environment.

Sincerely,



Ed DeWitt  
Executive Director

cc: Michael McClean, Massachusetts State Pesticide Bureau  
William Hayes, Eversource Energy