



May 9, 2016

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

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RE: Eversource Energy 2016 Yearly Operational Plan

Dear Commissioner Lebeaux:

The Association to Preserve Cape Cod (APCC) writes to you regarding Eversource Energy's Yearly Operational Plan (YOP) for 2016.

Founded in 1968, APCC is the leading regional non-profit environmental advocacy and education 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.

The 2016 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, Brewster, Dennis, Falmouth, Orleans, Sandwich 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. Glyphosate, one of the herbicides commonly used by Eversource in its IVM, was identified last year by the World Health Organization as a probable carcinogen to humans. At the same time, clear-cut mowing, which Eversource has stated is its alternative method to control vegetation, can be devastating to sensitive habitats and rare species when done indiscriminately.

Clearly, there are other methods of vegetation management that can be utilized that will not

482 Main Street | Dennis, MA 02638

Tel: 508-619-3185 | info@apcc.org | www.apcc.org

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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 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 calls upon policy makers and 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



Don Keeran
Assistant Director

cc: State Senator Daniel Wolf
State Senator Viriato deMacedo
State Rep. Sarah Peake
State Rep. Timothy Whelan
State Rep. Brian Mannel
State Rep. Timothy Madden
State Rep. David Vieira
State Rep. Randy Hunt
Michael McClean, Massachusetts State Pesticide Bureau
William Hayes, Eversource Energy
Brewster Conservation Trust
Harwich Conservation Trust