



March 9, 2017

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Director of Rights-of-Way Programs
Massachusetts State Pesticide Bureau
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Re: Eversource Energy 2017 Yearly Operational Plan

Dear Mr. Edwards:

The Association to Preserve Cape Cod (APCC) writes to state our opposition to Eversource Energy's Yearly Operational Plan (YOP) for 2017.

We write in opposition for the following reasons:

1. Eversource and MDAR continue to overlook the vulnerability of the Cape Cod designated sole source aquifer. According to the U.S. Environmental Protection Agency, a designated sole source aquifer means that there are no reasonably available alternative drinking water sources should the aquifer become contaminated.
2. Eversource continues to overlook a truly Integrated Vegetation Management program and even experiment with other proven technologies and best management practices. Using chemicals first does not protect Cape waters—both groundwater and surface water;
3. Eversource continues to overlook the mounting volume of evidence that challenge the claim that glyphosate is benign.
4. Eversource continues to put profits over people.
5. Eversource continues to improperly monitor the environment for the effects of chemical spraying; indeed, Eversource has never considered implementing independent testing for pesticides it uses in the environment.
6. Business as usual is harmful to the health and well-being of people of Cape Cod. Instead of proactively working to avoid health and environmental impacts, Eversource seeks conclusive evidence of health and environmental risks. Where alternatives exist, common sense should take precedence over having to wait 20 years to see elevated cancer rates.
7. There is currently no independent means to verify that contractors for Eversource are following the procedures outlined in its Vegetation Management Plan (VMP). There is growing anecdotal evidence that procedures are not being followed.

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

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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 2017 YOP submitted by Eversource states that it will conduct an IVM program on its transmission lines in the Cape Cod towns of Barnstable, Bourne, Brewster, Chatham, Dennis, Falmouth, Harwich, Orleans, Sandwich and Yarmouth. In conducting its IVM, Eversource intends to apply herbicides as a means to control vegetation growing along the utility's rights-of-way (ROW).

APCC once again joins other organizations, elected officials and citizens in expressing great concern over the potential impacts from Eversource's spraying plan involving the use of herbicides. Cape Cod's sandy soils are highly permeable, allowing contaminants to easily leach through to groundwater, which is hydrologically connected to the Cape's many freshwater ponds, streams and wetlands. Groundwater is also the only source for the region's private and public drinking water supplies. Eversource's ROW passes through many of the Cape's drinking water supply areas, wetlands and other sensitive habitats.

The Massachusetts State Pesticide Bureau has an obligation to recognize the special nature of Cape Cod's soils and hydrology, and the implications these unique conditions may have for the region's human population and natural environment when exposed to concentrated applications of pesticides, including the herbicides identified in Eversource's IVM. The Massachusetts Executive Office of Environmental Affairs states that "Pesticides are poisonous substances that can have an adverse effect on the environment or impair human health if handled improperly. If misused, they could kill untargeted plants and animals or leave excess residues on food crops or in drinking water. Misuse of pesticides could cause health problems to people who are exposed to them by inhalation or skin contact or by eating affected foods or drinking contaminated water."

(<http://www.mass.gov/eea/agencies/agr/pesticides/pesticide-regulation-in-massachusetts.html>). The elevated cancer rate on Cape Cod is well documented. The underlying cause of the elevated rate is not understood.

Glyphosate is one herbicide listed by Eversource in its IVM. Due to its widespread use, glyphosate is contaminating water and groundwater resources throughout the U.S. and the world. There is mounting evidence that glyphosate poses human health risks as well as impacts on fish and wildlife. Recently, glyphosate was identified by the World Health Organization as a "probable carcinogen" for humans. Other human health concerns include interference with respiratory enzymes, interference with amino acid synthesis, damage to red blood cells resulting in anemia, disruption of normal gut bacteria and development of glyphosate-resistant E. coli bacteria. Some toxic effects on animals include carcinogenicity, liver and kidney disease, deficiencies in important metals and disruption of sex hormones.

Clear-cut mowing, Eversource's traditional fallback to herbicide use, is certainly not a desirable alternative to spraying. Clear-cut mowing can be devastating to sensitive habitats and rare species when done indiscriminately. APCC strongly believes there are viable alternatives to spraying herbicides and clear-cut mowing that can and should be utilized by Eversource. Eversource must begin thinking more like a farmer and less like a reaper. There are many tools available in vegetation management other than chemicals and clearcutting including selective planting, fire, grazing and meadowscaping.

As APCC has done in previous comment letters on Eversource's YOP, we once again point to successful efforts conducted by local volunteer groups in several Cape towns to manually remove targeted vegetation along the ROW. Two examples are the Brewster Conservation Trust and the Harwich Conservation Trust. These organizations each conducted a series of annual vegetation management programs on their respective Brewster and Harwich properties along the ROW. Their work demonstrated 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.

APCC therefore calls on Eversource to be more responsive to the concerns expressed by many Cape

Cod citizens, elected officials and organizations opposed to the utility's current IVM policies. Eversource should take advantage of the opportunity to work constructively with community leaders in exploring and adopting viable low-impact alternatives for vegetation management—such as the examples mentioned above—that will not compromise Cape Cod's fragile environment.

Sincerely,



Ed DeWitt
Executive Director

cc: State Senator Julian Cyr
State Senator Viriato deMacedo
State Rep. Sarah Peake
State Rep. Timothy Whelan
State Rep. William Crocker
State Rep. Dylan Fernandes
State Rep. David Vieira
State Rep. Randy Hunt
William Hayes, Eversource