



# Martha's Vineyard Commission

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June 20, 2017

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

Dear Mr. Lebeaux,

We sent the following letter to Mr. Clayton Edwards, the ROW Program Manager, in mid-May. We did not receive a response, and recently found out that Eversource's Yearly Operational Plan for Cape Cod and Martha's Vineyard was approved shortly thereafter.

We reiterate our concerns regarding the proposed spraying of herbicides along the electric rights-of-way in Edgartown, Oak Bluffs, and Tisbury scheduled to occur later this year. We have reviewed Eversource's 2017 Yearly Operational Plan for Cape Cod and Martha's Vineyard, as well as NSTAR's Five Year Vegetation Management Plan for 2013-2017, and are familiar with the State's regulations regarding herbicide use as a way to manage ROWs. We are concerned that the unique ecosystem of Martha's Vineyard has not been considered in these regulations and studies, and their application could cause harm in the short and long term.

Martha's Vineyard has taken great strides to address environmental concerns in a wide variety of issues. For example, in the past few years, there have been strict regulations imposed on fertilizer use, plastic grocery bags have been banned in all six towns, and actions are being taken to clean up the coastal ponds.

Island residents are concerned about the effects the proposed spraying of glyphosate, fosamine ammonium, triclopyr, metsulfuron-methyl, imazapyr, and others could have on the island's fragile ecosystem, and have felt that Eversource has not provided adequate outreach to address the impacts caused by the introduction of these chemicals into our ecosystem.

The island is a small, contained ecosystem that is easily stressed, and the only source of drinking water is obtained through a sole source aquifer. The use of any herbicides, including those approved for Sensitive Areas, could be detrimental to the health of the island's vibrant, natural environment, and would have extremely harmful consequences if they were to seep into the aquifer. Several of the proposed herbicides, including triclopyr and imazapyr, have been shown to move readily through soil, and have a history of contaminating surface and ground waters. This is especially concerning for the island, where the depth to ground water is often less than 15 feet.

There are many delicate and protected environments on the island. Some of the proposed spraying is adjacent to the Manuel F. Correllus State Forest, which has the highest concentration of rare species in the entire state of Massachusetts. The Island also has a large amount of Priority Habitat as identified by Natural Heritage Endangered Species Program.

There is little known about the long-term effects these substances have on human health, wildlife, and the environment. We are not confident that they will not have a detrimental impact. Has there been testing and evaluations to determine that these chemicals are safe to use in the Sensitive Areas of the island? There is an increasing amount of research that suggests these substances may not be as safe as was originally supposed.

Due to these reasons, we strongly request that the use of herbicides be reconsidered for Martha's Vineyard. The MVC is concerned about these practices and would like them to be more fully presented and discussed.

Any assistance from the State in encouraging Eversource to utilize alternative methods while these issues are evaluated would be greatly appreciated. We also would like our concerns considered as the State list of herbicides is reviewed for certification. We look forward to working with your office to have these issues more fully considered.

Sincerely,

Adam Turner  
Executive Director