



Martha's Vineyard Commission

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

Dear Mr. Lebeaux,

We correspond again to express our concerns regarding the State permitting of dangerous herbicides to be used on Martha's Vineyard. We offer the following specific information on glyphosate and triclopyr.

Regarding the herbicide glyphosate that is permitted by the State of Massachusetts, this chemical compound was added to the State of California list of chemicals known to cause cancer. The decision came about after the World Health Organization's International Agency for Research on Cancer (IARC) declared that glyphosate was "a probable carcinogen" in 2015. In order to make this determination, the IARC ascertained that: there was sufficient evidence to conclude that glyphosate causes cancer in animals studies; there was evidence that farmers exposed to glyphosate have higher rates of non-Hodgkin's lymphoma; and it was established that glyphosate has been shown to damage DNA, which is a well-characterized pathway to cancer. The designation now puts glyphosate in the same category as DDT (Dichlorodiphenyltrichloroethane).

Regarding the herbicide triclopyr, it is basically Agent Orange, which has been illegal for many years. Triclopyr is identical to Agent Orange except one carbon has been replaced by a nitrogen. This may change the molecule's physical properties with respect to ease of application, but it does not change how it is used in the field or its mechanism of action. Per the Dow Chemical company, the butoxy ester of Triclopyr (Garland 4), which is the form NSTAR/Eversource plans to use on the Island, is labeled "highly toxic to estuary/marine fish." It is even more toxic to marine invertebrates and has been shown to kill 50% of oysters at a concentration of 0.00001%. Its use is further complicated as Dow data have shown: "The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in groundwater contamination." In short, triclopyr moves through the soil and is toxic. Even its metabolite retains its herbicide activity.

There is absolutely no place for these compounds on Martha's Vineyard. Their use is even more egregious as Eversource is proposing to apply in close proximity to municipal wells and recharge areas, home wells, and waterways. We again request that the State review the use and effects of these herbicides.

Thank you again for your consideration.

Adam Turner
Executive Director