



Martha's Vineyard Commission

OLD STONE BUILDING • 33 NEW YORK AVENUE
P.O. BOX 1447, OAK BLUFFS, MASSACHUSETTS, 02557
PHONE 508-693-3453 • FAX 508-693-7894
INFO@MVCOMMISSION.ORG • WWW.MVCOMMISSION.ORG

March 19, 2018

Clayton Edwards
Pesticide Inspector/ROW Program
Department of Agricultural Resources
251 Causeway St., Suite 500
Boston, MA 02114

Dear Mr. Edwards,

The Martha's Vineyard Commission is writing to comment on Eversource's Five-Year Vegetation Management Plan, on the basis that it does not adequately inform and protect the public, and it allows the use of potentially dangerous herbicides.

The common theme with all of the herbicides used by Eversource (fosamine ammonium, triclopyr, imazapyr, metsulfuron-methyl, glyphosate) is that there are no long term studies about their effects on human health and the environment. The Cape & Islands have many unique characteristics that aren't found in other places throughout the state; including acidic, sandy soils and a shallow water table. These special characteristics are not accounted for in this plan.

The tests used to prove that these chemicals are safe are incredibly outdated and have such a low sample size, usually six to ten male forestry workers who were exposed dermally for lengths ranging from three months to a year, that their validity and correlation to the rest of the population is called into question. We especially call for the elimination of the use of Triclopyr on Martha's Vineyard.

On the safety data sheet for Triclopyr provided by this department, it reads "No information was obtained on the invertebrate toxicity of Garlon 4, the butoxyethyl ester of Triclopyr."¹ Studies have shown Triclopyr to be highly toxic to aquatic invertebrates, especially oysters. There was one study conducted where a concentration of 0.0001% killed half of an oyster population.² It has also been proven that oyster larvae are much more susceptible to Triclopyr than other marine invertebrates.³ This is especially concerning for the Cape & Islands because of the efforts to use oyster cultivation as a nitrogen remediation technique in the coastal ponds.

Triclopyr has also been shown to move readily through soil, especially acidic, sandy soils with low carbon matter. On the safety data sheet provided by this department, it states that "microbial degradation is

¹ <http://www.mass.gov/eea/docs/agr/pesticides/rightofway/docs/triclopyr-2011.pdf>; p.6

² Ward, T.J. and R.L. Boeri. 1991c. Triclopyr-BEE: Acute flow through shell deposition test with the eastern oyster, *Crassostrea virginica*. Dow Elanco.

³ U.S. EPA. Prevention, Pesticides and Toxic Substances. 1998. Reregistration eligibility decision (RED): Triclopyr. Washington, D.C., Oct. Pp. 45.

the primary mechanism by which Triclopyr is degraded in soils..."⁴ The issue is that in sandy, acidic soils, Triclopyr dissolves in the water and moves quickly through the soil, instead of binding to the soil and degrading.⁵

The burden of proof should lie with the applicant, Eversource, to prove that all of the proposed herbicides are safe, and are not causing negative impacts on the environment, especially on the drinking water. The Towns and individual citizens should not be required to pay for expensive water and soil tests to prove that the chemicals used are causing harm. These tests should be conducted, at the applicant's expense, to prove that the herbicide applications are safe. The MVC requests the Department's support in creating such an agreement with Eversource.

Most of the power line ROWs on the Island run through conserved land, and the wire and border zones are already maintained for fire protection and trail use. The MVC suggests that MDAR cooperate in facilitating agreements between Eversource and the Sheriff's Meadow Foundation (West Chop Woods in Tisbury) and the Department of Conservation and Recreation (the Manuel F. Correllus State Forest in Edgartown). These agencies are completely capable of maintaining the power line ROWs to Eversource's specifications without the use of herbicides; for years the DCR used to maintain the ROWs in Edgartown. The small ROW in Oak Bluffs could easily be managed by the Oak Bluffs Highway Department.

Finally, we request that a regular meeting be held each year that herbicide applications are scheduled between Eversource and the Island Towns. The purpose of this meeting is to brief adjacent land owners and other interested parties on the dates, locations, concentrations and other attributes of the herbicide application program. This will ensure that the public is informed and protected.

There is danger in using these compounds on Martha's Vineyard. We request that the State review the use and effects of these herbicides, and control Eversource's use of them above the Cape & Island's shallow water table.

Thank you for your consideration.



Adam Turner
Executive Director

⁴ Reference 1, p. 2.

⁵ JN Smith, RC Martin, RG Croix, Levels of the herbicide glyphosate in well water. *Bulletin of Environmental Contamination and Toxicology* 1996. 57:759-65.