



# Town of Chatham

Office of the Selectmen  
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June 6, 2017

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

RE: Eversource Energy's 2017 Yearly Operational Plan

Dear Commissioner Lebeaux,

On May 16, 2017 the Chatham Board of Selectmen voted to write to you regarding Eversource Energy's Yearly Operational Plan (YOP) for 2017 in the event that the MA Department of Agriculture (MDAR) once again approved the YOP.

The 2017 YOP submitted by Eversource Energy states that it will conduct an Integrated Vegetation Management (IVM) program on its transmission lines in the towns of Barnstable, Bourne, Brewster, Chatham, Dennis, Falmouth, Harwich, Orleans, Sandwich and Yarmouth. In conducting its IVM, Eversource Energy 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, 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 Energy's ROW.

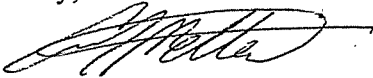
Eversource Energy's continued use of herbicides as part of its IVM has the potential to adversely affect the Cape's sensitive habitats and water resources, as well as pose human health risks from exposure to herbicides. Glyphosate, one of the herbicides commonly used by Eversource Energy in its IVM, has been identified by the World Health Organization as a probable carcinogen to humans. At the same time, clear-cut mowing, which Eversource Energy has stated is its alternative method to control vegetation, can be devastating to sensitive habitats when done indiscriminately.

Clearly there are other methods of vegetation management that can be utilized that will not 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 had been successfully demonstrated by volunteer groups in several Cape 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 Energy's IVM, but without the risk of herbicides or the destruction of clearcutting.

The Chatham Board of Selectmen once again re-confirms its resolution adopted November 30, 2010 opposing Eversource Energy's inclusion of herbicide use in its YOP. As an aggrieved party, the Town requests an adjudicatory hearing with MDAR before any herbicide application is performed within the Town of Chatham.

Sincerely,



Cory J. Metters  
Chairman

cc: Governor Charlie Baker  
State Senator Julian Cyr  
State Rep. Sarah Peak  
Laura Kelly, POCCA