



Cape Cod for a truly green nstar
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As part of its five-year Vegetation Management Plan in compliance with 333 CMR 11.00, NSTAR Electric and Gas Corporation (NSTAR) intends to apply five different herbicides under approximately 150 miles of electrical and transmission lines across Cape Cod and the Islands. For decades, NSTAR (formerly Boston Edison and Commonwealth Electric) used only non-chemical methods for controlling weeds along its rights-of-way, employing mechanical cutting and hand-mowing exclusively across the state, including on Cape Cod.¹

Between 2004 and 2007, NSTAR began spraying pesticides on Cape Cod along rights-of-way. Residents on Cape Cod learned of these pesticide plans when NSTAR filed a new Vegetation Management Plan in 2008. Following months of public outcry and delay, NSTAR agreed to a moratorium on herbicide spraying through the end of 2010. In the spring of 2011 they intend to begin spraying once again. These herbicides threaten public health, the environment and precious drinking water resources on Cape Cod. We, the undersigned organization, oppose pesticide use along rights-of-way on Cape Cod, and ask that NSTAR commit to a no-spray, herbicide-free policy on Cape Cod rights-of-way for the following reasons:

- In general, **herbicides are harmful to living organisms**. Herbicides, like all pesticides, are designed to kill, and they can harm more than just the intended target. NSTAR plans to use glyphosate (Accord), imazapyr (Arsenal), metsulfuron methyl (Escort), triclopyr (Garlon 4), and fosamine ammonium (Krenite). According to the Environmental Protection Agency (EPA), **glyphosate can cause kidney damage and reproductive disorders in humans and is an endocrine disruptor**.² Glyphosate is one of the most widely used pesticides in the country, and earlier this year the New York Times reported that its overuse is leading to the evolution of glyphosate-resistant weeds, forcing farmers to go back to plowing and other mechanical methods of weed control, or to even more toxic pesticides.³ A study in 1999 by the **American Cancer Society linked glyphosate exposure to non-Hodgkins Lymphoma**.⁴
- The herbicides NSTAR proposes for use on Cape Cod can **migrate off rights-of-way, seeping into groundwater and surface water** and exposing humans and aquatic organisms to toxic chemicals. A study of Metsulfuron Methyl on rights-of-way stated that the chemical is highly mobile in the environment and has the potential to contaminate groundwater.⁵ **Cape Cod is an EPA-designated sole source aquifer**, meaning the aquifer is the only source of drinking water for Cape Cod and “if contaminated, would create a significant hazard to public health.”⁶ Sandy soils across the Cape leave groundwater particularly vulnerable to contamination. Cape Cod is very windy and documented wind velocities rarely fall within label restrictions, meaning that herbicides will drift.

¹ <http://www.mass.gov/agr/pesticides/rightofway/vmp/NSTAR-VMP-2008-2012.pdf>, p. 7

² <http://www.epa.gov/safewater/contaminants/basicinformation/glyphosate.html#three>

³ <http://www.nytimes.com/2010/05/04/business/energy-environment/04wed.html?pagewanted=all>

⁴ *A Case-Control Study of Non-Hodgkin Lymphoma and Exposure to Pesticides*, American Cancer Society, 1999..

<http://www.beyondpesticides.org/documents/acs-nhlymphoma-1999.pdf>

⁵ <http://www.oregon.gov/ODF/privateforests/docs/metsulfuronmethyl.pdf>, Oregon State University.

⁶ <http://www.epa.gov/ne/eco/drinkwater/solecape.html>

- **Non-toxic alternatives to weed control on rights-of-way already exist** and are readily available. For decades before 2004, NSTAR dealt effectively with weeds on Cape Cod through selective hand-cutting and mowing. We are asking NSTAR to return to those safer, non-chemical methods of weed control.

We recognize that herbicide treatment can be less expensive in the short-term, however, the use of herbicides to control weed growth along rights-of-way on Cape Cod is an unnecessary risk for public health and the environment. The short-term financial benefits are far outweighed by the long-term liability for risks posed to precious drinking water, the health of Cape Cod communities, and the safety of workers. We request that NSTAR abandon its current plan to use herbicides along rights-of-way on Cape Cod and commit to a no-spray, pesticide-free policy of vegetation management on Cape Cod and the Islands.

Respectfully,

ORGANIZATION/BUSINESS: _____

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