

West Barnstable Water District
2160 Meetinghouse Way
West Barnstable, MA 02668

March 20, 2017

Clayton Edwards
Director of Rights-of-Way Programs
Massachusetts State Pesticide Bureau
251 Causeway Street, Suite 500
Boston, MA 02114-2151

Dear Mr. Edwards,

On March 20, 2017, the West Barnstable Water Commissioners met at the West Barnstable Fire Station and discussed the Yearly Operational Plan (YOP) as submitted by Eversource Energy, Eastern MA for 2017 as it may affect the water supply in the West Barnstable Water District. We send this letter with unanimous consent.

The concern expressed by the Water Commissioners is that the 2017 YOP provides for herbicide application along the Right-of-Way which accommodates the power lines. The Right-of-Way is within the Water Protection Zone ("WP") of the proven, potential municipal well for the residents and citizenry of the West Barnstable Fire District. This, the District's only proven well, has been identified as a future public water supply with the capacity of delivering over one million gallons of water a day. Spraying herbicides within the WP zone may compromise the pristine water quality that we expect to be available for use should this well be called into service. It is our obligation and responsibility to safeguard the integrity of this well for our constituency in West Barnstable now and for the future.

Given the recent contamination of wells in the Hyannis Water System¹, potential municipal water supplies like ours in West Barnstable are increasingly more valuable. We are cognizant that there are constant threats of contamination to established wells in more developed areas of the Town of Barnstable, such as within the village of Hyannis.

At this time, residents in the West Barnstable Fire District are served by private water wells. So although there is no municipal water service in our District at this time, we are vigilant to safeguard the integrity of the water sources of residents along the Right-of-Way.

We are aware of mounting concerns about the detrimental public health effects of herbicides. It is especially unsettling to learn of the harmful effects of glyphosate (primary ingredient in *Roundup*), causing apprehension not only in the United States, but globally as was reported in, "The World Health Organization's research arm declared glyphosate a probable carcinogen".² We found that the World Health

¹Debi Boucher Stetson, "Barnstable sues PROS manufacturers over well contamination," [Barnstable Patriot](#) 23 Nov. 2016

<http://www.barnstablepatriot.com/news/20161123/barnstable-sues-pfos-manufacturers-over-well-contamination>

²Daniel Cressey, "Widely Used Herbicide Linked to Cancer," [Scientific American](#) 25 Mar. 2015

<https://www.scientificamerican.com/article/widely-used-herbicide-linked-to-cancer/>

Organization's International Agency for Research on Cancer recognizes this on its Q&A fact sheet, dated 1 March 2016.³

We also recognize that the Town of Barnstable has adopted regulations from the Board of Health: **"The use of herbicides is prohibited along easements, rights-of-way, railroads, power lines, or similar uses, within the Town borders, unless the Board of Health approves a written application for such use in accordance with the provisions of § 332-4 hereof."** (§332-3; Town of Barnstable, Board of Health Regulations).⁴

Additionally, there are regulations that specifically address the application of herbicides as it relates to public or private wells; wetlands and watercourses; and dwellings, barns and cultivated land. (§332-5; Town of Barnstable Board of Health Regulations).⁵

As Water Commissioners for the West Barnstable Water District, we are cognizant of the many private wells, cultivated cranberry bogs, wetlands, horse paddocks and livestock operations in addition to private gardens that may be affected by herbicide applications along the Right-of-Way. We feel obligated to express these concerns as it relates to the Vegetation Management Plan in Eversource's Right-of-Way. We expect that all non-herbicidal treatments of vegetation control in the Right-of-Way be exhausted before herbicidal applications are considered.

Moreover, we are aware of the chance of accidents and spillage by the spraying crew during treatments, further putting our water supplies at risk. Such damage simply cannot be undone.

Finally, we expect that our partner groups will be equally vigilant of herbicidal application as it affects public water supplies currently in operation and identified for future service.

Thank you for this opportunity to comment on the 2017 Yearly Operational Plan as submitted by Eversource.

Sincerely,

Kris Clark, Clerk
West Barnstable Water Commissioners
Enclosed: 3 Attachments

cc: Paul Canniff DMD, Chair, Town of Barnstable Board of Health
Ed Smith, Chair, West Barnstable Prudential Committee
Mark Ells, Town Manager, Town of Barnstable
Eric Steinhilber, President, Barnstable Town Council
Phil Wallace, Councilor, Precinct 11
Tom Lee, Chair, Town of Barnstable Conservation Commission
Lindsey Council, Chair, Town of Barnstable Water Resources Committee
William Hayes, Sr. Transmission Arborist, Eversource Energy, Eastern MA

³https://www.iarc.fr/en/media-centre/iarcnews/pdf/Q&A_Glyphosate.pdf

⁴www.town.barnstable.ma.us. <http://ecode360.com/6561639>

⁵www.town.barnstable.ma.us. <http://ecode360.com/6561645>