

December 17, 1997

Board of Selectmen
Town of Falmouth
Town Hall Square
Falmouth, MA 02540

Dear Honorable Board Members,

In September, I copied you on a letter with attachments (enclosed here) that I sent to the Conservation Commission regarding a grant awarded to the Buzzards Bay Project through the Massachusetts Department of Environmental Protection's (DEP) Section 319 Non-Points Source Pollution Program. This grant, for a project titled "Buzzards Bay Cranberry Bog Initiative" included funding to physically isolate the Coonamessett River from the town owned cranberry bogs that the town commercially leases. The Town of Falmouth Conservation Commission, which owns the bogs on behalf of the town, supported the Buzzards Bay Project in this proposal. The total grant money that would be available to the town under this initiative may exceed \$80,000.

It is important that I meet with you as soon as possible for several reasons. First, the town must decide definitively whether it wishes to proceed with this project. Since our proposal was initially developed, the contaminant EDB was found in the bog irrigation water, and were most recently reported by the press to be contained in the berries. Earlier this week, Jeff LaFleur, Executive Director of the Cape Cod Cranberry Growers Association, informed me that Ocean Spray was not renewing its agreement with your lease holder, Brian Handy, for cranberry production on the town owned bog. These facts obviously bear on what the Town of Falmouth will do with its bogs.

I have heard Falmouth officials mention options for these parcels ranging from letting the bogs revert to natural wetlands to maintaining the bogs until any perceived EDB impacts are eliminated. Although all these issues will take time to sort out, the town must decide definitively whether it wishes to accept these funds and proceed with a project to isolate the Coonamessett River from the bog.

I am requesting 15 minutes to provide an overview of this project and related issues. You should allow, however, adequate time for your discussion. Thank you for considering this matter.

Sincerely,

Joseph E. Costa, Ph.D.
Executive Director

cc. Conservation Commission
attachments

Additional Background on BBP Cranberry Bog Initiative

The purpose of our initiative is to inventory and help remediate cranberry bogs where the owners or landusers do not have the means of impounding water on bogs. This impoundment following pesticide application is required to meet state and federal pesticide regulations. Pesticide manufacturer's application instructions often require impoundments from one to several days before release into surface waters to prevent toxicity to aquatic life. These requirements are impossible to meet for those bogs where a stream or river runs through and is part of the bog since a heavy rain will wash pesticides into the stream.

The proposal was based on the premise that a small number of bogs, perhaps only 10% in the region, were so called "flow through bogs" and that these sites warranted state and federal financial and technical assistance. At these sites the bog is not physically separated from streams or adjoining ponds by dikes or berms. In these kinds of bogs, keeping pesticides out of the adjoining surface waters is difficult. Many of the pesticides (insecticides, fungicides, and herbicides) applied to cranberry bogs require impoundments of one to several days to meet manufacturer guidelines and state and federal pesticide requirements to minimize mortality to aquatic species. Often these pesticides are applied through the irrigation system. Not only are farming Best Management Practices (BMPs) like half-head irrigators not a foolproof mechanism, but applied pesticides can easily be washed into surface waters after a heavy rain in these bogs.

We proposed three main tasks:

1) Conduct an inventory of bogs using GIS data layers and aerial photographs to identify bogs that are potential Best Management Practice opportunity sites. Based on the presence of herring runs, public water supplies, and so forth, this inventory would establish priorities and subsequently be used as a tool by the Project and other agencies to secure Army Corps, EPA, and other agency funding to isolate these flow through streams and ponds from the bogs.

2) Based on this data, conduct an outreach campaign to bog operators to encourage their involvement with USDA-NRCS in the development of Farm Plans to address these issues, and

3) Implement a demonstration project. In our proposal we identified a bog owned by the Town of Falmouth Conservation Commission which owns the largest flow through bog in Massachusetts.