

Wadmalaw Island Land Planning Committee

PO Box 59
Wadmalaw Island, SC 29487

1 October 2015

Jennifer Gruber
SCDOT - District 6
2401 Maintenance Way
North Charleston, SC 29406

Ms. Gruber,

As the Public Works Chairperson, I am writing the following request on behalf of the Wadmalaw Island Land Planning Committee (WILPC). WILPC is an 18-member committee originally formed in 1988 by the Charleston County Council to study land use, zoning, growth, and development issues on Wadmalaw Island.

The committee formally requests a Spray Exclusion Zone along state routes and rights-of-way on Wadmalaw Island. Specifically, the WILPC requests SCDOT exclude the use of chemical agents as part of the Integrated Roadside Vegetation Management Program. The committee unanimously agrees that the exclusion is in the best interests of residents on the island and will be protective of its unique environmental and cultural characteristics.

This decision and request is a result of the committee's review of chemical methods utilized by SCDOT in vegetation control and side trimming. The committee also reviewed the product inserts, MSDS, and other literature for chemicals utilized by SCDOT, including Garlon 4 Ultra. In addition, the committee spoke with individuals from the SCDOT District 6 Office and members at the SCDOT State office responsible for executing and managing the Integrated Roadside Vegetation Management Program.

Significant points of concern were drawn from the Garlon 4 Ultra specimen label. For example, according to the label, the chemical should "only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal." The committee realizes the chemical is applied in a targeted manner. However, the majority of rights-of-way along coastal Wadmalaw Island are adjacent to both residential areas and sensitive ditches with water flows that directly impact freshwater and saltwater tidal wetlands. The specimen label further states, "The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination." The application areas are directly adjacent to residential areas and are in close proximity to well points responsible for supplying drinking water.

Wadmalaw Island is not serviced by public utilities and all of the residents of the island rely solely on residential well water for their drinking water. The vast majority

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of the wells on the island are classified as shallow wells drawing from shallow subsurface water bodies. Chemical vegetative control is an unnecessary and unwarranted risk in these areas given that there are other means available within the Roadside Vegetation Management Program to manage vegetation along Wadmalaw Island's rights-of-way.

Furthermore, Wadmalaw Island has a rich agricultural tradition. In addition to large agricultural operations, many residents operate small gardens and family farms. The specimen label for Garlon 4 states that its use is contraindicated "where runoff or irrigation water may flow onto agricultural land." The committee realizes the state practices restricted spraying along "Designated Agricultural" tracts, but the state cannot prevent runoff onto the numerous undesignated family gardens and small agricultural operations along Maybank Highway, Bears Bluff, and other state routes on the island. For example, a WILPC Chairperson was personally impacted when his fruit-bearing tree was inadvertently sprayed and killed after the SCDOT fall chemical application.

Finally, Maybank Highway is a designated a "State Scenic Route." The chemical application detracts from the visual characteristics of this highway. After chemical application, there are areas of vegetation and trees that are dead throughout the year. These areas of brownout violate the recommendation in the SCDOT Vegetation Management Guidelines that, "Brownout should be minimized."

On behalf of WILPC, I look forward to the SCDOT response and appreciate SCDOT efforts to maintain the roadways and rights-of-way of Wadmalaw Island while preserving the unique cultural and historic characteristics of the island. I am available for discussion and can be reached at 504-339-3498. I also would like to extend an invitation for you to attend a WILPC meeting should you so desire.

Sincerely,



Michael Regan
Public Works Chairperson, WILPC