

Connecticut Botanical Society

P.O. Box 9004, New Haven, CT 06532

September 15, 2020

Eversource
48 Tolland Stage Road
Tolland, CT 06084
Attn: Robert D. Deptula, Supervisor
Environmental Land Use Permitting

RE: *CBS Recommendations for Electrical Utility Right-of-Way Vegetation Management*

Dear Mr. Deptula:

The Connecticut Botanical Society recognizes you and your colleagues at Eversource for working to safely and sustainably power Connecticut's homes and businesses. As your allies and neighbors, we feel the responsibility to offer our collective ecological expertise in the form of the attached Recommendations for Electrical Utility Right-of-Way (ROW) Vegetation Management. These are recommendations to help Eversource to safely deliver power statewide in compliance with relevant codes, while better protecting the important natural communities of powerline ROWs.

Our recommendations are the result of nearly a year of work by our ROW subcommittee. In addition to our own experience and expertise, they incorporate contributions by scientists from Connecticut College, the University of Connecticut, the Connecticut Agricultural Experiment Station, and the Connecticut Invasive Plant Working Group (CIPWG), who share concerns about ROW management. Particularly valuable are the new Best Management Practices for preventing invasive plant spread from construction and maintenance sites, issued in March 2020 by the CT Invasive Plant Council (<https://cipwg.uconn.edu/>).

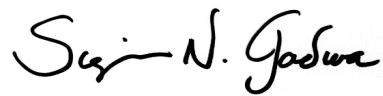
We have worked hard to develop guidelines that are a win-win for Eversource and ROW natural communities because we understand that sustainable solutions require genuine partnership. We also understand that as more research is done, and as experiences of contractors and landowners are shared, these recommendations can be further fleshed out. Of particular need is research for effective and cost-effective management for rare species and priority invasive species.

By implementing our recommendations for fostering stable, tree- and invasive-resistant ROW plant communities, Eversource may also reduce its labor and expenditures. This is an opportunity for Eversource to strengthen its public image as a utility provider invested in stewarding Connecticut's natural resources, with an active role in environmental conservation within our communities. These ROW Management Recommendations offer ecologically sound and cost-effective advice that will help preserve the biodiversity of our state.

Sincerely,



David Yih, PhD
President, Connecticut Botanical Society
yyih@wesleyan.edu



Sigrun N. Gadwa, MS
Chair, CBS Ecology & Conservation Committee
sigrun.n.gadwa@gmail.com

cc: Michelle Ford, Eversource Licensing & Permitting
Marcia Wellman, Eversource Siting & Construction
Jamie Lintner, Eversource Real Estate
Melanie Bachman, Executive Director, Connecticut Siting Council
Katie Dykes, Commissioner, Department of Energy & Environmental Protection
Senator Norm Needleman, Chair, Connecticut Energy and Technology Committee
Representative David Arconti, Chair, Connecticut Energy and Technology Committee
Amy Paterson, Executive Director, Connecticut Land Conservation Council