

rec'd 3/14/19

March 1, 2019

Leverett Conservation Commission
9 Montague Road
Leverett, MA 01054

RE: Eversource Energy Right-of-Way (ROW) Maintenance Activities

Dear Commission Members,

Eversource Energy (Eversource) is providing notice of planned and scheduled vegetation maintenance work on the electric transmission right-of-way(s) (ROW) located within your municipality for the 2019 calendar year. The planned maintenance will involve floor cutting, side pruning and the selective removal of hazard trees that are located along or just beyond the right-of-way edge.

- Floor cutting is clearing all incompatible woody vegetation that will be greater than 12 feet tall this growing season to maintained floor/easement ROW width. Woody vegetation is removed around all pole/tower structures, guide wires, gates/barriers and all "off road" access roads. Incompatible woody vegetation is removed 30 feet back from primary road crossings and/or ROW wooden barrier. All woody vegetation shall be mowed or chipped and removed from ROW.
- Pruning and hazard tree removal is required to comply with our vegetation management clearance program requirements for ensuring that vegetation does not contact or encroach within minimum distances of the energized transmission system. Our current cycle requires that this pruning be performed once every ten years. All planned work is reviewed in advance and all tree removals beyond the limits of the ROW easement area are discussed with property owners prior to the performance of the work.

The maintenance work is being conducted under the WPA M.G.L. Chapter 131, Section 40, and 310CMR 10.02(2)(a)(2), which provide for the following exemption:

"activities conducted to maintain, repair or replace, but not substantially change or enlarge an existing and lawfully located structure or facility used in the service of the public and used to provide electric, gas, water, sewer, telephone, telegraph and other communication services, provided said work utilizes the best practical measures to avoid or minimize impacts to wetland resource areas outside the footprint of said structure or facility."

Eversource is sending this notification to inform the Conservation Commission of the work and provide a contact for additional information. Under a separate correspondence and in accordance with 220 CMR 22.00, the Town Administrator was also notified of this maintenance work by Eversource Energy Electric Transmission Vegetation Management.

In addition to the activities described below, a locus map is enclosed.

Project: ROW WT-11 Utility Maintenance – Vegetation Management

Location: See attached maps.

Project Description: Vegetation management on transmission Rights-of-Way is an ongoing activity to provide worker safety and ensure electric service reliability, as well as controlling vegetation that hinders emergency restoration.

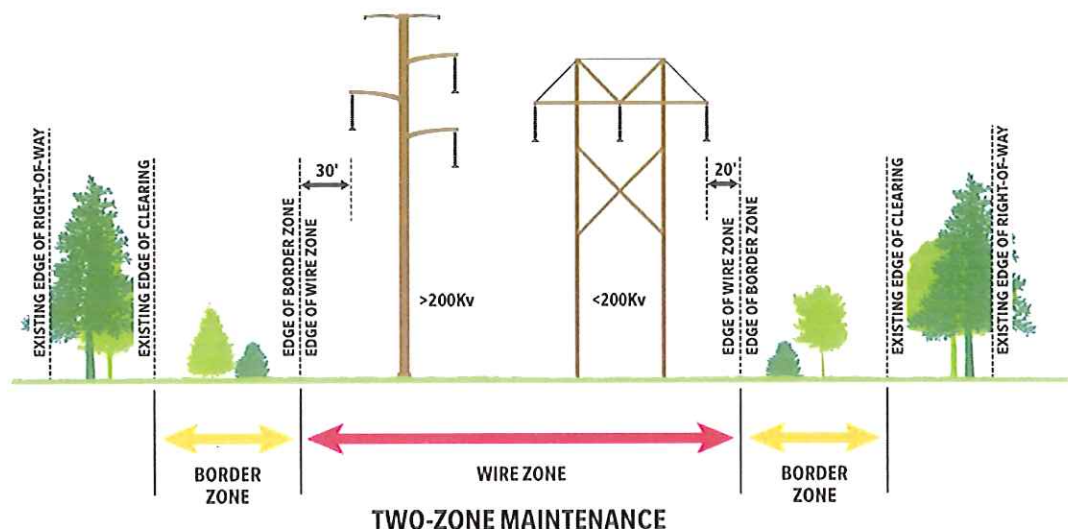
Eversource’s Integrated Vegetation Management Program (IVM) employs a Wire Zone-Border Zone method to maintain our transmission corridors. This method includes the establishment of two separate management zones:

The Wire Zone is the area directly under the transmission lines, extending out minimally 20 feet outside the wires. In this zone, all trees and brush are removed, and native, low-growing plant communities that have a mature height of three feet or less are preserved.

The Border Zone is the area from outside wire zone to the edge of the cleared area or the easement edge. In this zone, incompatible tall-growing trees are removed and native trees and shrubs that have a mature height of 25 feet or less may remain where possible.

Outside the ROW easement, trees that have the potential to damage transmission wires and/or towers will be pruned or removed with permission of the property owner.

The diagram illustrates a typical right-of-way condition. This work is occurring within the existing edge of clearing. The subject ROW may have a different configuration of transmission structures.



Environmental Protection Measures: As this work may take place within a buffer zone and/or wetland resource areas, Eversource requires this work to be performed using Eversource's standard best management practices to prevent permanent impact to the environment. These best management practices are listed below.

- Vegetation control activities are managed by degreed arborists holding certifications in Massachusetts and the International Society of Arboriculture.
- Vegetation Management activities are performed under a Vegetation Management Plan (VMP) and Yearly Operating Plan (YOP) submitted to the Massachusetts Department of Agricultural Resources. In addition, Best Management Practices used during these activities are based on standard requirements received from the Natural Heritage and Endangered Species Program (NHESP) under the Massachusetts Endangered Species Act (MESA).
- Unless safety concerns dictate otherwise and/or where feasible, the following general practices are used when working in and around wetlands:
 - Vehicle traffic will remain on ROW access roadways as much as possible.
 - Heavy equipment will remain outside of wetlands with visibly saturated areas to minimize rutting.
 - Vegetation management in wetlands with visibly saturated areas will be performed by hand, on swamp matting, or using low pressure equipment.
 - Low growing shrubs, such as winterberry or high bush blueberry will remain in the wetlands. (Note: these species may be trimmed or mowed, but their root system will not be destroyed or grubbed out).
 - Wood and cut branches will be diced and left within the rights-of-way. Diced vegetation will not be left within access areas or within the cleared areas around structures and guy wires. Debris will also be kept out of water courses, stream and river banks, and bodies of water including standing water in wetland areas.
 - No refueling of equipment will take place within 100 feet of wetlands.

If the Commission should have any questions or would like to meet regarding this letter or the scheduled maintenance activities, please call Jonathan Roberge at 401-484-2423. Thank you for your consideration in this matter.

Respectfully,



Jonathan Roberge
Environmental Specialist, Licensing & Permitting
Eversource Environmental Affairs