

## The Garden Club of New Haven

*Promoting the preservation of natural resources is one of the primary missions of The Garden Club of New Haven (GCNH) and of the organizations with which is affiliated, the Federated Garden Club of Connecticut and the Garden Club of America. Since 2011, GCNH has actively participated in educating the public about issues involving trees and power and advocating for a balanced approach to preserving the benefits of trees and protecting public safety, including power reliability.*

June 12, 2022

Marissa Paslick Gillett, Chairman  
John W. Betkoski III, Vice-Chairman  
Michael Caron, Commissioner  
Public Utilities Regulatory Authority  
Ten Franklin Square  
New Britain, CT 06051

Filed electronically

Re: Eversource Line Maintenance Plan for 2022 transferred from Docket No. 21-12-31 to Docket No. 17-12-03RE08 for review; Request for PURA to halt implementation of Eversource "resiliency projects"

Dear Chairman Gillett, Vice-Chairman Betkowski and Commissioner Caron:

We respectfully request that PURA halt implementation of Eversource vegetation management "resiliency projects" in all towns where such projects are planned to proceed, which, to date, include Chester, Clinton, Guilford, Mansfield, Middletown, Naugatuck, Newtown, Redding, Sharon, West Hartford, Windham and Woodstock.<sup>1</sup> There is precedent for suspending proposed deviations from standard vegetation management, pending review.<sup>2</sup>

The Eversource project has commenced in Redding, and was described in a slide show document in a community meeting in Redding.<sup>3</sup> The same approach would presumably be used in the other towns. On page 8, Eversource states explicitly that it intends to remove "hazardous and non-hazardous trees in both the public right-of-way and on private property" within the "Fall-Zone," *i.e.*, any tree that could potentially fall on the wires, even if healthy and structurally

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<sup>1</sup> Click [New Haven Register, June 28, 2022](#). Similar articles appeared in other CT local newspapers.

<sup>2</sup> Following public objections to planned use of Enhanced Tree Trimming (ETT), the Authority suspended its use pending further review on March 11, 2014 (press release) in Docket No. 12-01-10. See Attachment to this Correspondence: 12-01-10 tree trim release 031114.pdf

<sup>3</sup> See Attachment to this Correspondence: EVERSOURCE Veg Mgmt Resiliency '22.pdf

sound, would be removed. (See p. 12 of the Eversource document.) GCNH has long supported removal of hazardous trees, as defined in Section 16-234(a)(3), that are within the fall zone, but not removal of healthy, structurally sound trees.

The following reasons support our request that PURA order a halt to the Eversource "resiliency projects."

1. The vegetation management "resiliency projects" were not included in the line maintenance plan submitted by Eversource in accordance with Section 16-32g, C.G.S. It does not appear that the project plans were submitted to Redding or any other town by January 31 of 2022, as required by Section 16-234(i), C.G.S. Because they could not know of these planned projects, municipal leaders and residents could not voice their concerns before PURA, nor could PURA evaluate the proposed vegetation management projects.
2. Although labelled by Eversource as "resiliency projects," PURA has not had an opportunity to evaluate the costs and benefits of these projects, compared to other alternatives, to achieve resiliency on backbone circuits in these communities. Eversource justifies their projects because the backbone circuits are critical to serve thousands of customers. If so, serious consideration should be given to true hardening of these circuits with infrastructure improvements.
3. It is by no means certain that resiliency will be meaningfully achieved through the unprecedented aggressive tree removal proposed in the Eversource "resiliency projects." Even in the absence of trees, an above ground electric distribution system is vulnerable to extreme weather, including hurricanes, tornadoes, and ice storms, if that overhead system is not structurally strong enough to withstand that weather.
4. The proposed projects are far more expensive than standard vegetation management for line maintenance due to the expense of extensive tree removal, stump removal and replanting, the costs of which Eversource would presumably want to recoup by raising its rates.
5. Stump removal and replanting, while it should be done, would not adequately compensate for the lost benefits and harm to the town and its residents from the removals. Any evaluation of costs and benefits must also include the costs of losing the benefits of a robust tree canopy, especially tall, large trees, for mitigation, adaptation and resilience in the face of climate change, as well as numerous other benefits that would be lost.<sup>4</sup> The replacement trees will not provide the same level of benefits, not even as they achieve maturity.

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<sup>4</sup> As stated in our Memorandum of January 6, 2022, filed in this docket: Specifically with regard to climate change, a robust tree canopy provides mitigation of greenhouse gases due to carbon capture, and is critical to climate adaptation and resilience -- reducing the stress of heat by providing shade, lowering cooling and heating bills by reducing demand, absorbing stormwater and reducing flooding, and improving air quality by removing pollutants. Other benefits include increased property values, increased business income, protection of street pavement, improved mental and physical health, noise reduction, safer communities and traffic calming (reduction in traffic speed).

6. Such planned removal of tall, large trees that provide exponentially more environmental and economic benefits than smaller replacement trees also merits serious review by the Forestry Division of the Department of Energy and Environmental Protection (DEEP).
7. In light of PURA's sustained work in Docket No.17-12-03RE08 to develop a framework to evaluate approaches to achieving reliability and resiliency, the "resiliency projects" should not be allowed to proceed without thorough PURA review under the final framework.

Respectfully submitted,  
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# STATE OF CONNECTICUT

## PUBLIC UTILITIES REGULATORY AUTHORITY

*FOR IMMEDIATE RELEASE*

March 11, 2014

Contact: Michael Coyle 860.827.2686

michael.coyle@ct.gov

### **PURA Calls for Suspension of Enhanced Tree Trimming**

NEW BRITAIN, CT (March 11, 2014) - Connecticut's Public Utilities Regulatory Authority (PURA) today requested that tree trimming efforts by the Connecticut Light & Power Company (CL&P) and the United Illuminating Company (UI) temporarily be scaled back following public opposition and concerns raised regarding the plans.

Based on its review of information and testimony recently submitted by UI and CL&P, as well as elected officials and ratepayers, PURA today directed that CL&P and UI voluntarily curtail "enhanced" tree trimming programs, including removal of entire trees, pending a final ruling in its proceeding.

The PURA initiated its investigation as part of Governor Dannel P. Malloy's multi-pronged storm disaster preparedness and recovery initiatives. In this proceeding, the PURA sought to expand its evidentiary record to assess and address Connecticut utility companies' tree trimming plans to prevent excessive weather-related infrastructure damage.

In recent weeks, many individuals including property owners, tree wardens, environmental advocates, elected officials, and members of the Governor's Vegetation Management Task Force have written to PURA or offered testimony opposing the tree trimming activities underway and scheduled in parts of the state. Technical meetings and public comment sessions held last week drew strong public input, particularly at the evening public comment hearing held last Thursday at Hamden Middle School.

In its ruling today, the PURA directs CL&P and UI to respond in writing to the suspension request within three business days. The ruling does not seek a suspension of routine vegetation management activities.

PURA Chairman Arthur H. House stated "We need a time out to balance competing needs. One - as established by law - is Connecticut's demonstrated need for more aggressive tree trimming to secure the reliability of vital utility services. The second need, especially articulated by communities in the New Haven and Hamden areas, is to avoid unnecessary eradication of trees and instead proceed with selective trimming."

Vice-Chairman John W. Betkoski, III, who is the lead commissioner on the case, added that "Changes made to state law in 2013 provide that a utility may perform vegetation management within the utility protection zone to secure reliability, and the utilities have

**10 Franklin Square, New Britain, CT 06051**

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proceeded to fulfill their responsibilities under this law. In this proceeding, PURA is addressing the parameters of the word "may" to ensure appropriate balance between service reliability and retention of healthy trees wherever possible. Until we complete our assessment, the PURA calls upon the utilities to suspend complete eradication of trees not sanctioned by local tree wardens and to continue with ongoing programs of therapeutic trimming."

The PURA has also announced a technical meeting with stakeholders to be held at PURA's New Britain offices on March 27, 2014, beginning at 9:30 a.m. The purpose of the technical meeting is to further review the CL&P/UI Vegetation Management Plans, including coordination of future projects with local officials, and how the process may be improved.

Customers may speak on the record at any of the PURA hearings in this matter, or may file written comments with the PURA by writing to:

Executive Secretary  
Public Utilities Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

Comments may also be submitted to the PURA via e-mail addressed to [PURA.ExecutiveSecretary@ct.gov](mailto:PURA.ExecutiveSecretary@ct.gov). Filers should reference PURA Docket No. 12-01-10, PURA Investigation into the Tree Trimming Practices of Connecticut's Utility Companies, in any written correspondence.

# # #

***For more information about the State of Connecticut's  
Public Utilities Regulatory Authority, visit [www.ct.gov/pura](http://www.ct.gov/pura)***





# Vegetation Management

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**Resiliency Project | Redding**

2022



# Agenda

EVERSOURCE

- Connecticut's Tree Issue
  - Reliability is improving
  - Importance of backbone segments
- Resiliency Project
  - Scope of work
  - Route
  - Clearance
- Timeline
  - Stakeholder outreach



# Connecticut's Tree Issue | A collaborative approach

- Addressing the tree problem in CT is a shared responsibility and we want to continue to be a good partner and neighbor
- Our ability to manage trees near our wires is dependent on securing the permission of individual homeowners and local tree wardens
- A single homeowner's resistance to tree maintenance on our backbone network can negate tree work completed in your town and other communities





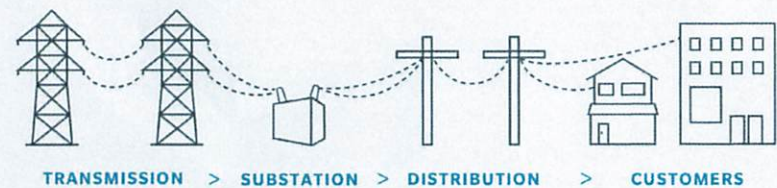
## Reliability is Improving | Trees remain top cause of outages

- **90% of outages** during storms are caused by trees
- We've taken steps to strengthen and modernize our system by installing smart switches, more durable poles, and wires that are resistant to breaking
- Our Vegetation Management programs remain the most effective method of ensuring safe and reliable power for our customers
- Trees that come down in storms also block roads, creating a public safety issue



# Circuit Backbone | Critical to resiliency and public safety

- Every single customer in CT relies on the backbone network to transport the power they use every day in their homes and businesses
- A single outage on a backbone circuit can impact thousands of our customers across multiple communities and has a high likelihood of impacting critical facilities
- Backbones supply laterals, so even if a customer is fed on a lateral, they can be impacted by a backbone outage





# Town Scorecard | Redding

EVERSOURCE

REDDING



## DISTRIBUTION TREE & RELIABILITY



TOTAL MILES SCHEDULED

**4**

TOWN TOTAL

**113**



BACKBONE MILES SCHEDULED

**2**

TOWN TOTAL

**32**



BLOCKED ROADS (2016-2021)

**136**



CUSTOMER REFUSALS  
& LIGHT TRIMS

2021

**9**

LAST 4 YEARS

**10**

## TREE RELIABILITY 2021 YEAR TO DATE

CUSTOMERS SERVED

**3,832**

PERCENT TREE-RELATED OUTAGES

**54%**

OUTAGES

**296**

CUSTOMERS IMPACTED

**6,533**

MINUTES CUSTOMERS IMPACTED

**1,593,156**

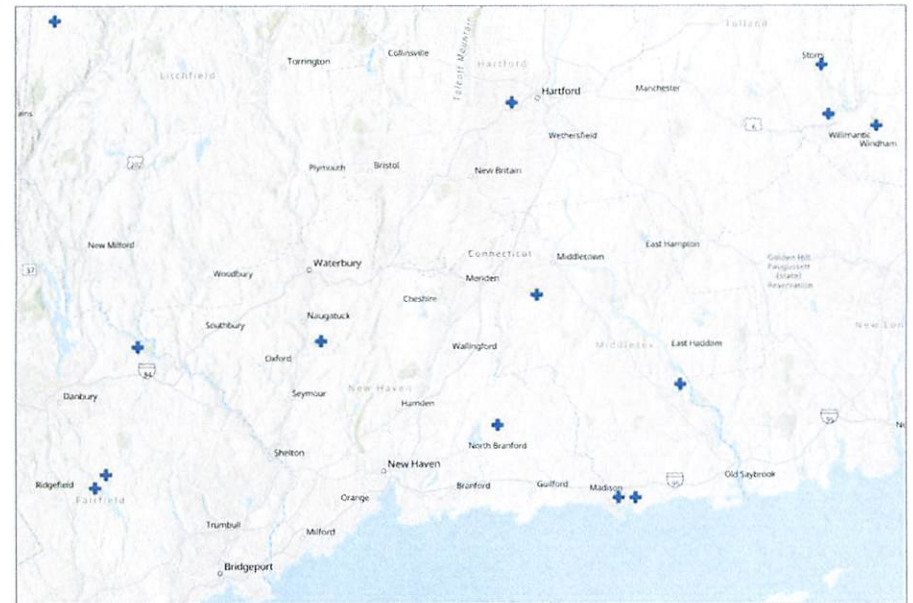
# Resiliency | How does it differ from reliability

- Resiliency - the ability to prepare for and adapt to changing conditions and withstand and recover rapidly from disruptions, specifically High Impact, Low Frequency events



# Resiliency Project | Scope of work

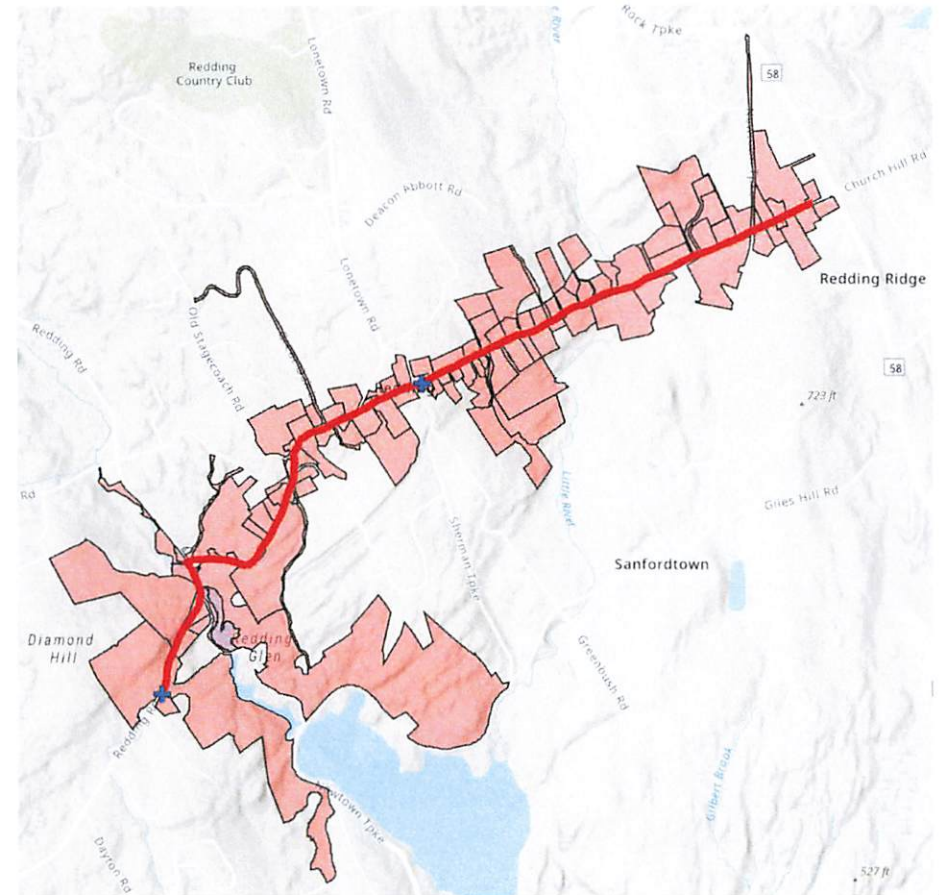
- Improving **resiliency** requires the removal of hazardous and non-hazardous trees in both the public right-of-way and on private property
- A licensed Eversource Arborist will work closely with customers and stakeholders
- This is a top priority for Eversource Vegetation Management as we incorporate **data-driven strategies** in how tree work is prioritized to increase resiliency for CT customers during severe weather events





# Resiliency Project | Route

- Redding Resiliency segment is 3.7 miles:
  - Cross Hwy
  - Hill Rd
  - Redding Rd
- In Redding, work will be conducted within the road rights-of-way in coordination with the town tree warden, CT DOT, and scenic roads committees.
- Additional tree work will occur on private property, including trees that are set back further than past trimming zones, as well as trees across the road. In CT, Eversource continues to see opposite side trees failing across the road causing power outages, blocked roads, and safety concerns.



# Segment Snapshot

Recloser, Cross Hwy



**2.2K**

Total customers  
impacted by device



2.6 thousand  
customers



4.9 million  
minutes

Customer Interruptions  
Past 5 years

**3.7 miles**

Total length

Outages in major storms



- ✓ Alfred
- ✓ Irene
- ✓ Sandy
- ✓ Isaias



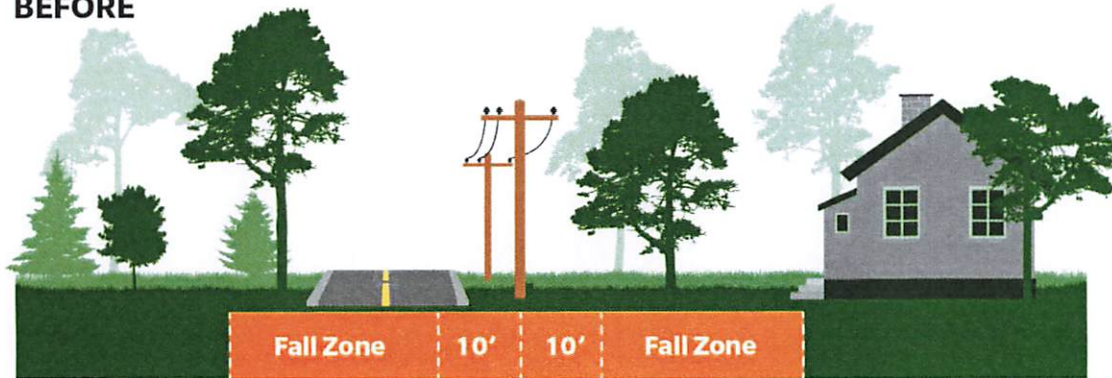
# Resiliency Project | Town Critical Facilities

- Resiliency segment powers:
  - Town Hall and Police Station
  - Black Rock Tpke Fire Dept
  - Hill Rd Fire Dept
  - Joel Barlow High School  
Emergency Shelter

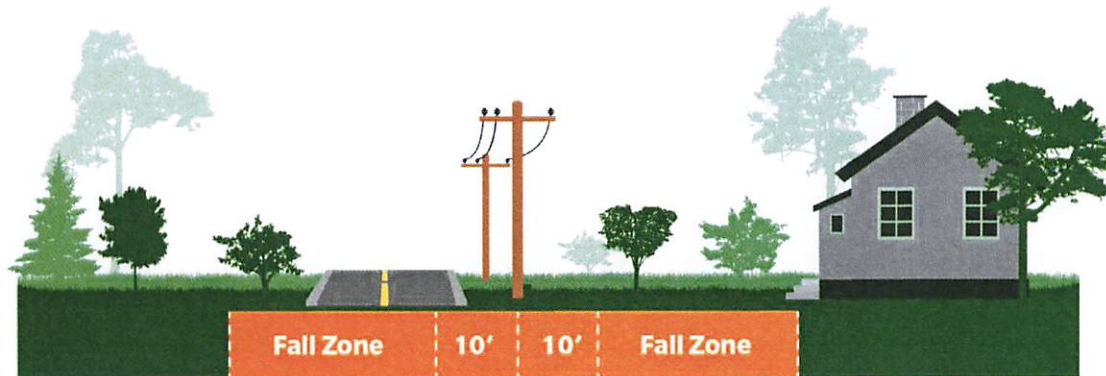


# Resiliency Project | Clearance

**BEFORE**



**AFTER**





# Resiliency Project | Benefits

- Trees that appear to be healthy with no apparent defects can fail during storm events as wind speeds hit critical levels, especially in the summer months when leaves act as sails
- The canopy that is removed as part of this project can be supplemented with vegetation that is compatible with overhead lines
- An Eversource Arborist will collaborate with key stakeholders to develop and manage replanting plans, incorporating sound environmental solutions to include but not limited to; **wildlife and pollinator habitat, incorporation of native species, proper site preparation, invasive species abatement, stump grinding and storm mitigative pruning for historic town trees**





# Plantings | Right Tree, Right Place and Pollinators

## Eversource's Recommended 30 Trees Under 30 Feet Tall



**Hedge Maple**  
Acer campestre  
10-15' tall, 10-15' wide  
Dense, full tree



**Paperbark Maple**  
Acer glabrum  
10-15' tall, 10-15' wide  
Beautiful bark, full tree



**Japanese Maple**  
Acer japonicum  
10-15' tall, 10-15' wide  
Red leaves



**Norway Maple**  
Acer platanoides  
10-15' tall, 10-15' wide  
Excellent fall color



**Tree Flower Maple**  
Acer thibeticum  
10-15' tall, 10-15' wide  
Multi-colored fall foliage



**Red-leafed Dogwood**  
Cornus alternifolia  
10-15' tall, 10-15' wide  
Shiny, flowers early



**American Hornbeam**  
Cornus canadensis  
10-15' tall, 10-15' wide  
Multi-colored fall foliage



**Japanese Redbud**  
Cercis canadensis  
10-15' tall, 10-15' wide  
Early spring purple flowers



**Small Japanese Redbud**  
Cercis canadensis  
10-15' tall, 10-15' wide  
Early spring purple flowers



**White Fraxinus**  
Fraxinus americana  
10-15' tall, 10-15' wide  
Fragrant, long hanging flowers



**Japanese Quince**  
Chaenactis chinensis  
10-15' tall, 10-15' wide  
Butterfly love flowers



**Paprika Dogwood**  
Cornus alternifolia  
10-15' tall, 10-15' wide  
Attracts birds and butterflies



**Flower Dogwood**  
Cornus florida  
10-15' tall, 10-15' wide  
Beautiful flowers in June



**Carolina Cherry**  
Prunella caroliniana  
10-15' tall, 10-15' wide  
Very early yellow flowers



**Common Snowflake**  
Cotinus coggygria  
10-15' tall, 10-15' wide  
Purple flowers, late flowers



**White Birch**  
Betula papyrifera  
10-15' tall, 10-15' wide  
Flowers in early



**Pencil Dogwood**  
Cornus alternifolia  
10-15' tall, 10-15' wide  
Longer flowers



**Small Redbud**  
Cercis canadensis  
10-15' tall, 10-15' wide  
Late summer flowers



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Cercis canadensis  
10-15' tall, 10-15' wide  
Late summer flowers



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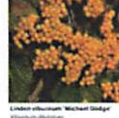
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# Project Timeline | Next Steps

## 2022 Project Timeline

### LATE SPRING

- Outreach to town officials begins

Determine additional stakeholder groups and schedule outreach education

Customer Outreach and Permissions

### SUMMER

- Tree Contractors begin tree trimming and removals on Resiliency segment

Review refusals and modifications within town rights-of-way

### FALL

- Plantings/ Stump Grinding

On-going monitoring of reliability and resiliency improvements

## Additional Outreach Plan | Redding

- Town Scenic Road Review
- State DOT
- State Scenic Road Review
- Redding Land Trust
- Aquarion

