

## D. Vegetation Management

We maintain comprehensive vegetation management plans for the long-term maintenance, reliability, and safety of our entire system. Toward that end, our crews install, service, and maintain 11,034 miles of subtransmission and distribution lines.

This appendix contains our Transmission Right-Of-Way Management Plan, our Distribution Integrated Vegetation Management Plan, and a short description of our emerging plans to combat the emerald ash borer, a highly invasive species already affecting portions of our service territory.

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### TRANSMISSION RIGHT-OF-WAY MANAGEMENT PLAN

Our plan discusses our philosophy for regularly handling the vagaries of nature, then describes the physical attributes of our transmission system. The plan then describes in detail our plan for managing our rights-of-way and how that plan is implemented.

We updated our plan in 2018 to include updated conditions, techniques, procedures, and our overall process.

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### DISTRIBUTION INTEGRATED VEGETATION MANAGEMENT PLAN

Our distribution IVM plan discusses our goals and objectives, details surrounding the types of vegetation and their growth rates, costs related to managing this growth, how we manage trimming and herbicidal application needs, and the fundamentals of operating this plan.

We also updated our IVM plan in 2018 as part of our continued commitment to maintain and operate a low-cost, effective vegetation management.

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## EMERALD ASH BORER MANAGEMENT PLAN



The emerald ash borer (EAB) might be an exotic beetle in its native Asia, where ash trees have co-evolved and developed inborn defenses. In North America, however, the beetle has become a monumental pest, killing hundreds of millions of ash trees since its discovery in southeastern Michigan near Detroit in the summer of 2002. It has been assumed that this invasive insect was transported to North America on wood packing materials carried by cargo ships or airplanes that originated in its native Asia.

The emerald ash borer was confirmed in Vermont less than a year ago, in February 2018. As of October 2018, emerald ash borers have been discovered in 34 states and five Canadian provinces. Its range continues to grow.

Vermont state officials have confirmed that the emerald ash borer has infested two main areas of our service territory, in the middle of the state and in the south, and is at high risk to infest surrounding areas of both sites.

Without close inspection of each tree, it's impossible to determine if a healthy looking ash tree has been infected by the emerald ash borer. Certainly, not all ash trees in our ROW will become infected, and of those infected, not all will eventually strike our conductors or pose immediate risk to the general public or our line crews. Nonetheless,



our evaluations have determined it safer, more efficient, and more cost effective to remove all ash trees within our ROW, even those uninfested. All ash trees are susceptible to infestation. We are choosing to be proactive rather than reactive. We have determined that waiting for signs of infestation not only poses significant safety risks, but also doubles or even triples our removal costs.

As a result of our research and evaluations, we have developed a proposed EAB Mitigation Program for removing ash trees within both already-confirmed infestation areas and those at high risk. We are reviewing that plan with the Department at the time of this writing, and expect to implement it within the IRP planning period.