



Public Utilities Regulatory Authority (PURA)

Public Input for Docket #18-12-25 regarding TRM

December 27, 2019

Dear Chairman Gillett, Vice-Chairman Betkoski, and Commissioner Caron,

The Greenwich Tree Conservancy (GTC) is writing you today concerning the proposed change in policy for Targeted Risk Management (TRM), as proposed by United Illuminating/Avangrid (UI). We oppose this change because it offers convenience to Connecticut's utilities at the expense of citizens, local public officials and our communities.

The GTC is a local 501(c)3 that promotes the preservation and enhancement of the tree and forest resources of Greenwich to benefit the community. We have partnered with the Town for 13 years to reach this goal. With that partnership we have planted over 4000 trees on public lands in Greenwich, this year exceeding our goal of 500.

We are proud that Greenwich is a Tree City USA and to have garnered Silver designation from Sustainable CT, certification program that recognizes municipalities for sustainability practices. Our tree canopy in Greenwich is what defines our sense of place and yet our Town tree canopy is under constant assault. In addition to aggressive utility vegetation management practices, Greenwich, like many of other coastal towns along the shore of Long Island Sound, all share the costs that I-95, Metro North and the Merritt Parkway have brought to our Towns such as noise pollution, air pollution, and a significant removal of trees along these transportation corridors.

Consequently, as required by State Statute, Greenwich approved on 12/9/19 its 2019 Plan of Conservation and Development which includes as one of the key Guiding Principles to:

- Maintain and enhance the Town's distinct sense of place by promoting tree preservation tree planting, public art and landscaping.

Electric utilities are tasked with keeping the lights on, and we understand the need to manage vegetation near electric infrastructure to make electricity reliable. Yet utility 'pruning' on town or private property, based solely on utility perspective fails to consider any historical, aesthetic and environmental benefits the trees provide to the community.



It is outrageous that United Illuminating/Avangrid (UI) has begun to use TRM (Targeted Risk Management), an exception in the law, in its 17-town service area to circumvent the normal requirements of prior consultation with municipal tree wardens and private landowners. We do not want to see other utilities encouraged to use this same practice.

Thank you for consideration of our concerns, and the GTC asks that you will incorporate this comment into PURA docket #18-12-25 which involves the maintenance of trees and electric utility infrastructure.

Again, we urge you to oppose this proposed change in vegetative management. Please confirm you have received this email.

Thank you.

Francia Alvarez, Board of Directors

Cheryl Dunson, President

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