

Connecticut General Assembly
Environment Committee
Legislative Office Building
Hartford, CT 061067
Via email:



Re: Testimony in support of HB 6610 An Act concerning “No Net Loss” of state forestlands

The Greenwich Tree Conservancy is a non-profit organization of over 1000 residents whose mission is to preserve and enhance the urban forest for the benefit of the community, its health and its quality of life.

Indiscriminate clear cutting is deforestation, not vegetation management.



CTDOT Clear Cutting
Riverside School, Greenwich, CT
December 2020

Overview

Greenwich, Connecticut has the unfortunate distinction to be ranked, within the stretch of highway on I-95 between Westport and Greenwich, as the #1 congested corridor in the US, and #3 for portions of the Merritt Parkway. *2022 INRIX Traffic Scorecard* Increase traffic congestion equates to increased carbon emissions.

Tree canopy in Connecticut is what defines our many towns and gives our cities sense of place. Greenwich like many other CT coastal towns, shares the burden of unprecedented removal of significant numbers of trees along the transportation corridors of I-95, the Merritt Parkway, Metro North and the CL&P right-of-way (ROW) easements along the rail tracks.

1. We need oversight of CTDOT and Eversource tree management practices in ROW & on Private Property.


Metro North Easement

Coastal Transportation & Utility Corridor

Old Greenwich, CT

North Side: Metro North/DOT ROW Tree Removal at Harding Rd

South Side: CL&P/Eversource Easement Tree Removals at Tomac Ave



BEFORE



Metro North/DOT Tree Removal North Side of Railroad Tracks: at Tomac Ave and Harding Road, Old Greenwich

June 2020 Trees removed in Railroad ROW along stream

BEFORE

Note the devastating effects of clear cutting along the north and south side of Metro North adjacent to a civic center where children play outdoors, and exposed tracks create safety issues.

Clear Cutting:
No longer screening
from trains.

Increased Run Off and
Safety Issues created
by tree removals
adjacent to a civic
center where children
play soccer.

AFTER



Eversource/CL&P Easement at the Innis Arden Club

Right-of-Way (ROW) and Easements

Innes Arden Golf Club
Old Greenwich

The ROW easements
regulations were first establish
in the later part of the 19th
Century.

Easements were later
granted to the power
companies.

These regulations are long
overdue for a 21st century
analysis.



BEFORE



As you can see, our utility providers have not stopped at the CL&P (Eversource) easements. They have given private property owners little choice but to agree to the removal of their trees on golf courses, in homeowners back yards, and at homes in coastal flood zone areas. These edge forests along highways and railroads provide significant noise reduction and reduce carbon emissions. Recent aggressive tree removal along these transportation corridors has created significant environmental setbacks to our towns, residential neighborhoods, and Environmental Justice areas that take decades to mitigate. There is no accountability.

2. We must hold CTDOT and Eversource accountable for replanting plans along transportation and utility corridors that address climate and safety concerns, and provide those plans to local tree wardens for their input prior to any tree removals.

CT needs a Tree Canopy Assessment of these coastal infrastructure corridors providing data broken out by north and south of the rail tracks over the past 20 years.

CT needs an Urban Tree Canopy Action Plan for our vulnerable coastal transportation corridors. There is no tracking of tree loss in these vulnerable areas.

CT needs to know what tree canopy we have now, what we have lost, and what we need to replace to meet our statewide 2040 Urban Tree Canopy Action Plan for all cities and towns meeting No Net Loss state goals.

Riverside, CT

Of course, we all want to provide road safety, and rail and power resiliency during storms, but the wooded Right-of-Way (ROW) areas adjacent to rail tracks, power distribution, and highways provide many benefits including visual screening, noise reduction, air quality remediation, stormwater runoff protection, wildlife habitat, and a safety barrier.



We also want to protect our water sources and coastal waters. However after clear cutting of ROWs herbicides are used to prevent tree regrowth, ultimately washing into Long Island Sound during the frequent flooding we experience along the coastal areas. All these factors have the potential to decrease property values and the Grand Lists Connecticut towns rely on. **These practices treat urban trees as obstacles to be removed rather than state assets to be preserved.**

3. Tightening CGS 16-234(e) through codification of PURA orders in Docket No 18-12-25 so as to allow trimming only “as necessary” when any part of a tree is in direct contact with an energized electrical conductor or has visible signs of burning and to prevent this provision from being used to justify clear-cutting over a wider area.

No Net Loss

What is happening now reaches much beyond the scope of a reasonable well-constructed maintenance plan. Mass removal of vegetation along our transportation networks’ thousands of acres of ROW is inconsistent with the work undertaken by the Governor’s Council on Climate Change. (GC3)

Because of higher light levels and reduced competition from other trees, edge forests and residential and urban treescapes typically contain larger trees which therefore store more carbon per tree or area of forest than do interior forests and trees. Hence their climate mitigation value is disproportionately large and should be reflected in the level of protection.

[Forests Sub-Group Working and Natural Lands Working Group 9/10/2020](#)

Along these infrastructure corridors at a time when there is widespread acknowledgement of the importance of trees, railroads, highways, parkways, and utilities are allowed to remove our valuable woodland assets especially those that border Environmental Justice Areas. With smaller building lots and greater population density, tree loss in these EJ areas contribute to the heat island effect, resulting in increased energy use for the communities that can least afford the costs.

Put simply, **indiscriminate clear cutting is deforestation, not vegetation management and should not be labeled nor accepted as such.** Successful vegetation management mitigates risk, ensuring that our urban and edge forests are conserved, restored and made more resilient.

No Net Loss policies require actionable priorities asking for:

1. Oversight of CTDOT and Eversource tree management practices.
2. Hold CTDOT and Eversource accountable for replanting plans along transportation and utility corridors, at no cost to the rate payers outside the of the statutory 8" UPZ, that address climate and safety concerns, and provide those plans to local tree wardens for their input prior to any tree removals.
3. Tightening CGS 16-234(e) through codification of PURA orders in Docket No 18-12-25 so as to allow trimming only "as necessary" when any part of a tree is in direct contact with an energized electrical conductor or has visible signs of burning and to prevent this provision from being used to justify clear-cutting over a wider area.

Urban trees are not obstacles to be removed but rather state assets to be preserved.

Francia Alvarez
Board of Directors, Advocacy Chair
Greenwich Tree Conservancy
greenwichtreeconservancy@gmail.com