



Katie Dykes, Commissioner CTDEEP
79 Elm Street
Hartford, CT 06106-5127

February 15, 2022

VIA EMAIL

Dear Commissioner Dykes,

The Greenwich Tree Conservancy (GTC) would like to thank you, Governor Lamont and your staffs for all of your hard work to put into effect, the December 2021, EXECUTIVE ORDER NO. 21-3, establishing 21st century climate change initiatives for Connecticut. The GTC is specifically focused on:

- Forestry strategies for flood prevention, climate resilience, and erosion control
- Healthy, intact, and resilient forests
- Incentives for stewardship and forest retention
- Protection of urban forests and planting of more trees

We must all work together on both the state and local level to achieve these goals.

The Greenwich Tree Conservancy, a public-private partnership, was founded 15 years ago out of a shared concern for the lack of understanding of the importance of trees in our community. In those 15 years, we have established Greenwich as a Tree City USA, created an internationally registered town-wide arboretum, and significantly assisted the town in garnering the highest designation from Sustainable CT.

The tree canopy in Greenwich, the gateway to Connecticut and the Northeast, is what defines the town's sense of place and yet it is under constant assault. 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 ROW easement along the rail tracks. These practices result in increased noise, air pollution, increased pesticide use, and a decrease in property values. While maintenance pruning and cutting needs to take place, what is happening now reaches much beyond the scope of a reasonable well-constructed maintenance plan.

Therefore, the Greenwich Tree Conservancy respectfully requests:

1. An urban tree canopy assessment for our transportation corridors

specific to ROW areas along I-95, the Merritt Parkway, Metro North (northside of railroad tracks), and Eversource CL&P easement (southside of railroad tracks) comparing 2000, 2010, 2021, to determine:

- **the extent of edge forest canopy loss as there has not been a tree canopy assessment in recent years;** we continue to lose trees along our transportation/utility corridors with no assessment of the total costs to our environment;

- **the Utility tree removal along the transportation corridors and abutting private property** which should be halted until current data has been collected through a tree canopy assessment;
- **tree equity as well as other environmental considerations** such as soil health to minimize erosion.

The Hartford Electric Light Company received its charter from the Connecticut General Assembly in 1881 and began service in 1882 to provide electricity for the city of Hartford, Connecticut.

<https://archives.lib.uconn.edu/islandora/object/20002%3A860131166> 140 years later the state is still guided by these charters. These charters are in need of a reevaluation to address the current challenges of climate change, incorporating modern technologies for a 21st Century Review.

We respectfully ask for your consideration of the following:

2. Review of all ROW and easements along railroad/utility corridors.

- **Review charters/regulations requiring Eversource to work with town and private property owners.**
- **Require Eversource to address potential flooding in coastal towns brought on by tree removals and climate change, and adjust scope of its projects when feasible.**
- **Review public safety concerns to keep people off the tracks by providing an analysis, and a safety plan before proposed tree removals.**

The Greenwich Tree Conservancy believes these requests can make a difference in achieving both local and state goals.

Please note the recent experiences the Town of Greenwich has had to face:

In addition to the transportation corridor tree removals, aggressive utility vegetation management practices are continuous on local roadways. Eversource has been a challenge to communicate with, and we now come to you out of a need for a reasoned discussion before the quality of life of many more CT taxpayers is significantly, and unnecessarily, negatively impacted. The net loss due to tree removals in the past ten years has been dramatic. When Connecticut DOT and Metro-North clear-cut in transportation corridors, noise and air pollution increases significantly beyond acceptable levels. Additionally, these disturbed open areas require regular use of known carcinogenic pesticides to battle invasive plant species. This impacts the health of all residents on adjacent properties. Finally, when these areas are so dramatically cleared security concerns arise.

Greenwich First Selectman and State Representatives, along with organizations such as the GTC, approached Metro North (MNR) and Connecticut DOT asking them to work with the town. There are encouraging results and this is a big step forward in working together to provide better outcomes following recent state initiatives to protect forests, edge forests, and equity justice housing neighborhoods.

Unfortunately, a similar response has not been received from Eversource. In a recent situation at the Riverside Train Station, Eversource did not work with the Greenwich Town Tree Warden to formulate a plan that was mutually agreeable. Instead, Eversource appealed the Tree Warden's decision to

Superior Court. The case ended up in mediation and Eversource is now working with the Tree Warden to find solutions. Is this the best way to work with a town?

Another recent incident occurred along the Innis Arden Golf Club in Old Greenwich. Eversource sent notification of clear cutting to be done on the CL&P easement, and that there was an easement to maintain the trees no greater than 30 feet on the Innis Arden property, where most of the trees were found.

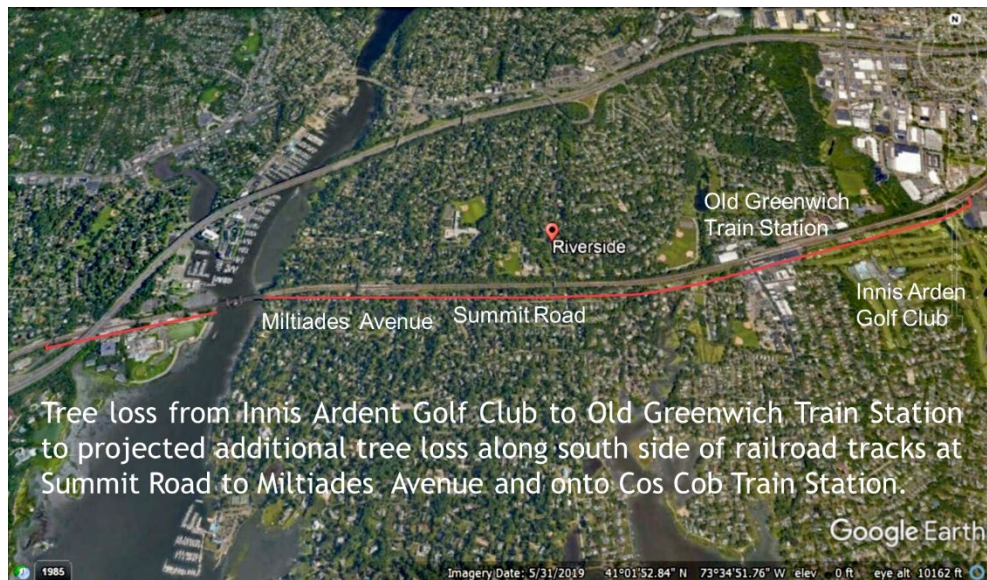
Tree topping, the drastic removal or cutting back of large branches in mature trees, leaving large, open wounds which subject the tree to disease and decay causes immediate injury to the tree and ultimately results in early failure or death of the tree. Innis Arden had no choice but to cooperate and let Eversource remove all trees with the promise that Eversource would plant replacement trees. As this was an agreement with a private property owner the planting plan was not available to the public or the Tree Warden.

Please see images below showing before and after cutting. The December 10th slide shows the light from the setting sun casting a glow on the trees. Note the safety concerns that now exist with nothing but bare dirt between the golf course and railroad cars.



The next area scheduled for tree removal is along the south side of the railbed in Riverside. Eversource is again targeting trees on private property that border the CL&P easement.

- This is a residential area of smaller lots where families walk their children to school.
- These are backyards where young children play.
- This is where Amtrak diesel powered passenger trains pass by multiple times a day.
- This is where the tracks are used late into the night by diesel freight locomotives transporting cargo.
- These are also the areas where pesticides are used to prevent regrowth along clear cut tree removal areas.



Greenwich has already experienced extensive loss of trees along the MNR rail corridor. Many trees have been taken down by Metro North and CL&P. Many towns along this transportation corridor also share the same loss of these edge forests to Eversource's current practices. There needs to be a consistent policy to manage these forest assets for all coastal towns.



As you are well aware, edge forests are especially important in urban areas, where some of the worst air quality in the state and the nation is found along CT transportation corridors. We are all familiar with the importance of trees for air quality and these edge forests are no exception. Indeed, they also provide a buffer from particulate pollution and act as noise barriers. Additionally, they help control erosion and other runoff pollutants that impact water quality. The need to properly maintain edge forests should not be ignored.

Electric utilities are tasked with keeping the lights on and they need to manage vegetation near utility infrastructure to maintain reliable electricity. Aggressive cutting on town and private property, based solely on the utility dialogue, fails to reasonably consider any historical, aesthetic or environmental benefits the trees provide to these communities. In many cases, these benefits are why residents have chosen to live in these communities.

The roadside and utility ROW forests in Connecticut are extensive and are deserving of adaptive management practices that reflect Executive Order 21-3. Clearcutting and widespread pesticide applications are no longer acceptable forest management techniques. We must do better. How can the state meet its carbon reduction goals without proper oversight of our coastal transportation corridors and urban edge forests? These areas raise environmental, health, and equity justice issues that should not be ignored.

In summary, the Greenwich Tree Conservancy is asking for:

- **An urban tree canopy assessment of transportation corridors.**
- **Review of all ROW and easements along railroad/utility corridors addressing the current challenges of climate change, incorporating new 21st Century technologies.**

The GTC looks forward to continuing to work with DEEP and other State agencies on the policies and sustainable climate-smart management of our urban edge forests.

Many thanks for your time and consideration,

The Greenwich Tree Conservancy

Francia Alvarez, Advocacy Board Member

JoAnn Messina, Executive Director

P.O. Box 4215

Greenwich, CT 06831

greenwichtreeconservancy@gmail.com

cc:

Governor Ned Lamont

PURA Chair Marissa Gillett

CTDOT Commissioner Joseph J. Giulietti

State Senator Ryan Fazio (36)

State Representative Stephen Meskers (150)

State Representative Harry Arora (151)

State Representative Kimberly Fiorello (149)

First Selectman Fred Camillo

Town Tree Warden Dr. Greg Kramer

GTC Chairman Peter L. Malkin

GTC President Urling Searle