



EVERSOURCE ENERGY, WESTERN, MA

2023 YEARLY OPERATIONAL PLAN

MASSACHUSETTS DEPARTMENT OF AGRICULTURAL RESOURCES

INTEGRATED VEGETATION MANAGEMENT PROGRAM



Submitted by:
Eversource Vegetation Management

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SUMMARY

In compliance with the Massachusetts Department of Agricultural Resources' Rights-of-Way Regulations (333 CMR 11.00), this Yearly Operational Plan (YOP) informs municipalities of Eversource Energy, Western MA's intent to utilize an integrated vegetation management plan that includes the use of herbicides on electric rights-of-way (ROW) in 2023. Our Integrated Vegetation Management program is outlined in our five-year Vegetation Management Plan.

This YOP identifies target vegetation; the affected rights-of-way and towns; the herbicides, rates and methods of application; alternative control methods; the individual responsible for supervising the OP, and the qualified contractors that will perform the application. It explains how sensitive areas; buffer zones and sites where herbicides are either restricted or not permitted are identified, appropriately marked, treated and protected. It addresses procedures for the mixing, handling and loading of herbicide concentrates. Finally, it includes Herbicide Fact Sheets and Labels, a list of emergency resources and telephone numbers, and maps marked with known Sensitive Areas.

The YOP process provides for a forty-five-day public review and comment period, in conjunction with the twenty-one-day municipal rights-of-way notification period. These review periods give communities an opportunity to provide information that will help identify additional areas that may require specific precautions or protection. Finally, notice will be published in general circulation newspapers at least 48 hours before the scheduled application.

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I. INTRODUCTION

In compliance with Commonwealth of Massachusetts' Rights-of-Way Vegetation Management Regulations (333 CMR 11.00) Eversource Energy, Western MA's Yearly Operational Plan (YOP) details our vegetation management program for 2023. This YOP is consistent with the terms and procedures set forth in the Eversource Energy, Vegetation Management Plan's (VMP's) per 333 CMR 11.05; with the Massachusetts Pesticide Control Act (Chapter 132B); with all pertinent clauses in Chapter 85 of the Acts of 2000; with the Massachusetts Endangered Species Act (MESA; MGL c. 131 A) and regulations (321 CMR 10.00), and with all Federal and State acts and regulations that apply to right-of-way vegetation management.

Eversource delivers electricity to 1.3 million customers in 136 municipalities. Electricity is transmitted over hundreds of miles of distribution and transmission rights-of-way (ROW) throughout the western, eastern, southeastern, and cape and islands regions of Massachusetts. To ensure safe reliable electric service, Eversource must keep these ROWs free from hazards and encroachments. In this effort, the vegetation on the ROW corridors must be maintained at an early stage of plant succession (herbaceous plants and shrubs).

Using the Integrated Vegetation Management Program (IVM) described in the VMP's, Eversource's program is based on a 4-year selective herbicide application and where appropriate mechanical treatment cycle. This program allows for the safe delivery of reliable electric service and supports a healthier more diverse habitat for wildlife that depends upon early successional landscapes (See VMP's for further description of Eversource's IVM program). The VMP's can be viewed at:

<https://www.eversource.com/content/residential/about/reliability/vegetation-management/transmission-system-vegetation-management/transmission-vegetation-management-projects>

II. CHAPTER 132B AND 333 CMR 11.00

The purpose of this chapter is to conform the laws of the commonwealth to the Federal Insecticide, Fungicide, and Rodenticide Act, Public Law 92-516, as amended, and the regulations promulgated there under and to establish a regulatory process in the commonwealth. The exclusive authority in regulating the labeling, distribution, sale, storage, transportation, use and application, and disposal of pesticides in the commonwealth shall be determined by this chapter. (*MGL 132B, Section 1*)

Chapter 132b (Massachusetts Pesticide Control Act) was created to ensure a clear and uniform set of standards for the entire Commonwealth of Massachusetts ***in order to protect the public from the negative impacts that arise from fragmented, decentralized, sets of standards.*** In this effort, the Commonwealth, through the Department of Agricultural Resources (MDAR) retains the sole right to regulate the use of pesticides, including herbicides, throughout Massachusetts. MDAR takes this responsibility extremely seriously and the regulations promulgated under Chapter 132b are stricter than Federal standards.

The purpose of 333 CMR 11.00 is to establish a statewide and uniform regulatory process which will minimize the uses of, and potential impacts from herbicides in right of way on human health and the environment while allowing for the benefits to public safety provided by the selective use of herbicides (*333 CMR 11.01*).

333 CMR 11.00 is the most comprehensive rights of way regulation in New England. It requires an Integrated Pest Management (in this case IVM) approach to right of way vegetation management; the establishment of standards and procedures to prevent unreasonable risks to humans or the environment, and a multi-layered system of public and municipal notification that requests input about environmentally and culturally sensitive areas. All of this is outlined in the Eversource VMPs, annual YOPs, *The Environmental Monitor* Notice, 21-day notification, Public Water Supplier notification and 48-hour newspaper notice which serve as guides for the public, state and municipal officials, vegetation management contractors and Eversource personnel.

To ensure compliance with Chapter 132b and 333 CMR 11.00, MDAR performs routine inspections of rights-of-way treatment crews, retains chemists, and perform further tests before approving a limited list of herbicides approved for use in Sensitive Areas (pursuant to 333 CMR 11.04 (1)(d)).

As detailed in the VMP's and YOP, Eversource Energy, Western MA's IVM program strictly adheres to all the requirements of Chapter 132b and 333 CMR 11.00. Eversource only retains herbicide application treatment contractors that hold Massachusetts' certifications and licenses to apply pesticides, which require ongoing training to maintain. All Sensitive Areas (see section V) are treated appropriately using either mechanical treatment methods or Commonwealth of Massachusetts recommended herbicides for use in Sensitive Areas. In fact, Eversource only uses these recommended herbicides on the entire length and cleared width of its ROW corridors.

Beyond the requirements of 333 CMR 11.00 and in compliance with Chapter 216 of the Acts of 2012, Eversource also notifies "abutters" (houses and businesses that abut the rights-of-way being treated in that year) within view of the ROWs before treatments begin. Treatment contractors are required to leave door hangers or talk personally with abutters which allow the contractor to answer site specific questions, identify private wells and help explain the program.

III. LOCATION OF INTENDED TREATMENTS

In 2023 Eversource plans on completing vegetation maintenance on 4 transmission and 8 distribution line ROWs as listed in Table I. Table II is a list of municipalities where a herbicide treatment will be applied as part of IVM.

Table I. 2023 Rights-of-Way:

Massachusetts West (WMA)	
ROW	Segment Name
Electric Transmission Rights of Way	
WT-01	Berkshire S/S (18C) - Plainfield S/S (18K) - Ashfield S/S (38A) plus Line 312 around Plainfield S/S (18K)
WT-03	Ashfield S/S (38A) - Arthur's Seat Jct. - WT-03/WT-12 Jct. - Erving Jct. - Northfield S/S (16R) plus Arthur's Seat Jct. - Cumberland S/S (22B)
WT-04	Doreen S/S (19A) - Hubbard Jct. - NEP Co TAP - plus Partridge S/S (15E) TAP
WT-05	Doreen S/S (19A) - Berkshire S/S (18C)
Electric Distribution Rights of Way	
D42	Clark Rd-North St. (15E2)
D40	Crane tap-Dalton Sub (15E3/19A3)
D35	Doreen-Dalton Sub* (19A6)
D12	Cumber - Gardnerfls (22B5/6)
D16	Cumber - Greenfield (22B5/6)
D25	Plainfield-Cummington-Chesterfield (18K2)
D24	Deerfield - Conway (22B1)
D68	Greenfield - Main St. (28W4)

Table II: List of 2023 IVM (herbicide treatment) Municipalities:

Western MA (WMA) municipalities:				
Ashfield	Dalton	Hinsdale	Peru	Windsor
Chesterfield	Deerfield	Lanesborough	Pittsfield	
Conway	Erving	Montague	Plainfield	
Cummington	Greenfield	Northfield	Shelburne	

IV. IDENTIFICATION OF TARGET VEGETATION FOR HERBICIDE APPLICATIONS

Pursuant to the policy and intent set forth in the Eversource VMPs, all vegetation must be removed that obscures the ROW corridors and grows tall enough to interfere with the safe, efficient and legal operation of an electrical power line. In the wire zone, trees and brush are targeted, and native, low growing plant communities that have a mature height less than three feet are established. In the border zone, incompatible trees and brush are targeted, and the growth of native trees and shrubs that have a mature height less than 15 feet is encouraged.

The primary target is all trees species within the cleared width of the ROW; except in Priority Habitats that are under the purview of the Natural Heritage and Endangered Species Program of the Department of Fish and Game (NHESP), which will be treated on a case by case basis.

Examples of targets include, but are not limited to:

Alder	Cherry	Pine
Aspen	Hemlock	Maple
Beech	Hickory	Oak
Birch	Locust	Sassafras

There are more non-target vegetation species on an electric or gas ROW than targets. In fact, ROW's are one of the primary early successional plant communities remaining in New England. As a result, many plant and animal species use ROWs as their homes, feeding grounds or nurseries. Certain plant species, therefore, are generally encouraged on the ROW through the use of an IVM program (excluding invasive plant species):

- Most herbaceous growth is acceptable and encouraged
- Shrubs that mature less than 15 feet in height are only targets where due to their location or attributes they interfere with the function of the ROW.

Certain categories of non-tree species are targets under some circumstances, because of their location and/or their nature. Dense woody vegetation, shrubs and vines are targets where they are capable of interfering with the inspection and maintenance of the poles, wires, and along access roads, paths and gates which need to be kept clear, especially for emergencies.

Eversource intends to control plant species including invasive, poisonous plants and vines at their facilities. Invasive plant species have become an increasing concern throughout Massachusetts in areas that include ROW corridors where they can spread rapidly and move into the adjacent landscape. Eversource plans to use herbicides to spot treat poisonous plants at sites under its ROWs identified as having a high risk of posing a health hazard. This vegetation, likewise, poses a risk to the safety and health of all individuals working on or traversing a ROW and it can impede a rapid response in an emergency.

Examples of non-tree species generally considered targets, include, but are not limited to:

Autumn Olive	Japanese Knot-Weed	Greenbriar
Buckthorn	Multiflora Rose	Poison Ivy
Buckthorn	Oriental Bittersweet	
Hawthorne	Staghorn Sumac	
Honeysuckle	Poison Sumac	

V. DEFINITION, IDENTIFICATION AND TREATMENT OF SENSITIVE AREAS

Sensitive Areas are those areas within a ROW in which public health, environmental concerns or agricultural interests warrant special protection to minimize the risk of unreasonable adverse effects.

The map(s) in Appendix I are a resource and a tool for both the public and the vegetation management crews. They contain the data necessary to identify, mark and treat Sensitive Areas appropriately.

The map(s) include known Sensitive Areas available at the printing of this YOP. Some Sensitive Areas are included in the base USGS topographic maps. The most current data available through Mass GIS such as public water suppliers, certified vernal pools, etc. and any data that Eversource has collected to date on areas such as private wells are added on top of the USGS data. At the time of treatment, any additional Sensitive Areas collected will be added to the maps utilized by our vegetation management contractors. Please note that Zone II's and limited spray areas are not mapped since Eversource Energy, will only use herbicides approved for use within this type of Sensitive Area in their 2023 IVM program.

There is one type of Sensitive Area not included on the maps that we are not authorized to publish: the locations of the Priority Habitats of state listed species as regulated by the Natural Heritage and Endangered Species Program (NHESP) of the Division of Fisheries & Wildlife. A map layer of Priority Habitats is available to the general public at <https://www.mass.gov/orgs/massgis-bureau-of-geographic-information>, but it is neither specific to areas of concern for herbicide applications nor does it include data on the individual species since the exact location and details of their habitat is protected. Please be assured that we follow all necessary precautions to stay in compliance with 321 CMR 10.00 and this YYOP was approved by NHESP.

Prior to any herbicide application, Sensitive Areas will be identified and when necessary marked in the field by an experienced vegetation management treatment crew point person, by individuals trained in the identification of Sensitive Areas that require the use of GIS (geographic information systems) and GPS equipment, and/or by a NHESP approved botanist trained in the delineation of state-listed species.

Two simple descriptions guide the complex identification of the Sensitive Areas listed in 333 CMR 11.02: *Readily identifiable in the field* and *Not readily identifiable in the field*:

- A. *Readily identifiable in the field areas* will be treated and marked according to all applicable restrictions listed in 333 CMR 11.00 and the Eversource Energy, 5-year VMP's.
- B. *Not readily identifiable in the field areas* are identified by the use of the data marked on our maps and additional data collected in the YYOP and notification processes before the time of treatment.

Eversource and contractor personnel assigned the task of identifying Sensitive Areas in the field will use the following sources and methods:

- A. Massachusetts Department of Environmental Protection (DEP) water supply maps/GIS mapping layers available through Mass GIS
- B. Massachusetts Department of Agricultural Resources (MDAR) records of identified private wells along the ROW

- C. Correspondence and input from municipalities within the consecutive forty-five day YYOP and twenty-one day municipal ROW notification review and comment periods and the 48 hour newspaper notification
- D. Correspondence and input from Eversource’s abutter notification procedure
- E. A point person who precedes the treatment crew verifying identified Sensitive Areas and any additional areas that may require special precautions.

The following section details some of the Sensitive Areas that require special attention, particularly those that are classified as either no spray or *not readily identifiable in the field*:

A. Limited Spray Areas:

Per 333 CMR 11.02, the following need to be identified in the field, require the use of herbicides on the *MDAR Rights-of-Way Sensitive Area Materials List*, and time restrictions between herbicide applications (see Appendix II, Sensitive Area Table). Please note that for 2023 IVM herbicide applications, Eversource is only using Sensitive Area approved herbicides on our entire ROW system:

- (a) any Zone II or IWPA
- (b) a distance of between 100 feet and 400 feet of any Class A Surface Water Source
- (c) a distance of between 10 and 200 feet of any tributary or associated surface water body where the tributary or associated surface water body runs outside the Zone A for the Class A surface water source
- (d) a lateral distance of between 100 and 200 feet for 400 feet upstream, on both sides of the river, of a Class B Drinking Water Intake
- (e) a distance of between 50 and 100 feet of any identified Private Well
- (f) a distance of between 10 and 100 feet of any Wetlands or Water Over Wetlands
- (g) a distance of between 10 feet from the mean annual high water line of any river and the outer boundary of the Riverfront Area
- (h) a distance of between ten feet from any Certified Vernal Pool and the outer boundary of any Certified Vernal Pool Habitat
- (i) a distance of 100 feet of any Agricultural or Inhabited Area.

Please Note that “(f)” is modified by the MDAR (formerly Department of Food and Agriculture) *Decision*, dated October 12, 1995, concerning the wetland impact study conducted pursuant to 333 CMR 11.04(4)(c)(2). According to the *Decision*, Eversource may use herbicides within wetlands except on or within 10 feet of standing or flowing water (item “g” in the *no-spray areas* below was removed from the no spray list for utilities because it does not apply for the same reason).

B. No-Spray Areas:

Again, quoting from 333 CMR 11.02 the following no-spray areas need to be identified:

No-Spray Area, any area that is both within a Right-of-Way and within:

- (a) any Zone I
- (b) 100 feet of any Class A Surface Water Source
- (c) 100 feet of any tributary or associated surface water body where the

- tributary or associated surface water body runs within 400 feet of a Class A surface water source
- (d) 10 feet of any tributary or associated surface water body where the tributary or associated surface water body is at a distance greater than 400 feet from a Class A surface water source
- (e) a lateral distance of 100 feet for 400 feet upstream, on both sides of the river, of a Class B Drinking Water Intake
- (f) 50 feet of any identified Private Well [within 100 feet of the ROW]
- ...
- (h) 10 feet of the mean annual high-water line of any river
- (i) 10 feet of any Certified Vernal Pool.

C. Identification and Treatment of Private Drinking Water Supplies

No herbicide treatments will take place within fifty feet of any identified private wells located within one hundred (100) feet of a ROW. Eversource updates its private well records based on available data.

Municipalities should assist in the identification process and the MDAR will be consulted again prior to the treatment in an attempt to keep the private drinking water supply information up-to-date.

Identified private drinking supplies within one hundred (100) feet of a ROW will be permanently recorded on appropriate maps.

D. State-Listed Species Habitat

Eversource recognizes the importance of the Massachusetts Endangered Species Act, M.G.L.C. 131 A, and its significance to ROW vegetation management. Eversource will comply with all applicable portions of this Act and the regulations promulgated thereunder. Eversource will also follow the rules and prohibitions directed at human activities which Take Species or alter their Significant Habitat (as of this printing there are no designated Significant Habitat in Massachusetts).

321 CMR 10.14, Massachusetts Endangered Species Act Regulations, Part II Exemptions and 333 CMR 11.04(3)(a-c) exempts utility ROW vegetation management from the permit process under the following conditions:

- (12) The management of vegetation within existing utility rights-of-way provided that the management is carried out in accordance with a vegetation management plan approved in writing by the Division prior to the commencement of work for which a review fee shall be charged, the amount of which shall be determined by the commissioner of administration under the provisions of M.G.L. c.7, § 3B...

To comply with exemption 10.14(12), Eversource submits this YYOP to the NHESP for review.

The NHESP has delineated areas as Priority Habitat based on the "Best Scientific Evidence Available" to protect State-listed species from a "take." Under the approval process, details about the Priority Habitat of state-listed species that might be affected by our activities and management recommendations are shared with Eversource under strict confidentiality agreements. Using this data and best management practices, Eversource and contract personnel will follow the appropriate vegetation management treatment methods within these sensitive areas taking all

practical means and measures to modify ROW vegetation management procedures to avoid damage to state-listed species and their habitat.

To identify Priority Habitats, Eversource personnel, NHESP approved review botanists and vegetation management crews must use proper identification procedures. Contractors are, therefore, required to train their personnel to recognize the location of Priority Habitats using one of the following tools: paper maps, GPS coordinates and/or GIS systems.

VI. PROPOSED HERBICIDE TREATMENT METHODS

Under Eversource's IVM program, combined with mechanical "prep-cutting," mowing and side-trimming activities, herbicide applications will be applied on foot using selective low pressure foliage treatments with backpack sprayers and cut stump or basal treatments. Experienced, Massachusetts licensed applicators will perform the selective herbicide treatments under the direct on site supervision of a certified applicator as required by Chapter 132B.

Eversource's herbicide program is a selective program scheduled to sustain acceptable vegetation control at minimal application rates. Using backpack sprayers, small amounts of herbicide are applied directly to the leaves, stumps or bark of the target vegetation. The average per acre rate of herbicide mix for Eversource's foliar program is under 5 gallons per acre and the actual amount of applied active ingredient is in the pints per acre range.

Eversource also chooses herbicide formulations that are low in acute toxicity, do not bio-accumulate and, as applied, have a short half-life with low soil mobility (see VMP's, Bibliography). Above and beyond the review by the Federal EPA, these herbicides are all carefully reviewed jointly by MDAR and the Massachusetts Department of Environmental Protection for use in "limited spray" sensitive areas (including Zone IIs). Eversource takes this one step further and only uses sensitive area approved herbicides on their entire right-of-way system.

A. Methods:

Eversource and contract personnel will utilize the most appropriate technique for the vegetation species, height, density, site and mandated restrictions. These methods as described in detail in the Eversource 5-year VMP's are briefly reviewed below:

Low Volume Foliage Techniques utilize hand-operated pumps or motorized, backpack sprayers. The motorized, backpack sprayer produces an air current that delivers small amounts of herbicide mixture from a portable spray tank to the target vegetation. The low-pressure hand-pump sprayer uses a column of water. In both cases, the amount of herbicide solution applied only dampens or lightly wets the target vegetation.

Low-Volume Stem Basal: the selective application of herbicides to the lower 6"-8" of the plant stem. The herbicide concentration is applied with low-pressure, backpack sprayers with special wand attachments and positive shut-off nozzle tips with small orifices.

Cut Stump Surface Treatment (CST): the application of an herbicide mixture to the cut surface of a stump immediately following or during a cutting operation. Application equipment includes low-volume, backpack, hand-pump sprayers; hand held squirt bottles; paintbrushes, or sponge applicators.

B. Guidelines:

1. All Sensitive Area restrictions will be followed.
2. Foliar and Basal treatments are used within the cleared width of the ROW for tree and shrub target species below 12 feet in height.
3. CST treatments are used in conjunction with hand-cutting and in situations including but not limited to: trees and shrubs that cannot be foliar treated, at road buffers, and around structures such as poles and gates.
4. Only mechanical treatment methods will be used in *no spray* Sensitive Areas, including but not limited to hand cutting, trimming and mowing.

C. Treatment of Wetlands

Herbicide applications in wetlands will be performed in accordance with 333 CMR 11.04 (4)(c)(2) relative to ROW management. Targets will be selectively treated with herbicides on the MDAR's *Sensitive Area Material List* and will not be applied within ten (10) feet of standing or flowing water.

D. Treatment of State-Listed Priority Habitats

All vegetation management activities will be completed in compliance with the Massachusetts Endangered Species Act (MESA; MGL c. 131 A) and its regulations, 321 CMR 10.00.

VII. PROPOSED HERBICIDES, CARRIERS, ADJUVANTS AND RATES

In 2023 only the Commonwealth of Massachusetts recommended herbicides listed below for use in Sensitive Areas—pursuant to 333 CMR 11.04 (1)(d)—will be used on the entire length and cleared width of Eversource Energy ROW corridors, in compliance with all labeled directions.

Table III. Tank Mixes for Low Volume Foliage Applications:

Tank Mix #1 for Low Volume Foliar (LVF) Treatment Applications

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. water)	Estimated Application Rate Per Acre
Krenite S	Fosamine Ammonium	42750-247	6-10%	32-128 oz.
Escort XP or Patriot	Metsulfuron-Methyl	432-1549 or 228-391	2-4 oz.	0.125-0.8 oz.
Arsenal Powerline or Polaris ¹	Imazapyr	241-431 or 228-534	0.125%-0.5%	2-8 oz.
Induce, Clean Cut, Methylated Seed Oil (MSO) ³ , or Aqua Fac or equivalent surfactant ²	n.a.	n.a.	0.125%-1%	1-16 oz.
Point Blank, Clasp, or equivalent drift retardant	n.a.	n.a.	0.125%-0.5%	1-2 oz.
Carrier: Water	n.a.	n.a.	n.a.	n.a.
Gallons per acre – 3 to 15				

Tank Mix #2 for Low Volume Foliar (LVF) Treatment Applications

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. water)	Estimated Application Rate Per Acre
Rodeo, Aquaneat, Roundup Pro, or Roundup Custom ^{4,5}	Glyphosate	62719-324, 228-365, 524-475, 524-343	3-5%	16-128 oz.
Escort XP or Patriot	Metsulfuron-Methyl	432-1549 or 228-391	2-4 oz.	0.125-0.8 oz.
Arsenal Powerline or Polaris ¹	Imazapyr	241-431 or 228-534	0.125%-0.5%	2-8 oz.
Induce, Clean Cut, MSO ³ , or Aqua Fac or equivalent surfactant ²	n.a.	n.a.	0.125%-1%	1-16 oz.
Point Blank, Clasp, or equivalent drift retardant ²	n.a.	n.a.	0.125%-0.5%	1-2 oz.
Carrier: Water	n.a.	n.a.	n.a.	n.a.
Gallons per acre – 3 to 15				

Tank Mix #3 for Low Volume Foliar (LVF) Treatment Applications
(can be used in MA only if MDAR approved Sensitive Materials List)

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. water)	Estimated Application Rate Per Acre
Vastlan	Triclopyr choline	62719-687	2-3%	12-64 oz.
Escort XP or Patriot	Metsulfuron-Methyl	432-1549 or 228-391	2-4 oz.	0.125-0.8 oz.
Arsenal Powerline or Polaris ¹	Imazapyr	241-431 or 228-534	0.125%-0.5%	2-8 oz.
Induce, Clean Cut, MSO ³ , or Aqua Fac or equivalent surfactant ²	n.a.	n.a.	0.125%-1%	1-16 oz.
Point Blank, Clasp or equivalent drift retardant ²	n.a.	n.a.	0.125%-0.5%	1-2 oz.
Carrier: Water	n.a.	n.a.	n.a.	n.a.
Gallons per acre – 3 to 15				

Tank Mix #4 for Low Volume Foliar (LVF) Treatment Applications

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. water)	Estimated Application Rate Per Acre
Escort XP or Patriot	Metsulfuron-Methyl	432-1549 or 228-391	2-4 oz.	0.125-0.8 oz.
Arsenal Powerline or Polaris ¹	Imazapyr	241-431 or 228-534	0.125%-0.5%	2-8 oz.
Induce, Clean Cut, MSO ³ , or Aqua Fac or equivalent surfactant ²	n.a.	n.a.	0.125%-1%	1-16 oz.
Point Blank, Clasp or equivalent drift retardant ²	n.a.	n.a.	0.125%-0.5%	1-2 oz.
Carrier: Water	n.a.	n.a.	n.a.	n.a.
Gallons per acre – 3 to 15				

Tank Mix #5 for Low Volume Foliar (LVF) Treatment Applications

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. water)	Estimated Application Rate Per Acre
Escort XP or Patriot	Metsulfuron-Methyl	432-1549 or 228-391	2-4 oz.	0.125-0.8 oz.
Arsenal Powerline or Polaris ¹	Imazapyr	241-431 or 228-534	0.125%-0.5%	2-8 oz.
Induce, Clean Cut, MSO ³ , or Aqua Fac or equivalent surfactant ²	n.a.	n.a.	0.125%-1%	1-16 oz.
Point Blank, Clasp, or equivalent drift retardant ²	n.a.	n.a.	0.125%-0.5%	1-2 oz.
Carrier: Water	n.a.	n.a.	n.a.	n.a.
Gallons per acre – 3 to 15				

Tank Mix # 6 for Low Volume Foliar (LVF) Treatment Applications

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. water)	Estimated Application Rate Per Acre
Garlon 4 Ultra	Triclopyr	62719-527	2-4%	12-64oz
Escort XP or Patriot	Metsulfuron-Methyl	432-1549 or 228-391	2-4 oz.	0.125-0.8 oz.
Arsenal Powerline or Polaris ¹	Imazapyr	241-431 or 228-534	0.125%-0.5%	2-8 oz.
Induce, Clean Cut, MSO ³ , or Aqua Fac or equivalent surfactant ²	n.a.	n.a.	0.125%-1%	1-16 oz.
Point Blank, Clasp, or equivalent drift retardant ²	n.a.	n.a.	0.125%-0.5%	1-2 oz.
Carrier: Water	n.a.	n.a.	n.a.	n.a.
Gallons per acre – 3 to 15				

Table IV: Tank Mix for Poison Ivy, Vines, and Invasive Species

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. water)
Rodeo, Aquaneat, Roundup Pro, or Roundup Custom ^{4,5}	Glyphosate	62719-324, 228-365, 524-475, 524-343	2-5%
Garlon 4 Ultra	Triclopyr	62719-527	2-4%
Escort XP or Patriot	Metsulfuron-Methyl	432-1549 or 228-391	1.25-4 oz.
Induce, Clean Cut, MSO ³ , or Aqua Fac or equivalent surfactant ²	n.a.	n.a.	0.125%-1%
Point Blank, Clasp or equivalent drift retardant ²	n.a.	n.a.	4-16 oz.
Carrier: Water	n.a.	n.a.	n.a.
Gallons per acre – 3 to 15			

Table V. Tank Mixes for Cut Surface Treatment (CST) Applications:

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. water)	Estimated Application Rate Per Acre
Rodeo, Aquaneat, Roundup Pro, or Roundup Custom ^{4,5}	Glyphosate	62719-324, 228-365, 524-475, 524-343	40% to 50%	Per density of target stems
Arsenal Powerline or Polaris ¹	Imazapyr	241-431 or 228-534	3%-5% (mixed with Glyphosate)	Per density of target stems
Carrier: Water or Windshield Washing Fluid	n.a.	n.a.	n.a.	n.a.

Table VI. Tank Mixes for Low-Volume Basal or Cut Surface Treatment (CST) Applications:

Tank Mix #1 Low Volume Basal or Cut Surface Treatments (CST) Applications

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals.)	Estimated Application Rate Per Acre
Garlon 4 Ultra	Triclopyr	62719-527	20%-30%	Per density of target stems
Polaris	Imazapyr	228-534	3%-5% (mixed with Garlon 4 Ultra)	Per density of target stems
Carrier: Arborchem's low odor basal oil or Aquimix Plus basal oil with dye or equivalent ²	n.a.	n.a.	n.a.	n.a.
Maximum of 8 gals. Per acre				

Tank Mix #2 Low Volume Basal or Cut Surface Treatments (CST) Applications

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals.)	Estimated Application Rate Per Acre
Garlon 4 Ultra	Triclopyr	62719-527	20%-30%	Per density of target stems
Carrier: Arborchem's low odor basal oil or Aquimix Plus basal oil with dye or equivalent ²	n.a.	n.a.	n.a.	n.a.
Maximum of 8 gals. Per acre				

1 – Imazapyr will not be applied on the same right-of-way in two consecutive years

2 – Equivalent surfactants, drift retardants, and basal oils will be used if those listed are no longer available or more effective alternatives become available

3 -Methylated Seed Oil (MSO) will be labeled for wetland uses

4- Roundup Custom ATU will only be used if added to the Massachusetts Sensitive Materials List

5- Additional Glyphosate products may be substituted depending on the availability of products or if additional products become available

VIII. ALTERNATIVE MECHANICAL CONTROL TECHNIQUES

Areas not treated or prohibited from herbicide use, such as protective buffers for Sensitive Areas, will be maintained mechanically according to the specifications in the VMP's. The following is a brief review of these methods:

Hand Cutting: the use of chain and brush saws to remove the stem and/or branches from the plant's root system; can be combined with CST except in no-chemical restricted areas.

Mowing: the cutting, severing or shattering of vegetation by large rotary or flail mowers.

Side Pruning: side pruning or removal of encroaching tops and/or branches of trees growing on or near the ROW's and access roads.

IX. COMPANIES THAT MAY PERFORM THE HERBICIDE TREATMENT

x

Vegetation Control Service, Inc. 2342 Main Street Athol, MA 01331 (978) 249-5348	Lewis Tree Service, Inc 300 Lucius Gordon Drive West Henrietta, NY 14586 (585) 436-3208
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X. INDIVIDUAL RESPONSIBLE FOR SUPERVISING THE OPERATION PLAN

William Hayes
Senior Supervisor
Eversource Energy
Transmission Vegetation Management
247 Station Drive, SW-1036
Westwood, MA 02090-9230
781-441-3932 (office)

XI. HERBICIDE FACT SHEETS

Herbicide Fact Sheets prepared and provided by the MDAR, explain technical information relative to the herbicide concentrates proposed for use during the 2023 treatment cycle. These are included in Appendix III, along with the manufacturer's labels in Appendix IV.

XII. PROCEDURES FOR HANDLING, MIXING AND LOADING HERBICIDE CONCENTRATES

All herbicides will be handled, mixed and applied strictly according to *Label Instructions* and in compliance with all applicable federal and state laws and regulations. If possible, herbicide mixing should be done at the contractor's facilities and extreme care shall be exercised during all mixing, handling and loading in order to prevent careless spills or splashes. No herbicide concentrates will be mixed, handled or loaded on a ROW within one hundred (100) feet of a Sensitive Area.

XIII. EMERGENCY RESOURCES

Eversource contracts with independent, professional, certified herbicide applicators that are responsible for the containment, clean up and reporting of chemical spills or accidents. The following is a guide to the information sources that, according to various regulations, must be available to the treatment crew in the event of a chemical spill or emergency situation:

- A. Technical Reference Materials:
 - a. Product Label
 - b. Product Material Safety Data Sheet (SDS)
 - c. Product Fact Sheet, if available

B. Table VII. Herbicide Manufacturers:

MANUFACTURER	TELEPHONE NUMBER	SPECIAL INSTRUCTIONS
Albaugh Inc.	800-247-8013	
BASF Corporation	800-832-4357	
ENVU and Bayer Environmental Science	800-334-7577	
Corteva AgriScience	800-992-5994	
Nufarm	877-325-1840	Medical Emergencies

C. Table VIII. State Agencies:

STATE AGENCY	TELEPHONE NUMBER	SPECIAL INSTRUCTIONS
Massachusetts Pesticide Bureau	(617) 626-1700	A.S.A.P. (within 48 hours)
Massachusetts Department of Environmental Protection, Emergency Response Section	DEP 24 Hour Contact: (888) 304-1133	For emergencies involving reportable quantities of hazardous materials; required info: City/town, street address, site name (if applicable), material
	Southeast Region: (508) 946-2700	
	Northeast Region: (978) 694-3200	
	Western Region: (413) 784-1100	
	Central Region: (508) 792-7650	
Massachusetts Dept. of Public Health, Bureau of Env. Health Assessment Toxicology Program	(617) 624-5757	
Massachusetts Poison Information Centers	(800) 682-9211	For medical emergencies involving suspected or known pesticide poisoning symptoms

D. Table IX. Emergency Services:

EMERGENCY SERVICE	TELEPHONE NUMBER	SPECIAL INSTRUCTIONS
Massachusetts State Police, Central Office	617-566-4500 or 911	
Local Fire / Police Dept.	911	
Chem Trec	800-424-9300	
Clean Harbors	800-OIL-TANK	
Pesticide Hotline	800-858-7378	PST: 8:00 am to 12:00 pm, Web: www.NPIC.orst.edu

E. Eversource contact in the case of a spill or accident is:

System Control
Eversource
247 Station Drive
Westwood, MA 02090-9230
(617)-541-7858

**F. Table X. Local Emergency Numbers:
Non-911 Emergencies Services for Eversource Electric Municipalities**

Town	Board of Health	Town/City Hall	Town	Board of Health	Town/City Hall
Ashfield	(413) 628-4441	(413) 628-4441 x5	Lanesborough	(413) 442-1167 x28	(413) 442-1351
Chesterfield	(413) 296-4771	(413) 296-4741	Montague	(413) 863-3200 x205	(413) 863-3200 x104
Conway	(413) 369-4235 x8	(413) 369-4235 x4	Northfield	(413) 498-2901	(413) 498-2901 x112
Cummington	(413) 634-5757	(413) 634-5560	Peru	(413) 655-8312	(413) 655-8312
Dalton	(413) 684-6111 x20	(413) 684-6111 x14	Pittsfield	(413) 499-9411	(413) 499-9361
Deerfield	(413) 665-1400 x109	(413) 665-1400 x100	Plainfield	(413) 634-5343	(413) 634-5420
Erving	(413) 422 2800 x101	(413) 422-2800 x101	Shelburne	(413) 625-0300	(413) 625-0300
Greenfield	(413) 772-1404	(413) 772-1555	Windsor	(413) 684-3811 x7	(910) 620-0162
Hinsdale	(413) 655-2300 x311	(413) 655-2300 x301			

**APPENDIX I:
Maps**

<https://www.eversource.com/content/residential/about/reliability/vegetation-management/transmission-system-vegetation-management/transmission-vegetation-management-projects>

**APPENDIX II:
Sensitive Area Table**

CONTROL STRATEGIES FOR SENSITIVE AREAS[#]

Sensitive Area	No-Spray and Limited Spray Areas (feet)	Control Method	Restriction Code
Public Ground Water Supplies	400'	Mechanical Only	None
Primary Recharge Area	Designated buffer zone or ½ mile radius	Mechanical, Recommended Herbicides*	24 months
Public Surface Water Supplies (Class A & Class B)	100'	Mechanical Only	None
	100'-400'	Recommended Herbicides	24 months
Tributary to Class A Water Source, within 400' upstream of water source	100'	Mechanical Only	None
	100'-400'	Recommended Herbicides	24 months
Tributary to Class A Water Source, greater than 400' upstream of water source	10'	Mechanical Only	None
	10'-200'	Recommended Herbicides	24 months
Class B Drinking Water Intake, within 400' upstream of intake	100'	Mechanical Only	None
	100'-200'	Recommended Herbicides	24 months
Private Drinking Water Supplies	50'	Mechanical Only	None
	50'-100'	Recommended Herbicides	24 months
Surface Waters	10'	Mechanical Only	None
	10'-100'	Recommended Herbicides	12 months
Rivers	10' from mean annual high water line	Mechanical Only	None
	10'-200'	Recommended Herbicides	12 months
Wetlands	100' (treatment in wetlands permitted up to 10' of standing water)*+	Low-pressure Foliar, CST, Basal Recommended Herbicides	24 months
Inhabited Areas	100' (for high-pressure foliar only)	Recommended Herbicides	12 months
Agricultural Area (Crops, Fruits, Pastures)	100' (for high-pressure foliar only)	Recommended Herbicides	12 months
Certified Vernal Pools	10'	Mechanical Only when water is present	None
Certified Vernal Pool Habitat	10'-outer boundary of habitat	No treatment without written approval per 321 CMR 10.14(12)	
Priority Habitat	No treatment without written approval per 321 CMR 10.14(12)		

Restrictions "24 Months": A minimum of twenty-four months shall elapse between applications

"12 Months": A minimum of twelve months shall elapse between applications

*Massachusetts recommended herbicides for sensitive sites

+Per "Decision Concerning the Wetlands Impact Study"

#Table Compiled by Jeffrey M. Taylor, Vegetation Control Service, Inc.

**APPENDIX III:
Herbicide Fact Sheets**

[HTTPS://WWW.MASS.GOV/SERVICE-DETAILS/RIGHTS-OF-WAY-SENSITIVE-AREA-MATERIALS-LIST](https://www.mass.gov/service-details/rights-of-way-sensitive-area-materials-list)

**APPENDIX IV:
Herbicide Labels**

AQUANEAT
[AQUANEAT HERBICIDE LABEL](#)

ARSENAL POWERLINE
[ARSENAL POWERLINE LABEL](#)

ESCORT XP:
[ESCORT XP LABEL](#)

GARLON 4 ULTRA:
[GARLON 4 ULTRA LABEL](#)

KRENITE S:
[KRENITE S LABEL](#)

MILESTONE:
[MILESTONE LABEL](#)

PATRIOT:
[PATRIOT LABEL](#)

POLARIS:
[POLARIS LABEL](#)

RODEO:
[RODEO LABEL](#)

ROUNDUP CUSTOM ATU:
[ROUNDUP CUSTOM ATU LABEL](#)

ROUNDUP PRO:
[ROUNDUP PRO LABEL](#)

VASTLAN:
[VASTLAN LABEL](#)