



C O N N E C T I C U T  
U R B A N  
F O R E S T  
C O U N C I L

TO: State Vegetation Management Task Force  
FROM: CT Urban Forest Council  
RE: PURA Docket on enhanced tree trimming  
DATE: November 25, 2013

United Illuminating's (UI) Enhanced Tree Trimming has been approved by PURA. UI's plan calls for removal of all trees and branches within the 8 foot utility protection zone from ground to sky, except those which meet "right tree/right place" standards. This provision includes removal of healthy trees. In urban areas, the 8 foot utility protection zone would encompass nearly all street trees. Thus, the urban environment presents unique challenges for tree pruning, maintenance and removal. These challenges go above and beyond the general requirements laid out by the legislature and PURA.

Tree plantings in cities are frequently "owned" by the neighborhood and represent their hard work and the commitment of neighborhood groups. In lower income communities notifying abutting property owners is likely not to include those who live in the residences nor those who have planted the trees. Not only do these communities have a lower percentage of owner occupied homes, they are also neighborhoods with less park land, smaller yards and lower percent tree canopy cover. These may be their only trees, and they represent something special to the neighborhood - these are not just trees, but something that bonds the neighborhood.

In accordance with state law, tree wardens retain their authority to approve or disapprove tree pruning or removal for trees on or over the public right of way. Under UI's plan, it will take a significant amount of the tree warden's time to review the proposed removals. Moreover, the UI plan does not commit to stump-grinding and replacing the healthy trees that they remove (except on case-by-case basis). The UI proposal not only takes from the citizens the asset of healthy street trees, it also represents a substantially increased burden on limited municipal staff time, to review the proposed removals and then clean up the streetscape after the trees are removed.

The Connecticut Urban Forest Council asks the State Vegetation Management Task Force to advocate that healthy trees be kept and priority be given to removal of only hazardous trees and branches that are likely to fall on the electric distribution lines.

We need trees because they matter to people. While electricity is important, there are other critically important benefits from trees, including well-documented public health benefits, quality of life benefits, social benefits and environmental benefits, including reduced electrical consumption, reduced burning of fossil fuels and the sequestration of atmospheric carbon. These should not be looked at in the context of either/or, but of how we can manage the urban forest so that we have both. That requires flexibility and a broadening of priorities in the UI's plans.