

# New York Power Authority's 2006 Strategy

## Strategic Approach

To promote the establishment of low growing relatively stable plant communities within the right-of-way (ROW) of all our electric transmission facilities by the selective removal of all tall growing trees. This proactive ROW vegetation management activity will occur only on those lands that harbor tall growing trees that eventually could grow tall enough to threaten the safe and reliable operation of the line. Simultaneously, we will encourage all other line compatible multiple uses of the ROW performed by underlying fee owners that prohibit the establishment and growth of trees. Our proactive tree removal program will be accomplished through a variety of actions that encompass the application of Integrated Vegetation Management (IVM). IVM is a strategic approach that includes all of the viable parameters of IPM: a decision making process, data management, monitoring, site specific prescriptive actions; a multiple methods approach including cultural (physical, mechanical, manual) biological (natural, ecological) and chemical (herbicides) methods; a core risk reduction strategy; and cost effectiveness. However, it should be stated from the outset that only the judicious application of an herbicide deposit to the appropriate deciduous tree part will insure complete control (i.e., that vegetative reproduction such as root suckers and stump sprouts will not occur). The New York Power Authority will continue to update its advanced application of Geographic Information System (GIS) technology to accurately map and describe its resource base, track all ROW activities including vegetation inventories and treatment techniques (with their attendant herbicide volumes) as well as costs per acre and identify environmentally sensitive ROW segments and property lines. NYPA will continue its dual notification system, consisting of both a letter to each landowner detailing its forthcoming ROW vegetation management activities, including enclosing labels of the herbicides to be applied and the posting of the ROW when treatments involving the use of herbicides are made, so that both landowners and other nearby residents will be informed that a treatment involving the application of herbicide has been performed.

### Background Note:

The New York Power Authority recognized in 1998 that it needed to manage its ROW resources in a more assertive manner after a number of electrical outages and other ROW problems surfaced. An internal "White Paper" was prepared detailing the problems and prospects for all facets of ROW management. At this time frame each transmission facility was under a more or less localized control of the nearest major Authority office (usually a generating station). Hence the first corrective step was hiring a "System Forester" that would provide advice to all the disparate Regions on how to best manage the ROW resources. In 1999 implementation of an enterprise Geographic Information System was initiated that would eventually cover the entire transmission network with a special emphasis on handling data to support a diverse vegetation management program. These first small steps were followed up in 2000 by a major restructuring of the entire NYPA Transmission Network through the creation of an entirely separate Transmission

Business Unit (TBU). The System Forester was at this juncture assigned the responsibility for all ROW environmental resources including all integrated vegetation management activities. Hence in 2001 a new ROW vegetation program emerged with the complete treatment of all lines end-to-end by competitively bid contractor work forces on a four year treatment cycle. Thus, each year approximately one-fourth of the total ROW “brush” acreage of 16,000 acres (about 4000 acres per year) is subject to tree removal operations that most often involve some type of herbicide application to the targeted tree species to prevent their vigorous resprouting that always occurs when deciduous trees are only subject to mechanical removal (hand-cut or mowed). Currently, in 2005 the Authority began the second four year treatment cycle

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### **Progress on 2005 Activity 1**

*Continue the emphasis on the low volume foliar application of herbicides to only the tall growing target tree species via low pressure hand pumped backpack spray units in a highly selective manner that results in complete tree control (foliage dieback with no attendant vegetative reproduction from dormant buds, stump sprouts or root suckers) with minimum disturbance to the surrounding low growing desirable vegetation. When the trees are too tall to be foliar treated, the emphasis will be on hand cutting and then applying a stump treatment. Both treatment techniques will minimize the amount of herbicide required for complete control of the target tree species while preserving to the extent feasible all the surrounding low growing ROW compatible vegetation. Following the ROW tree removal operations the low growing vegetation will have the opportunity to occupy these recently emptied ecological niches and increase their coverage and distribution on the ROW. This robust low growing plant community competition coming from a diverse assortment of woody shrubs, forbs, grasses, sedges, reeds, ferns, etc. will make it much more difficult (fewer tree seedlings established with those that do become established will have their height growth impaired) for trees to reoccupy the ROW. A new version of the hand cut and stump treatment technique will be employed for the first time this year on a limited basis by NYPA. This technique involves the cutting of the stem of trees less than three inches in diameter at 3 feet with hand held loppers and carefully applying a relatively minute herbicide deposit on the freshly cut stem with a hand held squirt bottle. The new technique will remove the chainsaw and further reduce the amount of herbicide required to treat the target tree.*

Emphasize the selective application of herbicide through the use of the two very discriminating techniques; the cut stump treatment (CST) and the low volume foliar (LVF) application that will result in complete tree control with a minimum amount of disturbance to the desirable lower growing ROW vegetation.

Over 90% of our vegetation management techniques in 2005 employed these two (CST & LVF) methods. We treated approximately 6692 acres of ROW in 2005. Also, on less than 4% of the ROW we did employ the selective application of modified low volume foliar (MLVF) when the trees were quite dense and not too tall (less than 15 feet) and the desirable ground over was mostly reduced to grasses under the dense aggrading forest canopy. A herbicide mix of Arsenal and Accord were applied in this situation and were

applied from the back of a bombardier type machine. This enables the applicator to stay above the vegetation and thereby perform the proper application technique.

In 2005 we have started our second time thru on our "cycle treatment" of the system. The Authority did not begin its full implementation of IVM on a four year cycle until 2001. In 1999 we used a very simple index for our ROW vegetation inventory of only three tree stem density classes; Low <1000 stems per acre, Medium 1000 to 3000 stems per acre and High >3000 tree stems per acre. We have subsequently added Very Low < 500 stems per acre as our target tree stem counts are showing that we will be achieving these numbers. Recently we have further added another density class of Ultra Low <50 stems per acre as our ROW monitoring after treatment is indicating an even greater reduced number of tree stems. Our ROW vegetation inventory for the lines to be treated in 2005, have found that the tree stem density in the High and the Medium classes have been greatly reduced. The vast majority of ROW acres for these lines are now in one of the three Low classifications. We have treated these lines again in 2005 completely end to end and the resulting herbicide use data should consequently show a similar decline. The estimated treatment costs will likewise decline as compared to the same lines only four years ago. This is the first "hard" evidence within our system that IVM is working as it should, reducing the target species stems while simultaneously promoting the number and diversity (cover values) of all the lower growing species within the ROW.

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## **Progress on 2005 Activity 2**

*The NYPA is fully deploying its newly completed GIS for our IVM program implementation over the entire transmission system this year (2005). All our transmission facilities including such items as tower sites and types, access roads, stream crossings, fences and gates, other utilities, etc are located on the GIS. GIS also allows us to map sensitive ROW environmental resources such as hydrologic landscape features (lakes, ponds, rivers and streams including ephemeral), public water supplies, private wells, delineated regulated wetlands as well as wetlands that are not officially listed, agricultural areas, critical habitat, locations for species of concern, landownership patterns, and nearby residences and other buildings in the proximity of the ROW. GIS also allows us to update landowner information or changes as well as mapping any sensitive landowners or landowner concerns (e.g. beware of dog or landowner will move livestock for herbicide application). The results of our ROW vegetation inventories are also displayed on one of the many GIS layers as are the actual treatment techniques performed with their attendant herbicide usage. The recent completion of the GIS system for our entire transmission network will enable us to acutely track both in real time and for archival purposes a large number of important ROW variables simultaneously in a manner that is site specific yet easily convertible to data aggregations for a "big picture" viewing.*

As scheduled, all remaining GIS efforts were completed in 2004 and thus all our transmission assets have full GIS coverage. All of the beneficial activities to reduce pesticide risk as described in our strategy document attributable to GIS will now be achievable.

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### **Progress on 2005 Activity 3**

*Continue to sponsor ROW research on IVM methods, effectiveness and environmental impacts. Currently the NYPA sponsors three separate ROW research related activities. One relatively small research project involves the yearly detailed environmental monitoring of the flora and fauna at a ROW site located on the lands of the Greenwoods Conservancy. Oneonta State College Biological Field Station is doing the field research. The Authority is also a member of the Electric Power Research Institutes ROW Environmental Management Research Target and has been since its inception in 1998. Prior to this NYPA was a member of the now defunct Empire State Electric Energy Research Corporation that sponsored ROW research continuously from 1973 to 1998. Finally the Authority has recently joined (2002) with a consortium of New York State Utilities to fund an extensive ROW field research program being conducted by the SUNY College of Environmental Science and Forestry. This later group is currently also a recipient of a PESP monetary grant to perform various research results outreach programs.*

The Authority has continued to be a contributing member of the EPRI ROW Management Research Target again for the calendar year 2005 (15K membership contribution) along with about 45 other member utilities nationwide. The Authority is also continuing to sponsor research (50K for five years for 250K total) as part of a consortium of NYS utilities (3), chemical companies (2) and the EPA to fund ROW vegetation management research at the SUNY ESF. Some of this field research is actually occurring on NYPA ROW. We are also still funding a relatively small scale research project (5K yearly for the past five years) on the Greenwoods Conservancy involving the annual environmental monitoring of an IVM treated ROW section being conducted by the SUNY Oneonta Biological Field Station.

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### **Progress on 2005 Activity 4**

*Continue NYPA participation in the statewide training of ROW Certified Pesticide Applicators (NYS Category 6) that is annually held each October over a two day period. Also, offer to our contractor work force to perform additional training (8 classroom hours) for their new applicators so that they may be eligible for the first step in becoming a CPA, an apprentice.*

The Authority contributed funds and manpower to the statewide Category 6 (ROW) two day certified pesticide applicator training session worth 8 credit hours (4 per daily session) by the NYS DEC which was held in Auburn, NY in October 2005. Over 225 certified applicators attended.

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## **Progress on 2005 Activity 5**

*The landowners may want to take some type of avoidance action themselves, e.g., keeping farm animals out of the work area. Answering questions about our ROW vegetation management program and the types of herbicides used and the way they are applied before treatment can avoid many problems after the ROW is treated and thus reduce complaints (inquires). In recent times we have had about 10% of the landowners that received letters contact us. Of this number about 10% (about 1% of total) simply do not want any pesticides used whatsoever anywhere around them and/or do not want any trees cut from their property. Direct contact with this last group by home visits and inspecting the ROW with them will eventually resolve the issues and in some instances (again about 10% which is <.1% of the total) no herbicides are used as alternatives (e.g., land use conversion or landowner self maintenance) measures are found agreeable to all parties.*

All underlying fee owners of the NYPA ROW system (NYPA uses easements) were sent notification letters for all lines to be treated in 2005. In all, about 3000 letters went out to ROW landowners in 2005. These letters informed landowners of upcoming work and also provided notice of a herbicide application as well as provided the warnings on the labels of the herbicides intended for use. Less than 3% of these (around 75) resulted in calls, emails, or wrote back about their concerns, questions, or had other inquiries about the Authority's vegetation and related ROW management operations. In about a quarter of the cases, (1% of total) an additional information package was sent to those inquiring. This informational package consists of a cover letter detailing our management perspectives, and other program specifics, pesticide labels as well as an IVM Position Paper and other pertinent information about the field of ROW vegetation management in general. In a few cases personal visits were made to ascertain specific concerns. Satisfactory resolution of all the issues brought to our attention allowed all the ROW treatments to proceed as scheduled. Altogether, these landowner concerns were about evenly split between people concerned over herbicide use and others that were more concerned about tree removals on their property. However, the vast majority of people contacting the Authority after the completion of ROW treatment applications were more concerned with the large trees that were felled and the resulting large quantities of woody residues left on the ROW than with herbicide application. After the application of herbicides on the ROW the Authority also requires that "Posted" signs be put up on the ROW so as to notify third party users of the recent ROW treatments involving the application of herbicides. Since telephone numbers for more information are included on these signs some calls (less than a dozen) are received from others that are not landowners.

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## **Activities for the Coming Year**

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## **Activity 1**

Continue the emphasis on the low volume foliar application of herbicides to only the tall growing target tree species via low pressure hand pumped backpack spray units in a highly selective manner that results in complete tree control (foliage dieback with no attendant vegetative reproduction from dormant buds, stump sprouts or root suckers) with minimum disturbance to the surrounding low growing desirable vegetation. When the trees are too tall to be foliar treated, the emphasis will be on hand cutting and then applying a stump treatment. Both treatment techniques will minimize the amount of herbicide required for complete control of the target tree species while preserving to the extent feasible all the surrounding low growing ROW compatible vegetation. Following the ROW tree removal operations the low growing vegetation will have the opportunity to occupy these recently emptied ecological niches and increase their coverage and distribution on the ROW. This robust low growing plant community competition coming from a diverse assortment of woody shrubs, forbs, grasses, sedges, reeds, ferns, etc. will make it much more difficult (fewer tree seedlings established with those that do become established will have their height growth impaired) for trees to reoccupy the ROW.

### **How does this activity reduce pesticide risk?**

Formerly, traditional high volume foliar applications (also applied at higher pressure rates), which were often broadcast in nature, resulted in much higher volumes of herbicides being applied with the attendant overt disruption to the adjacent low growing desirable species. These previous efforts produced a ROW, not only nearly devoid of trees (at least initially), but also spans most of the lower growing non-target desirable vegetation, that can provide a competitive buffer to the quick resurgence of trees. Thus the application of herbicide via low volume formulations directly to the target tree species (foliage or stump) will result in a practical minimum application rate for this type of operation. In addition, the Authority also used to employ large mowing machines that mechanically completely denuded the ROW (albeit temporarily) but then rather quickly produced a ROW filled with fast growing coppice trees (stump sprouts and/or root suckers) that required another mowing only three years later. Although no herbicide was used in these previous mowing operations the net result was more trees growing faster than before being cut. After a few such mechanical treatments over a number of cycles the result was extremely high tree densities that now require a major effort to reclaim the ROW and begin the conversion of the ROW to desirable low growing plant communities. As a result of completing the first four year treatment cycle, thus gaining back control of the ROW, the incompatible species density should be substantially less dense (stems per acre). As a result this has caused the majority of the densities of undesirable vegetation to be either very low density (50-500 stems/acre) or even an ultra low density (<50 stems/acre) class. The newest methods of hand lop and treat should further the selectivity and concurrently reduce the amount of herbicide required to control each tree so treated.

### **How will you measure the risk reduction gained from this activity?**

To the extent that our efforts to selectively apply herbicides will substantially reduce the number of trees present on the ROW and concurrently foster and promote the growth and development of low growing desirable species that will further slow the return of new

trees, then our accomplishments (end outcomes) will be readily measured by a number of methods. First, the physical number of tree stems present on the ROW well after treatment, i.e., the next vegetation inventory 3 years later will be a direct indicator of success. Secondly, the amount of herbicide needed to maintain this same ROW the following treatment cycle (four years after) should show a decline and this will likewise be a measurable parameter. Since the NYPA performs a vegetation inventory (including a tree stem density estimate for each individual ROW treatment zone) for all lines the year prior to treatment a “snapshot” of the entire ROW is readily available to determine the tree stem reduction since the previous inventory for the last treatment. Also, the NYPA GIS can capture all daily herbicide use and the precise location of said use and thus a composite tally of total quantities used for a given ROW and the amount per acre can also be tabulated. Again, a direct and highly detailed comparison between the amounts of herbicide used to completely treat the ROW of one transmission facility can be directly compared to the amounts required to again treat the same facility the following treatment cycle (four years later). This rate of application (pounds of active ingredient per acre) can be the final determining factor to directly quantitatively measure success (the end outcome) of the pesticide risk reduction program. The detailed treatment location data available through our use of GIS will enable us to isolate any anomalies precisely and develop site-specific remedial measures. Finally, since we use a multi-year competitive bidding arrangement we should also be able to track our success in these endeavors through a cost accounting approach. Our bids for work are based on unit prices for each separate treatment technique (e.g., low volume foliar), tree stem density classes (Ultra Low-50 stems or less, Very Low-50 to 500 stems, Low-500 to 1000 stems, Medium-1000 to 3000 stems and High-over 3000 stems or greater per acre) and the exact acreage of each treatment. Thus, costs, both total costs for an entire line as well as average cost per acre, are another reliable indicator that we are achieving progress in our IVM program to eliminate, to the extent feasible, the trees on the ROW. Thus as we bid work on a four year treatment cycle and each transmission line ROW is completely treated “end to end” the costs (as adjusted for inflation) for doing a particular line should also be third direct indicator (end outcome) of program success.

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## **Activity 2**

The NYPA is fully deploying its newly completed GIS for our IVM program implementation over the entire transmission system this year (2006) and is also upgrading the system during the summer of 2006. All our transmission facilities including such items as tower sites and types, access roads, stream crossings, fences and gates, other utilities, etc are located on the GIS. GIS also allows us to map sensitive ROW environmental resources such as hydrologic landscape features (lakes, ponds, rivers and streams including ephemeral), public water supplies, private wells, delineated regulated wetlands as well as wetlands that are not officially listed, agricultural areas, critical habitat, locations for species of concern, landownership patterns, and nearby residences and other buildings in the proximity of the ROW. GIS also allows us to update landowner information or changes as well as mapping any sensitive landowners or landowner concerns (e.g. beware of dog or landowner will move livestock for herbicide application). The results of our ROW vegetation inventories are also displayed on one of the many

GIS layers as are the actual treatment techniques performed with their attendant herbicide usage. The recent completion of the GIS system for our entire transmission network will enable us to acutely track both in real time and for archival purposes a large number of important ROW variables simultaneously in a manner that is site specific yet easily convertible to data aggregations for a “big picture” viewing.

### **How does this activity reduce pesticide risk?**

Our GIS database (overview map of the line and vicinity) updated annually on a rotating 4 year cycle with a recent ROW vegetation inventory is the primary basis for all our site-specific ROW IVM treatment specifications. These ROW treatment specifications are then performed by experienced contractors that are paid on a per unit price, e.g., by treatment type, tree stem density and acreage. This system helps insure that only those ROW segments that are specifically identified by the GIS as needing treatment are included in the contract documents and that the identified segments are actually treated as specified in the field by the contractor work forces. The GIS then provides us with a historical database of all ROW treatment activity so that records are kept over time and various comparisons can be made between treatments, e.g., relative efficacy, stems density, amounts of herbicide used, etc. This will be the yardstick by which we are able to measure our progress over time (from one treatment to the next and then from a multi-treatment cycle perspective) in reducing the amount of herbicide used and the resulting decrease in tree stem density.

### **How will you measure the risk reduction gained from this activity?**

The recent completion of the GIS in 2004 will now allow full employment of its multifaceted operations encompassing the entire transmission network, enabling us to achieve a relatively sophisticated approach to ROW vegetation management. Our ability to set precise contact specifications with site-specific attributes for each ROW segment in an easily discernable manner rests with the GIS. The GIS data gathering, manipulation and retrieval strengths will set the tone for the ease of depicting future ROW vegetation management comparisons residing within its archival data sets. Secondly, over the longer haul, pesticide risk reduction will be specifically measured by the ability to determine the rates applied per acre from one treatment cycle to the next, i.e., by making direct comparisons of the same line from one treatment cycle to the next one four years hence using the most current (current year herbicide volumes used) in comparison to the archival GIS databases (previous years treatments herbicide quantities used).

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### **Activity 3**

Continue to sponsor ROW research on IVM methods, effectiveness and environmental impacts. Currently the NYPA sponsors three separate ROW research related activities. One relatively small research project involves the yearly detailed environmental monitoring of the flora and fauna as well as the *Viburnum* leaf beetle (which mimics herbicide damage and is destroying a very desirable plant) at a ROW site located on the lands of the Greenwoods Conservancy. Oneonta State College Biological Field Station is

doing the field research. The Authority is also a member of the Electric Power Research Institutes (EPRI) ROW Environmental Management Research Target and has been since its inception in 1998. Prior to this NYPA was a member of the now defunct Empire State Electric Energy Research Corporation that sponsored ROW research continuously from 1973 to 1998. Finally the Authority has recently joined (2002) with a consortium of New York State Utilities to fund an extensive ROW field research program being conducted by the SUNY College of Environmental Science and Forestry. This later group is currently also a recipient of a PESP monetary grant to perform various research results outreach programs. The Authority also individually funds ROW field research conducted by the SUNY College of Environmental Science and Forestry. A portion of this research is to take the valuable information and bring it back to the field for the certified applicators doing the work on the powerlines. This is done thru training and the development of laminated fact sheets which can be carried on the crews

### **How does this activity reduce pesticide risk?**

Continuous research is essential to analyze effectiveness and impacts of all IVM parameters including treatment efficacy, new herbicide mixes, development of new approaches (strategies) and methods (tactics) of vegetation management, quantifying plant community resistance to invasion by trees, long term ecology of low growing ROW plant communities, environmental effects, to name just a few. New knowledge about these and other ROW vegetation management related issues and topics could find ways to use herbicides in a more efficacious manner as well as find new effective methods and techniques that use less or don't even use herbicides. One new ROW research project sponsored by NYPA and being performed by SUNY ESF involves the ability to readily identify various similar looking species of willows. Some willows are trees, others are very short shrubs, whereas others are in between and to add to this mix (there are 16 known separate willow species in NYS), some of these willow cross breed and hence are hybrids. This study will help sort out all the various species of willow into simple height classifications that we can then either allow to be retained on the Row or have them removed before they get too tall. In addition being able to bring the information from the studies back to the field personnel thru training and the development of fact sheets will continue to provide the personnel on the ground with the thorough knowledge of the how and why we do the things we do and through better understanding and knowledge then the risk is greatly reduced.

### **How will you measure the risk reduction gained from this activity?**

Pertinent research findings and results brought to the attention of ROW managers by the appropriate technology transfer mechanisms provide feedback into the decision making process for what types of specific ROW treatments (BMPs) will be performed and the underlying detailed specifications to implement these treatments. One administrative outcome would be to publish the research results in various peer reviewed journals. An intermediate outcome would be to hold research results workshops to insure timely dissemination of pertinent study results. Pesticide risk reduction is an integral facet of all ROW vegetation management decision-making. Program changes aimed at pesticide risk reduction will be measured in herbicide use rates and effects on ROW flora and fauna could be the longer term end outcome. Finally, the continuing NYPA support for these

various research efforts in the near term could be considered an intermediate or administrative outcome. For the willow study the fact that we can confidently leave certain willow species (or conversely remove them) on the ROW knowing they will not grow tall enough to effect the line security will let us be more precise in targeting the appropriate .vegetation for removal

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#### **Activity 4**

Continue NYPA participation in the statewide training of ROW Certified Pesticide Applicators (NYS Category 6) that is annually held each October over a two day period. Also, offer to our contractor work force to perform additional training (8 classroom hours) for their new applicators so that they may be eligible for the first step in becoming a CPA, an apprentice.

#### **How does this activity reduce pesticide risk?**

Consistent high quality pesticide training held annually with a well established program is essential for good performance in the field. This continuous training cycle covering an array of important ROW topics helps maintain a high degree of awareness that keeps vegetation management crew members attentive to the perpetual need for constant vigilance when transporting, handling, mixing and applying herbicides. As new problems or opportunities present themselves, these latest topics of importance can be added to the next training session through participation in the program formulation as a supporting member of the Category 6 Training Committee. An additional opportunity to reach potential future CPAs early in their career is to prepare and present a day long training session for the recently hired contractor crew members to enable them to start on the path to become a full CPA in NYS by first becoming an apprentice.

#### **How will you measure the risk reduction gained from this activity?**

An administrative measure would include documenting the number of personnel trained by such sessions as well as the Authority's direct participation on the Category 6 Committee coupled with small financial contributions to keep the training costs down for the participants and thus get more people to attend. Also, indirectly, one could track the number of complaints and/or violations received by the NYPA or its contractors by personnel misapplying herbicides. Over time continued aggressive training programs should result in fewer mistakes from ignorance and thus be discernable in the track records of the crews in regards to violations and public/land/owner complaints.

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#### **Activity 5**

The landowners may want to take some type of avoidance action themselves, e.g., keeping farm animals out of the work area. Answering questions about our ROW vegetation management program and the types of herbicides used and the way they are

applied before treatment can avoid many problems after the ROW is treated and thus reduce complaints (inquires). In recent times we have had about 10% of the landowners that received letters contact us. Of this number about 10% (about 1% of total) simply do not want any pesticides used whatsoever anywhere around them and/or do not want any trees cut from their property. Direct contact with this last group by home visits and inspecting the ROW with them will eventually resolve the issues and in some instances (again about 10% which is

- .1% of the total) no herbicides are used as alternatives (e.g., land use conversion or landowner self maintenance) measures are found agreeable to all parties.

### **How does this activity reduce pesticide risk?**

Prior notification of all the underlying fee owners of our transmission line easements that ROW vegetation management actions are forthcoming is routinely provided, using the landowner database in our GIS to identify the landowners and to generate and address the letters. This allows the landowner to express their views in regards to this proposed activity on their lands. Letters are sent (usually in mid April) to all the landowners who have transmission easements over their property and they are provided notice that ROW vegetation management involving the selective application of herbicides is forthcoming on a particular transmission facility, enclosed along with the letter are the labels of the herbicides planned to be used. If they desire more information about this impending event they can call or write the System Forester, and/or a NYPA Real Estate representative and receive more information or provide additional information of their own that may alter the type of vegetation management that is performed on their property. In addition to letter notification, the Authority also Posts (puts up signs) the ROW areas treated with herbicides as a supplemental measure so that third party users of the ROW will be aware of the recent pesticide use activity.

### **How will you measure the risk reduction gained from this activity?**

Administrative measures will be used to determine the benefits. The number of letters sent to ROW landowners of record is one measure (it has remained relatively constant, albeit slowly increasing as the number of subdivided land parcels is slowly growing) and the number of follow-up contacts is another measure. Finally the number of site visits made to discuss the issues brought forth by the landowner about the forthcoming ROW vegetation management work is a third measure.