

December 5, 2023

North Reading Select Board Chairperson  
235 North St  
North Reading, MA 01864

Dear Select Board Chairperson:

In compliance with 333 CMR 11.06, 45 Day Yearly Operational Plan Public Notice, Review and Comment, please review National Grid's 2024 Yearly Operational Plan (YOP) at the following website (hard copy available upon request): [https://www9.nationalgridus.com/transmission/c3-8\\_standocs.asp](https://www9.nationalgridus.com/transmission/c3-8_standocs.asp). A copy of the Environmental Monitor Notice is enclosed and published under the Massachusetts Environmental Policy Act (MEPA).

The map(s) for your municipality can also be found on the above website (scroll through the pdf to your municipality). If you have any trouble viewing the maps, please contact me.

Please review the YOP map(s) that locate the right-of-way corridors and the plotted location of known sensitive areas including public and private drinking water supplies. If there are any additional sensitive areas located on or near the rights-of-way, please advise us as soon as possible so we may establish GIS permanent records and implement appropriate field protective actions. **We particularly rely on this process to collect corrections to the public wells and to record the location of private wells.**

National Grid's YOP details specific information pertaining to the intended 2024 program. Please note that the YOP also lists the rights-of-way from the 2023 treatment program in case National Grid needs to request a "touch-up" retreatment of scattered locations from our contractor(s). If upon review of the previous year's treatments, National Grid finds a site(s) within your municipality that need follow-up treatments, this letter serves as notification of that follow-up treatment. The individual landowner(s) will also be notified about this work. *Please note that scheduled rights-of-way are subject to change based on workplan constraints.*

This notification also serves as a 21-day herbicide application notification. As detailed in National Grid's Five-Year Vegetation Management Plan (VMP) and Yearly Operational Plan (YOP), this treatment is conducted as a component of an integrated vegetation management (IVM) program that also utilizes mechanical and natural control techniques. National Grid's Five-Year Vegetation Management Plan (2024-2028) is posted at the following website (hard copy available upon request) [https://www9.nationalgridus.com/transmission/c3-8\\_standocs.asp](https://www9.nationalgridus.com/transmission/c3-8_standocs.asp).

As described in the VMP and YOP, the program will consist of a late winter-spring mechanical control, cut surface (CST), basal treatment, or dormant stem; a summer selective foliage or cut stubble, and, as necessary, fall CST, basal, or dormant stem treatments.

In compliance with 333 CMR 11.06-11.07, no herbicide applications will occur before the conclusion of the 45-day YOP review period, the 21 day treatment notice and the 48 hour newspaper notice. At the end of these review periods, which can run concurrently, no application shall commence more than ten days before nor conclude more than ten days after the treatment periods listed above.

Potential Treatment Periods\*

February 1, 2024 – May 30, 2024	May 30, 2024 - Oct 15, 2024	Oct 15, 2024 – Dec 31, 2024
CST	Foliar	CST
Basal	CST	Basal
Dormant stem	Basal	Dormant Stem
	Cut stubble	

\* The exact treatment dates are dependent upon weather conditions and field crew progress.

Commonwealth of Massachusetts recommended herbicides for use in sensitive areas listed in Section 7 (pages 13-15) of the YOP will be selectively applied to target vegetation by experienced, Massachusetts' licensed/certified applicators that walk along the rights-of-way using backpack equipment. Copies of the manufacturers' herbicide labels and fact sheets are also included in the YOP, Appendices 8 and 9.

The work will be performed by one of the following vegetation management vendors:

<b>Lewis Tree Service, Inc.</b>	<b>Stanley Tree</b>	<b>Vegetation Control Service, Inc.</b>	<b>Davey Tree Expert Co.</b>
300 Lucius Gordon Drive	662 Great Road	2342 Main Street	1500 N Mantua St
West Henrietta, NY 14586	North Smithfield, RI 02896	Athol, MA 01331	Kent, OH 44240
(585) 436-3208	(401) 765-4677	(978) 249-5348	800-445-8733
<b>Lucas Tree Experts</b>	<b>BluRoc</b>	<b>North Eastern Tree Service</b>	<b>Rainbow Treecare</b>
12 Northbrook Drive	15 Atwood Dr, Suite 301	1000 Pontiac Ave	11571 K-Tel Dr.
Falmouth, ME 04105	Northampton, MA 01060	Cranston, RI 02920	Minnetonka, MN 55343
(800) 339-8873	(413) 887-3653	(401) 941-7204	952-922-3810

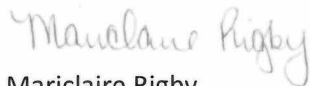
This informational 21-day notification follows Chapter 132B, section 6B of the Massachusetts General Laws, 333 CMR 11.05-11.07 Rights of Way Management and Chapter 85, Section 10 of the Acts of 2000. National Grid's vegetation management program is subject to federal and state regulations only. By statute, local permits or rulings are not applicable.

For inquiries concerning safety of the herbicides, please contact:

MDAR-Pesticide Division-ROW Coordinator  
 251 Causeway Street, Suite 500  
 Boston, MA 02114-2151  
 Telephone: (617) 626-1782

Please contact me if you have any questions about the application and monitoring of the vegetation management program. Email: mariclaire.rigby@nationalgrid.com Phone: 781-290-8310

Sincerely,



Mariclaire Rigby  
 Principal Vegetation Strategy Specialist

CC: Board of Health, Conservation Commission, Private and Public Water Suppliers  
 Massachusetts Department of Agricultural Resources

# THE COMMONWEALTH OF MASSACHUSETTS

EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS



## Department of Agricultural Resources

225 Turnpike Road, 3<sup>rd</sup> Floor, Southborough, MA 01772  
617-626-1700 fax: 617-626-1850 www.mass.gov/agr



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GOVERNOR

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Rebecca L. Tepper  
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Ashley E. Randle  
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### NOTICE

Pursuant to the provisions of the Rights-of-Way Management Regulations, 333 CMR 11.00, to apply herbicides to control vegetation along rights-of-way, a five year Vegetation Management Plan (VMP) and a Yearly Operational Plan (YOP) must be approved by the Massachusetts Department of Agricultural Resources (MDAR). National Grid has submitted and holds a current VMP, therefore, notice of receipt of a YOP and procedures for public review is hereby given as required by Section 11.06 (3).

National Grid has submitted a YOP to MDAR for 2024 and National Grid's YOP identifies the following municipalities as locations where they intend to use herbicides to treat their electric Rights-of-Way in 2024:

Abington	Chelmsford	Hanover	Melrose	Raynham	Stoughton
Adams	Clarksburg	Haverhill	Mendon	Reading	Sturbridge
Andover	Colrain	Heath	Methuen	Rehoboth	Swampscott
Attleboro	Dighton	Holbrook	Milford	Rowe	Swansea
Auburn	Dracut	Hopedale	Millbury	Salem	Taunton
Avon	East Bridgewater	Lawrence	Monroe	Saugus	Tewksbury
Ayer	Easton	Leicester	Montague	Seekonk	Uxbridge
Berkley	Florida	Leominster	North Adams	Shelburne	West Bridgewater
Billerica	Gill	Littleton	North Andover	Somerset	Westford
Bridgewater	Grafton	Lowell	North Reading	Spencer	Whitman
Brockton	Greenfield	Lynnfield	Pembroke	Sterling	

In 2024 National Grid will conduct a selective herbicide treatment program on their rights-of-way as part of an Integrated Vegetation Management (IVM) program on transmission and distribution lines.

The intended vegetation control program will be consistent with the guidelines set forth in National Grid's VMP and YOP. Herbicides will be selectively applied to target vegetation by licensed/certified applicators carrying backpack or hand held application equipment.

National Grid will only use herbicides recommended by MDAR for use in sensitive areas for their IVM program. Pursuant to 333 CMR 11.04, no herbicides will be sprayed within any designated "no spray sensitive sites." Instead, mechanical only methods will be used to control vegetation in these areas.

Public notification will be provided to each "affected" municipality at least twenty-one days prior to any herbicide application and in a newspaper notification at least 48 hours before the beginning of the spray season.

In accordance with 333 CMR 11.06 (2), National Grid's YOP includes the identification of target vegetation; methods of identifying, marking and protecting sensitive areas; application techniques; the herbicides, application rates, carriers and adjuvants proposed for use; alternative control measures, a list of the application companies and YOP supervisor; procedures for handling, mixing and loading herbicides; emergency resources including local, state and federal emergency telephone numbers; maps of the rights-of-way that include mapped sensitive areas, and herbicide fact sheets and labels.

## **PUBLIC REVIEW**

MDAR seeks to verify the location of sensitive areas defined in Section 11.02 and reported in the YOP. MDAR itself has a limited ability to survey the geography, land use and water supplies in all the communities through which rights-of-way pass. Municipalities have most of this information readily available, and the particular knowledge with which to better certify the sensitive areas in their communities. MDAR, therefore, requests, and urges the assistance of the "affected" municipalities in reviewing the completeness and accuracy of the maps contained in the submitted YOP.

The YOP can be viewed on MDAR's website: <http://www.mass.gov/eea/agencies/agr/pesticides/vegetation-management-and-yearly-operation-plans.html> or National Grid's website: [https://www9.nationalgridus.com/transmission/c3-8\\_standocs.asp](https://www9.nationalgridus.com/transmission/c3-8_standocs.asp)

### **MDAR has established the following procedures for this review:**

Copies of the YOP and this *Notice* will be sent by the applicant to the Conservation Commission, Board of Health (or designated health agent), the Head of Government (Mayor, City Manager, Chair of the Board of Selectman) and appropriate water suppliers of each municipality where herbicides are to be applied during the calendar year of 2024; and if applicable, to the Natural Heritage Endangered Species Program of the Massachusetts Department of Fisheries and Wildlife, the Massachusetts Water Resource Authority and the Massachusetts Department of Conservation and Recreation. Municipal agencies and officials will have forty-five days, following receipt of the YOP, to review its map for inaccuracies and omissions in the location of "sensitive areas not readily identifiable in the field."

Municipal agencies and officials are requested to forward the YOP to the appropriate official(s) in their municipality who are qualified to certify the accuracy of the sensitive areas indicated on the maps. The maps should then be "corrected" and returned to the applicant and a copy should be sent to MDAR, at the address listed below, within the forty-five day review period. If a city or town needs more time to carry out this review, it should send a written request for an extension to MDAR and cite why there is a "good cause" for requesting additional time.

The applicant is required to make corrections and the corrected maps will be sent back to the city/town that requested the disputed changes within fifteen days of receipt of the request. MDAR will decide whether or not the YOP should be approved without the requested changes. MDAR will consider the "final approval" of a YOP individually for each municipality.

The twenty-one day public review period of the Municipal Notification Letter may serve concurrently with the forty-five day YOP review period in order to provide public notifications as required by 333 CMR 11.06-7, if the applicant has an approved VMP and if all the requisite city-town offices that received copies of the YOP completed their review and all corrections were duly made by the applicant and approved by MDAR.

A failure by the city/town to respond to the applicant's submission of the YOP within the forty-five day period will automatically be considered by MDAR to indicate agreement by the municipal officials with the sensitive area demarcations provided by the applicant in their YOP.

Any questions or comments on the information provided in this *Notice* and the procedures established for the municipal review outlined above should be addressed to:

Clayton Edwards, Rights-of-Way Programs  
Massachusetts State Pesticide Bureau  
225 Turnpike Road,  
Southborough, MA 01772

Any questions or comments regarding the YOP should be addressed to:

Mariclaire Rigby  
Lead Vegetation Strategy Specialist  
National Grid Vegetation Management Strategy  
939 Southbridge Street, Worcester, MA 01610

**COMMENT PERIOD ENDS AT THE CLOSE OF BUSINESS (5pm) Friday, January 22, 2024**

# nationalgrid

## RIGHT-OF-WAY VEGETATION MANAGEMENT

### Additional Information about National Grid's Integrated Vegetation Management (IVM) Program:



National Grid utilizes a program called Integrated Vegetation Management (IVM) to maintain its rights-of-way (ROW) floor (WIRE ZONE AND BORDER ZONE in the above illustration). The ROW is the off-road section of our lines, these are not the poles and lines that run along the roadside. The IVM program encourages the establishment of a low growing plant community within the ROW using mechanical, biological, & herbicide treatments. Our IVM program is based on 4-5-year cycles which schedule crews to target incompatible vegetation as selectively as possible and then allows early successional ecological communities (low-growing plants and shrubs) to help maintain compatible vegetation between treatment programs. Because we have been using this program since the 1960's our ROWs consist mainly of compatible growing species. It's important to note that the cycles allow us to treat different ROWs in our system each year, so not all the ROWs in one town will necessarily be treated in the same year.

The vegetation management work is being performed in accordance with 333 CMR 11.00 Rights of Way Management and the provisions of the Massachusetts Wetlands Protection Regulations (310 CMR 10.02(2)(a)(2) that allow for the maintaining, repairing, or replacing, but not substantially changing or enlarging, existing structures or facilities. This work is done to keep vegetation away from electrical transmission lines and facilities to prevent power outages and ensures the safety and reliability of the existing lines therefore, it constitutes maintenance of utility structures and facilities.

The herbicide maintenance work is also covered under 310 CMR 10.03 (6): Presumption Concerning Application of Herbicides. (a) Any application of herbicides within any Area Subject to Protection under M.G.L. c. 131, § 40 or the Buffer Zone associated with a structure or facility which is: 1. existing and lawfully located; 2. used in the service of the public; and 3. used to provide electric, gas, water, sewer, telephone, telegraph and other telecommunication services shall be presumed to constitute work performed in the course of maintaining such structure or facility, and shall be accorded the exemption of such work under M.G.L. c. 131, § 40, only if the application of herbicides to that structure or facility is

performed in accordance with such plans as are required by the Department of Food and Agriculture pursuant to 333 CMR 11.00: Rights of Way Management, effective July 10, 1987.

National Grid uses field GIS software to gather data on the ROW. Before we begin any ROW vegetation maintenance work, professionally trained forestry staff field inventory the ROW 1-2 years ahead of the scheduled maintenance year and prescribe the work for the crews. Each site is GIS mapped and designated with a land use type, site prescription, and any special notes. When making the prescription all land use factors are considered: proximity to water, sensitive areas, wetlands, landowner concerns, priority habitat, etc. GIS shapefiles/locations of wetlands and other sensitive areas provided from the state and local municipalities are added to our GIS. In addition, all the necessary state listed buffers have also been applied to our GIS. (Please see Appendix 6 of the YOP for the list of buffers). National Grid Forestry staff and contracted field crews conducting the ROW work all use the GIS software in the field to help identify the work and sensitive area requirements.

In addition to using GIS field software, National Grid chooses to only use herbicides from the MA Sensitive Materials List. These are herbicides that may be used in sensitive areas. (ex: wetlands). In areas where we use herbicides, the herbicide treatments are selectively applied by trained, licensed applicators using hand-held equipment. Two methods of application are primarily used. A preparatory Cut and Stump Treatment (CST) is made where trees must be hand cut near inhabited areas, roads, and for all trees over 12 feet tall. A foliage application consisting of the same materials is made selectively to target species only less than 12 feet tall over the remaining portion of the right-of-way. In both treatment methods, applicators walk to each target plant and apply minimal amounts of herbicide. National Grid does not utilize any broadcast treatments. All herbicides have been approved for use by the U.S. Environmental Protection Agency as well as the MA Department of Agriculture (MDAR). Herbicide use in Massachusetts is solely regulated by MDAR. <https://www.mass.gov/rights-of-way-vegetation-management> . ***Important: if you note any additional sensitive areas, please notify us so we can add them to our GIS and apply the necessary buffers.***

National Grid is currently taking part in a study to quantify the biodiversity found within our rights-of-way. <https://www.tdworld.com/vegetation-management/article/21239573/national-grids-biodiversity-study-for-integrated-vegetation-management>

For more information about the study: <https://bioaudit.acrt.com/national-grid/>