



State of Vermont

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Department of Environmental Conservation
State Geologist
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Department of Environmental Conservation

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December 17, 2004

Susan Hudson, Clerk
Vermont Public Service Board
112 State St. Drawer 20
Montpelier, VT 05620-2701

Re: Docket No. 6967, Honeysuckle Control

Dear Ms. Hudson:

I am writing to you on behalf of the Vermont Pesticide Advisory Council (VPAC) in regards to the Certificate of Public Good issued on August 11, 2004 pursuant to the control of honeysuckle in the Central Vermont Public Service Corporation (CVPS)/VICON utility corridor near Rutland, Vermont. VPAC is authorized by statute to review utility right-of-way vegetation management plans and to provide recommendations to the Secretary of the Agency of Agriculture, Food and Markets (AAFM) regarding the annual permitting of vegetation control activities. The three Departments of the Agency of Natural Resources (ANR) are represented on the VPAC and approval of Vegetation Management Plans by those representatives constitutes an approval by the Secretary of ANR.

CVPS came to VPAC for guidance and an opinion in regard to the Certificate of Public Good issued by the PSB. It is the opinion of VPAC that consultation with VPAC is consistent with the intent of the PSB that CVPS consult with ANR in regards to the development of a plan "outlining methods for controlling honeysuckle in the VICON corridor". In addition, VPAC consulted with Scott Pfister, administrator of the Vermont Noxious Weed Quarantine Rule for the AAFM, and Kathy Decker, representing the Vermont Department of Forests, Parks and Recreation on the Vermont Invasive Exotic Plant Committee.

VPAC appreciates the attention that the PSB has brought to the issue of invasive plants in ROW corridors. Clearly CVPS is in an excellent position to address this issue given a professional staff of foresters and plant specialists as well as an active program of vegetation surveillance and control. VPAC agrees that there is a role for CVPS to play in the struggle to control the establishment and spread of invasive plant species populations.

After consulting with the experts mentioned above and with CVPS, VPAC offers the following opinions and recommendations. Please regard these comments and recommendations as consistent with the PSB directive to consult with the Agency of Natural Resources.

1. The Vermont Agency of Agriculture, Food and Markets have established noxious weed quarantine regulations. Under these regulations, honeysuckle (several species) is listed as a "Class B Noxious Weed" meaning any noxious weed that is not native to the state, is of limited distribution statewide, and poses a serious threat to the State, or any other designated noxious weed being managed to reduce its occurrence and impact in the State. The movement, sale, and / or distribution of Class B Noxious Weeds designated in Section IV of this quarantine regulation is prohibited.
2. Honeysuckle is a low growing shrub and is not currently a target species for control in utility line ROWs. Control of honeysuckle would provide little benefit in regards to the goals and objectives of vegetation control in those ROWs.
3. In many parts of the state, honeysuckle is well established both within utility ROWs and in lands adjacent to the ROW. This is the case in the ROW section under consideration. The Vermont Invasive Exotic Plant Committee does not currently recommend eradication programs but places emphasis on spread prevention and control. VPAC does not believe that there is significant benefit from an invasive species control perspective to eradicating invasive species populations exclusively in ROWs when adjacent land areas also support well-established populations.
4. While there are certainly non-chemical alternatives (e.g. mechanical) to controlling honeysuckle, there appears to be some consensus that chemical methods are the most effective and economically feasible methods available and this would most likely be the conclusion of an assessment of control methods. VPAC is charged with making recommendations regarding the wise use of pesticides and promoting practices which minimize the use of pesticides. VPAC does not feel that the use of pesticides to control honeysuckle when there is little or no demonstrable benefit is a wise use of pesticides, neither does it represent a minimization of use in that it would result in increased pesticide use with little to no benefit.
5. VPAC believes that utility ROWs, by their disturbed and open nature, present a potential route for the spread of invasive exotic species. Since utility ROW management practices may promote the spread of unwanted invasives, there is a definite role for utility ROW managers to address the issue of spread prevention. Professional ROW managers are continually assessing ROW condition and are in an ideal position to identify pioneer populations within their ROWs. VPAC believes that there is significant benefit to applying resources to a proactive spread prevention consciousness within the utility industry.
5. Therefore, VPAC recommends that CVPS amend its vegetation management plan to include a component addressing activities related to the prevention of the spread of invasive species within their ROW corridors. Priority activities should include the

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identification and eradication of pioneer infestations. When feasible, non-chemical methods should be used to control small infestations. Eradication of well established populations should be considered only in cases where findings can be made that there is an obvious benefit to the goals and objectives of either ROW management or overall invasive exotic species control.

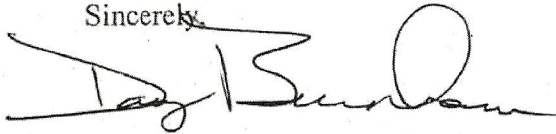
Thank-you for the opportunity to comment. VPAC will be happy to work with CVPS in amending its vegetation management plan. All parties involved in this discussion were very positive about the role that CVPS can play in preventing the spread of invasive exotic plant species in Vermont.

Please let me know if you have any questions. My phone number and e-mail are:

241-3784

doug_burnham@anr.state.vt.us

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Burnham". The signature is fluid and cursive, with a large, prominent "D" and "B".

Doug Burnham
Chair, Vermont Pesticide Advisory Council