

# Attachment 12

**ATTACHMENT 12  
MON-FAYETTE TOWER RELOCATIONS PROJECT  
VEGETATION MANAGEMENT PRACTICES**

---

This Attachment describes Duquesne Light Company’s (“Duquesne Light” or the “Company”) plans for managing vegetation within and around the transmission line corridor.

*(1) A general description of the utility’s vegetation management plan.*

Duquesne Light will apply the Wire Zone/Border Zone management technique, which is recognized as an industry best practice to manage vegetation and ensure the safe and reliable delivery of electricity. Under the Wire Zone/Border Zone management technique, non-compatible species in both the Wire Zone/Border Zone areas are removed. Areas within the Wire zone are cleared of all woody vegetation leaving only grasses and other herbaceous plants. Areas within the Border Zone are cleared of vegetation that would exceed 15 feet at maturity. ROW management extends beyond the managed corridor to include “danger trees” located outside the ROW that present a hazard to, or target, a transmission line. Danger trees are those that, upon partial or complete failure, would either strike the conductors or pass within the minimum clearances required for the conductors, structures, and facilities.

*(2) Factors that dictate when each method, including aerial spraying, is utilized.*

Vegetation management methods are site dependent. Duquesne Light employs a Utility Vegetation Management (“UVM”) assessment of each vegetation management job to align job objectives, the characteristics and setting of the work site and vegetation thereon, and the vegetation management tools available. For example, field personnel consider species composition, stem density, and stand age to assist in the selection of management methods appropriate for the site.

Vegetation management methods are often used in combination to produce desired outcomes. Methods for consideration include, but are not limited to, the following and recognized as an Industry Best Practice and documented in the ANSI A300 Part 7, Integrated Vegetation Management:

- Manual Control: work performed with hand tools.
  - Highly selective method; can be useful in sensitive sites.
  - May be less efficient and more costly compared to other methods.
- Mechanical Control: work performed with the assistance of mechanized equipment.
  - Less selective; may result in site disturbance requiring restoration.
  - Can be highly efficient and cost-effective.
  - Application is limited by terrain and right-of-way accessibility.
- Chemical Control: application of herbicides.
  - When properly used, can be efficient and cost-effective, while minimizing site disturbance and enhancing plant and wildlife diversity.
  - Selection of proper herbicide and application method depend upon site and vegetation characteristics and will be consistent with the manufacturer's label and applicable laws and regulations.
  - Selective application directly to targeted species is preferred. Non-selective aerial applications may be appropriate for less-sensitive sites that are in sparsely populated areas, are difficult to safely access, and/or have a high stem density.
- Biological Control: encouragement of mutually beneficial interactions of naturally-occurring plant and animal species inhabiting the right-of-way.

- Certain plants compatible with transmission line rights-of-way (“compatible species”) naturally produce substances that inhibit the establishment of incompatible competing species (for example, fern allelopathy).
- In some instances, field personnel may be able to selectively remove certain plants to encourage the growth of other, more favorable species.
- Availability and feasibility of this method is highly dependent on-site conditions, plant and animal species present at the site, and vegetation management objectives.
- Cultural Control: management of vegetation within the right-of-way to promote desired compatible plant communities (or “cultures”).
  - In some instances, it can be feasible to supplement the above control methods with additional interventions to encourage the development of relatively stable communities of compatible plants within the right-of-way. For example, Duquesne Light can provide landowners with informational resources to aid them in the cultivation and management of desirable, compatible plant species in the right-of-way.
  - Can reduce longer-term maintenance requirements and costs once plant community stability is achieved.

*(3) Vegetation management practices near aquatic and other sensitive locations.*

All sites, notably those that are environmentally sensitive, should only be managed using appropriate UVM control methods. Field personnel assess special site characteristics, such as proximity to wetlands or sensitive species habitats, as part of their UVM analysis. The control methods employed are then tailored to the site conditions to minimize or mitigate impacts

consistent with the desired UVM objectives. Special site conditions are then noted for routine vegetation maintenance work.

*(4) Notice procedures to affected landowners regarding vegetation management practices.*

Duquesne Light employs robust landowner notification procedures regarding its vegetation management practices. Duquesne Light or its representatives (referred to collectively as Duquesne Light) notify landowners of routine vegetation management, such as maintenance of the right-of-way corridor, approximately 2-8 weeks prior to the scheduled vegetation management work. Duquesne Light typically makes at least one attempt at in-person contact with each landowner, except for landowners who reside outside of Duquesne Light's service territory, whom Duquesne Light contacts via telephone, mail or email. At such initial contact, Duquesne Light provides information regarding the scheduled work, including:

- A brief explanation of what and when work will be performed;
- Why the work is necessary;
- A general location of the work and utility facilities involved;
- The extent of work and how it will be performed;
- The contractor to perform the work and crew members involved; and
- Contact information for customer questions or follow-up.

Also, at these in-person visits, Duquesne Light marks trees affected with either flagging or paint (blue for those identified for removal, yellow for those identified for pruning), and requests a landowner signature on a written description of work.

Where the in-person contact attempt is unsuccessful, Duquesne Light marks trees as discussed above and leaves a door hanger explaining the nature, necessity, and anticipated date of the scheduled work, as well as contact information for customer questions or follow-up. Depending

on the nature and extent of the scheduled work, Duquesne Light may also supplement this notice with other written correspondence mailed to the landowner or via telephone upon request by the landowner.

In addition to these individualized contacts, Duquesne Light provides general notice of its vegetation management practices through other outlets. Duquesne Light's website, [www.duquesnelight.com](http://www.duquesnelight.com), includes extensive information concerning the reasons, methods, and features of Duquesne Light's vegetation management practices, as well as links to other educational sites for customers who wish to learn more. Duquesne Light staff also participate in periodic public events, such as the annual Pittsburgh Home & Garden Show, where they are available to respond directly to landowner questions or concerns.

*(5) Provision of a copy of a landowner maintenance agreement that describes the duties and responsibilities of landowners and the utility for vegetation management to the extent utilized.*

Landowners' and Duquesne Light's respective rights and responsibilities are perpetualized in the right-of-way and easement agreements between Duquesne Light and respective landowners. In general, landowners can continue to use the right-of-way area, so long as such use is compatible with the safe and reliable operation and maintenance of Duquesne Light facilities. Compatible uses that require no prior review or approval from the Duquesne Light include agricultural farming and gardening. Duquesne Light also allows compatible development within the right-of-way area, provided that the design and work in the area does not interfere with the safe and reliable operation and maintenance of Duquesne Light facilities. Such uses can include: grading, installation of roadways or parking lots, and installation of underground infrastructure (such as utilities).