

FILE

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Mr. Jim O'Dell  
Ohio Power Siting Board  
Public Utilities Commission of Ohio  
Borden Building  
180 East Broad Street  
Columbus, Ohio 43266-0573

February 18, 2005

Subject: Beaver-Carlisle 345 kV Transmission Line Relocation Project  
Construction Herbicide Use Plan  
OPSB Case No. 04-264-EL-BTX

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Dear Mr. O'Dell,


Enclosed for your review and approval are three copies of the Construction Herbicide Use Plan for the Beaver-Greenfield Electric Transmission Line Project, dated February 18, 2005. If there are any questions concerning this information, please call me at (330) 761-4268.

Sincerely,



Ted Krauss  
Senior Transmission Engineer  
FirstEnergy Service Company

Attachment

This is to certify that the images appearing are an  
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Technician  Date Processed 3-9-05

## **Beaver-Carlisle 345 kV Transmission Line Relocation Project Construction Herbicide Use Plan**

**February 18, 2005**

The Beaver-Carlisle 345 kV Transmission Line Relocation Project Construction Herbicide Use Plan has been developed to describe how herbicides will be used during construction of the relocated transmission line. Construction on the project is expected to begin in February 2005 and be completed by December 2005. Herbicide use during the construction of the relocated transmission line will be in accordance with this plan. The plan was submitted to the OPSB for their review and approval prior to its implementation.

### **Background Information**

American Transmission Systems, Incorporated's ("ATSI") transmission lines provide power to thousands of customers in northern and central Ohio and western Pennsylvania. ATSI's transmission lines connect customers to generation sources and are a vital reliability link with other utilities. ATSI is charged by state and federal regulatory agencies with the responsibility for providing safe, reliable electric service to its customers. Providing clearances between vegetation and the transmission line structures and conductors is an important aspect of providing safe, reliable electric service. Trees and other vegetation can cause interruptions of service by growing into, or falling through power lines. Vegetation management involves establishing the necessary vegetation clearances during initial construction of the transmission line and maintaining them thereafter.

Establishing vegetation clearances involve removing trees and other vegetation located within or next to the transmission line right-of-way that potentially interfere with the construction and safe operation of transmission facilities during the transmission line construction process. This may be accomplished by using power saws and mechanical equipment. Disturbance to compatible trees, shrubs and other vegetation that do not interfere with construction or operation of the transmission facilities is minimized. However, merely cutting such woody vegetation may perpetuate the growth of incompatible vegetation because

of the biological response of sprouting. When a single stem is cut, multiple sprouts can grow from the severed stump or root system. These sprouts can be fast growing because they are fed from the root system, which is already well established. A repetitive cycle of cutting and sprouting can result in an increasing density of tall growth species that is incompatible with the transmission line. In many instances, use of herbicide is preferred because it controls the entire plant and greatly inhibits re-sprouting, thereby reducing the need for repetitive cutting and more quickly establishing compatible vegetation within the right-of-way.

Established transmission line right-of-ways typically contain a diverse mixture of low growing vegetation shrubs and other ground cover that provide the vegetation clearances required for safe operation of the transmission line, while also establishing a compatible low maintenance vegetation environment.

#### **Herbicide Use Plan**

During construction of the Beaver-Carlisle 345 kV Transmission Line Relocation Project, Ohio Edison and/or the FirstEnergy Service Company, on behalf of ATSI will use a selective herbicide program. This program will assure reliable operation of the transmission line and safe access for service and maintenance needs while establishing a compatible, low growth vegetation environment within the right-of-way.

Herbicide use on the Beaver-Carlisle 345 kV Transmission Line Project will be in accordance with applicable state and federal regulations and will be applied in accordance with the manufacturer instructions. Stumps of trees in or adjacent to the transmission line right-of-way likely to sprout and impact the safe operation of the transmission line will be treated with herbicide. Only a stump herbicide treatment will be used on the construction of the transmission line. The application of a stump herbicide treatment consists of applying herbicide to the cambium layer of the stump and associated root flares. In areas ~~away from wetlands and~~ ~~near~~ a Garlon 4 & Basal Oil (20%) mixture will be used. The Garlon 4 & Basil Oil (20%) mixture is registered and approved as a herbicide for use in non-wetland areas. In areas near wetlands and streams, either a Glypro & Water (08%) mixture or Garlon 3A will be used. The

Glypro & Water (08%) mixture is registered and approved as a herbicide for use near streams, lakes, ponds, and reservoirs. Garlon 3A is registered and approved for use in and around standing water areas, but may be used with care near, but not directly on, the banks of rivers and streams. A green color dye will be added to Garlon 4 & Basal Oil mixture, a red color dye will be added to the Glypro & Water Mixture and a blue color dye will be added to the Garlon 3A to provide a visual indication of where each herbicide has been used. The designated Environmental Specialist for the project will inspect herbicide application in or near wetlands, streams and rivers preferably during the application, but no later than within 48 hours following the application.

The herbicides used during construction of the Beaver-Carlisle 345 kV Transmission Line Relocation Project work on enzymes found only within plants, not people or animals. These compounds enter through leaves, stems and stumps (with only the stump treatment method being use on this project) and control plant growth from the inside of the plant. The products used have undergone years of testing. The USEPA approves such products for use only after determining that they will not adversely affect people, animals, or the environment when properly applied. The crews that apply herbicides will be required to follow strict usage guidelines in accordance with the labeling and application requirements. Workers who apply herbicides must hold a pesticide applicator license from the state of Ohio or work under the direct supervision of a certified applicator.