



**Testimony of:
William Wegner, Staff Scientist, Riverkeeper, Inc.**

**New York State Public Service Commission
Case 10-E-0155, New York State's Electric Utility Transmission Right-of-Way Practices**

**August 24, 2010
Greenburgh Public Library
300 Tarrytown Road, Elmsford, NY**

Good afternoon. My name is Bill Wegner and I am Staff Scientist for Riverkeeper, a non-profit environmental organization dedicated to protecting the Hudson River, its tributaries and the 2,000-square-mile New York City Drinking Water Supply Watershed, which provides unfiltered drinking water to more than nine million New Yorkers.

In June, we submitted written comments to the New York State Public Service Commission on Con Edison's right-of-way Vegetation Management Plan. Our primary concerns regard recurring impacts to wetlands and wetland buffer areas as a result of Con Edison's vegetation management practices here in Westchester County. As I have personally witnessed, the clear-cutting of vegetation and improperly installed stormwater management practices have resulted in heavier stormwater flows leaving Con Edison's rights-of-way, causing at times excessive erosion and sediment to be transported to wetlands that ultimately drain to drinking water reservoirs in the New York City East-of-Hudson Watershed.

Because these wetlands are vital for protection of the environment and public health, we favor the tiered approach recommended by the federal NERC guidelines. This approach eliminates the potentially devastating environmental impacts of clear-cutting by removing only those trees that pose a line hazard within the wire zone and leaving trees and other vegetation of lower heights within the right-of-way to intercept stormwater for infiltration and plant uptake. This practice will require oversight to monitor compliance and to ensure that the tiered approach provides sustained water quality benefits. Disturbing right-of-way habitat invites the establishment of invasive plant species; however, increasing foliage height diversity and establishing native vegetation in cleared areas within the right-of-way will mitigate the impacts of vegetation management without sacrificing system safety and reliability.

Thank you for this opportunity to comment further.