Distribution Right-Of-Way Vegetation Management Plan

March 18th 2025

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111 West Brashear Avenue
Bardstown Ky, 40004

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1.0 Introduction

The purpose of this report is to establish a guideline with an emphasis on supplying our members with the most safe and reliable approach for optimal operational compliance. All vegetation management work performed shall follow arboricultural standards for line clearance as established and published in the ANSI Z133-2012 standard, ANSI A300 (Part 1)-2017 Pruning standard, RUS Bulletin 1728F-804, Section M, OSHA §1910.269, Kentucky Fertilizer and Pesticides Storage, Pesticide Use and Application Act of 1996 (KRS Chapter 217B), Federal Insecticide, Fungicide, and Rodenticide Act of 1972 (FIFRA), and the Kentucky Administrative Regulations Title 302 Department of Agriculture (Chapter 27 and 31), as revised.

2.0 Specifications Guide for Line Clearance

2.1 Landowner Notification

2.1.1 Communication with members shall promote sound arboricultural standards, including natural pruning techniques, as defined, and by following this specification and the ANSI Z133 and A300 standards.

2.1.2 Communication with members shall allow for pre-notification in advance or actual work to be performed to allow for access and concerns to be addressed.

2.1.3 Any issues or complaints of any nature that are received from a property owner in relation to tree trimming operations will be resolved with the utmost satisfaction and due regard for members. These situations will receive immediate attention and all efforts will be made for a prompt resolution.

2.1.4 All permits and licenses necessary for the work to be performed hereunder will be obtained and to pay all charges and fees required for such permits and licenses.

2.2 Scheduled Maintenance Cycle

2.2.1 Salt River is currently on a 9-year trim cycle. Limited resources during and following the covid-19 pandemic significantly impacted Salt River's ability to maintain its vegetation management program. Following the pandemic, incremental ROW companies and crews have been added to return Salt River to a 5-6 year cycle trim program. It is expected that this process will take through 2029.

2.3 Pruning Guidelines for on Right-Of-Way Trees

2.3.1 Effective tree clearance for line reliability is dependent on the voltage

of the conductor, the type of tree, its growth rate and habit. Clearance shall be accomplished by ground cutting and removing all tall growing tree species from within the Right-Of-Way, whenever approved. The guidelines for tree clearances apply at the time of pruning and clearing and are intended to protect the wires under normal operating conditions. Special clearances may be needed at times because of field conditions.

2.4 Pruning Along Distribution Right-Of-Way Edge or Off Right-Of-Way Trees

2.4.1 Every tree shall be trimmed ground-to-sky in accordance with ANSI A-300. To the extent practicable, these limbs shall be trimmed back to the trunk of the tree except on species that are susceptible to sun scald. The Right-Of-Way shall always be clear of all trees or brush thirty (30) feet wide for three-phase lines and twenty (20) feet wide for single-phase lines. Pruning shall not shape trees beyond the extent required to achieve the desired conductor/vegetation clearance. Only trees directly involved with overhead lines, as defined by this specification shall be pruned. Pruning trees for privately owned lines is not permitted.

2.5 Secondary Wires

2.5.1 Shall be cleared to the extent previous clearances were established or a minimum of four (4) feet. Service drops shall be cleared to the extent that the conductor can swing free of obstructions.

2.6 Security/Street Lighting

2.6.1 Pruning trees shall not be solely for area lighting illumination.

2.7 Desirable Species

2.7.1 All low growing desirable species, if present, may be left unless:

2.7.1.1. they create clearance problems, mechanical, non-selective equipment (e.g. mowing) is used, or they block access to the rights-of-way.

2.7.1.2. Ingested wilting foliage of wild cherry is poisonous to livestock. All wild cherry foliage from fields where livestock graze shall be removed.

2.8 Tree Removal Specifications

2.8.1 A Landowner signature verification for legal interest in the property shall be obtained using a removal form which grants such removal permission.

2.8.2 Danger/Hazard trees are generally diseased, damaged, defective or lean toward the line in a manner that poses a threat to service reliability and/or integrity of the line under any weather conditions.

2.8.3 Danger/Hazard trees shall be removed or reduced in height, with the property owner's permission, so that if the remaining portion of the tree

were to fall it could not strike the line. Removal shall include cutting down a tree and the disposal of the brush with large wood remaining on site in manageable pieces.

2.8.4 Trees will be cut as close to the ground as possible. Stumps will not be removed. Stumps will be treated with an EPA approved herbicide to control re-growth where appropriate.

2.8.5 Trees will not be removed if the:

2.8.5.1 Tree will not affect lines, or

2.8.5.2 Tree affects only a service drop, or

2.8.5.3 Tree removal will only improve street lighting.

2.9 Debris Disposal

2.9.1 It is acceptable in some circumstances for line clearance debris to remain on site, provided the disposal method is communicated to and understood by the property owner.

2.9.2 All debris disposals from pruning, tree removal or brush clearing shall be cleaned up according to Federal, State and Local regulations.

2.9.3 All hangers shall be pulled to remove them from trees, including all work completed by trim lift, manual, and mechanical pruning crews.

2.9.4 All tree, limb, and brush disposal that remains along the right of way with property owner approval shall be neatly piled along the edge of the Right-Of-Way so as to ensure the Right-Of-Way is readily accessible for emergency patrols.

2.9.5 When limbs, wood, and debris must be removed from the site, it shall be removed the same day it was cut unless the Landowner approves otherwise.

2.9.6 No limbs, wood, or debris shall be left on or immediately adjacent to a public Right-Of-Way, fences, or in or near running water, or in or near natural drainage ditches.

2.10 Storm Event Related Specifications

2.10.1 Any large tree trunks, limbs and any brush that has fallen will not be cleaned up.

2.10.2 Any large tree trunks, limbs and any brush that have to be cut and left on site will not be cleaned up.

2.10.3 Danger/Hazard trees will be classified as and will include trees that have become damaged, defective or lean toward the line due to the storm event in a manner that poses a threat to the integrity of Salt River Electric lines.

2.10.4 Danger/Hazard trees shall be removed or reduced in height, so that if the remaining portion of the tree were to fall it could not strike the line.

2.10.5 Where trees have fallen and impede our access for restoration, a path for equipment and workers will need to be cut out.

2.10.6 Trees and limbs that are laying or hanging on service wires still up and that are still energized will be removed off of the wire.

2.10.7 In the event that a tree has failed and laying on a building structure or vehicle. We will make the situation safe in regards to our lines, but will not remove trees in this situation.

2.10.8 Trees will not be removed if the:

2.10.8.1 Tree will not affect Salt River Electric powerlines.

2.10.8.2 Tree removal will only improve street lighting.

2.11 Reports and Completed Work

2.11.1 Approved crew/work progress reports for all T&M work showing billable labor and equipment hours for the week, together with all relevant work data shall be furnished to Salt River. This report shall be submitted weekly and each T&M crew's weekly time/work completion report shall be submitted directly to Salt River Electric. The report shall be sufficient to support billing.

2.11.2 Approved crew/work progress reports for all Firm Priced Bid Work shall be submitted when all line clearance activities are done to full specification, and has been reviewed for thoroughness and completion.

2.11.3 Salt River Electric will audit the completed work to ensure completed work is to full specification. When work is deemed complete, payment will be approved.

2.12 Tree Voucher/Replacement

2.12.1 In any case where a tree presents an imminent danger to facilities, tree removal may be necessary and replacement vouchers can be issued so a more desirable species can be planted after the hazard tree has been mitigated.

2.12.1 Tree vouchers may be issued when pruning results in an undesired appearance and a member requests the tree to be removed.

2.13 Vegetation Management Unscheduled Outage Protocol

2.13.1 Cease operations, secure employees and stay clear of facilities.

2.13.2 Gather location information, outage information and any information that would be helpful with the restoration process.

2.13.3 Call the Manager of Right-of-Way.

2.13.4 If the Manager of Right-Of-Way is not available, call Salt River Dispatch.

2.13.5 Remain at outage site until Salt River workers arrive.

2.13.6 Provide any assistance if requested.

2.13.7 After power is restored, resume routine work.

2.14 Herbicide Application Guidelines

2.14.1 All members shall be pre-notified, unless otherwise directed, on the scheduled circuits of the full extent of the intended work, prior to beginning herbicide application activities.

2.14.2 Applicable laws that govern herbicide application shall be followed as established and published in the Kentucky Fertilizer and Pesticides Storage, Pesticide Use and Application Act of 1996 (KRS Chapter 217B), Federal Insecticide, Fungicide, and Rodenticide Act of 1972 (FIFRA), and the Kentucky Administrative Regulations Title 302 Department of Agriculture (Chapter 27 and 31).

2.14.3 Work progress reports and time sheets for record keeping purposes shall be furnished to Salt River Electric.

2.14.4 Any contractor shall follow record keeping requirements as established in the Kentucky Administrative Regulations Title 302 Department of Agriculture (Chapter 27).

2.14.5 Any contractor shall furnish all herbicide mixing and application equipment, and shall be responsible for transporting, handling and applying herbicides in compliance with product labeling. Necessary measures and precautions to avoid spills during handling and transporting herbicides.

2.14.6 Any contractor shall bear all cost of chemical storage, decontamination, treatment, and transportation of empty chemical containers to an authorized disposal site.

2.14.7 Any contractor shall ensure that herbicide application is conducted in a manner assuring restriction of applied chemical to the rights-of-way, care shall be exercised to prevent damage by spray drift or direct contact of herbicide to areas containing residential plantings, vegetable or flower gardens, or any susceptible farm crops.

2.15 Member Refusal

2.15.1 If any contractor encounters property owners who refuse to allow completion of work, or have special concerns, the contractor shall:

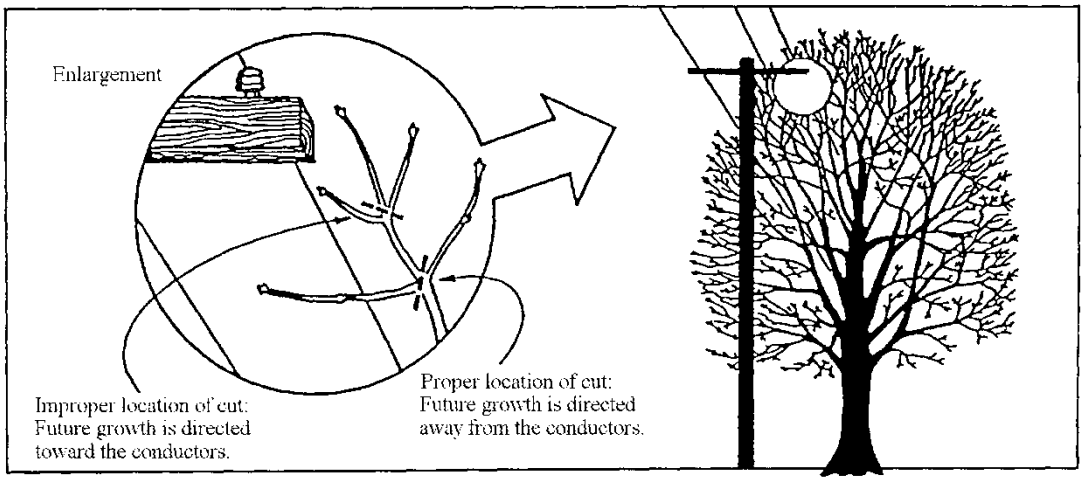
2.15.1.1 Notify Manager of Right-Of-Way prior to performing the necessary work.

2.15.1.2 Have the owner sign a refusal form and then notify the Manager of Right-Of-Way.

3.0 Appendices

3.1 Pruning Specifications

Pruning Specifications



Natural Pruning (to direct growth away from wires)

Natural pruning is a method by which branches are cut at a suitable parent limb back toward the center of the tree. The cut should be made as close as possible to the branch collar at the branch base, however the branch collar should not be injured or removed. Every branch has a branch bark ridge that separates the branch from the main stem. The cut should be made on the outer side of the ridge. If the cut is made on the inner side of the branch bark ridge, a larger wound will result that may inhibit the trees ability to naturally compartmentalize the wound, increasing wound closure time and the risk of entry for microorganisms. This method of pruning is sometimes called “drop-crotch pruning”, “directional pruning,” or “lateral pruning.” Large branches should be removed to laterals at least one-third the diameter of the branch being removed. Natural pruning is especially adapted to the topping of large trees where a great deal of wood must be removed.

In natural pruning, almost all cuts are made with a saw, and very little pole pruning work is required. This results in a natural looking tree when finished, even if a large amount of wood has been removed. However, a hydraulic or manual pole pruner is required to trim those smaller laterals that cannot be properly trimmed using the pole saw and each crew shall be equipped with the necessary hydraulic pruners for lift crews and manual pruners for climbing crews.

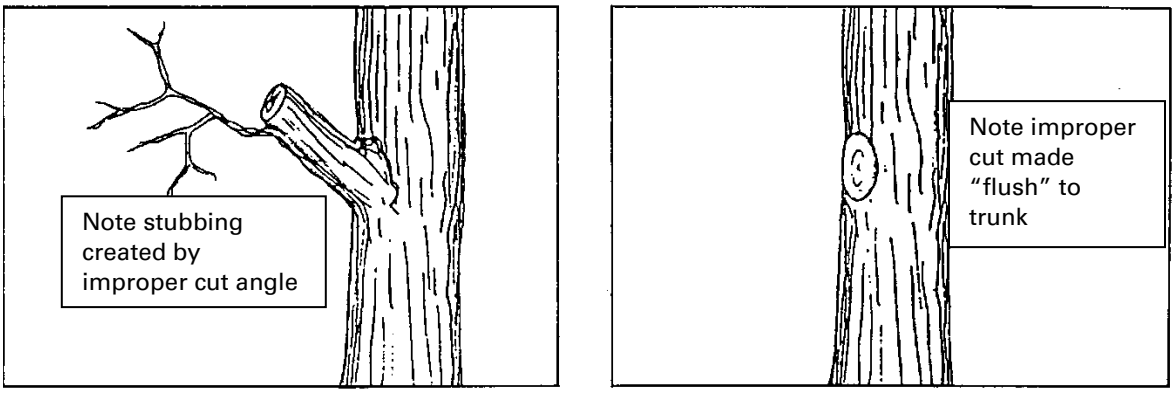
Natural pruning is also directional pruning, since it helps to guide the growth of the tree away from the wires. Stubbing or pole-clip clearance, on the other hand, tends to promote rapid sucker growth right back into the conductors. It is important to remember that natural pruning does work, and that two or three pruning cycles done in this manner will bring about an ideal

situation for both the utility and the tree owner. Most shade trees lend themselves easily to this type of pruning.

Natural pruning techniques should be used for top pruning, side pruning, under pruning, and combinations as described on the following pages.

Natural Pruning Details

Improper Pruning Techniques

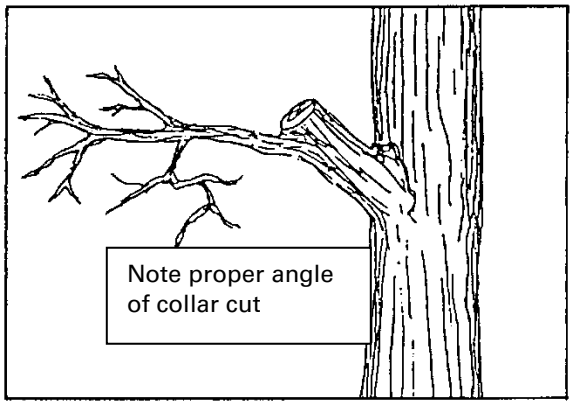


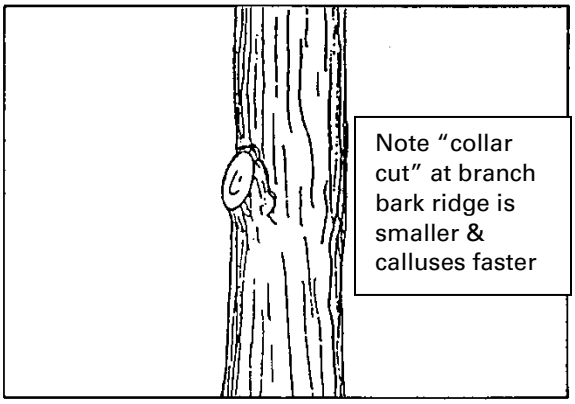
Details of improper pruning and proper natural pruning techniques are shown here. The branch at left above was cut back to a lateral that is too small. Branches should be cut back to a lateral that is at least one-third the size of the branch being removed as shown at left below. If a proper lateral is not available, the branch should be cut back to the trunk. Note that the remaining limb should be trimmed in a manner that meets the minimum clearance requirements while "training" it to grow away from the conductors. When limbs growing toward the conductors cannot be trimmed to meet these requirements, they should be removed back to the truck of the tree.

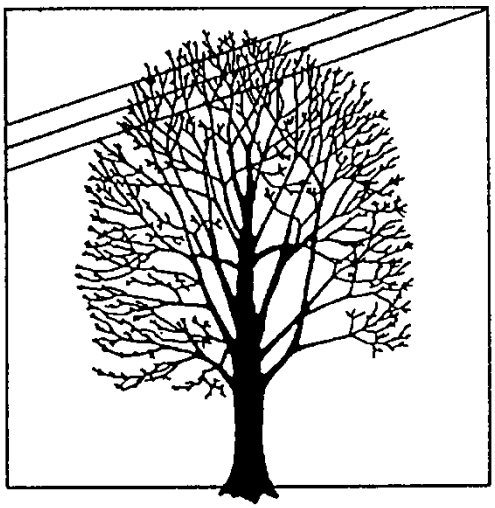
The cut shown at right above is an improper flush cut where the branch collar was removed. The cut at right below shows the proper method to remove the branch at the trunk, leaving the branch collar but not a stub.

Removing of all past stubbing, correctly pruning these limbs back to a lateral one third the size of the parent limb, or removing them back to the trunk of the tree, to promote proper callusing. Removal back the trunk will be the preferred method when it would create a "cleaner" appearance and minimize future regrowth and pruning.

Proper Pruning Techniques

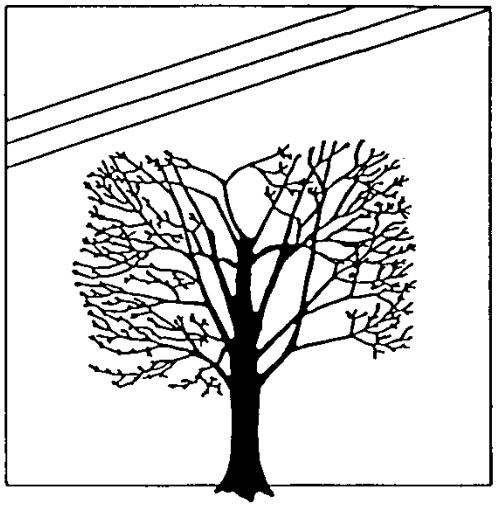






Before Top Pruning

After Top Pruning

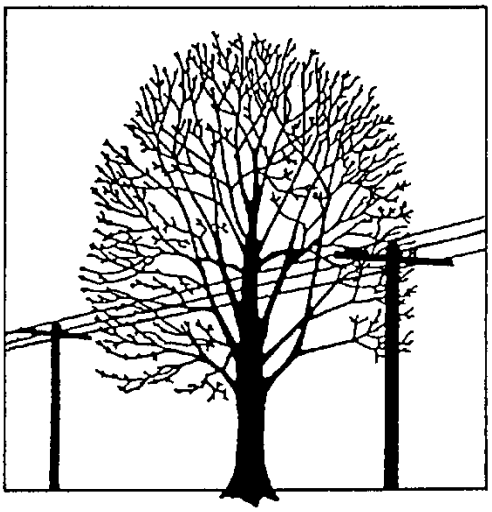


1. TOP PRUNING

Top pruning involves cutting back large portions of the upper crown of the tree. Top pruning is often required where a tree is located directly beneath a line. The main leader or leaders are cut back to a suitable lateral. (The lateral should be at least one-third the diameter of the limb being removed.) While most cuts should be made with a saw; a hydraulic or manual pole pruner is still required to properly prune the small lateral limbs that cannot be properly pruned using a pole saw.

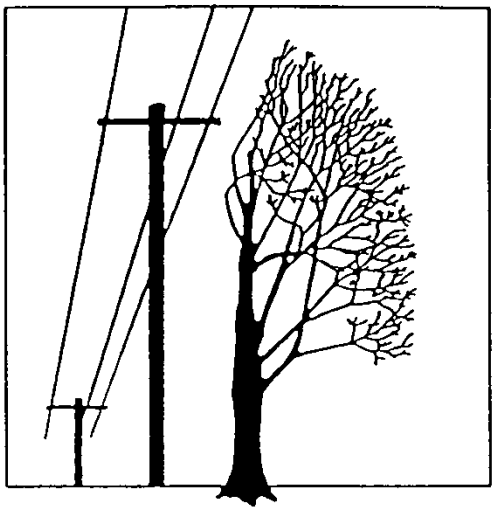
For the sake of appearance and to limit the amount of regrowth, it is best not to remove more than one-fourth of the crown when top pruning. In certain species, removal of too much of the crown may result in death of the tree.

Top pruning is generally required to address the situation where a tall growing tree has been planted or grown underneath the lines. Top pruning should not be used on those trees that are located partially under the line, where part of the tree could be trained to grow away from and/or beside the line.



Before Side Pruning

After Side Pruning
Rural – RIGHT-OF-WAY areas



2. SIDE PRUNING IN NON-RESIDENTIAL RIGHT-OF WAY AREAS

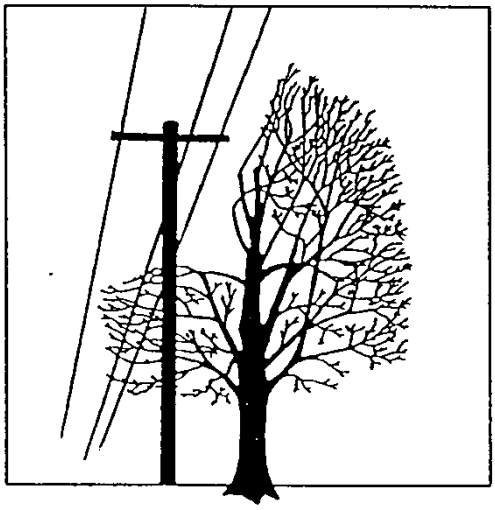
In non-residential or rural Right-Of-Way situations, side pruning consists of cutting back or removing the side branches that are threatening the conductors from ground to sky. Side pruning is required where trees are growing adjacent to utility lines. Limbs should be removed at a lateral branch or the main trunk wherever possible to minimize future regrowth. All branches beneath the conductors should be removed to prevent them from growing up into the lines. Avoid unsightly notches in the tree, if possible.

3. SIDE PRUNING IN RESIDENTIAL AREAS

In residential situations, where the tree to be trimmed is part of a lawn or landscape setting, it is often necessary to leave a “shelf” of branches below the phone cable level, or at least three years of clearance. While this is not a preferred pruning method, it is commonly required in residential areas in order to maintain as much of the natural appearance, screening and shade value of the tree as possible. Trees that would require excessive pruning or create serious visual impacts for the property owner should be candidates for removal.

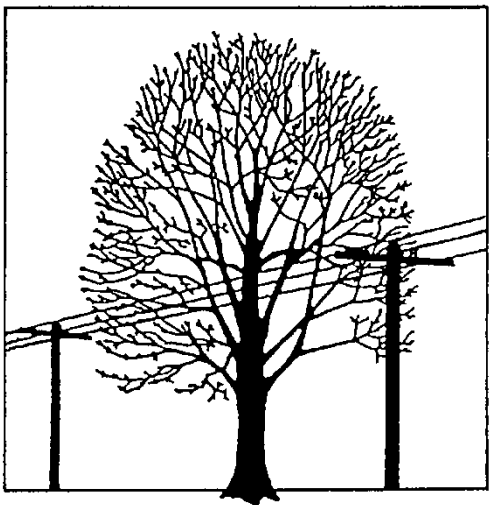
When shelf pruning is performed, the remaining branches shall be trimmed so as to train them to grow out flat, or down and away from the wires. Branches growing up, toward the overhead conductors, should be removed or trimmed to laterals growing away from the wires.

After Side Pruning Residential Areas

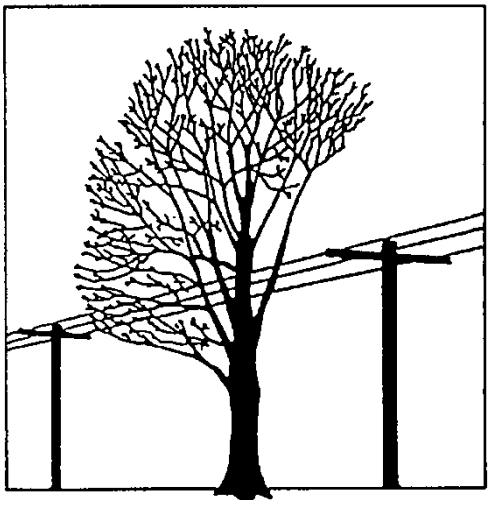


4. UNDER PRUNING

Under pruning involves removing the lower limbs of the tree to allow wires to pass below the tree crown. All cuts should be made as close as possible to the branch bark ridge at the branch collar, to avoid leaving unsightly stubs. The natural shape of the tree is retained in this type of pruning, and the tree can continue its normal growth. Overhangs shall be trimmed or removed in accordance with the clearance requirements. Where overhangs will be allowed to remain, overhangs will be visually inspected to identify dead, decayed, cracked, split or weak conditions that may exist at the time of pruning and could damage the facilities if they broke out the tree and fell on the lines. Hazardous conditions shall be promptly reported and summarized in a weekly report.



Before Under Pruning



After Under Pruning

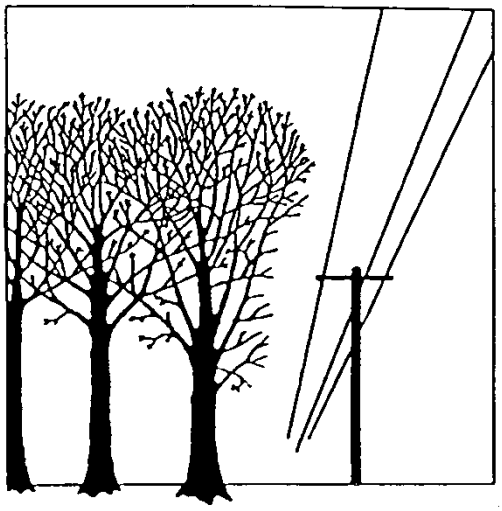
5. COMBINATIONS

It may be necessary to combine several pruning types in order to achieve a good-looking job and to obtain adequate clearances.

Improper Pruning Methods

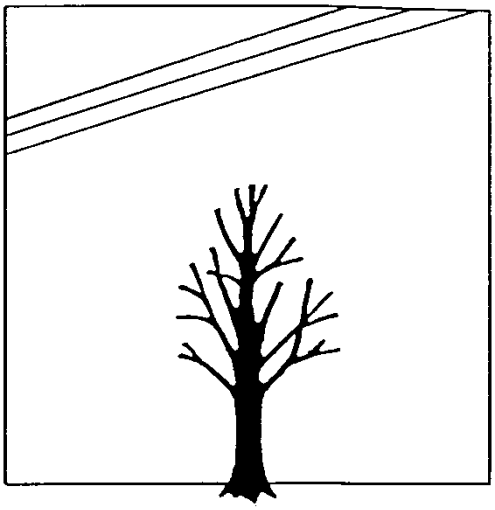
6. SIDE TRIM STUBBING

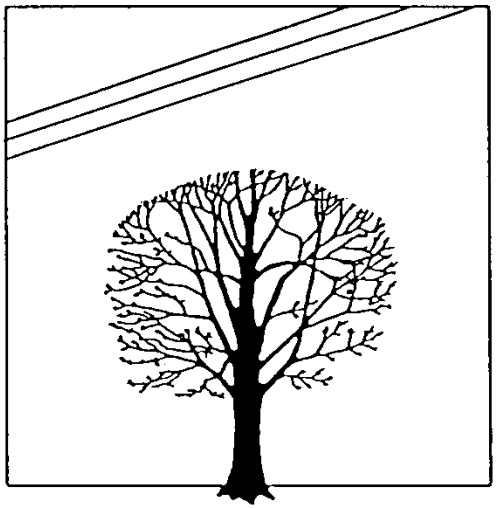
This is done by stubbing off portions of limbs along the side of the tree to obtain clearance. Cutting off portions of limbs (leaving stubs) to obtain clearance creates many fast-growing suckers that become a serious line clearance problem. Corrective pruning will be required to eliminate and repair past stubbing practices when they are encountered.



8. POLLARDING

This is done by stubbing off major limbs to greatly reduce the size of the tree crown. The result is not only unsightly, but promotes a multitude of fast-growing suckers that sprout from the stubs. The combination of stubbing and re-sprouting leads to weak limb attachments, disease and decay, which then lead to a serious reliability and line clearance problem. Pollarding is unacceptable.





9. ROUNDING OVER

Rounding over (or shearing) is done by making many small cuts so that the treetop is sheared in a uniform line. This creates an unhealthy tree condition and results in rapid regrowth of suckers directly toward the electric conductors.

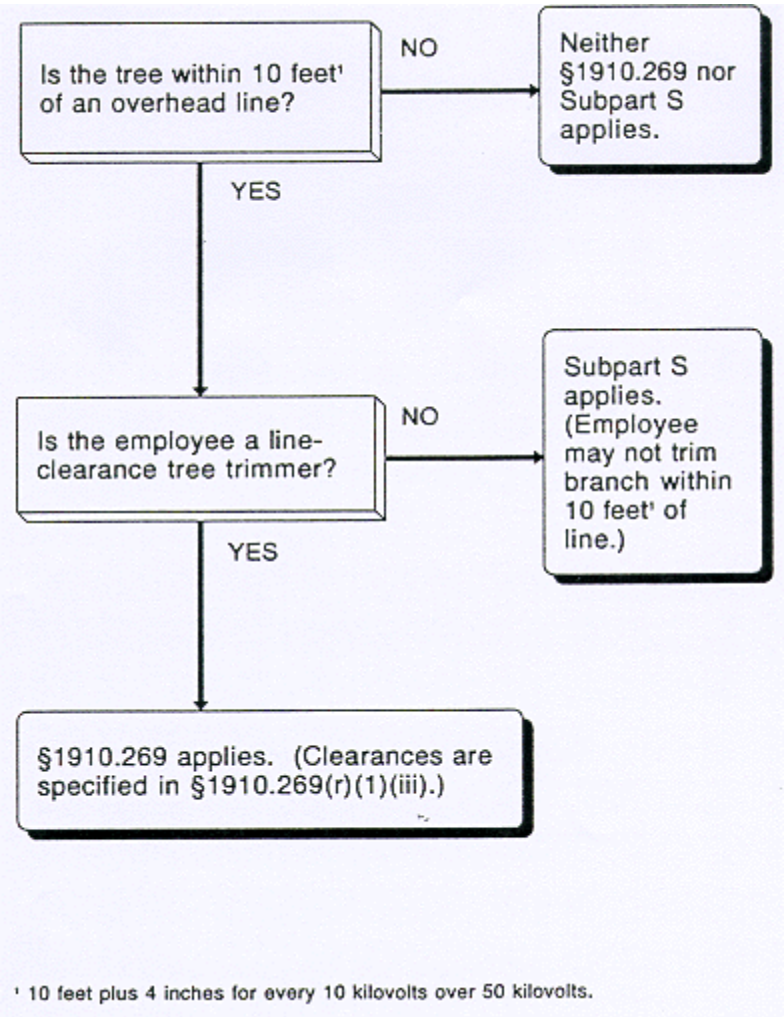
When a round over is done using a pole saw, the trimmer usually leaves numerous stubs, rather than following drop crotch and directional pruning principles. This commonly leads to decay, disease, and rapid re-growth. This condition is unacceptable, except when mandated by member requirements, and even then should be a last resort.

When a round over must be done, it shall be completed using the proper hydraulic or manual pruning tools, following the proper collar cut procedures. Stubbing is unacceptable.

3.2 OSHA Flow Chart

OSHA Appendix A to §1910.269 -- Flow Chart

Appendix A-3 to §1910.269 -- Application of §1910.269 and Subpart S of this Part to Tree-Trimming Operations.



3.3 Refusal Form

Refusal Form

Vegetation Management Department

Date:_____Substation:_____Circuit No._____

Name: _____Phone:_____

Site Street Address:_____Zip Code:_____

Description:_____

_____

_____

_____

_____

_____

Owner's Signature:_____Date_____

Worked By:_____Completion Date:_____

Comments:_____

_____

_____

_____

Prepared By:_____Date:_____

Company:_____Phone:_____

Comments:_____

_____

_____

_____

Customer Contacted: Person ☐ Phone ☐

3.4 Removal Form

Tree Removal Release Form
Vegetation Management Department

Date: _____

Dear Property Owner:

Salt River Electric has engaged_____ to remove the tree(s) interfering with Salt River's electrical distribution wires in this area. A survey of the situation indicates that the removal of the tree(s) is necessary to ensure the safety and reliability of Salt River Electric's electrical facilities.

Please indicate your agreement to the removal of the tree(s) by signing in the space provided below. Your signature verifies that you have a legal interest in the property and you are authorized to grant such removal permission.

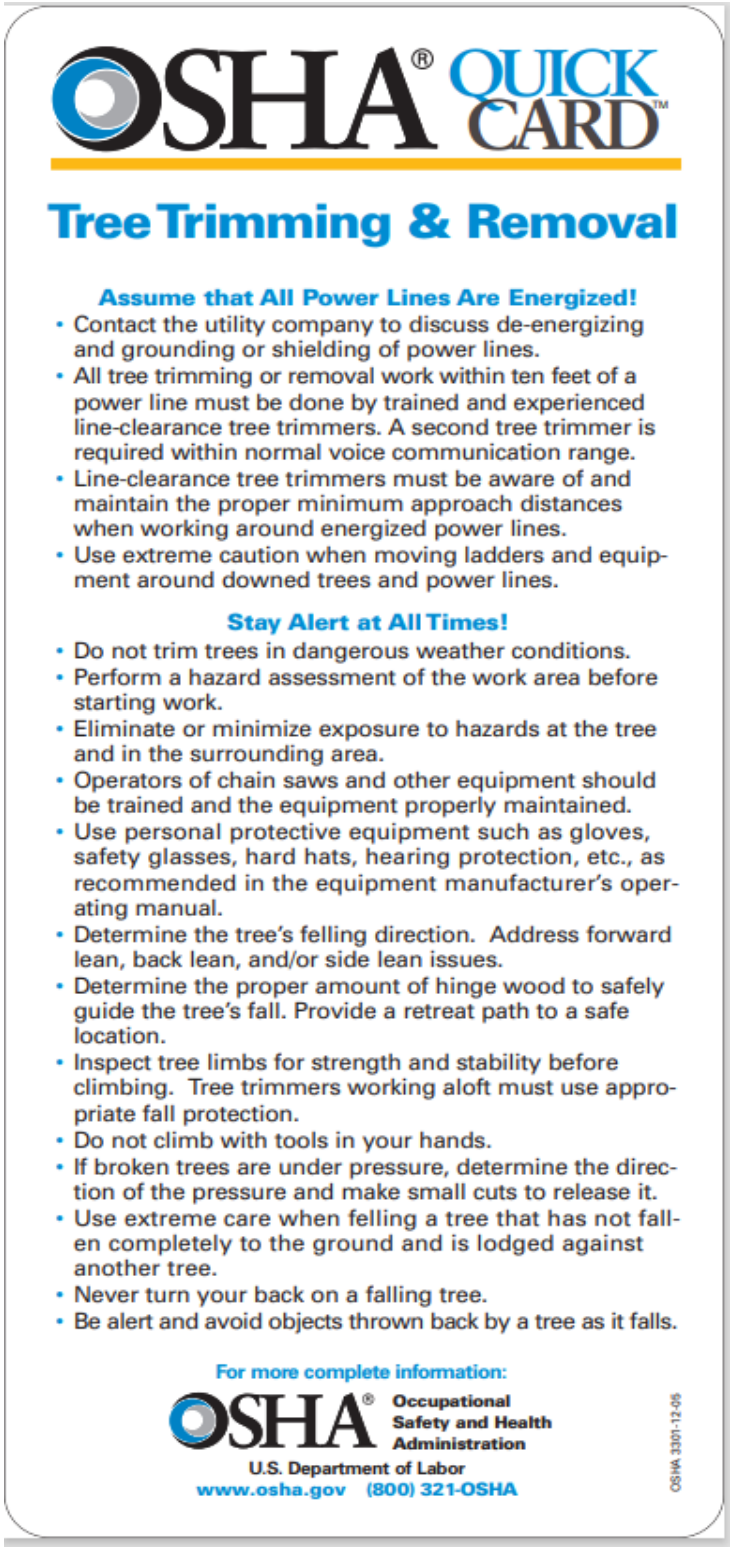
Salt River Electric contracted line clearance professionals will cut tree(s) as close to the ground as possible. Stumps will not be removed. Stumps will be treated with an EPA approved herbicide to control re-growth where appropriate.

THERE WILL BE NO CHARGE MADE TO YOU FOR THIS TREE REMOVAL WORK

Name:			**Phone:**
Address:			
Signature: X			**Date:** X
Species	**Diameter**	**Quantity**	**Comments**
Inspector:			**Date:**
Company:			**Sub/Circuit:**

This agreement is subject to approval by Salt River Electric.

3.5 OSHA Brochure



OSHA® QUICK CARD™

Tree Trimming & Removal

Assume that All Power Lines Are Energized!

- Contact the utility company to discuss de-energizing and grounding or shielding of power lines.
- All tree trimming or removal work within ten feet of a power line must be done by trained and experienced line-clearance tree trimmers. A second tree trimmer is required within normal voice communication range.
- Line-clearance tree trimmers must be aware of and maintain the proper minimum approach distances when working around energized power lines.
- Use extreme caution when moving ladders and equipment around downed trees and power lines.

Stay Alert at All Times!

- Do not trim trees in dangerous weather conditions.
- Perform a hazard assessment of the work area before starting work.
- Eliminate or minimize exposure to hazards at the tree and in the surrounding area.
- Operators of chain saws and other equipment should be trained and the equipment properly maintained.
- Use personal protective equipment such as gloves, safety glasses, hard hats, hearing protection, etc., as recommended in the equipment manufacturer's operating manual.
- Determine the tree's felling direction. Address forward lean, back lean, and/or side lean issues.
- Determine the proper amount of hinge wood to safely guide the tree's fall. Provide a retreat path to a safe location.
- Inspect tree limbs for strength and stability before climbing. Tree trimmers working aloft must use appropriate fall protection.
- Do not climb with tools in your hands.
- If broken trees are under pressure, determine the direction of the pressure and make small cuts to release it.
- Use extreme care when felling a tree that has not fallen completely to the ground and is lodged against another tree.
- Never turn your back on a falling tree.
- Be alert and avoid objects thrown back by a tree as it falls.

For more complete information:

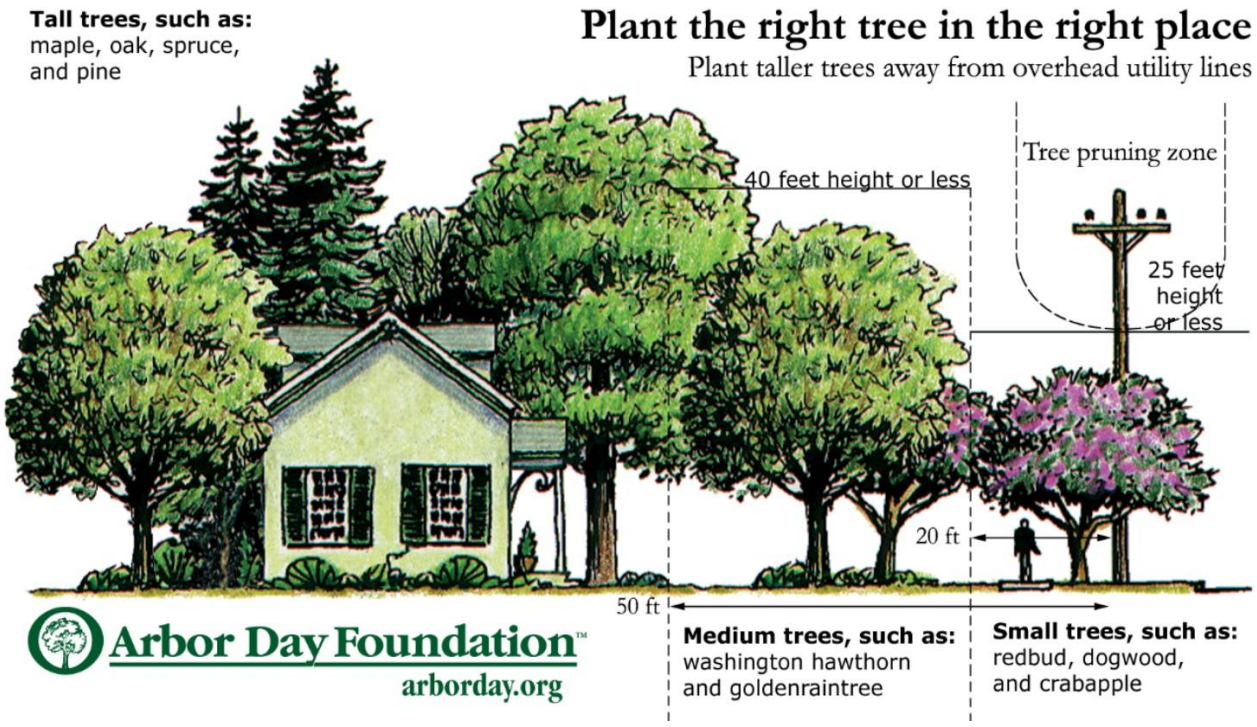
OSHA® Occupational Safety and Health Administration

U.S. Department of Labor

www.osha.gov (800) 321-OSHA

OSHA 3301-12-06

3.6 Right Tree in the Right Place



3.7 RUS Bulletin 1728F-804 Section M