

## COUNCIL ON ENVIRONMENTAL QUALITY

February 23, 2022

Melanie Bachman, Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

PETITION NO. 1484 - The Connecticut Light and Power Company d/b/a Eversource Energy petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed modifications to its existing Gales Ferry Substation located at 301 Whalehead Road, Ledyard, Connecticut, and related electric transmission line structure improvements.

Dear Ms. Bachman:

The Council on Environmental Quality (“Council”) offers the following comments regarding Petition 1484.

### **Wetlands**

The Petitioner states that approximately 4,745 square feet of permanent wetland effects are required to facilitate the Substation expansion and that approximately 45,222 square feet of temporary effects to wetlands would result from the placement of construction mats for work areas during construction. The Petitioner also states that the vegetation in the wetlands that would be affected by the proposed expansion (including temporary work area) is dominated by common reed (*Phragmites australis*), an invasive species, which does not provide high quality habitat for wildlife or exhibit other wetland functions and values provided by native communities of wetland vegetation. The Council recommends that the Petitioner develop and implement a wetland restoration plan for the area impacted by the temporary placement of construction matting and equipment. Such a plan could include provisions to: address ongoing causes of degradation, restore native species and control non-native or invasive species, and restore the impacted area’s ecological integrity, natural structure, and natural function.<sup>1</sup> The Council also recommends that the Petitioner coordinate with the Town’s wetland official and/or the Wetlands Program at the Connecticut Department of Energy and Environmental Protection (DEEP).

Thank you for your consideration of these comments.

Sincerely,



Peter Hearn  
Executive Director



Keith Ainsworth  
*Acting Chair*

Alicea Charamut

David Kalafa

Kip Kolesinskas

Matthew Reiser

Charles Vidich

William Warzecha

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Peter Hearn  
*Executive Director*

<sup>1</sup> Environmental Protection Agency, Principles of Wetland Restoration, <https://www.epa.gov/wetlands/principles-wetland-restoration>