



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

April 16, 2021

TO: Service List, dated March 19, 2021

FROM: Melanie Bachman, Executive Director *MAB*

RE: **PETITION NO. 1445** - 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 1588 Line Rebuild Project, consisting of the replacement and reconductoring of electric transmission line structures along approximately 2.65 miles of its existing 115-kilovolt (kV) electric transmission line within existing Eversource transmission line right-of-way (ROW) that extends from Wallingford Electric's Colony Substation, located at 15 Old Colony Road, Wallingford and Wallingford Electric's North Wallingford Substation, located at 130 Thorpe Avenue, Wallingford, Connecticut, and related electric transmission line structure improvements.

Comments have been received from the Connecticut Department of Energy and Environmental Protection on April 15, 2021. A copy of the comments is attached for your review.

MB/MP/lm

c: Council Members

April 15, 2021

Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RE: 115-kV Transmission Line Rebuild
Eversource Energy
Wallingford, Connecticut
Petition No. 1445

Dear Members of the Connecticut Siting Council:

Staff of this department have reviewed the above-referenced Petition for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need will be required for the proposed reconstruction of Eversource Line 1588, a 2.65-mile 115-kV transmission line connecting the Colony and North Wallingford Substations in northern Wallingford. The project will involve replacing the existing line 1588 with a new line in the same right-of-way but running 45' south of the existing line. Twenty-three new structures, new conductors and an optical ground wire will be required to construct the new line. DEEP conducted a field review of the transmission line ROW on April 7, 2021. The following comments are offered to the Council for your use in this proceeding. I would also like to thank Eversource staff for providing and hand-delivering a hard copy of the Petition to me, which greatly facilitated the field review for this project.

The Petition describes the 1588 line as being originally constructed in 1946 and cites (p. 4) modifications to the line in 1984 and 1994 in connection with the construction of the two Wallingford Electric-owned substations which the line connects. As noted later in these comments, some of the structures along the interior sections of the line also appear to have been replaced since the original construction. Overall, the subject right-of-way is relatively accessible and, though certainly not a flat corridor by any means, the accessibility to and along the corridor should aid in the project from a constructability standpoint.

Description of Line 1588 Corridor

The line was reviewed from Colony Substation eastward to North Wallingford Substation.

According to a note on map sheet 1 of 5 of Attachment A- Aerial Maps, there are two pad-mounted transformers near structure 3644. Actually, the two enclosures atop the concrete pads at this location are Frontier Communications equipment cabinets containing hundreds of Lucent toggle switches and associated wiring and circuitry. One of the two equipment cabinets was found to have one of the two doors on the south-facing side open and both doors on the north-facing side also open, exposing all of interior equipment. The latching mechanisms on the doors

were not working so they would not stay closed. Since no Frontier personnel were at the site either on my first pass at the beginning of the field review or on my return four hours later, and since the equipment in the open cabinet would be subject to weather damage or vandalism, after several unsuccessful attempts to reach Frontier, a call was made to the Wallingford Police Department to notify them of this situation.

From structure 3643 to 3642, the ROW runs along the north side of a Lowe's outlet and its driveway. The corridor here is flat and is dominated vegetatively by dead stalks of mullein up to 6 feet in height. It is also dominated by litter and debris in this stretch.

Line 1588 crosses Meetinghouse Brook on the backside of the Lowe's property. As noted in the Petition, the stream has been channelized here and is rip-rapped to the north of the line. Visually, the quality of the stream is excellent. A dirt bike/ATV trail runs atop the east bank of the stream. Although this trail was rutted from use on the southern edge of the ROW, there was no evidence of erosion. The ROW was not cleared between Meetinghouse Brook and structure 3641 in terms of any maintained access road. The line crosses the edge of a maintained residential yard at structure 3641.

The 45-foot southward shift of Line 1588 likely means the removal of a stand of eleven white pine along the driveway of the residence at 1117 Yale Avenue just east of structure 3641. Two large white pine near structure 3640 on the east side of Yale Avenue next to the Wilbur Cross Parkway will also likely be removed.

The line crosses another residential yard on the eastern side of the Wilbur Cross Parkway before the line climbs a steep bank to structure 3639, crossing a Wallingford Land Trust trail in the process. A graveled access road begins at structure 3639 and runs eastward. An information kiosk, a wooden bench and several birdhouses are found just south of structure 3638, along with another crossing of the ROW by the Wallingford Land Trust trail. Forest to the south of the cleared portion of the ROW at this point consists mostly of oak and beech with some sugar maple. The southward shift of the new transmission line will require clearing along this forested edge of the ROW.

Much of the cleared portion of the ROW between structures 3638 and 3637 is a thicket of multiflora rose, blackberry and greenbrier. Structure 3637 looks much newer than the other structures and has fresh creosote exuding from it. Beginning at structure 3637, the land north of the ROW is farmland. By the midpoint of the span between structures 3637 and 3636, active agricultural land extends right up to the transmission line access road.

A new bridge with natural stream bottom beneath it carries the ROW access road across Spruce Glen Brook. The access road from here eastward is of very recent vintage with the hay bales for erosion control still in place. Some hemlock (but despite the stream's name, no spruce) are found in the forest in this section, first to the south of the cleared ROW, then slightly later, to the north. Structures 3635 and 3634 also appear to be of newer vintage than most along line 1588. These two structures are surprisingly close together with a very short span between them. The proposed new structure 3635 will be sited substantial westward of, and downslope from, the current structure, while, the replacement structure 3634 will be moved substantially eastward.

Eyeballing the new locations for these two structures and the intervening topography. chiefly the sharp break in slope just west of existing structure 3635, it appears that the new conductor would have very minimal ground clearance in this span. The heights of the new H-frame structures 3635 and 3634 are not given in the Petition but their positions and the intervening slope at the current structure 3635 almost doesn't look as if the new conductor would even clear the ground where structure 3635 is currently located. The Council may wish to check with Eversource on this point.

West of structure 3633 at the bottom of the slope descending from this structure, a small flow crosses the access road from north to south, with apparent wetland on both the upstream and downstream sides of the access road. This wetland is not shown on the aerial photo maps (Map sheet 3 of 5) and may have been missed during the wetland delineation.

The forest south of the cleared portion of the ROW at the staked site of new structure 3634 and eastward is younger than the oak/beechn forest to the west and consists of oak and some ash.

From a point midway between structures 3634 and 3633, the ROW climbs steeply to structure 3633. To the north is hayfield in this stretch. To the south there are a couple of large rhododendron (not mountain laurel, but rhododendron), with more rhododendron just east of structure 3633. Structure 3633 also sports fresh creosote and more recent vintage poles. The hayfield north of the ROW extends right up to the access road at several locations between structures 3632 and 3631. Mountain laurel in early bloom was found south of the ROW between these two structures on April 7.

The new 1588 line will skirt a residential yard at 1061 North Farms Road, which is on the west side of that road. Once crossing North Farms Road, the existing line crosses another residential yard at 1064 North Farms Road, in which the one steel H-frame structure (#3630) of the existing line is located. The new line will run along a windrow of trees and the access road at the north edge of a hayfield on the east side of North Farms Road.

Wetland 7 on Map Sheet 4 of 5 contains some particularly dense and nearly impenetrable multifloral rose on its eastern edge before the corridor emerges onto the parking lot of the Keystone Freight Company terminal at structure 3629. Line 1588 crosses the Keystone Freight parking lot from structure 3629 to 3628 before entering the very extensive Wetland 8, a wet meadow wetland. The berm of a detention pond receiving drainage from the industrial parking lots north of Keystone Freight marks the northern edge of Wetland 8 and provides dry access across about half of it.

The area north of the ROW between structure 3627 and Wetland 9 is in the early stages of being developed, sporting silt fencing around the site, active land grading, and riprap for a detention pond in the southeastern corner of that property. A stockpile of concrete catch basin frames and some plastic piping are found south of structure 3627 at the southern edge of the right-of-way or just off it.

Access along the ROW is discontinuous at Wetland 9 due to the pond along its north-south axis. East of Wetland 9, the locations of both the existing and proposed new structures 3626 are easily accessed off Northrup Road.

A cornfield on the east side of Northrup Road is crossed to reach structure 3625, both the existing and proposed new one, on the immediate west side of Interstate 91. East of Interstate 91, the line is generally on or adjacent to industrial/ commercial land uses. Structure 3624 is accessed from a parking lot of the US Postal Service's Wallingford regional mail processing facility. Just east of and adjacent to structure 3624 is Wetland 10 which contains potential vernal pool 01 in its southern end. According to Attachment D of the Petition, Davison Environmental will conduct a survey for indicator species in PVP 01 this spring to determine its status as a vernal pool. For its surface area, the pool is very shallow, probably just a bit over 12" deep on April 7. The complete perimeter of the circular pool is well defined dry ground, pointing to a probably manmade origin for this pond, as would the apparent berm at its northern end. A small intermittent drainage enters the pool at its southern end. The Petition does not discuss the 750' critical terrestrial habitat of this potential vernal pool but it would include Interstate 91 and land west of the highway as well as parking lots and industrial development north and south of the pool.

Proceeding eastward, the new transmission line would not directly cross Wetland 11 but would be close to it. East of Interstate 91, the ROW is essentially flat except for the final short ascent from Research Parkway up to the North Wallingford Substation.

Natural Diversity Data Base

Two State-listed species may potentially occur on or in the vicinity of the project corridor. These are the State-endangered plant false mermaid weed (*Floerkea proserpinacoides*) and the eastern box turtle (*Terrapene carolina carolina*), which is a Species of Special Concern. For these species, either a survey to confirm their presence or absence or the development of appropriate protection and mitigation measures will be required. A response letter to the applicant is anticipated to be issued shortly.

Stormwater General Permit

Representatives from Eversource have been in contact recently with the staff of the DEEP Stormwater Program to discuss the review of transmission line projects. Though transmission line projects are linear in nature and not the typical type of action reviewed under the Stormwater General Permit, the lack of flexibility in the Stormwater General Permit does require that Eversource register under that permit for transmission line projects.

Thank you for the opportunity to review this petition and to submit these comments to the Council. Should Council members or Council staff have any questions, please feel free to contact me at (860) 417-2748 or at frederick.riese@ct.gov.

Respectfully yours,



Frederick L. Riese
Senior Environmental Analyst

cc: Commissioner Katie Dykes