



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

August 25, 2022

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Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

PETITION NO. 1534 - Groton Utilities (Petitioner) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed modifications to its existing Buddington Substation located at the intersection of Buddington Road and Gold Star Highway in Groton, Connecticut, and related electric transmission line structure improvements.

Dear Ms. Bachman:

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1534.

### 1. Best Management Practices

The Petitioner notes that the Project would be constructed, operated, and maintained in accordance with Groton Utilities' Best Management Practices (BMPs) Manual. However, the BMPs are not included in the Petition or included as bulk filings in this proceeding. The Council recommends that the Petitioner provide the referenced BMPs to the Siting Council so that the Siting Council and members of the public can assess the appropriateness of the BMPs for the proposed project. It is the Council's recommendation that any external environmental quality standards referenced by petitioners/applicants be submitted to the Siting Council for inclusion in the record, consideration, and possible incorporation into permits.

### 2. Wildlife

The Petitioner states that a "review of the Connecticut Department of Energy and Environmental Protection's ("CTDEEP") Natural Diversity Database ("NDDB"), shows that an area of the Substation falls within a NDDB buffered area" and that "this area has been identified and addressed in Groton Utilities Petition 1436." The Council's review of the Petition 1436 record, which was filed almost two years ago, indicates that at the time, the Petitioner was "in consultation with CT DEEP regarding Groton Utilities' proposed work"; consequently, the status of the consultation with the NDDB is unclear. Furthermore, NDDB determinations are usually only valid for a defined period, such as two years. The Council recommends that the Petitioner provide a NDDB determination letter for the proposed project area to the Siting Council and that it be part of the Petition filing so that the Siting Council and members of the public have access to the information.

### 3. Soils

The Petitioner states that "there will be a demolition of the existing structure to accommodate space for the upgraded 400 terminal" and that "all new structures within the Substation will have new concrete foundations." It is assumed that the construction of new concrete foundations will require the excavation of materials within the substation, such as the

existing structure and soil. The Council recommends that the Petitioner provide the Siting Council with 1) a plan for the testing of any excavated materials to determine if it is contaminated; and 2) a plan for the reuse or disposal of the excavated materials, consistent with applicable regulations.

The Council's comments above address only certain elements of the materials provided by the Petitioner at the time of the filing. Additional information can become evident through comments offered by other parties and during the Siting Council's administrative hearing process. The absence of comment(s) by this Council about any Petition or Application, or any aspects thereof, may not be interpreted as an endorsement of a proposed project, or its components or that this Council might not have comments or concerns on more specific issues raised during the hearing process.

Thank you for your consideration of the Council's comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Aresta". The signature is written in a cursive, flowing style.

Paul Aresta  
Executive Director