



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

February 29, 2024

Melanie Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
Melanie.Bachman@ct.gov

PETITION NO. 1614 - The Connecticut Light and Power Company d/b/a Eversource Energy (Petitioner) petition for a declaratory ruling for the proposed Christian Street Junction to Stevenson Substation Rebuild Project consisting of the replacement and reconductoring of electric transmission line structures along approximately 5.5 miles of its existing electric transmission line right-of-way (ROW) shared by its existing 115-kilovolt (kV) 1580 and 1808 Lines between Christian Street Junction in Oxford and Stevenson Substation in Monroe, Connecticut, and related electric transmission line and substation improvements.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1614.

1. Best Management Practices

The Petitioner notes that certain project activities, including, but not limited to, work in or near water resource areas, right of way restoration, activities in wetland areas, measures to control the disturbance and spread of invasive species, erosion and sedimentation (E&S) control measures, handling of excessive soils, etc. would be done in accordance with the Petitioner's April 2022 Construction & Maintenance Environmental Requirements, Best Management Practices Manual for Massachusetts, and Connecticut (BMPs) and the project-specific Stormwater Pollution Control Plan. The Council recommends that the referenced BMPs; the Natural Diversity Database (NDDDB) determination, when received; and any external environmental quality plans and/or standards, referenced by the Petitioner, be submitted to the Siting Council for inclusion in the record, consideration, and possible incorporation into permits.

2. Wetlands and Watercourses

The Petitioner identified 24 wetlands and 13 watercourses that occur proximate to the proposed project area. The Petitioner notes that permanent impacts would be associated with the installation of a hard bottom (stone ford) to cross wetland 9 (W9) and that a total of at least 1.62 acres of wetlands would have temporary impacts. The Council recommends that the proposed permanent and temporary impacts to wetlands be minimized to the extent practicable. The Council also recommends that the boundary of all wetlands in the project area be delineated and marked in the field to avoid any potential unnecessary encroachment.

3. Vegetation

The Petitioner states that "in resource sensitive areas, Eversource would require the contractor to use low-impact methods to remove brush vegetation to protect wetlands, watercourses and

Keith Ainsworth
Acting Chair

Christopher Donnelly

David Kalafa

Matthew Reiser

Denise Rodosevich

Charles Vidich

William Warzecha

Paul Aresta
Executive Director

state-listed species and their habitats” and that such “low-impact methods” would include utilizing hand clearing methods for vegetation removal work. The Council supports the Petitioner’s proposed use of “low impact” methods for vegetation management in resource sensitive areas. The Council recommends that the areas to be designated for “low impact” methods be depicted on the project plans and that an environmental inspector ensure that the contractor(s) conforms to using such low impact methods in the designated areas.

4. Erosion and Sedimentation (E&S) Controls

The Petitioner notes that temporary gravel tracking pads would be installed at points of construction vehicle ingress/egress to minimize the potential for equipment to track dirt onto local roads and fugitive dust. The Petitioner also states that “Project construction activities would conform to Eversource BMPs for E&S control, including those provided in the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control (“Connecticut Guidelines”) and the Project specific SWPCP.” The Council supports efforts to minimize fugitive dust and the impact of erosion and sedimentation and recommends that the Petitioner consider utilizing updated methods and techniques for minimizing erosion and sedimentation based on the best currently available technology and strategies, as identified in the revised Connecticut Guidelines for Soil Erosion and Sediment Control, which has an effective date of March 30, 2024, as appropriate. The Council also supports the Petitioner’s proposed use of “environmental controls with no plastic netting to limit wildlife entanglement.”

5. Wildlife

The Petitioner states that “the CT DEEP Natural Diversity Database (“NDDB”) mapping depicts known or potential occurrences of state-listed endangered, threatened, or special concern species in the vicinity of the Project area.” The Council questions if the proposed staging area/laydown yard off of Division Street in Derby was included in the NDDB review since Figure 2 depicts an NDDB area traversing the proposed laydown area and that site is located approximately six miles from the proposed project’s endpoint in Monroe.

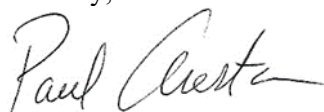
6. Inspections and Education

The Petitioner states that “temporary E&S control measures will be installed prior to any site work and would be maintained and inspected for the duration of the Project to ensure their integrity and effectiveness” and that protection measures, including but not limited to contractor training and education, would be employed during the project. The Council supports the proposed contractor education efforts and the presence of an environmental inspector who would be available onsite during construction and recommends that inspections be conducted a minimum of weekly and within 24 hours of the end of a storm that generates a discharge that equals or exceeds 0.5 inch. The Council recommends that the Petitioner expand the inspector’s duties to include, but not be limited to, ensuring that the contractor(s) adhere to the protective measures for the state-listed species identified by the NDDB; ensuring that low impact vegetation management methods are employed in the designated areas; and ensuring that invasive species control methods are implemented to minimize the spread and establishment of invasive species.

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,



Paul Aresta, Executive Director