Weston Solutions of New York, Inc.
c/o 205 Campus Drive
Edison, NJ 08837

732-417-5800
WestonSolutions.com

October 27, 2020

Via Electrnoic Delivery
deep.nddbrequest@ct.gov

Central Permit Processing Unit
Department of Energy and Environmental Protection
79 Elm St.
Hartford, CT 06106-5127

RE: Request for Natural Diversity Database (NDDB) State Listed Species Review
Applicant: United Illuminating Company
Milvon-West River Railroad Transmission Line 115-kV Rebuild Project
Milford, Orange, West Haven and New Haven, Connecticut

To Whom it May Concern:

To maintain the reliability of the bulk transmission grid in Connecticut and regionally, The United Illuminating Company (UI or the Company) proposes to rebuild its two existing single-circuit 115-kilovolt (kV) overhead lines that extend southwest-northeast within the Connecticut DOT (CT DOT) - Metro-North Railroad (MNR) / Amtrak Railroad corridor between UI's Milvon Substation (located in the City of Milford) and UI's West River Substation (located in the City of New Haven), all in New Haven County, Connecticut.

In support of this project, Weston Solutions, Inc. (Weston) on behalf of UI, requests any information from the Connecticut Department of Energy and Environmental Protection (DEEP) Natural Diversity Data Base (NDDB) on state-listed species documented in the vicinity of the proposed project.

This NDDB review submission is intended to aggregate previous submissions for separate portions of this project, including the following previous NDDB Determination Numbers: 201710206, 201710684, and 201911039.

Included with this letter is a completed NDDB request form. The attached information request package includes the following to facilitate your review:

1. Attachment A – Overview Map
2. Attachment B – Detailed Site Map
3. Attachment C – Supplemental Project Information

Please review the attached application and contact me at (774) 239-5994 or via email at Ryan.Jendrasiak@WestonSolutions.com with any questions you may have regarding this submission.

Sincerely,

WESTON SOLUTIONS OF NEW YORK, INC.

Ryan Jendrasiak
Senior Project Manager

Cc: Kate Brennan (United Illuminating Company)

Enclosures: Completed NDDB Request Form

Connecticut Department of
Energy & Environmental Protection
Bureau of Natural Resources
Wildlife Division

CPPU USE ONLY
App #:
Doc #:
Check #: No fee required
Program: Natural Diversity Database Endangered Species
Hardcopy _____ Electronic _____

Request for Natural Diversity Data Base (NDDB) State Listed Species Review

Please complete this form in accordance with the instructions (DEEP-INST-007) to ensure proper handling of your request.
There are no fees associated with NDDB Reviews.

Part I: Preliminary Screening & Request Type

Before submitting this request, you must review the most current Natural Diversity Data Base "State and Federal Listed Species and Significant Natural Communities Maps" found on the DEEP website. These maps are updated twice a year, usually in June and December.

Does your site, including all affected areas, fall in an NDDB Area according to the map instructions:

☒ Yes ☐ No **Enter the date** of the map reviewed for pre-screening: June 2020

This form is being submitted for a :

☒ *New* NDDB request ☐ *Renewal/Extension* of a NDDB Request, ***without*** *modifications and within* ***two years*** *of issued NDDB determination* (no attachments required) [*CPPU Use Only - NDDB-Listed Species Determination #* 1736]	☐ *New* **Safe Harbor Determination** (optional) must be associated with an application for a GP for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities ☐ *Renewal/Extension* of an existing Safe Harbor Determination ☐ With modifications ☐ Without modifications (no attachments required) [*CPPU Use Only - NDDB-Safe Harbor Determination #* 1736]
Enter NDDB Determination Number for Renewal/Extension: This request consolidates parts of previous submissions (201710206, 201710684, 201911039)	Enter Safe Harbor Determination Number for Renewal/Extension:

Part II: Requester Information

If the requester is a corporation, limited liability company, limited partnership, limited liability partnership, or a statutory trust, it must be registered with the Secretary of State. If applicable, the name shall be stated **exactly as it is registered with the Secretary of State. Please note, for those entities registered with the Secretary of State, the registered name will be the name used by DEEP. This information can be accessed at the Secretary of the State's database CONCORD.* (www.concord-sots.ct.gov/CONCORD/index.jsp)

If the requester is an individual, provide the legal name (include suffix) in the following format: First Name; Middle Initial; Last Name; Suffix (Jr, Sr., II, III, etc.).

If there are any changes or corrections to your company/facility or individual mailing or billing address or contact information, please complete and submit the Request to Change company/Individual Information to the address indicated on the form.

1. Requester*

Company Name: Weston Solutions, Inc. on behalf of The United Illuminating Company

Contact Name: Ryan Jendrasiak

Address: 205 Campus Drive

City/Town: Edison State: NJ Zip Code: 08837

Business Phone: 774-239-5994 ext.

**E-mail: Ryan.Jendrasiak@WestonSolutions.com

**By providing this email address you are agreeing to receive official correspondence from the department, at this electronic address, concerning this request. Please remember to check your security settings to be sure you can receive emails from "ct.gov" addresses. Also, please notify the department if your e-mail address changes

a) Requester can best be described as:

☐ Individual ☐ Federal Agency ☐ State agency ☐ Municipality ☐ Tribal

☒ *business entity (* if a business entity complete i through iii):

i) Check type ☒ corporation ☐ limited liability company ☐ limited partnership ☐ limited liability partnership ☐ statutory trust ☐ Other:

ii) Provide Secretary of the State Business ID #: 0297748 This information can be accessed at the Secretary of the State's database (CONCORD). (www.concord-sots.ct.gov/CONCORD/index.jsp)

iii) ☐ Check here if your business is **NOT** registered with the Secretary of State's office.

b) Acting as (Affiliation), pick one:

☐ Property owner ☒ Consultant ☐ Engineer ☐ Facility owner ☐ Applicant

☐ Biologist ☐ Pesticide Applicator ☐ Other representative:

2. List Primary Contact to receive Natural Diversity Data Base correspondence and inquiries, if different from requester.

Company Name: The United Illuminating Company

Contact Person: Todd Berman Title: Manager of Environmental Programs & Projects

Mailing Address: 100 Marsh Hill Road

City/Town: Orange State: CT Zip Code: 06477

Business Phone: 860-395-8297 ext.

**E-mail: todd.berman@uinet.com

Part III: Site Information

This request can only be completed for one site. A separate request must be filed for each additional site.

1. SITE NAME AND LOCATION

Site Name or Project Name: The United Illuminating Company's Milvon-West River Railroad 115-kV Transmission Line Upgrade

Town(s): Milford, Orange, West Haven, and New Haven

Street Address or Location Description: The coordinates for the beginning and end points of this linear project are 41.21236, -73.08095; and 41.28854, -72.93820 respectively. The project site is a linear corridor (i.e., an existing rail road), approximately 10 miles long and 50 feet wide on the north and south sides of the Metro North railway from UI's Milvon Substation to UI's West Haven Substation.

Size in acres, or site dimensions: 108.2

Latitude and longitude of the center of the site in decimal degrees (e.g., 41.23456 -71.68574):

Latitude: 41.247575 Longitude: -72.997273

Method of coordinate determination (check one):

☐ GPS ☐ Photo interpolation using CTECO map viewer ■ Other (specify): CAD/GIS Files

2a. Describe the current land use and land cover of the site.

The field investigations were conducted within the area of the Metro North rail way Right-of-Way, a transportation corridor constructed over 100 years ago and has been in continuous use since construction. As such, this historic land use and both past and present anthropogenic actions have affected the ecology of the areas within the railroad right-of-way. The current land use consists of mostly light urban - residential and light commercial. Occasional forested tracts and estuary crossings are present, as well. The proposed project crosses 12 waterbodies including Wepawaug River, Indian River, Oyster River; Cove River; and West River.

b. Check all that apply and enter the size in acres or % of area in the space after each checked category.

■ Industrial/Commercial 10%	■ Residential 20%	■ Forest 12%
■ Wetland 2%	■ Field/grassland 2%	☐ Agricultural _____
■ Water 2%	■ Utility Right-of-way 2%	
■ Transportation Right-of-way 50%	☐ Other (specify): _____	

Part IV: Project Information

1. PROJECT TYPE:

Choose Project Type: Utility construction/modification , If other describe: _____

2. Is the subject activity limited to the maintenance, repair, or improvement of an existing structure within the existing footprint? ☐ Yes ■ No If yes, explain.

Part IV: Project Information (continued)

3. Give a detailed description of the activity which is the subject of this request and describe the methods and equipment that will be used. Include a description of steps that will be taken to minimize impacts to any known listed species.

To maintain the reliability of the bulk transmission grid in Connecticut and regionally, The United Illuminating Company (UI or the Company) proposes to rebuild its two existing single-circuit 115-kilovolt (kV) overhead lines that extend southwest-northeast within the Connecticut DOT (CT DOT) - Metro-North Railroad (MNR) / Amtrak Railroad corridor between UI's Milvon Substation (located in the City of Milford) and UI's West River Substation (located in the City of New Haven), all in New Haven County, Connecticut.

Recent engineering analyses, commissioned by UI, of the existing 115-kV lines along the MNR corridor between Milvon and West River substations determined that, to maintain the reliability of the bulk transmission grid, the transmission support structures need to be upgraded to meet current electrical codes and to withstand extreme weather conditions (e.g., hurricanes). Based on these engineering analyses, UI proposes to rebuild the 115-kV lines on double-circuit monopoles, expected to be located parallel to and mostly along the north side of the railroad corridor, on property mostly owned by CT DOT. A more complete project description is provided in Attachment C of this information request.

Anticipated construction equipment includes but is not limited to cranes, bucket trucks, pulling mechanisms for new wires, excavators, loaders, and construction support vehicles.

Wetland resources will be field delineated and will be avoided to the maximum extent practicable. Wetlands will be flagged within 300 feet of any work areas. UI's contractor will utilize Soil Erosion and Sediment Control (SESC) Best Management Practices (BMPs) and that a General Permit for the Discharge of Stormwater from Construction Activities will be submitted. In accordance with that General Permit, inspections will be performed including an initial inspection by a qualified Environmental Professional, weekly inspections during construction, and inspections following rain events if there are discharges.

It is expected that timber matting will be utilized and the erosion control measures will be consistent with the 2002 Connecticut Guidelines for Erosion and Sediment Control (DEEP Bulletin 34). Further avoidance and mitigation strategies will be developed as conceptual plans progress and site-specific species information is determined.

4. If this is a renewal or extension of an existing Safe Harbor request *with* modifications, explain what about the project has changed.

N/A

5. Provide a contact for questions about the project details if different from Part II primary contact.

Name: Todd Berman

Phone: 860-395-8297

E-mail: todd.berman@uinet.com

Part V: Request Requirements and Associated Application Types

Check *one* box from either Group 1, Group 2 *or* Group 3, indicating the appropriate category for this request.

Group 1. If you check one of these boxes, complete Parts I – VII of this form and submit the required attachments A and B.

- ☐ Preliminary screening was negative but an NDDB review is still requested
- ☐ Request regards a municipally regulated or unregulated activity (no state permit/certificate needed)
- ☑ Request regards a preliminary site assessment or project feasibility study
- ☐ Request relates to land acquisition or protection
- ☐ Request is associated with a *renewal* of an existing permit or authorization, with no modifications

Group 2. If you check one of these boxes, complete Parts I – VII of this form and submit required attachments A, B, *and* C.

- ☐ Request is associated with a *new* state or federal permit or authorization application or registration
- ☐ Request is associated with modification of an existing permit or other authorization
- ☐ Request is associated with a permit enforcement action
- ☑ Request regards site management or planning, requiring detailed species recommendations
- ☐ Request regards a state funded project, state agency activity, or CEPA request

☐ **Group 3.** If you are requesting a **Safe Harbor Determination**, complete Parts I-VII and submit required attachments A, B, and D. Safe Harbor determinations can only be requested if you are applying for a GP for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities

If you are filing this request as part of a state or federal permit application(s) enter the application information below.

Permitting Agency and Application Name(s):
CT Siting Council Review and Permitting

Related State DEEP Permit Number(s), if applicable: _____

State DEEP Enforcement Action Number, if applicable: _____

State DEEP Permit Analyst(s)/Engineer(s), if known: _____

Is this request related to a previously submitted NDDB request? ■ Yes ☐ No

If yes, provide the previous NDDB Determination Number(s), if known: _____

201710206, 201710684, 201911039

Part VI: Supporting Documents

Check each attachment submitted as verification that *all* applicable attachments have been supplied with this request form. Label each attachment as indicated in this part (e.g., Attachment A, etc.) and be sure to include the requester's name, site name and the date. **Please note that Attachments A and B are required for all new requests and Safe Harbor renewals/extensions with modifications.** Renewals/Extensions with no modifications do not need to submit any attachments. Attachments C and D are supplied at the end of this form.

■ Attachment A:	**Overview Map:** an 8 1/2" X 11" print/copy of the relevant portion of a USGS Topographic Quadrangle Map clearly indicating the exact location of the site.
■ Attachment B:	**Detailed Site Map:** fine scaled map showing site boundary and area of work details on aerial imagery with relevant landmarks labeled. (Site and work boundaries in GIS [ESRI ArcView shapefile, in NAD83, State Plane, feet] format can be substituted for detailed maps, see instruction document)
■ Attachment C:	**Supplemental Information, Group 2 requirement (attached, DEEP-APP-007C)** ■ Section i: Supplemental Site Information and supporting documents ■ Section ii: Supplemental Project Information and supporting documents
☐ Attachment D:	**Safe Harbor Report Requirements, Group 3 (attached, DEEP-APP-007D)**

Part VII: Requester Certification

The requester *and* the individual(s) responsible for actually preparing the request must sign this part. A request will be considered incomplete unless all required signatures are provided.

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of the individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief."

Ryan Jendrasiak	10/27/2020
Signature of Requester (a typed name will substitute for a handwritten signature	Date
	Senior Project Manager
Name of Requester (print or type)	Title (if applicable)
Signature of Preparer (if different than above)	Date
Name of Preparer (print or type)	Title (if applicable)

Note: Please submit the completed Request Form and all Supporting Documents to:

CENTRAL PERMIT PROCESSING UNIT
DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
79 ELM STREET
HARTFORD, CT 06106-5127

Or email request to: **deep.nddbrequest@ct.gov**

Attachment C: Supplemental Information, Group 2 requirement

Section i: Supplemental Site Information

1. Existing Conditions

Describe all natural and man-made features including wetlands, watercourses, fish and wildlife habitat, floodplains and any existing structures potentially affected by the subject activity. Such features should be depicted and labeled on the site plan that must be submitted. Photographs of current site conditions may be helpful to reviewers.

The proposed Project will be constructed along the existing Metro North rail way Right-of-Way (ROW), a transportation corridor constructed over 100 years ago and has been in continuous use since construction. The portion of the rail way ROW that the proposed Project will parallel is largely surrounded by developed land including residential, commercial and industrial development at various intensities. The developed land is interrupted with the occasional forested tract and wetland or waterbody. The proposed Project ROW crosses 12 waterbody features, some of which have an associated floodplain. Several wetlands have been mapped on both sides of the proposed Project ROW. The proposed Project ROW crosses four Natural Diversity Areas that are associated with wetlands, waterbodies and floodplains. In addition, the proposed Project ROW crosses one threatened and endangered species designated critical habitat. These natural resources are depicted on the Project Detail Map in Attachment B to this information request.

☐ **Site Photographs (optional) attached**

☒ **Site Plan/sketch of existing conditions attached**

2. Biological Surveys

Has a biologist visited the site and conducted a biological survey to determine the presence of any endangered, threatened or special concern species ☐ Yes ☒ No

If yes, complete the following questions and submit any reports of biological surveys, documentation of the biologist's qualifications, and any NDDB survey forms.

Biologist(s) name: _____

Habitat and/or species targeted by survey: _____

Dates when surveys were conducted: _____

☐ **Reports of biological surveys attached**

☐ **Documentation of biologist's qualifications attached**

☐ **NDDB Survey forms for any listed species observations attached**

Section ii: Supplemental Project Information

1. Provide a schedule for all phases of the project including the year, the month and/or season that the proposed activity will be initiated and the duration of the activity.

Construction is anticipated to begin Q3 of 2023 and be completed by Q2 of 2028. However, as detailed design progresses, the anticipated schedule is subject to changes.

2. Describe and quantify the proposed changes to existing conditions and describe any on-site or off-site impacts. In addition, provide an annotated site plan detailing the areas of impact and proposed changes to existing conditions.

See Attachment C, Supplemental Project Information for further project details.

A Site Plan is currently being drafted. Therefore, quantities of temporary/permanent impacts are not known at this time.

☐ **Annotated Site Plan attached**

Attachment D: Safe Harbor Report Requirements

Submit a report, as Attachment D, that synthesizes and analyzes the information listed below. Those providing synthesis and analysis need appropriate qualifications and experience. A request for a safe harbor determination shall include:

1. **Habitat Description and Map(s), including GIS mapping overlays, of a scale appropriate for the site, identifying:**

    - wetlands, including wetland cover types;
    - plant community types;
    - topography;
    - soils;
    - bedrock geology;
    - floodplains, if any;
    - land use history; and
    - water quality classifications/criteria.

2. **Photographs** - The report should include photographs of the site taken from the ground and also all reasonably available aerial or satellite photographs and an analysis of such photographs.

3. **Inspection** - A visual inspection(s) of the site should be conducted, preferably when the ground is visible, and described in the report. This inspection can be helpful in confirming or further evaluating the items noted above.

4. **Biological Surveys** - The report should include all biological surveys of the site where construction activity will take place that are reasonably available to a registrant. A registrant shall notify the Department's Wildlife Division of biological studies of the site where construction activity will take place that a registrant is aware of but are not reasonably available to the registrant.

5. **Based on items #1 through 4 above, the report shall include a Natural Resources Inventory of the site of the construction activity.** This inventory should also include a review of reasonably available scientific literature and any recommendations for minimizing adverse impacts from the proposed construction activity on listed species or their associated habitat.

6. **In addition, to the extent the following is available at the time a safe harbor determination is requested, a request for a safe harbor determination shall include and assess:**

    - Information on Site Disturbance Estimates/Site Alteration information
    - Vehicular Use
    - Construction Activity Phasing Schedules, if any; and
    - Alteration of Drainage Patterns

REQUEST FOR NATURAL DIVERSITY DATA BASE (NDDB) STATE LISTED SPECIES REVIEW

for the

MILVON-WEST RIVER RAILROAD TRANSMISSION LINE 115-KV REBUILD PROJECT

Prepared for

CONNECTICUT DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
Bureau of Natural Resources – Wildlife Division
Central Permit Processing Unit
79 Elm St.
Hartford, CT 06106-5127

On Behalf of

UNITED ILLUMINATING COMPANY
180 Marsh Hill Rd.
Orange, CT 06477

Prepared by

WESTON SOLUTIONS, INC.
205 Campus Drive
Edison, NJ 08837-3939
P: 732-417-5800; F: 732-417-5801

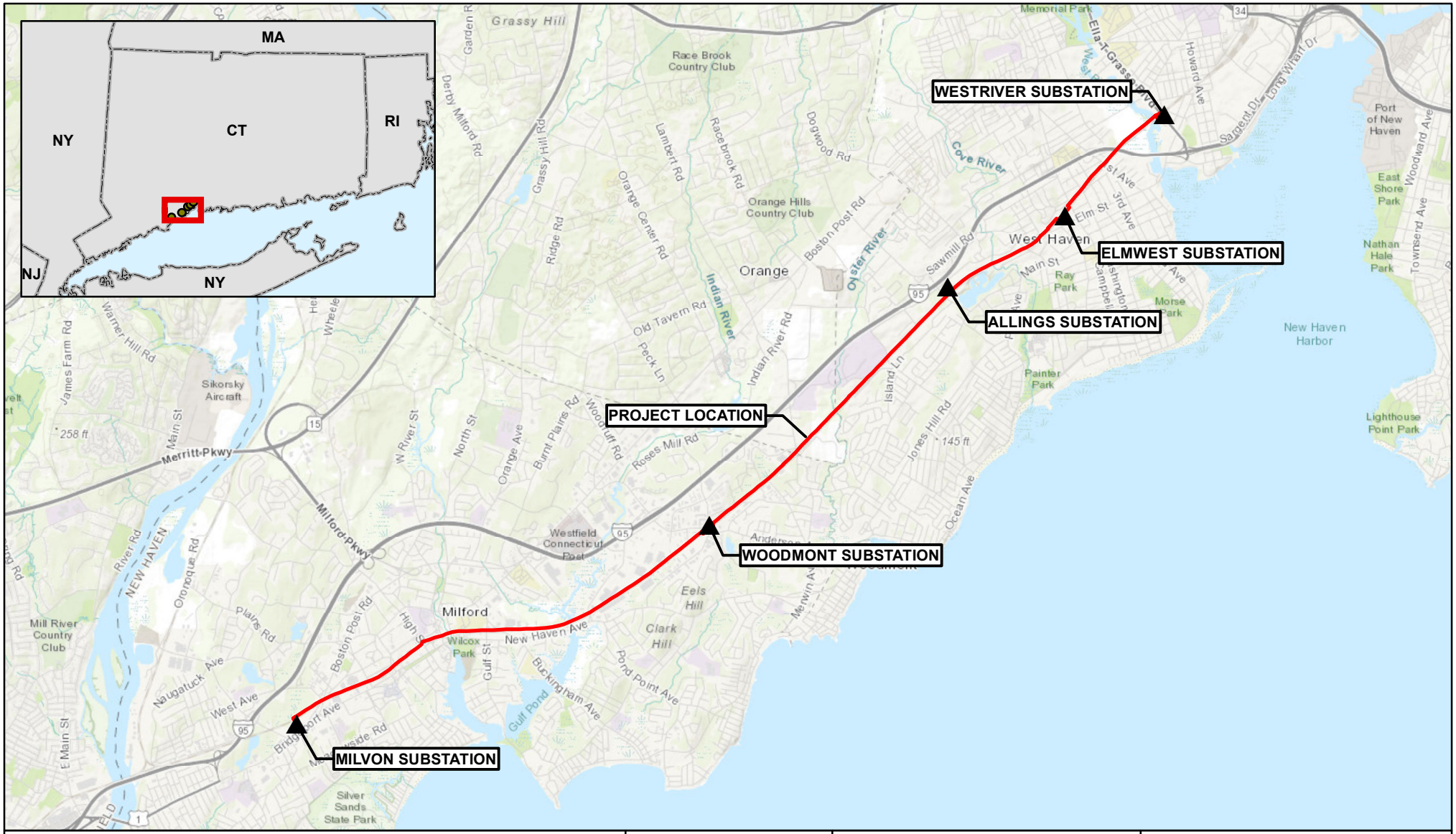
October 2020

FedEx Tracking Number:

LIST OF ATTACHMENTS

ATTACHMENT A

Overview Map



LEGEND

- PROPOSED PROJECT LOCATION
- EXISTING SUBSTATION LOCATION

SOURCE: ESRI TOPOGRAPHIC LAYER, 2020

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Miles

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WESTON SOLUTIONS

ATTACHMENT A
PROJECT OVERVIEW

UI MILVON-WEST RIVER RAILROAD
115-KV TRANSMISSION LINE UPGRADE
NEW HAVEN COUNTY CONNECTICUT

DATE	PROJECT NO	SCALE
OCT 2020	15557.003.001.0005	1:75,000

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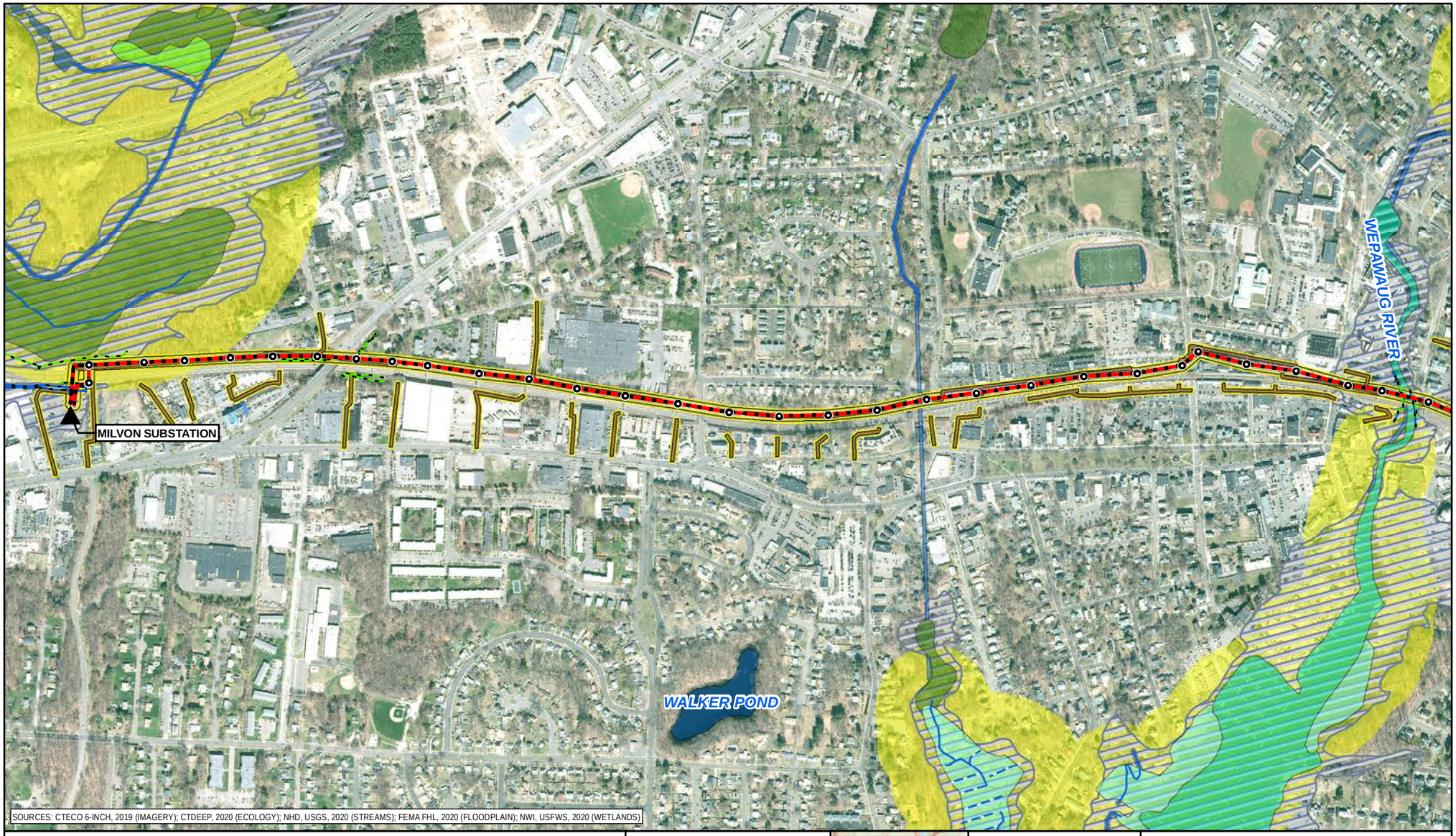
ATTACHMENT B

Detailed Site Map



LEGEND

- PROPOSED TOWER LOCATION
- PROPOSED PROJECT LOCATION
- PROPOSED LIMITS OF DISTURBANCE
- PROPOSED ACCESS ROAD

CTDEEP BIOSCIENCE/ECOLOGY

- NATURAL DIVERSITY AREA
- T&E SPECIES CRITICAL HABITAT

NHD FLOWLINE

- CANAL/DITCH
- STREAM/RIVER

NWI WETLANDS

- FRESHWATER FORESTED/SHRUB WETLAND
- FRESHWATER EMERGENT WETLAND
- RIVERINE
- FRESHWATER POND/LAKE
- ESTUARINE & MARINE WETLAND
- ESTUARINE & MARINE DEEPWATER

FEMA FLOOD HAZARD LAYER

- 100-YEAR FLOODPLAIN

N

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Feet

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WESTON SOLUTIONS

ATTACHMENT B

PROJECT DETAIL MAP

SHEET 1 OF 6

UI Milvon-West River Railroad
115-kV Transmission Line Upgrade
NEW HAVEN COUNTY CONNECTICUT

DATE	PROJECT NO	SCALE
OCT 2020	15557.003.001.0005	1:10,000

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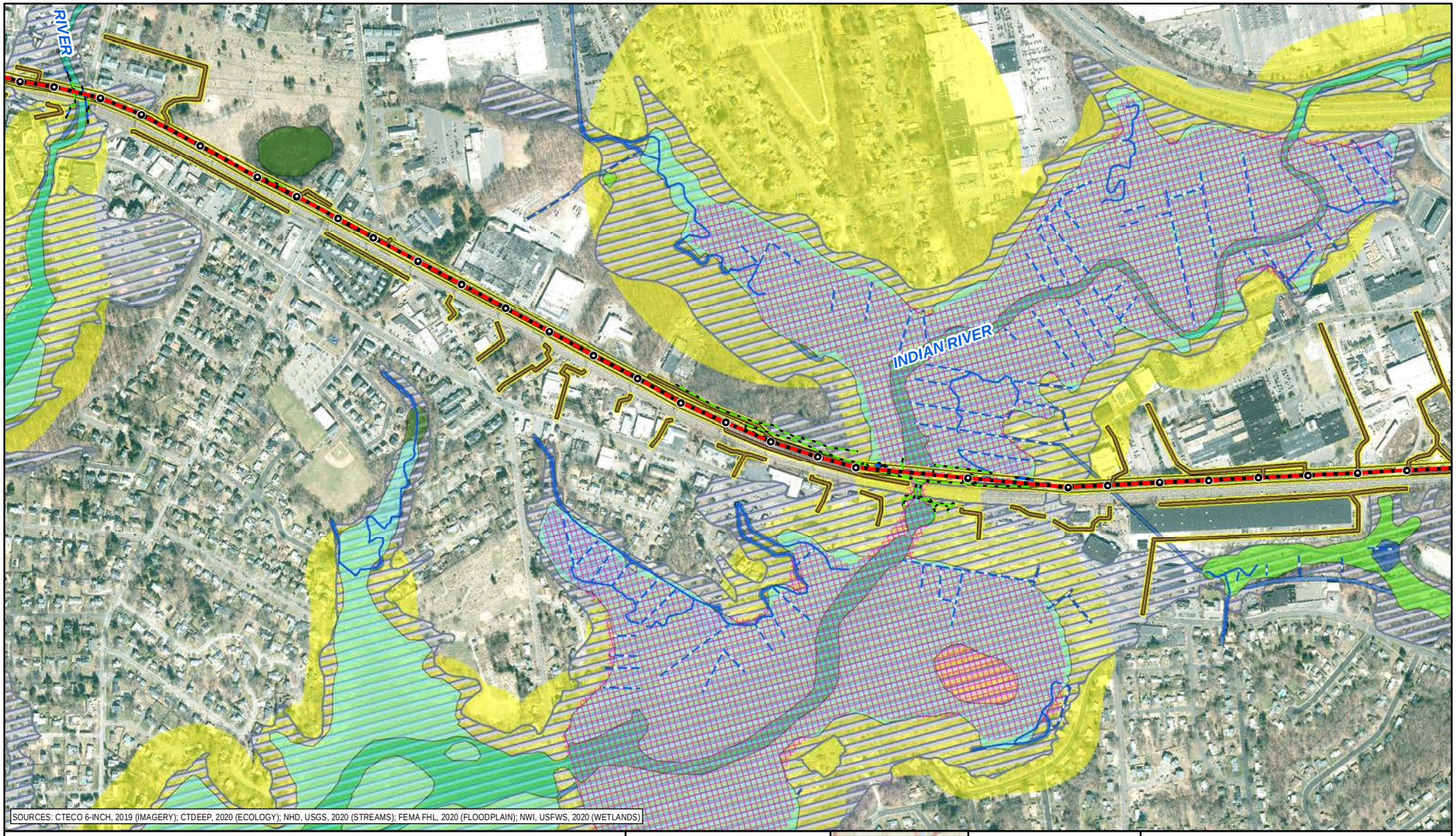

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- ESTUARINE & MARINE DEEPWATER

FEMA FLOOD HAZARD LAYER

- 100-YEAR FLOODPLAIN

N

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Feet

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WESTON SOLUTIONS

ATTACHMENT B
PROJECT DETAIL MAP
SHEET 2 OF 6
UI Milvon-West River Railroad
115-kV Transmission Line Upgrade
NEW HAVEN COUNTY CONNECTICUT

DATE	PROJECT NO	SCALE
OCT 2020	15557.003.001.0005	1:10,000

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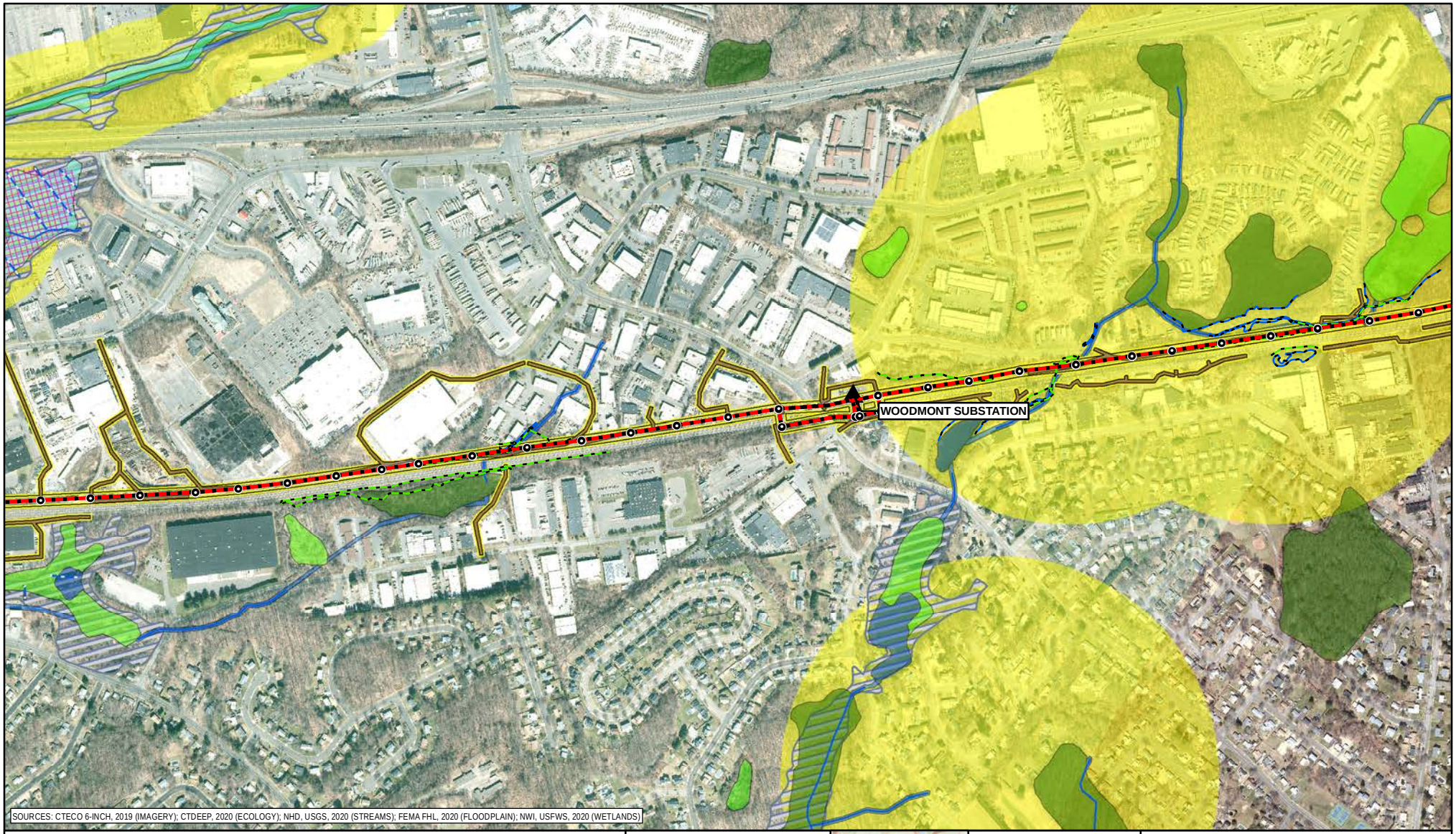

LEGEND

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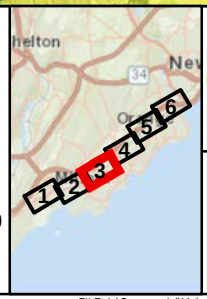

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ATTACHMENT B

PROJECT DETAIL MAP

SHEET 3 OF 6

UI Milvon-West River Railroad
115-kV Transmission Line Upgrade
NEW HAVEN COUNTY CONNECTICUT

DATE	PROJECT NO	SCALE
OCT 2020	15557.003.001.0005	1:10,000

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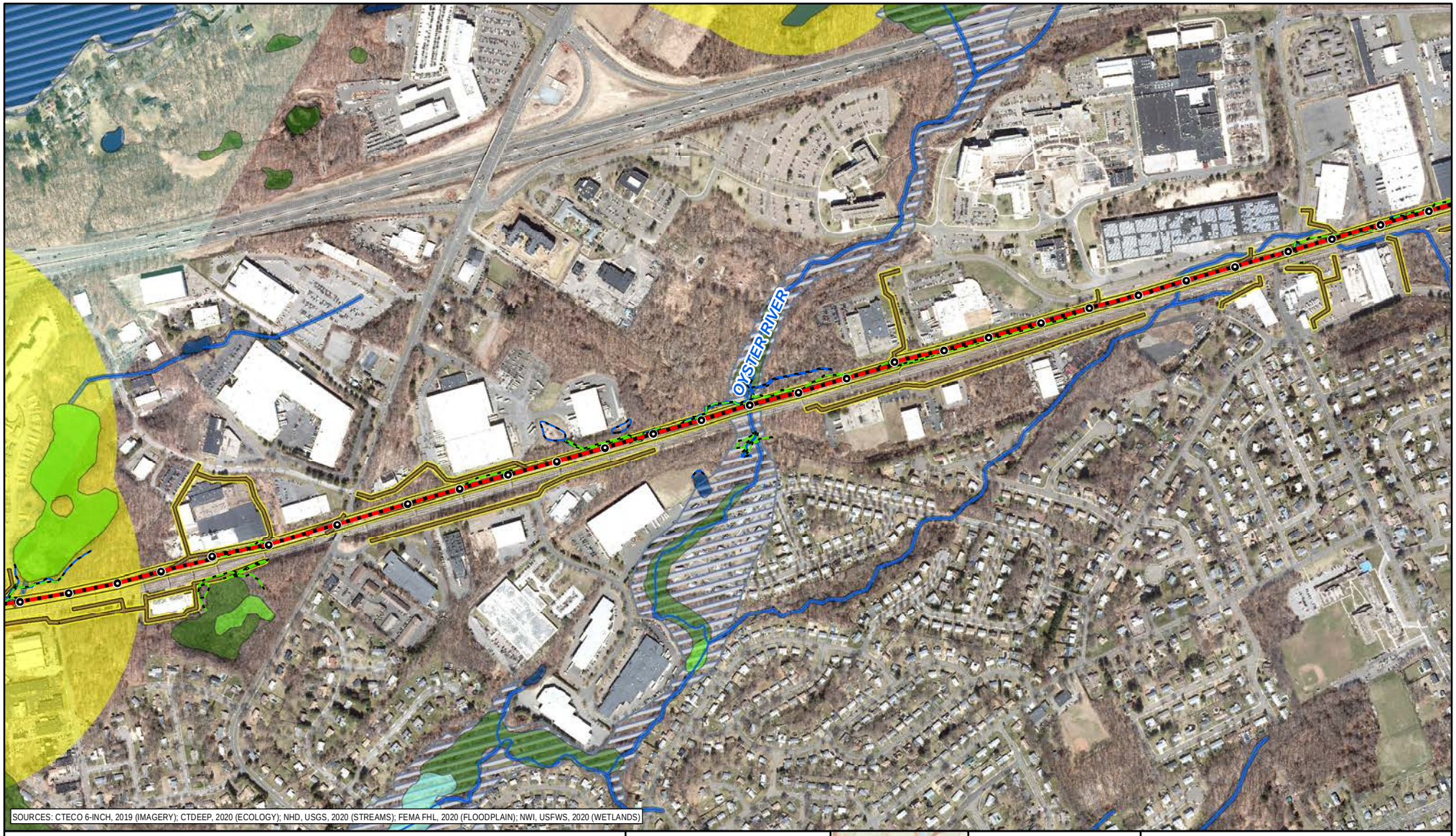

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FEMA FLOOD HAZARD LAYER

- 100-YEAR FLOODPLAIN

N

0 1,000 2,000

Feet

AVANGRID

WESTON SOLUTIONS

ATTACHMENT B

PROJECT DETAIL MAP

SHEET 4 OF 6

UI Milvon-West River Railroad
115-kV Transmission Line Upgrade
NEW HAVEN COUNTY CONNECTICUT

DATE	PROJECT NO	SCALE
OCT 2020	15557.003.001.0005	1:10,000

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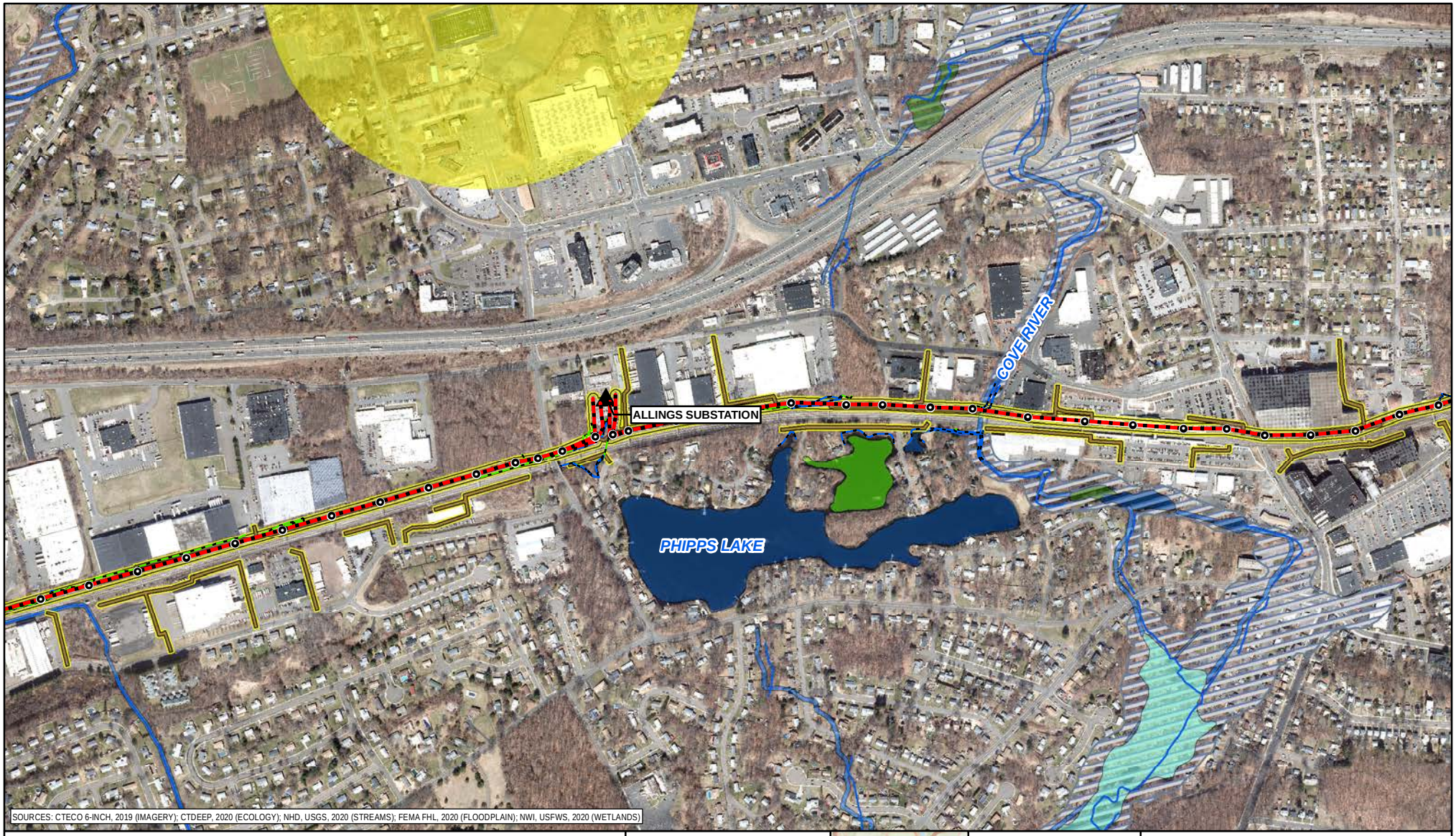

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- NATURAL DIVERSITY AREA
- T&E SPECIES CRITICAL HABITAT

NHD FLOWLINE

- CANAL/DITCH
- STREAM/RIVER

NWI WETLANDS

- FRESHWATER FORESTED/SHRUB WETLAND
- FRESHWATER EMERGENT WETLAND
- RIVERINE
- FRESHWATER POND/LAKE
- ESTUARINE & MARINE WETLAND
- ESTUARINE & MARINE DEEPWATER

FEMA FLOOD HAZARD LAYER

- 100-YEAR FLOODPLAIN

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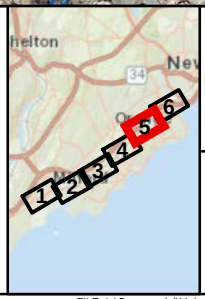
Feet



AVANGRID

WESTON SOLUTIONS

ATTACHMENT B

PROJECT DETAIL MAP

SHEET 5 OF 6

UI Milvon-West River Railroad
115-kV Transmission Line Upgrade
NEW HAVEN COUNTY CONNECTICUT

DATE	PROJECT NO	SCALE
OCT 2020	15557.003.001.0005	1:10,000

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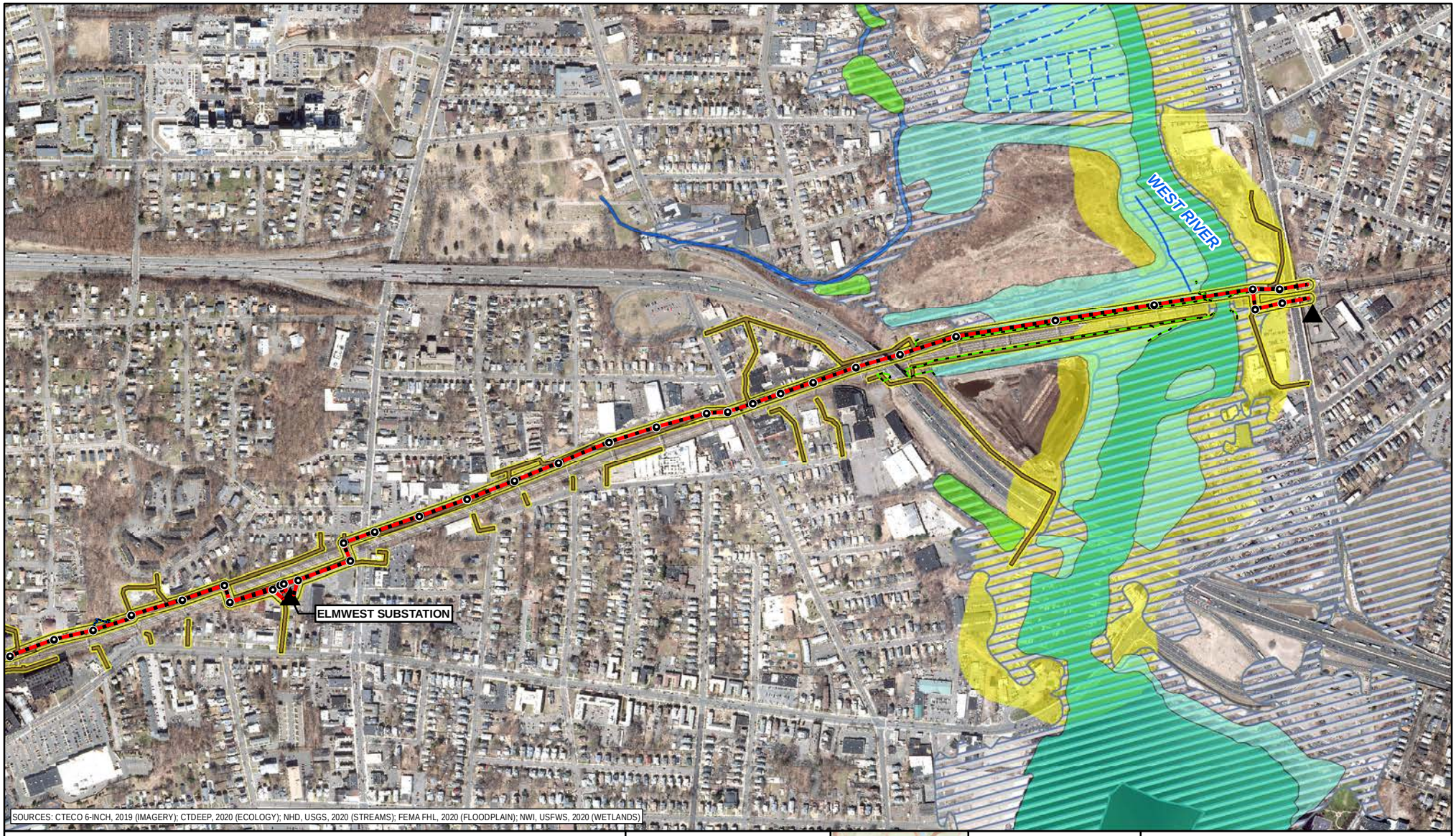

LEGEND

- PROPOSED TOWER LOCATION
- PROPOSED PROJECT LOCATION
- PROPOSED LIMITS OF DISTURBANCE
- PROPOSED ACCESS ROAD

CTDEEP BIOSCIENCE/ECOLOGY

- NATURAL DIVERSITY AREA
- T&E SPECIES CRITICAL HABITAT

NHD FLOWLINE

- CANAL/DITCH
- STREAM/RIVER

NWI WETLANDS

- FRESHWATER FORESTED/SHRUB WETLAND
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ATTACHMENT C

Supplemental Project Information

Request for NDDB State Listed Species Review
Attachment C
Supplemental Project Information

Project Background

To maintain the reliability of the bulk transmission grid in Connecticut and regionally, The United Illuminating Company (UI or the Company) proposes to rebuild its two existing single-circuit 115-kilovolt (kV) overhead lines that extend southwest-northeast within the Connecticut DOT (CT DOT) - Metro-North Railroad (MNR) / Amtrak Railroad corridor between UI's Milvon Substation (located in the City of Milford) and UI's West River Substation (located in the City of New Haven), all in New Haven County, Connecticut.

UI's existing 115-kV lines between Milvon and West River substations, which encompass approximately 19 circuit miles or 9.5 miles per line, traverse portions of southern Milford, the Town of Orange, City of West Haven, and City of New Haven. The lines also connect to UI's Woodmont Substation (located adjacent to the railroad corridor in the City of Milford) and to UI's Allings Crossing and Elmwest substations, situated adjacent to the railroad corridor in the City of West Haven.

Currently, the Milvon-West River 115-kV lines are located within the railroad corridor, on top of catenary structures that span the MNR and Amtrak rail lines. These lattice-type catenary structures, which are owned by CT DOT and operated by MNR, were originally built between 1912 and 1914 to support MNR signal and feeder wires for the electric operation of the trains.

UI attached transmission lines to the catenary structures in the 1940s. The UI transmission lines are supported on columns, referred to as "bonnets", located on top of the CT DOT catenary structures. One of the 115-kV lines is situated on the bonnets on the northern catenary support columns, while the other line is located on bonnets on the south side of the catenary support columns.

CT DOT owns the railroad corridor, which includes three tracks, in fee. Under a lease agreement between UI and CT DOT/ MNR, the catenary structures support UI-owned bonnet/pole extensions,

along with conductors, shield wires, insulators, and insulator hardware. According to UI engineering analyses, there are 130 catenary structures along the railroad corridor between Milvon and West River substations.

Between the Milvon and West River substations, the railroad corridor varies in width, but generally ranges from approximately 130 to 160 feet. From the northern bonnet structure, the width of the CT DOT ROW to the north varies from 5 to 140 feet in width, depending on location.

Over the years, UI's transmission lines on the catenary structures have been modified. Originally constructed at 69 kV in the 1940s, the lines were upgraded to 115 kV in the 1960s. In the 1980s, UI re-conductored the 115-kV lines; since then, various modifications have been made to the lines and to the catenary structures. Over the past 20 years, to maintain conformance with national electric reliability codes, at certain locations (e.g., near Milvon and Allings Crossing substations, West Haven Train Station), UI removed small portions of the 115-kV lines from specific catenary structures and instead installed the line on monopoles within the railroad corridor.

Project General Description

Recent engineering analyses, commissioned by UI, of the existing 115-kV lines along the MNR corridor between Milvon and West River substations determined that, to maintain the reliability of the bulk transmission grid, the transmission support structures need to be upgraded to meet current electrical codes and to withstand extreme weather conditions (e.g., hurricanes).

Based on these engineering analyses, UI proposes to rebuild the 115-kV lines on double-circuit monopoles, expected to be located parallel to and mostly along the north side of the railroad corridor, on property mostly owned by CT DOT. Referred to as the Milvon-West River Railroad Transmission Line 115-kV Rebuild Project (Project), the primary components of the Project will include:

- Rebuild the two 115-kV lines in a double-circuit configuration, supported on galvanized steel monopole structures, between Milvon and West River substations. The new monopoles will be offset from the catenary structures based on the railroad corridor width

and clearance requirements specified by CT DOT / MNR and electrical standards. This offset will vary based on location, but typically is expected to be 25 feet. The centerline of the new monopoles will be approximately 15 feet from the edge of the ROW (i.e., the edge of the CT DOT ROW, where space is available within that ROW, or from the edge of the new UI easement (to be acquired).

- The new structure heights will vary by location. Based on current design information, the proposed pole heights, by segment, are:
  - Milvon to Woodmont: 80-140 feet. The tallest poles (125-140 feet) will be between the Milford Train Station and the Milford Cemetery. Structures adjacent to the US Route 1 crossing and the Indian River crossing will be approximately 120 feet tall. Along the remainder of the segment, structure heights will be 80-100 feet.
  - Woodmont to Allings Crossing: 75-115 feet.
  - Allings Crossing to Elmwest: 65-160 feet. The tallest poles (>120 feet) will be near the West Haven Train Station. The proposed parking garage between P1017N and P1018N requires the tallest poles of the Project (150 and 160 feet).
  - Elmwest to West River: 65-130 feet. The tallest poles (>12 feet) are between 1st Avenue and the I-95 crossing, as required to span the MNR underbuild and road overpasses.
- The new 115-kV lines will consist of 1590 ACSS "Lapwing" conductors and 72-fiber optical ground wire (OPGW) shield wires. However, the new structures will be designed to support 2156 ACSS "Bluebird" conductors and to meet the clearance requirements for such conductors.
- Modify existing 115-kV connections, based on the configuration of the rebuilt 115-kV lines, to the Milvon and West River substations and to four other existing UI substations located adjacent to the railroad corridor (Woodmont, Allings Crossing, Elmwest, and West River) between Milvon and West River substations.
- Remove or modify certain steel monopoles that were installed as part of previous recent UI transmission upgrade projects (i.e., UI's 2015 Milvon Take-Off Structure Replacement Project [Structure P887N]; FAC-08 Project [Structure P898AS, P930AS, P959N, P968AS; P1015AS, P1026AS]; 2011 West Haven Train Station Project).

- Decommission and remove the existing 115-kV facilities on the railroad catenary structures (the bonnets may remain in place if CT DOT accepts ownership of them).

Construction and Right-of-Way Requirements

The Project will involve first constructing the new monopoles to support the double-circuit 115-kV lines, after which the existing 115-kV transmission line facilities will be removed from the top of the catenary structure bonnets. Specific construction plans have not been developed. However, work pads for the monopoles are expected to be contained within the CT DOT property, in most cases.

Access to construct and to operate/maintain the rebuilt 115-kV lines is expected to be via the existing public road network, CT DOT/MNR access, or new temporary or permanent access roads. Most of the ROW will be on undeveloped portions of the CT DOT property abutting the railroad tracks. However, some private easement acquisition will be required for the installation of the proposed transmission line structures and/or to maintain mandated operational clearances between the electric lines and nearby vegetation.

Land Use and Environmental Features

The proposed right-of-way (ROW) for the rebuilt 115-kV lines will extend adjacent to a mix of land uses (residential, recreational, commercial, industrial) and will be near or will cross certain environmental resources (inland/tidal wetlands, rivers, flood zones, and coastal zone boundaries in Milford, West Haven, and New Haven). Mileages along different ROW segments (between substations) are as follows:

- Milvon – Woodmont: 4.1 miles
- Woodmont – Allings Crossing: 2.9 miles
- Allings Crossing – Elmwest: 1.3 miles
- Elmwest to West River: 1.2 miles

The following table summarizes key features in the Project area, by municipality:

Feature / Municipality	Milford	Orange	West Haven	New Haven
Miles (of route)	• 4.05 miles (Milvon-Woodmont) • 0.98 mile (Woodmont to Allings Crossing) Total = 5.03 miles	Total = 0.46 mile (along Woodmont-Allings Crossing segment)	• 1.47 miles (Woodmont-Allings Crossing) • 1.24 miles (Allings Crossing – Elmwest) • 1.15 miles (Elmwest-New Haven) Total = 3.86 miles	Total = 0.10 mile
Substations	Milvon SS (a 115-kV to 13.8-kV distribution substation located at 772 Bridgeport Avenue) Woodmont SS	None	Allings Crossing SS Elmwest SS	West River SS
Nearby Environmental & Other Features	Beaver Brook wetlands / Trails /Milford Harbor Indian River/Gulf Pond (tidal wetlands) Coastal zone (southwest portion) Milford Train Station	Oyster River Yale University West Campus Coastal zone	Phipps Lake Coastal zone West River (Boundary with New Haven, coastal, wetlands) Yale University West Campus West Haven Train Station	West River (boundary with West Haven) Coastal zone
State Road Crossings	US Route 1	None	State Route 162 I-95	State Route 10

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

December 27, 2020

Mr. Todd Berman
The United Illuminating Company
100 Marsh Hill Road
Orange, CT 06477
Todd.berman@uinet.com

Project: United Illuminating Company Milvon-West River Railroad 115-KV Transmission Line Upgrade in Milford, Orange, West Haven and New Haven, Connecticut
NDDB Determination No.: 202073487

Dear Todd Berman,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed United Illuminating Company Milvon-West River Railroad 115-KV Transmission Line Upgrade in Milford, Orange, West Haven and New Haven, Connecticut. According to our information we have known extant populations of State Endangered *Eriocaulon parkeri* (Parker's pipewort) State Threatened *Ammodramus maritimus* (seaside sparrow) and State Special Concern *Ammodramus caudacutus* (saltmarsh sharp-tailed sparrow), *Rana pipiens* (northern leopard frog), *Terrapene carolina carolina* (eastern box turtle) and *Malaclemys terrapin terrapin* (northern diamondback terrapin) and *Bolboschoenus novae-angliae* (Salt marsh bulrush) in the vicinity of this project.

State Endangered Plant Protection
State Endangered *Eriocaulon parkeri* (Parker's pipewort)
Habitat: Muddy tidal shores of coastal estuaries.
Blooms late July – September.

State Special Concern *Bolboschoenus novae-angliae* (Salt marsh bulrush)
Habitat: Brackish tidal marshes.
Blooms mid-July with seeds through October

In order to prevent adverse impacts to *Eriocaulon parkeri* (Parker's pipewort) and State Special Concern *Bolboschoenus novae-angliae* (Salt marsh bulrush):

1) Provide a botanical survey for the Indian River section of right-of-way during the 2021 growing season and **before any work is started in this area of the right-of-way**. The botanical survey must be conducted by a qualified botanist familiar with these species. The botanical survey results and report must be submitted to the NDDB Program (deep.nddbrequest@ct.gov) **before any work is done in this section of the right-of-way**. The report should include: a resume/CV of the qualified botanist conducting the survey, dates of survey, detailed maps of the route taken during the survey and locations of state listed species, list of all component plant species in study area with scientific nomenclature, if state listed species are observed include rare plant forms that can be found at: https://portal.ct.gov/DEEP/Endangered-Species/Contributing-Data;

And conservation plans to protect any state listed plants observed in the right-of-way from project activities.

2) Do all structure replacements in winter, outside of growing season.
3) Do not expand existing pads or service roads, instead use temporary wooden matting when replacing structures. No additional gravel should be placed within the right-of-way either on roads or on pads in this right-of-way.
4) Remove all wood chips and slash if created by this rebuild of the transmission line. Do not add any wood chips to this right of way.
5) All state listed plant species found during structure replacement or hazardous tree removal must be reported on a special plant form and submitted to the NDDB (deep.nddbrequest@ct.gov) as soon as possible.

State Special Concern *Terrapenne carolina carolina* (eastern box turtle)
Best management practices to protect these turtles should be implemented throughout the entire work area. For all upland work, crushed stone should be avoided as much as possible and temporary mats should be used instead. No wood chips should be placed in any eastern box turtle upland habitat. Instead these wood chips should be removed and used elsewhere (off site). Any sightings of these turtles should be reported to the Natural Diversity Data Base (deep.nddbrequest@ct.gov) using a special animal form along with photographs to ensure proper identification of this species. The link to this form can be found here: https://www.ct.gov/deep/lib/deep/endangered_species/general_information/Vertebrateform.pdf

Protection for Turtles during Inactive Period (October 1st through March 30th):

- Keeping heavy equipment in the open ROW to the greatest extent possible and hand-felling trees to the greatest extent possible will minimize the potential for heavy machinery to crush hibernating turtles located in the forested edges along the ROW (a preferred habitat for box turtles to hibernate in).
- Overall, minimizing ground disturbance along the forest edges will minimize the potential for box turtle mortality during the winter months.
- Avoid and limit any equipment use within 50 feet of streams and brooks (wood turtles may be active in waterways even during the winter months).
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species, and instructed to notify the appropriate authorities to relocate any observed turtle.
- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

Protection for Turtles during Active Period (April 1st through September30th):

- Hire a qualified herpetologist to be on site to ensure these protection guidelines remain in effect and prevent turtles from being run over when moving heavy equipment. This is especially important in the month of June when turtles are selecting nesting sites. All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species, and instructed to relocate turtles found inside work areas or notify the

appropriate authorities to relocate individuals. The Contractor and consulting herpetologist must search the work area each morning prior to any work being done. If a turtle is discovered later in the day after the initial search work should stop until the turtle can be relocated by the qualified herpetologist or educated construction worker. Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and any exclusionary fencing should be inspected to identify and remove access point. The goal is to keep turtles from being unintentionally killed during this project.

- Exclusionary practices will be required to prevent any turtle access into construction areas. These measures will need to be installed at the limits of disturbance.
- Exclusionary fencing must be at least 20 in tall and must be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through. Do not use plastic or netted silt-fence.
- All staging and storage areas, outside of previously paved locations, regardless of the duration of time they will be utilized, must be reviewed to remove individuals and exclude them from re-entry.
- In areas where silt fence is used for exclusion, it shall be removed as soon as the area is stable to allow for reptile and amphibian passage to resume.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- Special precautions must be taken to avoid degradation of wetland habitats including any wet meadows and seasonal pools.
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- Avoid and limit any equipment use within 50 feet of streams and brooks.
- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

State Special Concern *Rana pipiens* (northern leopard frog):
The northern leopard frog is a species of special concern frog that utilize open, grassy habitats either along the floodplain of a large stream or river, in wetlands around the margins of large lakes, or in meadows adjoining tidal wetlands. Leopard frogs are active from late March to mid-October. We have records of this frog from the wetlands surrounding the West River in New Haven.

Protection Measures for State Special Concern Northern Leopard Frog:
Most work should occur during the frog's active period (between March and October). Additional protection strategies that protect and enhance wetland habitat should be implemented in all areas where floodplain and alluvial marsh and wet meadow habitat will be impacted. No gravel or hard surface should be placed in any floodplain or alluvial marsh habitat. Construction personnel should also be notified of the presence of this species and provide information to assist in the identification of leopard frogs. During disturbance, geotextile silt fence is required be installed along the perimeter of the project disturbance limits and would will serve as a barrier for the northern leopard frog to access the work area. Any sightings of these frogs should be reported to the Natural Diversity Data Base (deep.nddbrequest@ct.gov) using a special animal form along with photographs to ensure proper identification of this species. The link to this form can be found here:
https://www.ct.gov/deep/lib/deep/endangered_species/general_information/Vertebrateform.pdf
No gravel should be placed in any floodplain or alluvial marsh habitat. Construction personnel should also be notified of the presence of this species and provide information to assist in the identification of

leopard frogs. I do not anticipate any adverse impacts to the northern leopard frog population from this project if activities are confined to fall and winter months (October through February) if temporary matting is used and removed promptly once the project is finished.

State Special Concern *Malaclemys t. terrapin* (Northern Diamondback Terrapin)
The Northern diamondback terrapin is a turtle that inhabits salt marshes and salt or brackish tidal waters. They can also be found in mud flats, shallow bays, coves, and tidal estuaries. Adjacent sandy dry upland areas are required for nesting. Nesting takes place in June-July on salt marshes and adjacent beach areas. The peaks of hatching occurrences are April – June and September – November. This species overwinters in depressions in the bottom of estuaries, creeks, and salt marsh channels. We have records of this turtle in Golf Pond and Indian River in Milford.

Recommended Protection Measures for Northern Diamondback Terrapin:

To protect Northern diamondback terrapin any ground disturbance in the area of **Golf Pond/Indian River** should be done during the turtle's inactive periods (November 1st to April 1st).

In the event that construction cannot be completed during the winter months then the work may be performed between April - November in accordance with the protection measures and Best Management Practices below:

1. Hire a qualified herpetologist to be on site to ensure these protection guidelines remain in effect and prevent turtles from being run over when moving heavy equipment. This is especially important in the month of June when turtles are selecting nesting sites. All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species, and instructed to relocate turtles found inside work areas or notify the appropriate authorities to relocate individuals. The Contractor and consulting herpetologist must search the work area each morning prior to any work being done. If a turtle is discovered later in the day after the initial search work should stop until the turtle can be relocated by the qualified herpetologist or educated construction worker. Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and any exclusionary fencing should be inspected to identify and remove access point. The goal is to keep turtles from being unintentionally killed during this project.
2. Daily inspections should be conducted during the construction period to monitor for any turtles or terrapins. All construction workers should be advised and educated about these turtles and protection strategies.
3. Silt Fencing should be installed around the work area prior to commencement of construction and will be inspected daily.
4. A visual inspection should be conducted once silt fencing is in-place and prior to start of any work activity to locate any potential turtles.
5. All work personnel will be notified to be alert for the potential presence of the turtles and will be provided with a description of the species. Any turtle that may be discovered will be carefully moved, without harm, to a location outside the work area, and positioned in the same orientation that it had been moving. NO turtles will be removed or relocated from the area.
6. No vehicles or machinery should be parked in any identified turtle habitat that has not been confined by silt fencing and cleared of turtles.
7. Special care to avoid harm to basking or foraging individuals should be taken for any work conducted in the early morning and evening hours.

8. Report any observations of these turtles to our DEEP-NDDB Program at deep.nddbrequest@ct.gov as soon as possible.

State Threatened *Ammodramus maritimus* (Seaside sparrow) and State Special Concern *Ammodramus caudacutus* (saltmarsh sharp-tailed sparrow)
The State Threatened *Ammodramus maritimus* (Seaside sparrow) and State Special Concern *Ammodramus caudacutus* (saltmarsh sharp-tailed sparrow) are two wetland bird species that nest in salt marsh complexes and are most susceptible to human disturbance during the breeding season (approximately April through August). We have records of these birds in the salt marshes surrounding the Indian River in Milford. Adults return to set up territories as early as April. Nests for these species are usually not established until May 1st but can be started as late as August 1st.

Recommended Protection Measures for Seaside Sparrow and Saltmarsh Sharp-tailed Sparrow
• Begin work before May 1st or after August 31st to avoid impacting an active nest. Do not introduce any new excessive noise between April 15th and August 15th.

• If work must occur between May 1st and August 31st, before initiating work, nest surveys must occur to determine if nests are present impacted by project activities. Nest surveys must be conducted by an ornithologist familiar with the identification and the habitat requirements of this species. A report summarizing the results of such surveys should include habitat descriptions, survey results species list and a statement/resume giving their qualifications. Please forward the results of these surveys to the NDDB Program (deep.nddbrequest@ct.gov) within 14 days of this survey. If a nest is discovered all work should halt until after August 31st.

If these protection strategies are followed then the proposed activities will lessen the impact on these state-listed species. This determination is good for two years. Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by December 27, 2022.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov . Thank you for consulting the Natural Diversity Data Base.

Sincerely,

Dawn M. McKay

Dawn M. McKay
Environmental Analyst 3