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June 9, 2022

Melanie A. Bachman, Esq.
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 508 - The United Illuminating Company Application for a Certificate of Environmental Compatibility and Public Need for the Milvon to West River Railroad Transmission Line 115-kV Rebuild Project

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council ("Council") is a letter from the State Historic Preservation Office ("SHPO") to The United Illuminating Company ("UI" or the "Company"), dated June 8, 2022. Also, enclosed is UI's May 25, 2022 letter to the SHPO that should have been included as part of the Company's response to MIL 3-7(a) that was filed with the Council yesterday. The Company apologizes for the oversight.

An original and fifteen (15) copies of this filing will be hand delivered to the Council.

Should you have any questions regarding this letter, please do not hesitate to contact me.

Very truly yours,



Bruce L. McDermott

Enclosures

cc: Service List

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New Haven, CT 06510
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June 8, 2022

Mr. David R. George
Heritage Consultants
PO Box 310249
Newington, CT 06131

Subject: Request for Additional Information, Visual Impacts
Milvon-West River Railroad Transmission Line 115-kV Rebuild Project
Milford, Orange, West Haven, New Haven, Connecticut
ENV-22-0382

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the additional information prepared by Heritage Consultants, LLC (Heritage), dated May 25, 2022, in response to a request from our office, dated May 13, 2022. The proposed activities are under the jurisdiction of the Connecticut Siting Council and are subject to review by this office pursuant to the Connecticut Environmental Policy Act (CEPA). The proposed project includes the rebuilding of two single-circuit 115-kilovolt (kV) overhead lines along the Connecticut Department of Transportation (CT DOT) corridor between the Milvon and West River substations, within the municipalities of Milford, Orange, West Haven, and New Haven. The project includes moving utility lines from existing catenary structures, to new, freestanding structures. The catenaries are to remain, with the bonnets (c. 1940) to be removed.

In our letter of May 13, 2022, our office asked for information regarding potential alternatives to the proposed action, as well as clarification of the height and frequency of the new structures.

Regarding reuse of the catenary structures, this office concurs that the required structural reinforcement, coupled with the installation of larger bonnets, would adversely impact the catenaries, which are eligible as contributing resources to this segment of the New York, New Haven, & Hartford Railroad linear district, eligible for listing on the National Register of Historic Places. The current proposal avoids a direct impact to a historic resource. This office further acknowledges that leaving critical infrastructure within an active rail line, on property it does not own, does not meet the project objective of “reliability and resiliency of UI’s electrical system.”

State Historic Preservation Office

450 Columbus Boulevard, Suite 5 | Hartford, CT 06103 | P: 860.500.2300 | ct.gov/historic-preservation

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Department of Economic and
Community Development

State Historic Preservation Office

After viewing the requested photosimulations, it is the opinion of this office that the introduction of additional structures would exacerbate the visual impact to historic resources. Therefore, this office would recommend the proposal for taller, but fewer, pole structures.

As previously stated, the proposed action will visually adversely impact resources within the area of potential affect, an indirect effect. SHPO still believes a comprehensive archaeological survey of Charles Island, coupled with interpretive signage, would constitute adequate mitigation, and would resolve the adverse, indirect impact. However, this office would consider other alternative mitigation measures, appropriate to the project's effect on historic properties, proposed by the project sponsor, or other interested parties. Regardless, SHPO requests that any agreed upon mitigation be a requirement of project approval, and be codified in an agreement document.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's cultural resources. These comments are provided in accordance with the Connecticut Environmental Policy Act. For additional information, please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or marena.wisniewski@ct.gov.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Kinney". The signature is written in a cursive style with a large, sweeping flourish at the end.

Jonathan Kinney
State Historic Preservation Officer

State Historic Preservation Office

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