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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

**Murtha Cullina LLP**  
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May 25, 2022

Mr. Jonathon Kinney  
State Historic Preservation Officer  
450 Columbus Boulevard, Suite 5  
Hartford, CT 06103

**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. Kinney,

In response to your letter dated May 13, 2022, The United Illuminating Company (UI) is pleased to provide the following to the State Historic Preservation Office (SHPO) in response to your request for additional information on visual impacts from UI's Milvon-West River Railroad Transmission Line 115-kv Line Rebuild Project:

- 1) Please provide a narrative as to whether reuse of the existing catenary structures has been considered, and if so, why their reuse did not meet the needs of the project. This response should also consider reuse of a limited number of catenary structures located within the viewshed of the enumerated resources.

UI Response:

Reuse of the existing catenary structures has been considered but was eliminated as a potential project design option.

The specific required height of each rebuilt catenary structure in the Project area is unknown at this time. If the catenary structures were rebuilt, and the Metro-North Railroad (MNR) signal and feeder wires stayed at their existing elevations, UI estimates that the UI bonnet structures, mounted on top of the existing catenaries (and associated rebuilt 115-kV conductors and OPGW) would increase in height by a minimum of 20' – 25' from the existing catenary support column/bonnet configuration (to a total estimated catenary plus bonnet height of 80' – 85').

However, reuse of the existing catenary structures has other challenges which include the fact that UI does not own the catenary structures – they are owned by CT DOT. It is potentially prohibitive to rebuild infrastructure that UI does not own. The structural standards (including storm hardening) required for electrical infrastructure are significantly different than standards for other types of structural infrastructure. Keeping UI's electrical equipment located on structures owned by another entity and in very close proximity to the railroad tracks (which are a critical part of the Northeast U.S. railroad system) does not meet the core project objectives of enhancing the reliability and resiliency of UI's electrical

system. Rebuilding on the catenary structures would require each catenary structure to be analyzed and designed individually, with extensive coordination/concurrence with CT DOT. This would significantly increase the timeframe to complete the engineering design. As stated in the Project solution study, rebuilding each catenary structure between Milvon and West River Substations would require extensive railroad outages and four-track crossings at each location (four-track crossings have work hours limited to Friday and Saturday nights). The construction schedule would be extended by years and the associated costs would increase accordingly.

In addition, UI's cultural resources contractor, Heritage Consultants, LLC, has advised that the catenaries are a historic component of the railroad corridor, which is eligible for listing on the National Register of Historic Places (NRHP). Modifications to or the rebuilding of the catenaries may be considered a direct impact to the NRHP eligible resource. The current proposed CSC design avoids any direct impacts to catenaries from potential modifications designed to support the 115-kV line.

- 2) Please provide clarification as to the height of the structures proposed to be installed within the viewshed of the enumerated resources.

UI Response

Please find below a table listing the enumerated resources along with the associated nearest proposed UI structure and height

Property Name	Property Address	UI Proposed Monopole (and Height)	UI Proposed Monopole Height
Residence	South Corner of Hill St. & Clark Street	P900N	105'
		P901N	105'
Residence	Corner of Hill & Clark St	P900N	105'
		P901N	105'
The Academy of Our Lady of Mercy – Lauralton Hall	200 High Street	P908N	135'
River Park Historic District	Between Boston Post Road and Milford Harbor (south of the CT DOT corridor)	P914N	135'
		P915N	145'
		e	135'
US Post Office – Milford Main	6 West Street	P912N	130'
St. Peter's Episcopal Church	61, 71, and 81 River Street	P914N	135'
Taylor Memorial Library	5 Broad Street	P912N	130'
Milford Residence	49 Clark Street	P900N	105'
		P901N	105'
Milford Train Station-East Side	Depot Station	P912N	130'
Milford Train Station-West Side	Depot Station	P910N	140'
Milford Green	Broad Street, South Broad Street	P906N	120'
		P908N	135'
		P910N	140'
		P912N	130'
Milford Historic District No. 2 South of the Green	High Street, Green Street, Pond Street, Lafayette Street, Reed Street, Center Street, Center Avenue	P906N	120'
		P908N	135'
		P910N	140'

- 3) During initial discussions of visual impacts, the installation of additional structures of lower height was considered, rather than the submitted design of fewer, taller structures. Please provide photo simulations that illustrate the lower structures within the viewshed of the enumerated resources.

UI Response

Please see the attached photo simulations prepared in response to a request from the City of Milford to reduce the proposed heights of structures P905N through 912N to 120' in order to evaluate what shorter structures look like relative to the five historic resources. Note that three additional structures at a height of 120' would need to be added to UI's originally proposed alignment and structure heights, for total of eight structures within this area.

UI appreciates the opportunity to provide additional information on the design process, criteria and documentation used to determine the proposed configuration of UI's transmission system between Milvon Substation and West River Substation within the CTDOT corridor. If you have any questions, please feel free to contact me at [dgeorge@heritage-consultants.com](mailto:dgeorge@heritage-consultants.com).

Sincerely,

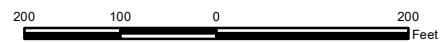


David R. George



EXISTING

Legend  
 ● Proposed Structure — Project Transmission Line

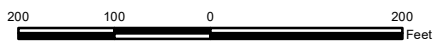




**CSC PROPOSED DESIGN**

Legend

- Proposed Structure
- Project Transmission Line





**EXISTING**

LOCATION  
**VIEW FROM 1 DARINA PLACE – MILFORD**

ORIENTATION  
**SOUTHWEST**





**CSC PROPOSED DESIGN**

LOCATION

**VIEW FROM 1 DARINA PLACE – MILFORD**

ORIENTATION

**SOUTHWEST**



**ALTERNATE DESIGN**

LOCATION

**VIEW FROM 1 DARINA PLACE – MILFORD**

ORIENTATION

**SOUTHWEST**



**EXISTING**

LOCATION  
**VIEW FROM RAILROAD AVENUE – MILFORD**

ORIENTATION  
**SOUTHWEST**



PHOTOGRAPHED ON 3/31/2022



**CSC PROPOSED DESIGN**

LOCATION

**VIEW FROM RAILROAD AVENUE – MILFORD**

ORIENTATION

**SOUTHWEST**



**ALTERNATE DESIGN**

LOCATION

**VIEW FROM RAILROAD AVENUE – MILFORD**

ORIENTATION

**SOUTHWEST**



**EXISTING**

LOCATION

**VIEW FROM SOUTH BROAD STREET – MILFORD**

ORIENTATION

**NORTH**



**CSC PROPOSED DESIGN**

LOCATION

**VIEW FROM SOUTH BROAD STREET – MILFORD**

ORIENTATION

**NORTH**





**ALTERNATE DESIGN**

LOCATION

**VIEW FROM SOUTH BROAD STREET – MILFORD**

ORIENTATION

**NORTH**