



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

May 13, 2024

Bruce McDermott, Esq.
Murtha Cullina LLP
One Century Tower
265 Church Street, 9th floor
New Haven, CT 06510-1220
bmcdermott@murthalaw.com

RE: **DOCKET NO. 508** – The United Illuminating Company (UI) Certificate of Environmental Compatibility and Public Need for the Milvon to West River Railroad Transmission Line 115-kV Rebuild Project that consists of the relocation and rebuild of its existing 115- kilovolt (kV) electric transmission lines from the railroad catenary structures to new steel monopole structures and related modifications to facilitate interconnection of the rebuilt 115-kV electric transmission lines at UI's existing Milvon, Woodmont, Allings Crossing, Elmwest and West River substations along approximately 9.5 miles of the Connecticut Department of Transportation's Metro-North Railroad corridor traversing the municipalities of Milford, Orange, West Haven and New Haven, Connecticut. **Partial Development and Management (D&M) Plan III - Segment 3**

Dear Attorney McDermott:

At a public meeting of the Connecticut Siting Council (Council) held on May 9, 2024, the Council considered and approved Partial Development and Management (D&M) Plan III submitted for this facility on March 28, 2024, with the recommendation that UI contact local railroad museums regarding possible bonnet preservation and display, and the following conditions:

- a) Contact DEEP Wildlife Division regarding the use of osprey deterrents on the new structures and replacement of any osprey platforms for any osprey nests that are removed during construction; and
- b) Submit provisions for erosion and sedimentation controls, if necessary, at the staging/laydown area(s) prior to commencement of construction.

This approval applies only to Partial D&M Plan III submitted on March 28, 2024. Requests for any changes to Partial D&M Plan III shall be approved by Council staff in accordance with Regulations of Connecticut State Agencies §16-50j-62(b).

Furthermore, the Certificate Holder is responsible for compliance with the reporting requirements under RCSA §16-50j-62, including:

1. Notification of commencement of construction;
2. Quarterly construction progress reports;
3. Notification of completion of construction and commencement of operation **along with a representative photograph of the facility**; and

4. Final report.

Please be advised that deviations from the approved Partial D&M Plan III are enforceable under Connecticut General Statutes §16-50u.

Enclosed is a copy of the staff report on Partial D&M Plan III, dated May 9, 2024.

Thank you for your attention and cooperation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Melanie A. Bachman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Melanie A. Bachman
Executive Director

MAB/MP/lm

Enclosure: Staff Report, dated May 9, 2024

c: Service List, dated April 21, 2022



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

Docket No. 508

The United Illuminating Company

**Milvon to West River Railroad Transmission Line 115-kilovolt (kV) Rebuild Project
Milvon S/S, off Bridgeport Avenue (Route 1), Milford to Woodmont S/S, off Quarry Road, Milford
Partial Development and Management Plan III – Segment 3**

Staff Report

May 9, 2024

Introduction

On August 19, 2022, the Connecticut Siting Council (Council) issued a Certificate of Environmental Compatibility and Public Need (Certificate) to The United Illuminating Company (UI) for the Milvon to West River Railroad Transmission Line 115-kilovolt (kV) Rebuild Project (Project) that traverses the municipalities of Milford, Orange, West Haven and New Haven and consists of the construction, maintenance and operation of a rebuilt 115-kV overhead electric transmission line entirely within approximately 9.5 miles of the existing Connecticut Department of Transportation’s (CDOT) Metro-North Railroad (MNR) corridor by relocating existing electric transmission lines from railroad catenary structures to new steel monopole structures and related modifications to facilitate the interconnection of the rebuilt 115-kV transmission lines with UI’s existing Milvon, Woodmont, Allings Crossing, Elmwest, and West River Substations (Project). There are four Project segments.

In its Decision and Order (D&O), the Council required UI to submit a Development and Management (D&M) Plan in compliance with Sections 16-50j-60 through 16-50j-62 of the Regulations of Connecticut State Agencies (RCSA).¹

On April 13, 2023, in compliance with RCSA §16-50j-61(d), UI submitted Partial D&M Plan I to the Council and the service list. Partial D&M Plan I addressed Segment 1 of the Project that extends for approximately 1.28 miles from Elmwest Substation in West Haven to West River Substation in New Haven. On June 8, 2023, the Council approved Partial D&M Plan I.

On July 7, 2023, in compliance with RCSA §16-50j-61(d), UI submitted Partial D&M Plan II to the Council and the service list. Partial D&M Plan II addresses Segment 2 of the Project that extends for approximately 1.28 miles from Allings Crossing Substation in West Haven to Elmwest Substation in West Haven. On August 18, 2023, the Council approved Partial D&M Plan II.

On March 28, 2024, in compliance with RCSA §16-50j-61(d), UI submitted Partial D&M Plan III to the Council and the service list. Partial D&M Plan III addresses Segment 3 of the Project that extends for approximately 4.05 miles from Milvon Substation to Woodmont Substation in the City of Milford. No comments regarding Partial D&M Plan III were received.

¹ Regulations of Connecticut State Agencies §16-50j-60(b) states, “A *partial* or full D&M plan shall be prepared in accordance with this regulation...” (Emphasis added).

Condition 2 of the Council’s D&O requires the following information to be included in the D&M Plan:

- a) **Detailed site plans depicting final transmission line structure heights and identification of locations for the access roads, structure foundations, equipment laydown areas; material staging areas; field office trailers, sanitary facilities and parking;**

Partial D&M Plan III includes detailed site plans including structure heights and identification of locations for the access roads and structure foundations.

UI will rebuild the existing 88005A-1 and 89005B-1 115-kV Lines from Catenary Structure B888 east of Milvon Substation to Catenary Structure B957 west of Woodmont Substation. The lines will be installed primarily on double-circuit monopole structures located north of the MNR tracks and mostly within the CDOT corridor. Some single-circuit monopoles are also required to facilitate the connections.

Specifically, 1 single-circuit monopole (85 feet tall) north of the railroad tracks, 2 single-circuit monopoles (95 feet tall) south of the railroad tracks and 57 double-circuit monopoles (ranging in heights from 85 feet to 130 feet) north of the railroad tracks will be installed for Segment 3. All structures will be galvanized steel and will have concrete drilled pier foundations.

Partial D&M Plan III is consistent with the Option J Configuration (Option J) as required under Condition 1 of the D&O. This approved alternative eliminated Structure 915N (via the use of anti-galloping devices) and resulted in 7 shorter structures from Structures 904N and 916N in comparison with the originally proposed project. Structure P912N remains comparable in height under Option J versus the original configuration. Option J also resulted in a net increase in structures by one. A table of the approximate structure heights is included below.

Structure Number	Originally Proposed Structure Height	Approved Option J Structure Height
P904N	105 feet	101 feet
P905N	115 feet	101 feet
P906N	120 feet	101 feet
P907N	N/A	106 feet (additional structure)
P908N	135 feet	111 feet
P909N	N/A	111 feet (additional structure)
P910N	140 feet	126.5 feet
P912N	130 feet	131 feet
P914N	135 feet	134 feet
P915N	145 feet	N/A (eliminated)
P916N	135 feet	131 feet

The two rebuilt 115-kV lines will consist of 1590 kcmil aluminum conductor steel supported (ACSS) “Lapwing” conductors arranged in a vertical configuration and will include 0.583-inch 72 count fiber optical ground wire (OPGW) to act as shield wire. Shield wire is used for lightning protection. The span adjacent to Woodmont Substation and associated with the 88005A-1 Line will have 7#7 Alumoweld shield wire in lieu of OPGW. Helicopters may be used to install pulling ropes at the commencement of the conductor/OPGW pulling process. Helicopter use, if any, would be determined by the contractors. UI will notify municipal officials in advance of any planned use of helicopters during Project construction.

UI will utilize a combination of public roads and proposed or existing access roads within or adjacent to the CDOT railroad corridor for Segment 3 construction. During construction, temporary access roads will be established both north and south of the MNR tracks in order to install the rebuilt 115-kV transmission lines and remove existing UI infrastructure from the railroad catenary support columns and/or to remove/modify existing monopoles.

Six permanent access roads will be required for Segment 3. Permanent access roads will have a typical width of 12 to 16 feet. One permanent access road will be installed within the 100-year Federal Emergency Management Agency flood zone. This access road will have its final gravel surface match the existing grade to avoid impacts on flood storage capacity.

With the exception of access roads that extend across paved areas and certain locations where existing graveled roads will be improved, UI will install timber mats (or equivalent) on temporary access roads. Alternatively, UI could utilize temporary gravel on top of geotextile fabric for temporary access in certain areas. Temporary access roads will have a typical width of 16 feet. Access roads may be wider in some areas to accommodate equipment turning and passing or to account for safety and existing terrain. Existing paved access is not expected to require significant upgrades. UI will improve existing gravel roads as necessary to support its construction equipment. UI will also utilize anti-tracking pads at entrances and exits to work sites from public roads.

Construction work pads will be required to install the new monopoles, remove existing 115-kV facilities from the northern and southern catenary support structures, and remove existing structures such a monopole or monopole sections that will no longer be needed. Gravel or timber mat work pads will be used to provide a safe, level base for construction equipment as well as locations to temporarily stage materials. Work pads will typically measure 100 feet by 40 feet. In most areas, minimal grading is expected to be necessary to install the work pads. Pull pads will typically measure 300 feet by 40 feet.

On the north side of the MNR tracks, the same work pads used to install the monopoles will (to the extent practical) be used to stage the work to remove existing UI infrastructure from the northern catenary support columns. On the south side of the MNR tracks, work pads that typically measure 60 feet by 40 feet will be required to remove UI infrastructure from the southern catenary support columns.

UI's main contractor yard/staging area will be located at 51 Carlson Road, Orange, and its secondary contractor yard/staging area will be located at 3191 Broadbridge Avenue, Stratford. These contractor yards/staging areas will be used for personal vehicles, construction vehicles, contractor equipment, construction office trailers, temporary storage of transmission infrastructure to be removed, CONEX storage boxes, portable restrooms, and a generator if necessary for on-site power.

UI will also utilize portions of Milvon and Woodmont Substation properties to support the substation modifications and transmission rebuild work. UI will also utilize its approximately 1.6-acre property at 680 Campbell Avenue, West Haven (adjacent to Elmwest Substation) for laydown/staging.

- b) **Detailed site plans for equipment installation/modifications at Milvon, Woodmont, Allings Crossing, Elmwest and West River Substations;**

Partial D&M Plan III includes modifications to Milvon Substation and Woodmont Substation that will be performed to interconnect the rebuilt 115-kV lines to the substations and remove existing 115-kV line connections.

The Milvon Substation modifications include, but are not limited to, the installation of two underground all-dielectric self-supporting (ADSS) fibers from new splice boxes located on the existing termination structures to the existing control enclosure. UI will remove the existing shield wire and associated hardware from the termination structures. UI will install new hardware on the termination structures and install new OPGW. UI will also replace two of the three phase conductors on the 89005B-1 Line that extend into the substation in order to re-orient the phasing. Should any portion of the existing substation fence require temporary removal to accommodate construction, UI would replace the fence in the same location and restore fencing to pre-construction conditions.

The Woodmont Substation modifications include, but are not limited to, the installation of one ADSS fiber from a new splice box located on an existing monopole (located north of the MNR tracks and immediately outside the substation fence) to the existing control closure inside the substation fence; new insulators and hardware at the substation termination structures; and new 115-kV conductors and shield wire. UI will remove the existing shield wire, 115-kV conductors, and associated insulators and hardware from the substation termination structures.

Modifications to Elmwest and West River Substations were addressed in Partial D&M Plan I. Modifications to Allings Crossing and additional modifications to Elmwest Substation were addressed in Partial D&M Plan II.

c) **Decommissioning plan for bonnets;**

Partial D&M Plan I included a Project-wide Decommissioning Plan for the catenary bonnets which currently support the 115-kV lines on the northern and southern portions of the catenary structures. UI will remove existing 115-kV infrastructure such as bonnets, related hardware, 115-kV line conductors, and OPGW or shield wires.

Specifically, for Segment 3, 136 bonnets will be removed completely; 10 bonnets will be cut down to approximately 2 feet above the bonnet connection to support a shield wire to protect the MNR signal and feeder wires. UI will transfer the ownership of these remaining bonnets to CDOT.

In addition to bonnet removals and/or modifications, to allow for the construction of the rebuilt 115-kV lines, UI will remove 1 monopole. Three existing monopoles will have their top sections removed, and the lower sections will remain to support MNR wires. Six existing monopoles will remain and will have insulators and hardware replaced in order to support the new conductors and OPGW/shield wire.

Most of the existing infrastructure to be removed will be recycled. Materials that cannot be recycled will be disposed of at an appropriate off-site location.

d) **An erosion and sediment control plan, consistent with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control, as amended;**

Partial D&M Plan I included a Project-wide Erosion and Sediment Control Plan for erosion and sedimentation control measures (E&S controls) that will be installed in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control, the 2004 Stormwater Quality

Manual, the Stormwater Pollution Control Plan (SWPCP), and DEEP Stormwater Permit. Partial D&M Plan II contains E&S control measures in Volume 2 that are specific to Segment 3.

UI's DEEP Stormwater Permit was issued on June 12, 2023.

e) **Results of any further consultations with SHPO and/or the City of Milford regarding historic resources;**

Option J included reduced structures heights in the historic areas of Downtown Milford and in the vicinity of five resources listed on the National Register of Historic Places. Notwithstanding, by letter dated January 17, 2023, the State Historic Preservation Office (SHPO) noted that there would be indirect effects that would adversely impact resources within the area of potential effect.

As a result of further consultations with SHPO, UI developed a Mitigation Plan that includes historical research to document grave markers within the Milford Cemetery and making such research available to the public. UI submitted the Mitigation Plan to the Council on August 30, 2023, in compliance with Condition 2(e) of the D&O.

UI would implement the Project-wide Procedures for Unanticipated Cultural Resource Discoveries that was included in Partial D&M Plan I.

f) **Identification of wetland and watercourse resources, related temporary construction impacts and methods to reduce such impacts;**

Partial D&M Plan III identifies water resource crossings, construction-related impacts and plans to mitigate such impacts. Both the existing and rebuilt 115-kV lines span the Wepaug River and Indian River, but no work will be performed in either watercourse.

Construction activities including, but not limited to, vegetative clearing and/or temporary work pads and access will be required in three tidal wetlands (M-TW1, M-TW2 and M-TW3), all of which are located adjacent to the Indian River. Vegetation clearing and/or temporary work pads and access will also be required in five inland wetlands (M-W2, M-W4, M-W6, M-W8, and M-W9). Two monopoles will be installed within inland wetland M-W9. The impacts to wetlands and watercourses for Segment 3 are identified in the tables below:

Volume 2 Mapsheet No.	Watercourse No. & Flow Type Intermittent (I) or Perennial (P)	Estimated Project Impact, by Type (Acres)		
		Temporary Impacts		Permanent Access Road Impacts
		Access Roads	Work Pads	
City of Milford				
2	M-WC2 (I)	0.02	0.03	-
18	M-WC4 (I)	0.01	0.02	-
19	M-WC5 (P)	0.01	-	-
	Total Impacts	0.04	0.05	-

Volume 2 Mapsheet No.	Wetland No.	Estimated Project Impact, by Type (Acres)			
		Temporary Impacts		Permanent Impacts	Permanent Change to Wetland Vegetation Type*
		Access Roads	Work Pads		
City of Milford					
1	Wetland M-W2	-	0.11	-	-
8	Wetland M-W4	-	0.08	-	0.08
11	Wetland M-W6	-	0.28	-	0.38
11	Tidal Wetland M-TW1	-	-	-	0.01
11-12	Tidal Wetland M-TW2	-	-	-	-
11-12	Tidal Wetland M-TW3	0.13	0.10	-	0.13
17-18	Wetland M-W8	0.57	0.38	-	-
17	Wetland M-W9	0.16	0.26	0.002 (pole foundations)	0.19
Subtotal Wetland Impacts		0.86	1.21	0.002	0.79

During construction, UI will implement measures to protect wetlands and watercourses. Specifically, UI will install E&S controls, utilize temporary matting, implement wetland invasive species control procedures, and perform environmental inspections per the SWPCP, Stormwater Permit, and the Project-wide On-Site Environmental Inspection and Monitoring Plan.

After the rebuilt lines are installed and existing 115-kV facilities are removed from the catenaries, all temporary timber mats will be removed from wetlands, and wetlands will be restored to pre-construction conditions to the extent practicable.

g) **Vegetative clearing plan;**

Construction of the Project will require vegetation removal from construction areas including, but not limited to, access roads, work pads for new structures, work pads for the removal of existing 115-kV facilities from the railroad catenary structures, and to maintain proper clearances from the rebuilt 115-kV line conductors. The vegetation that must be removed along Segment 3 consists of a mix of tall shrubs and mature trees along with low-growing herbaceous species.

Partial D&M Plan I included a Project-wide Vegetation Clearing Plan that specifies clearing methods and vegetation management consistent with the construction and operation of overhead transmission lines per industry and UI standards for conductor clearance.

Total tree clearing for Segment 3 will be approximately 11.67 acres.

h) **Restoration plan of disturbed areas, including incorporation of areas for pollinator habitat consistent with C.G.S. §16-50hh, if feasible;**

Partial D&M Plan I included a Project-wide Restoration Plan including, but not limited to, removal of temporary work pads and access roads; utilization of pollinator-friendly seed mixes in certain upland areas; and removal of E&S controls after final stabilization.

i) **A spill prevention control and countermeasures plan;**

Partial D&M Plan I included a Project-wide Spill Prevention and Control Plan. Name and contact information for the spill response contractor is included in Partial D&M Plan III.

j) **Wetland Invasive Species Control Plan;**

Partial D&M Plan I included a Project-wide Wetland Invasive Species Control Plan to avoid or minimize the potential spread of invasive species in wetlands.

k) **Provisions for on-site environmental inspection and monitoring of the ROW and substations during construction;**

Partial D&M Plan I included a Project-wide On-Site Environmental Inspection and Monitoring Plan. For Segment 3, UI will assign an environmental inspector to monitor construction, and UI will assign protected species specialist(s) to train and coordinate with UI crews and contractors to implement protective measures for state and federally-listed species.

l) **A schedule of construction hours;**

Construction activities are expected to begin for Segment 3 in March 2025 and be completed in approximately 15 months. The rebuilt transmission lines are expected to be in service by the end of second quarter 2026.² Project construction will require some line outages of existing electric transmission and/or distribution equipment. Line outages must be coordinated with the Connecticut Valley Electric Exchange (CONVEX).

Construction work will typically occur between 7:00 a.m. and 7:00 p.m., Monday through Saturday. However, certain activities may require work outside of the typical construction hours, in some cases on a 24-hour basis and/or on Sundays. Such non-typical work includes activities that must be performed during a CONVEX-approved outage and/or due to the need to perform construction during off-peak rail use hours. The work hours, including potential extended work hours, also apply to the laydown/material staging/contractor yards required to support construction activities.

m) **A blasting plan, if necessary;**

Blasting is not expected to be necessary for the Project. UI plans to utilize mechanical means to remove bedrock as necessary.

n) **Plans to comply with DEEP Natural Diversity Database recommendations to reduce impacts to state-listed endangered, threatened and special concern species; and**

Partial D&M Plan I included a Project-wide Species Protection Plan based on DEEP recommendations.

² Notwithstanding, Line 89005B-1 is expected to be taken out of service again in the Fall 2027 in order to complete the rebuild of the final two spans in Woodmont Substation (to be performed as part of the Segment 4 construction).

o) **EMF Monitoring Plan.**

Partial D&M Plan I included a Project-wide Post-Construction Electric and Magnetic Field Monitoring Plan to document the post-construction magnetic field levels at various distances from the CDOT railroad corridor.

Within 12 months of the in-service date (i.e. energization of all rebuilt 115-kV lines between Milvon Substation and West River Substation), UI will submit a report to the Council.

Conclusion

Partial D&M Plan III is in compliance with the Council's D&O dated August 19, 2022.

If approved, staff recommends the following condition:

1. Submission of provisions for erosion and sedimentation controls, if necessary, at the staging/laydown area(s) prior to commencement of construction.