



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

April 22, 2022

TO: Service List, dated April 21, 2022

FROM: Melanie Bachman, Executive Director

MB

RE: **DOCKET NO. 508** - The United Illuminating Company (UI) application for a 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.

Comments have been received from the Department of Energy and Environmental Protection on April 21, 2022. A copy of the comments is attached for your review.

MB/MP/laf

c: Council Members

April 21, 2022

Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RE: 115-kV Transmission Line Rebuild
United Illuminating
Milford, Orange, West Haven and New Haven
Docket No. 508

Dear Members of the Connecticut Siting Council:

Staff of this department have reviewed the above-referenced application for a Certificate of Environmental Compatibility and Public Need and have visited a portion of the project corridor. Based on these efforts, the following comments are offered to the Council for your consideration in this proceeding.

United Illuminating proposes to rebuild the subject 9.5-mile portions of two 115-kV transmission lines by removing the lines from their current location above the Metro-North Railroad's New Haven Line where they are supported on bonnets above the railroad's catenary structures to a new location along the northern side of the railroad corridor where the lines would be supported on 158 new monopole structures. The affected portion of the two transmission lines runs from the Milvon Substation in Milford to the West River Substation approximately one-tenth of a mile east of the West River in New Haven. The intent of the project is to improve the reliability and resiliency of the transmission system by removing the lines off of the 100+ year old catenary support structures to the more substantial monopoles.

Department staff note that modern monopoles will likely have a material positive impact on energy system reliability and resiliency over the century-old catenary structures. Of course, it would be important to ensure that United Illuminating has coordinated with staff at Metro-North to confirm that the new 115-kV lines are located a sufficient distance from the railroad tracks that there is no AC system electromagnetic interference with railroad signals or operation. Finally, ISO-NE, which manages the regional electric grid, has done a study which suggests that 115-kV transmission lines may need upgrading in the next twenty years. UI should be encouraged to ensure that their new lines are sufficient to meet the anticipated future needs.

Description of the Project Corridor

The proposed rebuilt transmission line will be located almost exclusively on the north side of the rail corridor where 145 of the 158 new structures will be erected. Thirteen monopoles will be added to the south side of the rail corridor and will support only a single circuit. As part of the review of the application, the project corridor was visited on April 12, beginning at Milvon

Substation, which is labeled as Bridgeport 772 on its gate. Because of the overhead nature of the proposed facility and the longer spans that are proposed between monopoles in sensitive locations, the extent of permanent impacts to natural resources along the corridor will not be great. However, the available corridor for the relocated lines is a very narrow one which will unavoidably place the lines in close proximity to residences in several areas of the project.

Beginning at the western end of the new line, the project should not have any impact on the Beaver Brook Nature Trail which, in the area of the proposed line, is located in a large wetland system just north of the railroad corridor and north of Milvon Substation.

One nice serendipity of the timing of the field review was the multiple occurrences of daffodils and jonquils in full bloom, occurring either separately or in mixed clumps, at multiple locations along the northside of the corridor, most frequently on the southernly facing banks in areas where the tracks occur below the surrounding topography.

In addition to the 1912-1914 vintage catenary support structures which support both the railroad power supply and UI's transmission lines, there are occasional newer structures of much simpler design which support the Metro-North catenaries, and an atypical catenary structure no. 894A which is just a beam across the tracks and supported on both ends on the brownstone block abutments of a bridge which was long ago removed.

In general, the land to the southern side of the rail corridor is uniformly dedicated to commercial and industrial uses and those uses approach closer to the tracks than the mix of residential and industrial uses north of the tracks. There is also much less vegetation along the southern side of the corridor between the railroad and the non-railroad uses.

The locations of the proposed new monopoles were not marked in the field but the numbering on the catenary structures in the field and in the ortho photos in Volume 2 of the application corresponded perfectly and were not only a help in the field review but a good reference system for some of the observations contained in these comments. Also noted in the field is the presence of various roads, closed roads, or occasional shelves of level land from former roads or paths which parallel the north side of the tracks either above or below the railroad grade which will simplify the task of constructing permanent access roads to maintain the structures of the new double circuit line in these areas.

Perhaps the area where the proposed new line comes into the closest proximity to residences is found on the eastern end of Pearl Hill Street, just west of Beardsley Avenue, in the area of catenary structure 904 where the new line may be as close as 50' to the nearest homes.

New apartments are under construction on the southern side of the rail corridor immediately west of High Street and west of the southern platform of the Milford train station in the area of catenary structure 910.

The Wepawaug River is crossed between catenary structures 914 and 915. Five turtles of about 12" in length and one smaller turtle were basking on the eastern bank of the river about

50' north of the rail bridge and two pairs of mallards were enjoying the afternoon sun near the western bank of the river in what remains a very natural setting at this point along the corridor.

Though Milford Cemetery was not entered to inspect any gravestones, from their appearance from the ROW, the oldest stones would appear to date from the 1700s. As the southerly edge of the cemetery will be spanned by the new lines with no structures placed in it, there should be no impact to the cemetery. Neither the temporary nor permanent access roads cross the portions of the cemetery nearest to the rail bed. The section of permanent access road just east of the cemetery will be up on land between the track embankment and Wetland M-W4 and thus will not impact that wetland.

Wetland M-W5 is red maple swamp with occasional areas of standing water as of the date of the field review. A paved but blocked off road that extends eastward from a factory parking lot will provide access to this section of the new line without disturbance to this large wetland.

As noted in the application, the tidally influenced wetlands adjacent to the Indian River are largely devoid of invasive species with only a narrow band of *Phragmites* observed along the western border of the wetlands. Interstate 95 is clearly seen north of the rail corridor from the Indian River crossing.

The Metro-North rail corridor expands to four tracks shortly east of the Indian River at catenary structure 937. The fourth track, which runs along the northern edge of the corridor, is very lightly used, assumedly limited to freight use. Unlike the other three tracks, it has wood ties rather than concrete ones.

A United Illuminating equipment and maintenance yard is located on the north side of the right-of-way at catenary structure 942. An industrial siding splits off the fourth track and runs around the eastern side of the UI facility.

An abandoned siding parallels the other four lines between catenary structures 946 to 947. The new easement areas to be acquired by UI are located on the northern side of the ROW between structures 942 to 951 and between structures 952 and 957.

At approximately catenary structure 949, approximately four miles into the project corridor, the field review ended abruptly as I was escorted off the Metro-North corridor by a Metropolitan Transportation Authority officer for lack of having official authorization to be on the line.

Project Permits and Approvals

The listing of DEEP permits and approvals contained in Table 8-1 of the application is accurate. Any impacts to flood storage from the placement of thirteen new monopoles in the FEMA-delineated floodplain would be evaluated as part of the Section 401 Water Quality Certification or under the Structures, Dredging and Fill Permit. Impacts to flood storage within any tidally-influenced areas are not a concern. As mentioned in Table 8-1, the Coastal Consistency Determination for the 2.52 miles of the project corridor that are within the Coastal Boundary is not a separate permit but will be included as an element of other DEEP permits.

Continued coordination with the DEEP Natural Diversity Data Base program is recommended as this project will take several years to complete the four individual phases, and as elements such as the specific placement of individual poles has not yet been finalized.

Miscellaneous Application Commentary

The washing and cleaning of construction mats prior to each new placement to avoid the spread of invasive species, as proposed on page 3-7 of the application, is a very beneficial practice worthy of specific mention, especially given the large number of individual wetland and watercourse crossings along the length of the project corridor.

The discussion of the lengths of the project corridor that are within the 100-year and 500-year flood zones (P. 5-14 of Volume I) is confusing in its wording. The description says that 2.16 miles of the railroad corridor are within the FEMA-designated 100-year floodplain and 1.22 miles of the corridor are within the 500-year floodplain. Since all of the 100-year floodplain is within the 500-year floodplain, the above description is assumed to mean that 2.16 miles of the railroad corridor are in the 100-year floodplain with an additional 1.22 miles being in the 500-year floodplain.

One other area concerning floodplain impacts meriting mention is the discussion of the project's impacts to floodplain storage on page 6-13. While not disputing the basic conclusion that the project's impacts on floodplain storage will not be significant, the comparison of the floodplain area occupied by the 13 monopole structures within the 500-year floodplain and the access roads to them to the total area of the watersheds of the affected watercourses is not a relevant or meaningful comparison. Comparing the project occupied area in the floodplain to the total area in the floodplain for each watercourse would be a somewhat more relevant comparison. However, since the impact to floodplain storage is a function of volume, not area, even that comparison is not very useful. The access roads occur at ground level and may not occupy any floodplain storage whereas the monopoles clearly occupy floodplain storage capacity, negligible as it may be. Nevertheless, DEEP will expect to have UI look at the lost floodplain storage on a volumetric basis and to analyze the impact of floodwater conveyance through a cross-section of the 100-year floodplain of each affected watercourse.

Thank you for the opportunity to review this petition and to submit these comments to the Council. Should Council members or Council staff have any questions, please feel free to contact me at (860) 424-4110 or at frederick.riese@ct.gov.

Respectfully yours,



Frederick L. Riese
Senior Environmental Analyst

cc: Commissioner Katie Dykes