

BRUCE L. MCDERMOTT  
203.772.7787 DIRECT TELEPHONE  
860.240.5723 DIRECT FACSIMILE  
BMCDERMOTT@MURTHALAW.COM

June 30, 2023

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

Re: Docket No. 516 – The United Illuminating Company Application for a Certificate of Environmental Compatibility and Public Need for the Fairfield to Congress Railroad Transmission Line 115-kV Rebuild Project

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council (“Council”) is The United Illuminating Company’s (“UI”) June 29, 2023 letter to the Connecticut State Historic Preservation Office (“SHPO”) concerning supplemental information to the Phase IA Cultural Resources Assessment Survey. Included as part of the submission to SHPO are visual simulations of proposed monopoles from visually impacted historic structures.

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

Should the Council have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,



Bruce L. McDermott

Enclosure

**Murtha Cullina LLP**  
265 Church Street  
New Haven, CT 06510  
T 203.772.7700  
F 203.772.7723



June 29, 2023

Ms. Marena Wisniewski  
Department of Economic and Community Development  
National Register Specialist  
450 Columbus Boulevard, Suite 5  
Hartford, Connecticut 06103

**RE: Supplemental Information, Phase IA Cultural Resource Assessment Survey, Fairfield to Congress Street Substation Railroad Transmission Line 115-kV, Rebuild Project, Fairfield and Bridgeport, Connecticut, ENV-23-0716**

Dear Ms. Wisniewski,

On behalf of The United Illuminating Company (UI), thank you for your letter of April 24, 2023 regarding the review of the previously submitted supplemental information to the Phase 1A Cultural Resources Assessment Survey (February, 2023) for the Fairfield to Congress Street Substation Railroad Transmission Line 115-kV Rebuild Project (the Project) in Fairfield and Bridgeport, Connecticut. UI welcomes the opportunity to coordinate further with the State Historic Preservation Office (SHPO) regarding the mitigation of any adverse effects to historic resources that may result from the Project.

In response to your request for additional information regarding the Project, UI provides the following:

- 1. Analysis of Potential Reuse of Existing Catenary Structures.** As part of the Project planning process, UI conducted an extensive evaluation of alternatives for rebuilding the 115-kV lines. This process, which included an assessment of the potential for reusing or rebuilding the catenary structures owned by the Connecticut Department of Transportation (CT DOT), is summarized in Section 9 of UI's Project Application to the Connecticut Siting Council (CSC) for a Certificate of Environmental Compatibility and Public Need (CSC Docket No. 516). Overall, UI determined that costly and time-consuming structural modifications to upgrade the existing railroad catenary structures and UI bonnets (infrastructure on top of the catenary support columns) would be necessary. More importantly, maintaining the 115-kV lines on the railroad catenary structures would be inconsistent with CT DOT's current plans to improve railroad service and would continue to hamper CT DOT's maintenance of its railroad lines and equipment, which requires coordination with UI for transmission line outages. CT DOT commented on the reuse of the catenary structures and its future plans for railroad upgrades in general as part of UI's Milvon to West River Railroad Rebuild Project (CSC Docket No. 508; [https://portal.ct.gov/-/media/CSC/1\\_Dockets-medialibrary/1\\_MEDIA\\_DO500\\_600/DO508/PROCEDURALCORRES/DO508-SACRCDPI\\_DOT.pdf](https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/1_MEDIA_DO500_600/DO508/PROCEDURALCORRES/DO508-SACRCDPI_DOT.pdf)); CT DOT has stated that these comments also apply to the current Fairfield to Congress Project.
- 2. Additional Photosimulations of Proposed Monopoles from Visually Impacted Historic Structures.** The attached visual simulations provide the additional information requested in the April 24, 2023 letter. These visual simulations were prepared by Mr. Brian Gaudet of All-Points technology Corporation, working in cooperation with Heritage Consultants, LLC (Heritage); all

potential monopole locations depicted in the simulations were verified by UI, based on current Project design plans. These photo-simulations were prepared for areas determined in consultation with the SHPO as priority locations. They correspond to some of the previously identified National Register of Historic Places, State Register of Historic Places, and Local Historic Districts identified by Heritage during a study of above-ground resources located within 0.5 mile of the Project.

As presented in a phone call by Mr. Gaudet and agreed to by SHPO on May 11, 2023, please note that some of the visual simulations reflect “leaf on” conditions, whereas others reflect “leaf off” conditions.

The UI Project team’s internal review of the visual simulations determined that in many areas along the Project route, the “visual clutter” in the viewshed will be reduced by the removal of numerous existing overhead electrical wires and structures. In addition, the removal of the bonnets on top of the catenaries along the CT DOT corridor, will also result in a reduction of visual intrusions in the viewshed and will return the railroad to more of its original historic character.

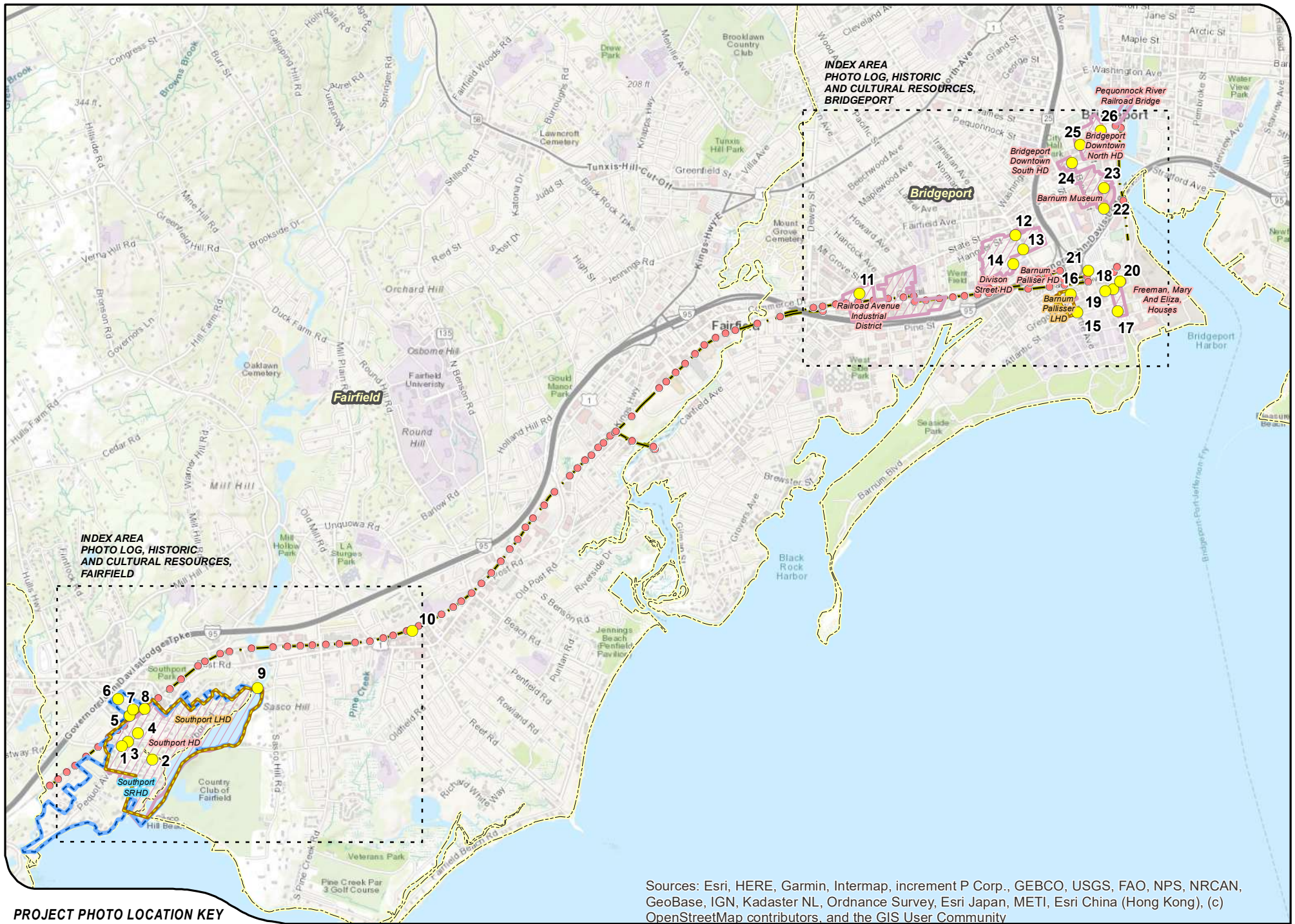
UI looks forward to your evaluation of the visual simulations and to continuing to work with you regarding the mitigation of impacts to historic resources from this important Project. If you have any questions, please feel free to contact me at [dgeorge@heritage-consultants.com](mailto:dgeorge@heritage-consultants.com) or by phone at 860.299.6328.

Sincerely,



David R. George, M.A., R.P.A.  
Heritage Consultants, LLC

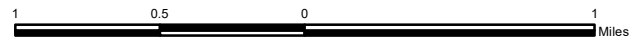
Encl.

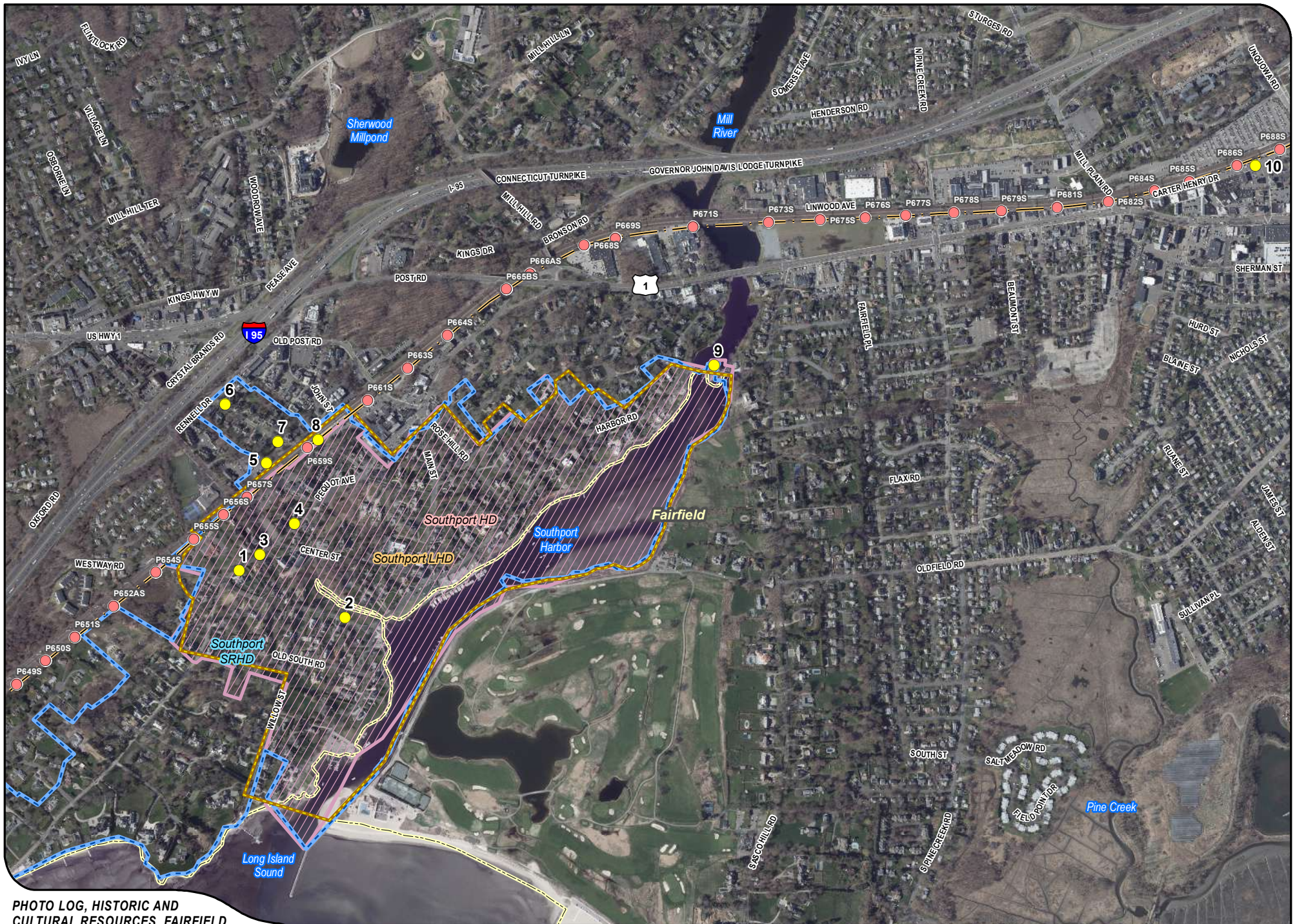


Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

**PROJECT PHOTO LOCATION KEY**

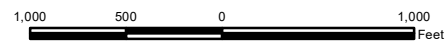
- Legend**
- Photographic Location
  - Proposed Structure
  - Local Historic District
  - State Register Historic Area
  - Project Transmission Line
  - Municipal Boundary
  - National Register Historic Area





**PHOTO LOG, HISTORIC AND CULTURAL RESOURCES, FAIRFIELD (PHOTOS 1-10)**

- Legend
- Photographic Location
  - Local Historic District
  - National Register Historic Area
  - State Register Historic Area
  - Proposed Structure
  - Project Transmission Line
  - Municipal Boundary





PHOTOGRAPHED ON 1/19/2022

**EXISTING**

PHOTO

1

LOCATION

**PEQUOT AVENUE - SOUTHPORT HISTORIC DISTRICT**

ORIENTATION

**NORTHWEST**





*Photo-Simulation Based  
on 70% Design Drawings*

**PROPOSED**

PHOTO

1

LOCATION

**PEQUOT AVENUE - SOUTHPORT HISTORIC DISTRICT**

ORIENTATION

**NORTHWEST**





PHOTOGRAPHED ON 5/21/2023

**EXISTING**

PHOTO

2

LOCATION

**WESTWAY ROAD - SOUTHPORT HISTORIC DISTRICT**

ORIENTATION

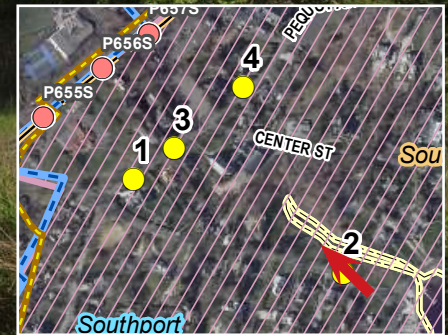
**NORTHWEST**







*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

2

LOCATION

**WESTWAY ROAD - SOUTHPORT HISTORIC DISTRICT**

ORIENTATION

**NORTHWEST**



PHOTOGRAPHED ON 5/21/2023

**EXISTING**

PHOTO

3

LOCATION

678 PEQUOT AVENUE

ORIENTATION

NORTHWEST



*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

3

LOCATION

**678 PEQUOT AVENUE**

ORIENTATION

**NORTHWEST**



**EXISTING**

PHOTO

4

LOCATION

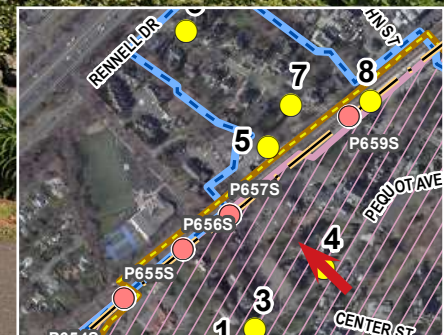
**560 PEQUOT AVENUE**

ORIENTATION

**NORTHWEST**



*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

4

LOCATION

**560 PEQUOT AVENUE**

ORIENTATION

**NORTHWEST**



PHOTOGRAPHED ON 6/7/2023

**EXISTING**

PHOTO

5

LOCATION

**SOUTHPORT TRAIN STATION**

ORIENTATION

**SOUTHWEST**





*Photo-Simulation Based  
on 70% Design Drawings*

**PROPOSED**

PHOTO

5

LOCATION

**SOUTHPORT TRAIN STATION**

ORIENTATION

**SOUTHWEST**



PHOTOGRAPHED ON 5/21/2023

**EXISTING**

PHOTO

6

LOCATION

**SPRUCE STREET - SOUTHPORT HISTORIC DISTRICT**

ORIENTATION

**SOUTHEAST**





*Photo-Simulation Based  
on 70% Design Drawings*

**PROPOSED**

PHOTO

6

LOCATION

**SPRUCE STREET - SOUTHPORT HISTORIC DISTRICT**

ORIENTATION

**SOUTHEAST**



**EXISTING**

PHOTO

7

LOCATION

**SPRUCE STREET - SOUTHPORT HISTORIC DISTRICT**

ORIENTATION

**SOUTHEAST**



*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

7

LOCATION

**SPRUCE STREET - SOUTHPORT HISTORIC DISTRICT**

ORIENTATION

**SOUTHEAST**





**EXISTING**

PHOTO

8

LOCATION

**STATION STREET - SOUTHPORT TRAIN STATION**

ORIENTATION

**NORTHEAST**



*Photo-Simulation Based  
on 70% Design Drawings*

**PROPOSED**

PHOTO

8

LOCATION

**STATION STREET - SOUTHPORT TRAIN STATION**

ORIENTATION

**NORTHEAST**



PHOTOGRAPHED ON 1/19/2022

**EXISTING**

PHOTO

9

LOCATION

**HARBOR ROAD - SOUTHPORT**

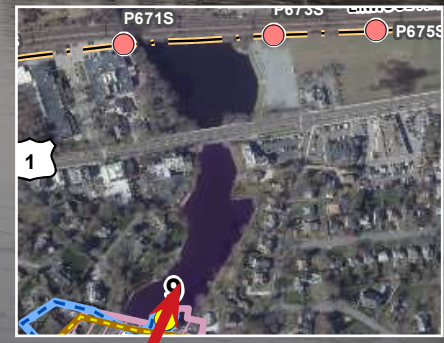
ORIENTATION

**NORTHEAST**





*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

9

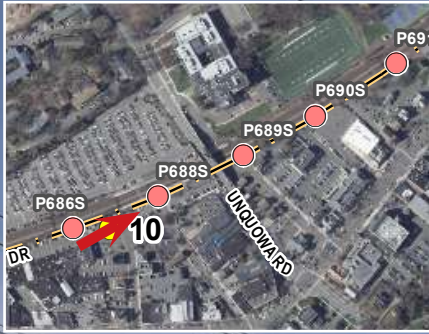
LOCATION

**HARBOR ROAD - SOUTHPORT**

ORIENTATION

**NORTHEAST**





PHOTOGRAPHED ON 1/19/2022

**EXISTING**

PHOTO

10

LOCATION

**CARTER HENRY DRIVE AT MILLER STREET - FAIRFIELD TRAIN STATION**

ORIENTATION

**NORTHEAST**







*Photo-Simulation Based on 70% Design Drawings*

**PROPOSED**

PHOTO

10

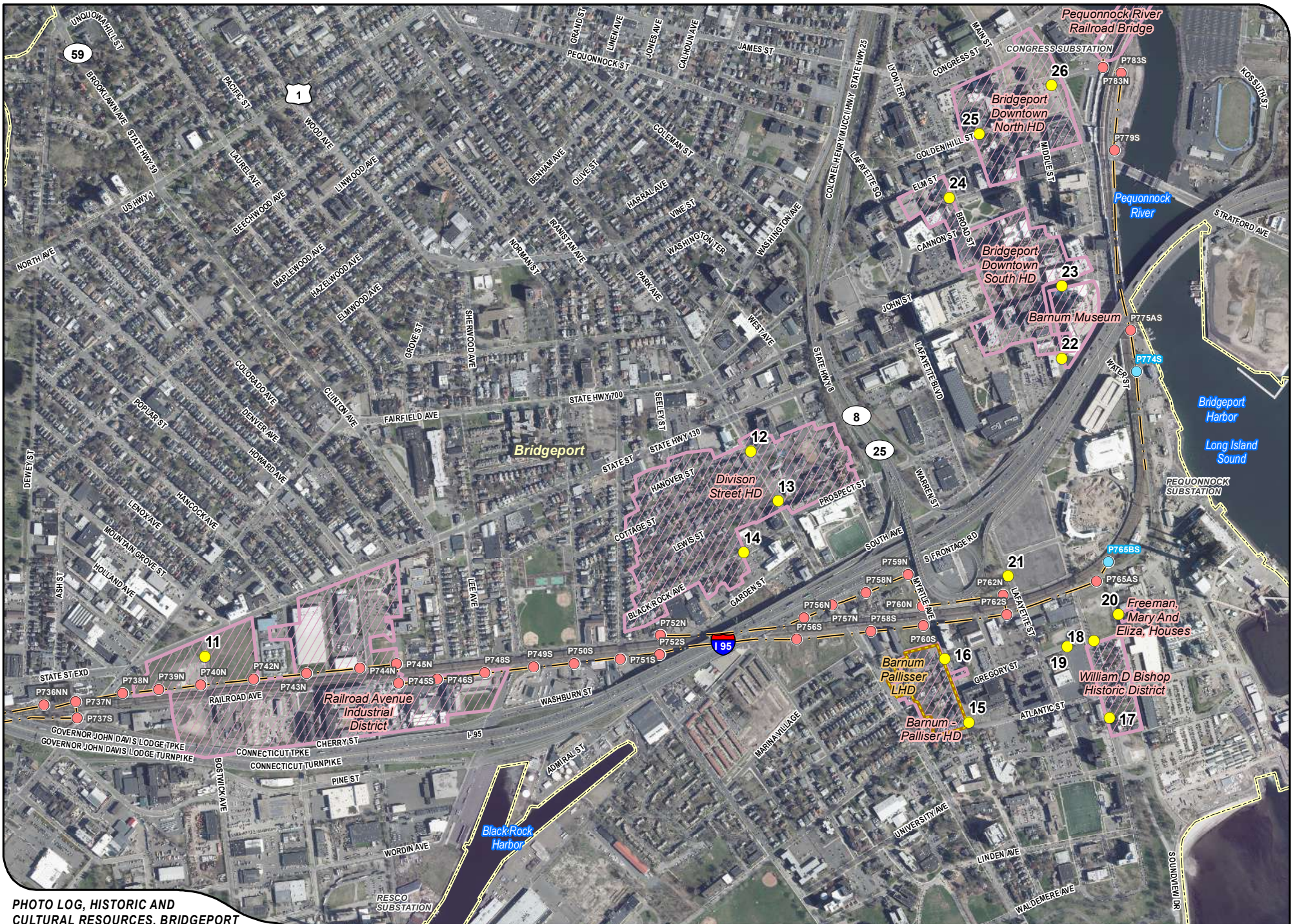
LOCATION

**CARTER HENRY DRIVE AT MILLER STREET - FAIRFIELD TRAIN STATION**

ORIENTATION

**NORTHEAST**

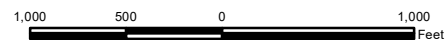




**PHOTO LOG, HISTORIC AND CULTURAL RESOURCES, BRIDGEPORT (PHOTOS 11-26)**

**Legend**

- Photographic Location
- Local Historic District
- National Register Historic Area
- Proposed Structure
- State Register Historic Area
- Project Transmission Line
- Municipal Boundary
- Structure Approved in CSC Docket No. 483





**EXISTING**

PHOTO

11

LOCATION

**BOSTWICK AVENUE - BRIDGEPORT**

ORIENTATION

**SOUTHEAST**



PHOTOGRAPHED ON 11/19/2022



*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

11

LOCATION

**BOSTWICK AVENUE - BRIDGEPORT**

ORIENTATION

**SOUTHEAST**



**EXISTING**

PHOTO

12

LOCATION

**PARK AVENUE - DIVISION STREET HISTORIC DISTRICT**

ORIENTATION

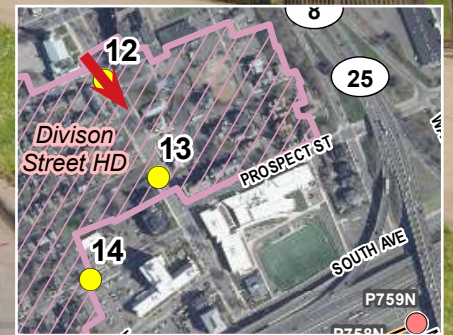
**SOUTHEAST**



PHOTOGRAPHED ON 5/21/2023



*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

12

LOCATION

**PARK AVENUE - DIVISION STREET HISTORIC DISTRICT**

ORIENTATION

**SOUTHEAST**



**EXISTING**

PHOTO

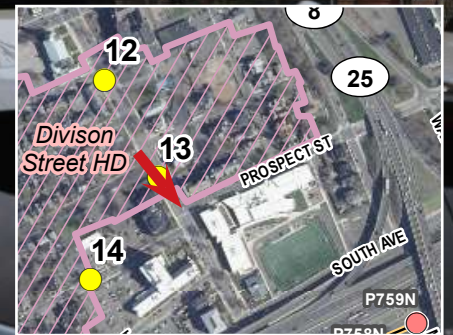
13

LOCATION

**PARK AVENUE - DIVISION STREET HISTORIC DISTRICT**

ORIENTATION

**SOUTHEAST**



PHOTOGRAPHED ON 5/21/2023



*Photo-Simulation Based  
on 70% Design Drawings*

**PROPOSED**

PHOTO

13

LOCATION

**PARK AVENUE - DIVISION STREET HISTORIC DISTRICT**

ORIENTATION

**SOUTHEAST**





PHOTOGRAPHED ON 1/19/2022

**EXISTING**

PHOTO

14

LOCATION

**BLACK ROCK AVENUE - BRIDGEPORT**

ORIENTATION

**SOUTHEAST**



*Photo-Simulation Based  
on 70% Design Drawings*

**PROPOSED**

PHOTO

14

LOCATION

**BLACK ROCK AVENUE - BRIDGEPORT**

ORIENTATION

**SOUTHEAST**



**EXISTING**

PHOTO

15

LOCATION

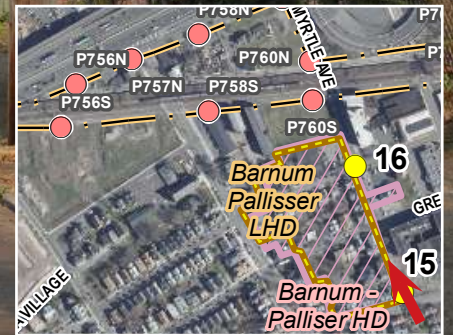
**MYRTLE AVENUE - BARNUM-PALLISER HISTORIC DISTRICT**

ORIENTATION

**NORTHWEST**



*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

15

LOCATION

**MYRTLE AVENUE - BARNUM-PALLISER HISTORIC DISTRICT**

ORIENTATION

**NORTHWEST**



**EXISTING**

PHOTO

16

LOCATION

**MYRTLE AVENUE - BARNUM-PALLISER HISTORIC DISTRICT**

ORIENTATION

**NORTHWEST**



PHOTOGRAPHED ON 5/21/2023



*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

16

LOCATION

**MYRTLE AVENUE - BARNUM-PALLISER HISTORIC DISTRICT**

ORIENTATION

**NORTHWEST**



PHOTOGRAPHED ON 5/29/2023

**EXISTING**

PHOTO

17

LOCATION

**BROAD STREET - WILLIAM D BISHOP HISTORIC DISTRICT**

ORIENTATION

**NORTH**



*Photo-Simulation Based on 70% Design Drawings*



**PROPOSED**

PHOTO

17

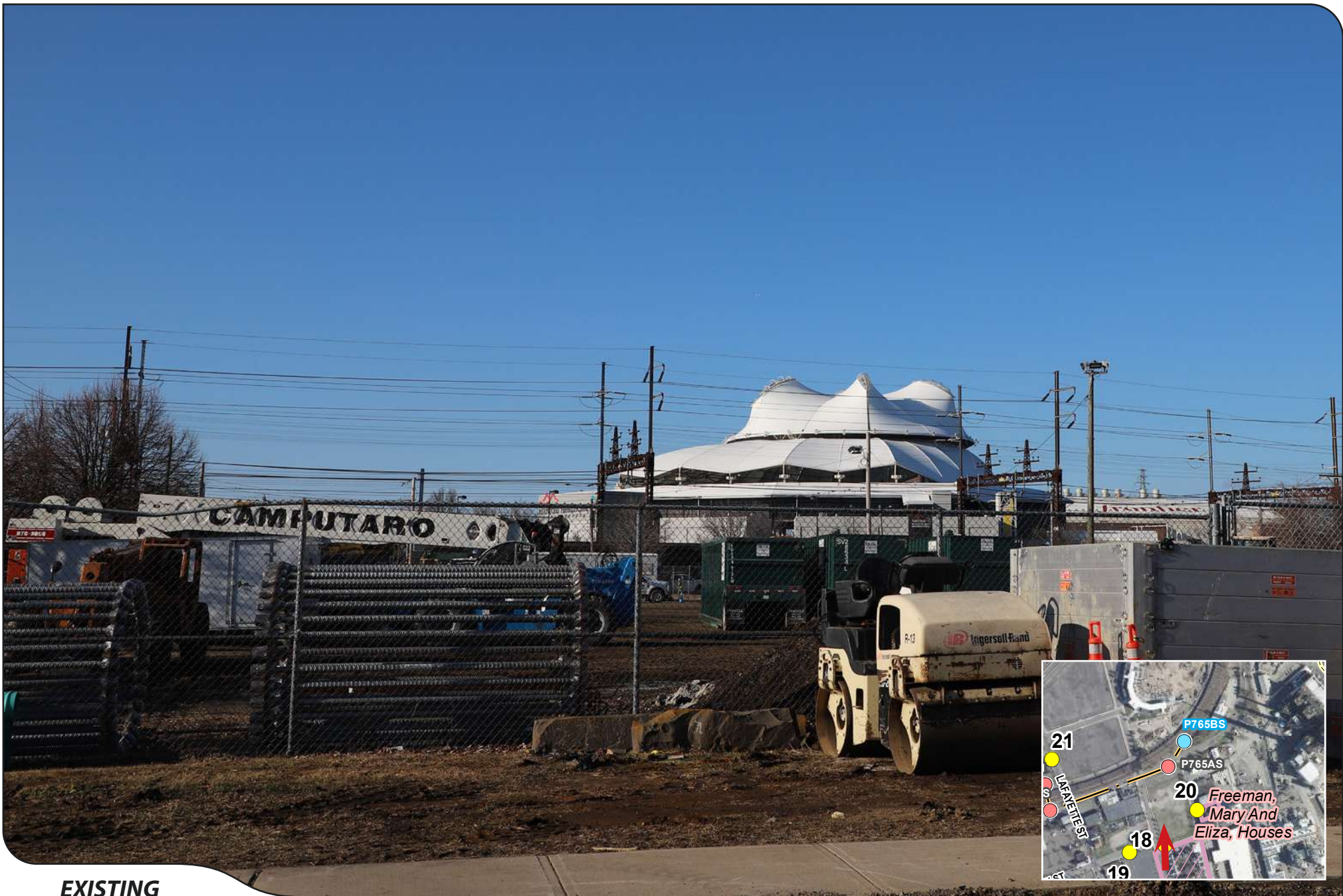
LOCATION

**BROAD STREET - WILLIAM D BISHOP HISTORIC DISTRICT**

ORIENTATION

**NORTH**





PHOTOGRAPHED ON 1/19/2022

**EXISTING**

PHOTO

18

LOCATION

**WHITING STREET - WILLIAM D BISHOP HISTORIC DISTRICT**

ORIENTATION

**NORTH**

THIS STRUCTURE WAS APPROVED UNDER CT SITING COUNCIL DOCKET NO. 483  
BUT IS NOT YET INSTALLED



*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

18

LOCATION

WHITING STREET - WILLIAM D BISHOP HISTORIC DISTRICT

ORIENTATION

NORTH



**EXISTING**

PHOTO

19

LOCATION

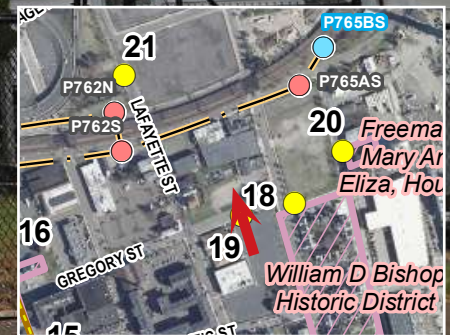
**BISHOP JC WHITE BOULEVARD - WALTER'S MEMORIAL AME ZION CHURCH**

ORIENTATION

**NORTH**



*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

19

LOCATION

**BISHOP JC WHITE BOULEVARD - WALTER'S MEMORIAL AME ZION CHURCH**

ORIENTATION

**NORTH**



**EXISTING**

PHOTO

20

LOCATION

**MAIN STREET - MARY AND ELIZA FREEMAN HOUSES**

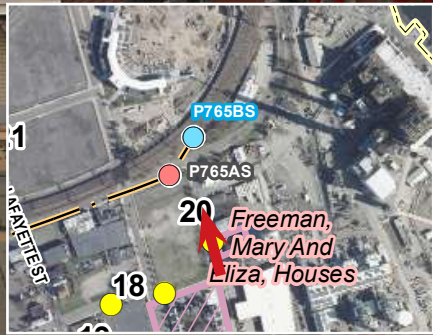
ORIENTATION

**NORTH**

THIS STRUCTURE WAS APPROVED UNDER CT SITING COUNCIL DOCKET NO. 483  
BUT IS NOT YET INSTALLED



*Photo-Simulation Based  
on 70% Design Drawings*



**PROPOSED**

PHOTO

20

LOCATION

**MAIN STREET - MARY AND ELIZA FREEMAN HOUSES**

ORIENTATION

**NORTH**



**EXISTING**

PHOTO

21

LOCATION

**531 LAFAYETTE STREET - DAVID PERRY HOUSE**

ORIENTATION

**SOUTHEAST**



*Photo-Simulation Based on 70% Design Drawings*

**PROPOSED**

PHOTO	LOCATION	ORIENTATION
21	531 LAFAYETTE STREET - DAVID PERRY HOUSE	SOUTHEAST





PHOTOGRAPHED ON 5/21/2023

**EXISTING**

PHOTO

22

LOCATION

**MAIN STREET - BARNUM MUSEUM**

ORIENTATION

**EAST**



*Photo-Simulation Based on 70% Design Drawings*

**PROPOSED**

PHOTO

22

LOCATION

**MAIN STREET - BARNUM MUSEUM**

ORIENTATION

**EAST**



**EXISTING**

PHOTO

23

LOCATION

**STATE STREET - BRIDGEPORT DOWNTOWN HISTORIC DISTRICT**

ORIENTATION

**NORTHEAST**



PHOTOGRAPHED ON 5/21/2023



*Photo-Simulation Based  
on 70% Design Drawings*

**PROPOSED**

PHOTO

23

LOCATION

**STATE STREET - BRIDGEPORT DOWNTOWN HISTORIC DISTRICT**

ORIENTATION

**NORTHEAST**





**EXISTING**

PHOTO

24

LOCATION

**FAIRFIELD AVENUE - BRIDGEPORT DOWNTOWN HISTORIC DISTRICT**

ORIENTATION

**EAST**



*Photo-Simulation Based  
on 70% Design Drawings*

**PROPOSED**

PHOTO

24

LOCATION

**FAIRFIELD AVENUE - BRIDGEPORT DOWNTOWN HISTORIC DISTRICT**

ORIENTATION

**EAST**



**EXISTING**

PHOTO

25

LOCATION

**GOLDEN HILL STREET - BRIDGEPORT DOWNTOWN HISTORIC DISTRICT**

ORIENTATION

**EAST**



*Photo-Simulation Based on 70% Design Drawings*

**PROPOSED**

PHOTO

25

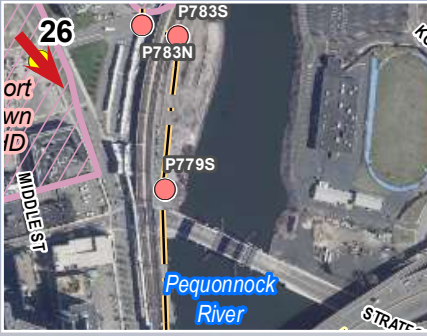
LOCATION

**GOLDEN HILL STREET - BRIDGEPORT DOWNTOWN HISTORIC DISTRICT**

ORIENTATION

**EAST**





PHOTOGRAPHED ON 1/19/2022

**EXISTING**

PHOTO

26

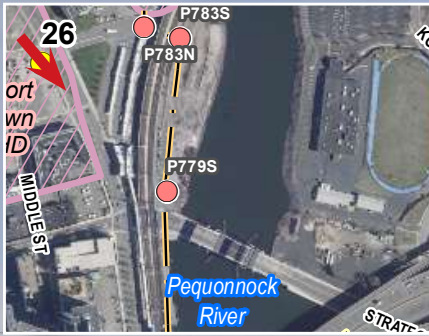
LOCATION

**WATER STREET - BRIDGEPORT**

ORIENTATION

**SOUTHEAST**





*Photo-Simulation Based on 70% Design Drawings*

**PROPOSED**

PHOTO

26

LOCATION

**WATER STREET - BRIDGEPORT**

ORIENTATION

**SOUTHEAST**

