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October 3, 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 Pre-Filed Testimony of Correne Auer concerning the use of 100-year and 500-year “floodplain” terms.

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

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STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

The United Illuminating Company Application for a : Docket No. 516  
Certificate of Environmental Compatibility and Public :  
Need for the Fairfield to Congress Railroad :  
Transmission Line 115-kV Rebuild Project : October 3, 2023

**PRE-FILED TESTIMONY OF CORRENE AUER**

Q. Please state your name, relation to the applicant and business address.

A. My name is Correne Auer. I am a Manager for Environmental Programs/Projects at The United Illuminating Company. My business address is 100 Marsh Hill Road, Orange, CT 06477.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony is to further describe the use of 100-year and 500-year “floodplain” term in different sections of UI’s Siting Council application.

Q. What did UI intend when using those terms in the application?

A. UI intended the term “floodplain” to convey that the locations of selected proposed monopoles are within a flood hazard area classified by the Federal Emergency Management Agency (FEMA) as “Special Flood Hazard Area” (100-year flood hazard zone) or a “Moderate Flood Zone” (500-year flood hazard zone). FEMA describes the 100-year flood hazard zone as an “area that will be inundated by the flood event having a 1% chance of being equaled or exceeded in any given year, also commonly referred to as the base flood, or 100-year flood zone area”. FEMA describes the 500-year flood hazard zone as an “area that will be inundated by the

flood event having a 0.2% chance of being equaled or exceeded in any given year, also commonly referred to as the 500-year flood zone”.

Q. What additional information on this topic is provide in the docket?

A. In addition to UI’s flood risk analysis, a comprehensive wetland survey was commissioned by UI along the project corridor (appended to the Application’s Ecological Report). UI’s flood risk and wetland analysis of the monopole areas located in the 100-year and 500-year flood hazard zones are further explained in Late File Exhibit 3 that was filed with the Council on August 22, 2023 as well as in Late File Exhibit 2-4 that was filed with the Council on October 3, 2023.

Q. Is there any additional information you would like to provide?

A. Yes. In order to complement the application’s flood risk and wetland analysis UI developed a summary table (Attachment 1) and associated mapping to further illustrate the physical characteristics of the area where the monopoles in question are located.

Q. What does the table show?

A. The table lists the proposed poles that are located within the FEMA flood hazard type classification “Special Flood Hazard Area” and the “Moderate Flood Zone” referred to by UI throughout the application as areas within the 100-year and 500-year “floodplains”, respectively.

The Table also lists the findings of State wetland designation of the proposed monopole locations based on available mapping resources as well as the findings

of the of the UI-commissioned wetlands field survey for the project. The proposed locations are not defined as wetlands based on the results of the above-mentioned mapping analysis and results of the field survey investigation conducted for the project.

As indicated in the table, soils within the area of the proposed monopoles are classified by the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) as human-altered and human-transported (HAHT) soils. HAHT soils are likely to have been significantly changed by human-transported materials or human-altered materials.

Municipal zoning code and area type description for each monopole proposed location, along with descriptions of the immediate surrounding areas are also included in the table. This information is provided to further enhance that the proposed location of monopoles within the 100-year and 500-year flood zone areas were selected in locations that are highly urbanized.

Visual representations of the monopoles are presented in Attachment 2. The first page of the mapping depicts a general aerial overview of the proposed poles within the 100-year and 500-year flood zone hazard areas. Sheets 1-7 provide zoomed-in aerial imagery of the proposed pole locations, USDA's NRCS mapped soil types, and FEMA's Special and Moderate Flood Hazard layers.

Q. Does this conclude your testimony?

A. Yes.



Attachment 1

Pole ID #	FEMA Flood Zone Type	Flood Zone Description	Located in State Designated Wetland?	Located in Project Delineated Wetland?	Soil Type Mapping	Area Type	Proposed Structure Area Type Description	Municipal Zoning District
EXAMPLE	Special Flood Hazard Area	Area that will be inundated by the flood event having a 1% chance of being equaled or exceeded in any given year. Also referred to as the base flood or 100-year flood.	No	No	Urban fill	Commercial	Structure is located in paved commercial lot, and within a grassy island.	Heavy Commercial-Wholesale
P654S	Special Flood Hazard Area	Area that will be inundated by the flood event having a 1% chance of being equaled or exceeded in any given year. Also referred to as the base flood or 100-year flood.	No	No	Agawam-Urban Land Complex	Residential	Partially wooded, undeveloped parcel owned by CT DOT	Residence R-3 District (R-3)
P698S			No	No	Urban Land	Commercial	Railroad embankment upgradient of paved parking area	Designed Commercial District (DCD)
P699S			No	No	Urban Land	Commercial	Railroad embankment adjacent to gravel storage yard and drainage swale	Designed Commercial District (DCD)
P700S			No	No	Urban Land	Commercial	Wooded area adjacent to drainage swale and paved parking	Designed Commercial District (DCD)
P701S			No	No	Urban Land	Commercial	Wooded area adjacent to drainage swale and paved parking	Designed Commercial District (DCD)
P703S			No	No	Urban Land	Commercial	Brush area on commercial property adjacent to drainage swale and paved parking	Designed Commercial District (DCD)
P704S			No	No	Urban Land	Commercial	Brush area adjacent to concrete lined drainage swale and paved parking	Designed Commercial District (DCD)
P706S			No	No	Urban Land	Commercial	Wooded area adjacent to concrete lined drainage swale and box culvert	Designed Commercial District (DCD)
P708S			No	No	Udorthents-Urban Land Complex	Commercial	Wooded area on commercial property adjacent to railroad corridor	Designed Commercial District (DCD)
P713ES-1			No	No	Udorthents	Industrial	Brush embankment adjacent to Ash Creek, Kenard St, and Fairfield Metro Conservation Area	Designed Industrial District (DI)
P713ES-2			No	No	Udorthents	Industrial	Brush embankment adjacent to Ash Creek Substation and Ash Creek	Utility-Energy Infrastructure (P4)
P714WS-1			No	No	Udorthents	Industrial	Brush embankment adjacent to Ash Creek, Kenard St, and Fairfield Metro Conservation Area	Designed Industrial District (DI)
P714WS-2			No	No	Urban Land	Industrial	Brush embankment adjacent to Ash Creek Substation and Ash Creek	Utility-Energy Infrastructure (P4)
P730S			No	No	Udorthents-Urban Land Complex	Industrial	Railroad embankment adjacent to gravel/paved areas	Neighborhood Mix 2 (NX2)
P733S			No	No	Udorthents-Urban Land Complex	Industrial	Railroad embankment adjacent to gravel/paved areas	Neighborhood Mix 2 (NX2)
P749S			No	No	Urban Land	Industrial	Grass island adjacent to Railroad Ave and paved/gravel areas	Heavy Commercial-Wholesale (CX)
P750S			No	No	Urban Land	Industrial	Grass island adjacent to Railroad Ave and paved/gravel areas	Heavy Commercial-Wholesale (CX)
P751S			No	No	Urban Land	Industrial	Grass island adjacent to Railroad Ave and paved/gravel areas	Heavy Commercial-Wholesale (CX)
P752S			No	No	Urban Land	Industrial	Grass island adjacent to Railroad Ave and paved/gravel areas	Heavy Commercial-Wholesale (CX)
P752N			No	No	Urban Land	Commercial	Paved parking adjacent to Railroad Ave	Residential-Office Center (RX2)
P762S			No	No	Urban Land	Commercial	Grass/gravel area adjacent to Railroad Ave	Residential-Office Center (RX2)
P762N			No	No	Urban Land	Other	Grass area adjacent to Railroad Ave	Downtown Edge (DX2)
P765AS			No	No	Urban Land	Industrial	Grass/gravel area adjacent to Railroad Ave	Residential-Office Center (RX2)
P779S	No	No	Urban Land	Urbanized	Gravel area in "Sliver by the River" adjacent to Straford Ave and Pequonnock River	Parks and Open Space (P1)		
P783S	No	No	Urban Land	Urbanized	Gravel area in "Sliver by the River"	Parks and Open Space (P1)		
P783N	No	No	Urban Land	Urbanized	Grass Island adjacent to Bridgeport Transportation Center and Congress Street Substation	Downtown Edge (DX2)		
P695S	Special Flood Hazard Area	Area that will be inundated by the flood event having a 0.2% chance of being equaled or exceeded in any given year. Also referred to as the 500-year flood zone.	No	No	Urban Land	Commercial	Grass area adjacent to paved parking lot and railroad embankment	Designed Commercial District (DCD)
P696S			No	No	Urban Land (307)	Other	At toe of railroad embankment in vegetated area adjacent to Fairfield's Jennings Park	Residence A District (A)
P710S			No	No	Udorthents-Urban Land Complex (306)	Residential	In CTDOT corridor ROW, adjacent to railroad and residential	Residence B District (B)
P712S			No	No	Udorthents-Urban Land Complex (306)	Industrial	In CTDOT corridor ROW, in railroad embankment adjacent to paved lot	Designed Industrial District (DI)
P714WS-3 (OPGW only)			No	No	Urban Land (307)	Industrial	Within fenceline of Ash Creek Substation	Utility-Energy Infrastructure (P4)
P728S (see note 1)			No	No	Udorthents-Urban Land Complex (306)	Commercial	Paved parking area	Designed Industrial District (DI)
P737S			No	No	Urban Land (307)	Urbanized	Grass embankment between CTDOT corridor, I-95 and Fairfield Ave	CTDOT ROW
P738N			No	No	Urban Land (307)	Urbanized	Grass adjacent to Railroad Ave	Residential-Office Center (RX2)
P739N			No	No	Urban Land (307)	Urbanized	Grass adjacent to Railroad Ave	Residential-Office Center (RX2)
P736NN (see note 2)			None	N/A	No	No	Udorthents-Urban Land Complex (306)	Commercial

Note 1: P728S was not included in Table 6.3 on Page 6-12 of the CSC Application. Minor adjustment of proposed pole location during design efforts following CSC submission has resulted in existing surface grade to be within 500 year flood zone limits by 0.2 approximately vertical feet.

Note 2: P736NN was included in Table 6.3 on Page 6.12 of the CSC Application, however the proposed pole location has been subsequently determined to not be located in any flood zone due to the existing ground surface elevation at the proposed location.

# Attachment 2

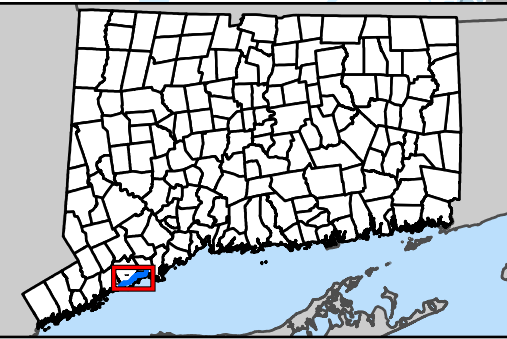
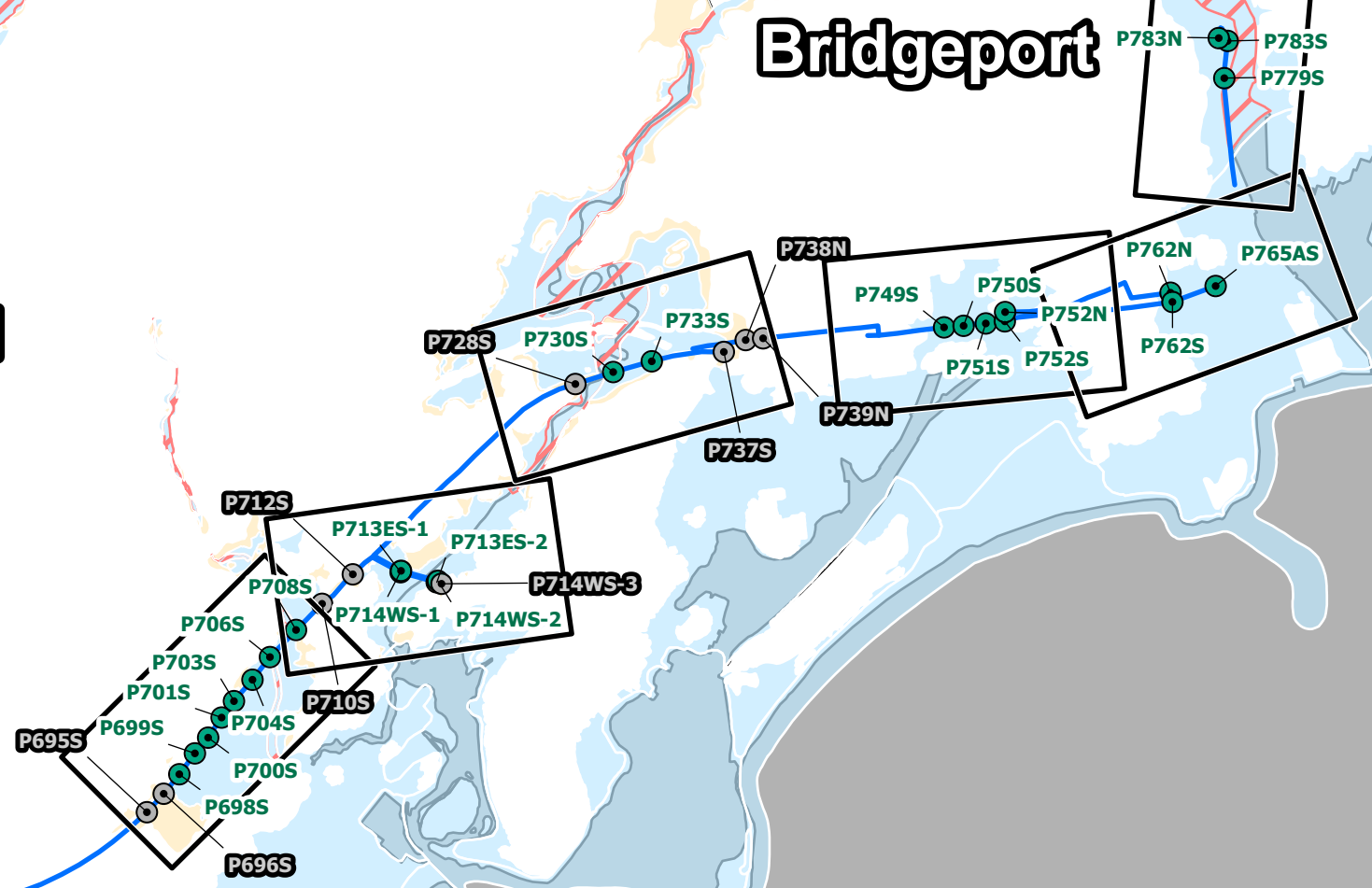
## Fairfield

## Bridgeport

## Westport

## Long Island Sound

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### Map Legend

- Map Book Page
- Proposed Alignment of Rebuilt 115-kV Line
- Proposed Transmission Structure within 100 Year Flood Hazard Zone
- Proposed Transmission Structure within 500 Year Flood Hazard Zone
- 1% Annual Flood Chance
- Regulatory Floodway
- 0.2% Annual Flood Chance

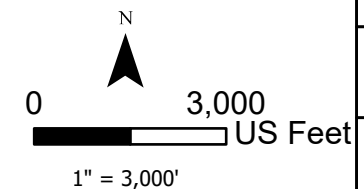
### UI 115 KV RAILROAD PROJECT – FAIRFIELD TO CONGRESS

FAIRFIELD & BRIDGEPORT, CT



**Westwood**

OVERVIEW



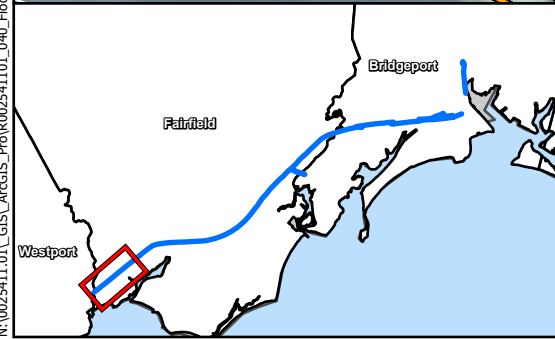
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Linear Units: Foot US  
Revised: 9/22/2023



Map Unit Symbol	Map Unit Name
229B	Agawam-Urban land complex, 0 to 8 percent slopes
307	Urban land
306	Udorthents-Urban land complex
308	Udorthents, smoothed



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**Map Legend**

- Proposed Transmission Structure within 100 Year Flood Hazard Zone
- Proposed Alignment of Rebuilt 115-kV Line
- 1% Annual Flood Chance
- 0.2% Annual Flood Chance
- Soil Unit Boundary (USDA NRCS Web Soil Survey)

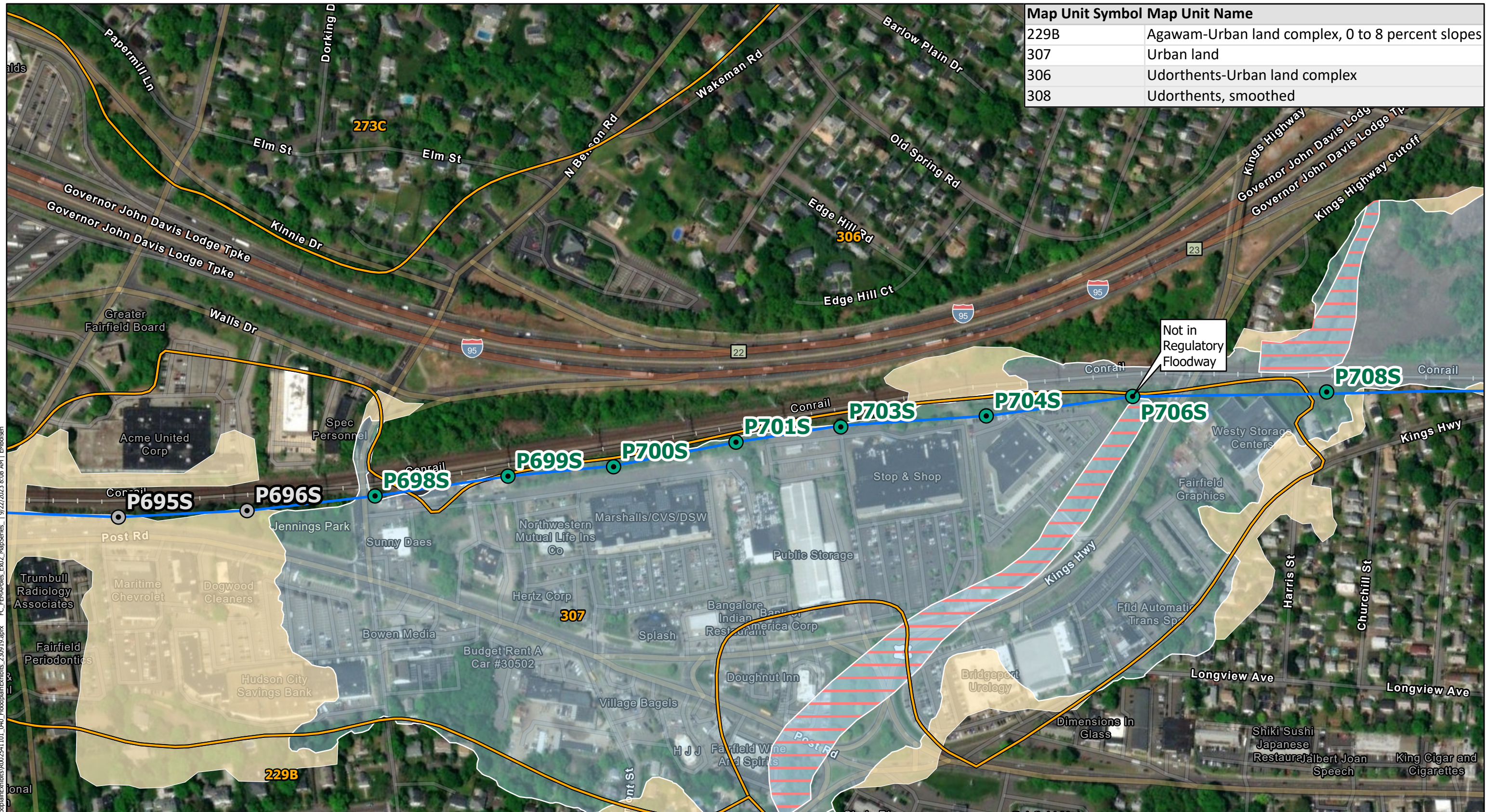
**UI 115 KV RAILROAD PROJECT – FAIRFIELD TO CONGRESS**  
FAIRFIELD & BRIDGEPORT, CT

Coordinate System:  
NAD 1983 (2011) State Plane Connecticut FIPS 0600 (US Feet)  
Linear Units: Foot US  
Revised: 9/22/2023

SHEET 1 OF 7



Map Unit Symbol	Map Unit Name
229B	Agawam-Urban land complex, 0 to 8 percent slopes
307	Urban land
306	Udorthents-Urban land complex
308	Udorthents, smoothed



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**Map Legend**

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**UI 115 KV RAILROAD PROJECT – FAIRFIELD TO CONGRESS**  
 FAIRFIELD & BRIDGEPORT, CT

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 NAD 1983 (2011) State Plane Connecticut FIPS 0600 (US Feet)  
 Linear Units: Foot US

Revised: 9/22/2023

SHEET 2 OF 7



Map Unit Symbol	Map Unit Name
229B	Agawam-Urban land complex, 0 to 8 percent slopes
307	Urban land
306	Udorthents-Urban land complex
308	Udorthents, smoothed



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**Map Legend**

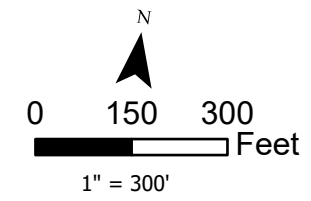
- Proposed Transmission Structure within 100 Year Flood Hazard Zone
- Proposed Transmission Structure within 500 Year Flood Hazard Zone
- Proposed Alignment of Rebuilt 115-kV Line
- 1% Annual Flood Chance
- Regulatory Floodway
- 0.2% Annual Flood Chance
- Soil Unit Boundary (USDA NRCS Web Soil Survey)

**UI 115 KV RAILROAD PROJECT – FAIRFIELD TO CONGRESS**  
 FAIRFIELD & BRIDGEPORT, CT

Coordinate System:  
 NAD 1983 (2011) State Plane Connecticut FIPS 0600 (US Feet)  
 Linear Units: Foot US

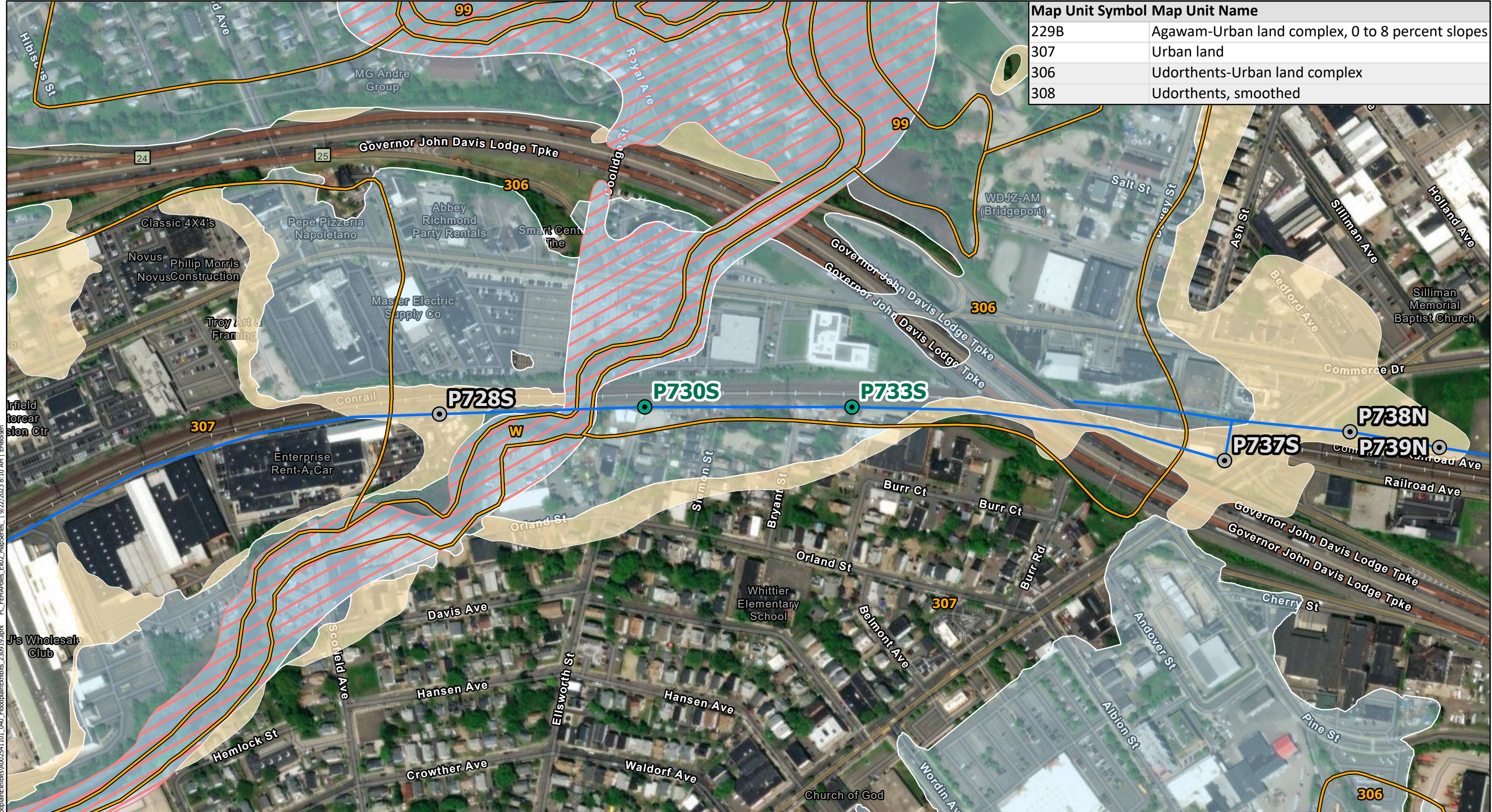
Revised: 9/22/2023

SHEET 3 OF 7





Map Unit Symbol	Map Unit Name
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307	Urban land
306	Udorthents-Urban land complex
308	Udorthents, smoothed



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**Map Legend**

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- Proposed Transmission Structure within 500 Year Flood Hazard Zone
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- Regulatory Floodway
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**UI 115 KV RAILROAD PROJECT – FAIRFIELD TO CONGRESS**  
 FAIRFIELD & BRIDGEPORT, CT

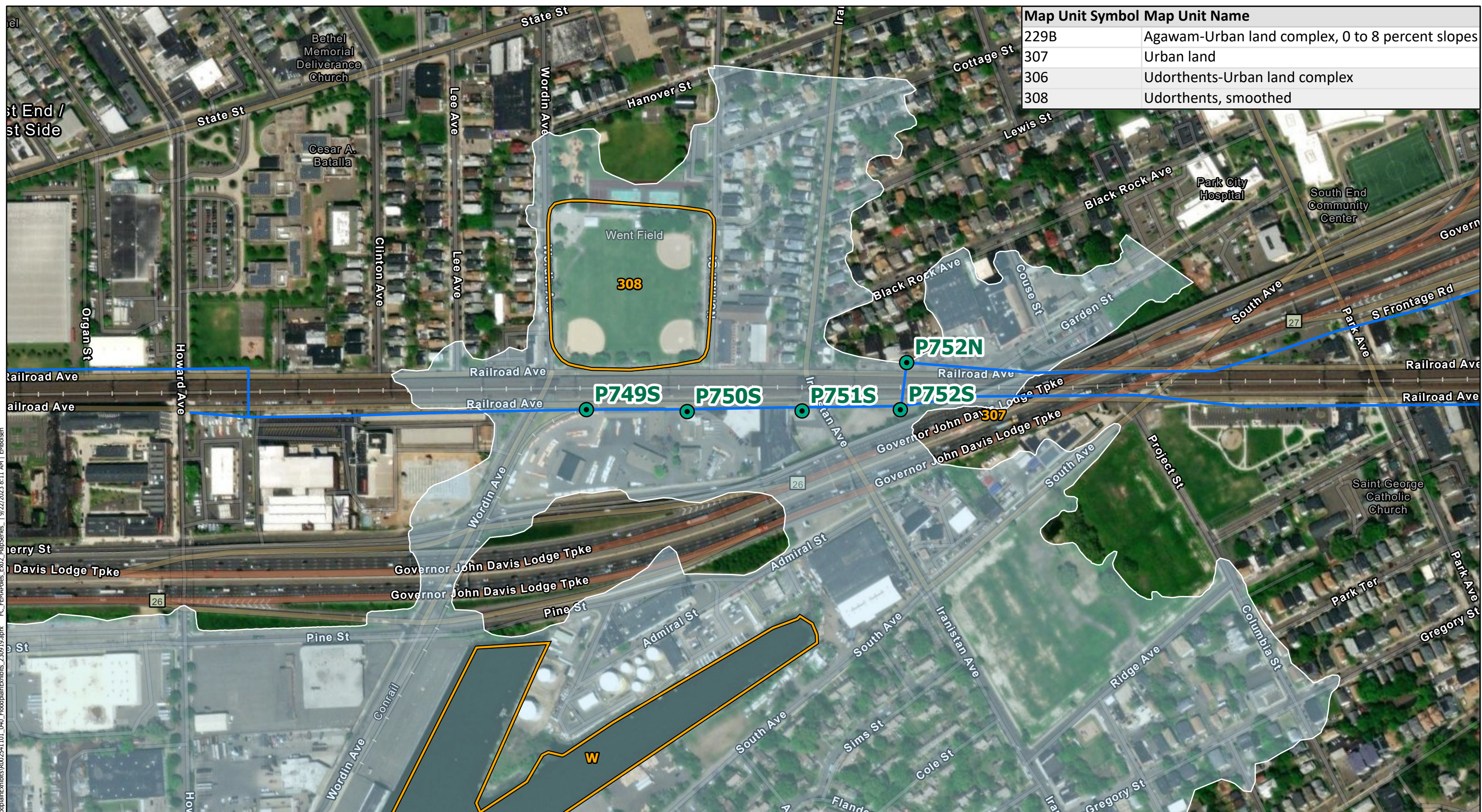
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 Linear Units: Foot US

Revised: 9/22/2023

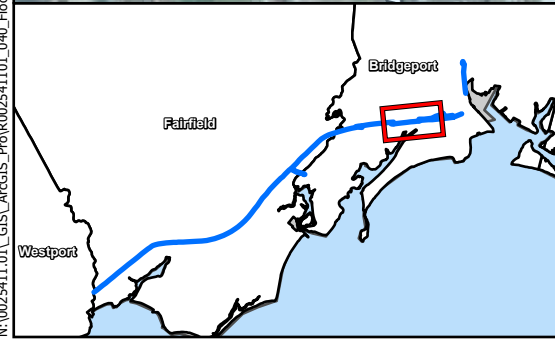
SHEET 4 OF 7



Map Unit Symbol	Map Unit Name
229B	Agawam-Urban land complex, 0 to 8 percent slopes
307	Urban land
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308	Udorthents, smoothed



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**Map Legend**

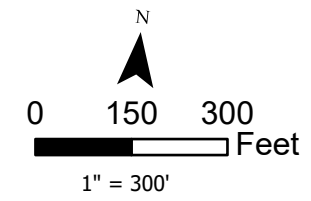
- Proposed Transmission Structure within 100 Year Flood Hazard Zone
- Proposed Alignment of Rebuilt 115-kV Line
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- Soil Unit Boundary (USDA NRCS Web Soil Survey)

**UI 115 KV RAILROAD PROJECT – FAIRFIELD TO CONGRESS**  
 FAIRFIELD & BRIDGEPORT, CT

Coordinate System:  
 NAD 1983 (2011) State Plane Connecticut FIPS 0600 (US Feet)  
 Linear Units: Foot US

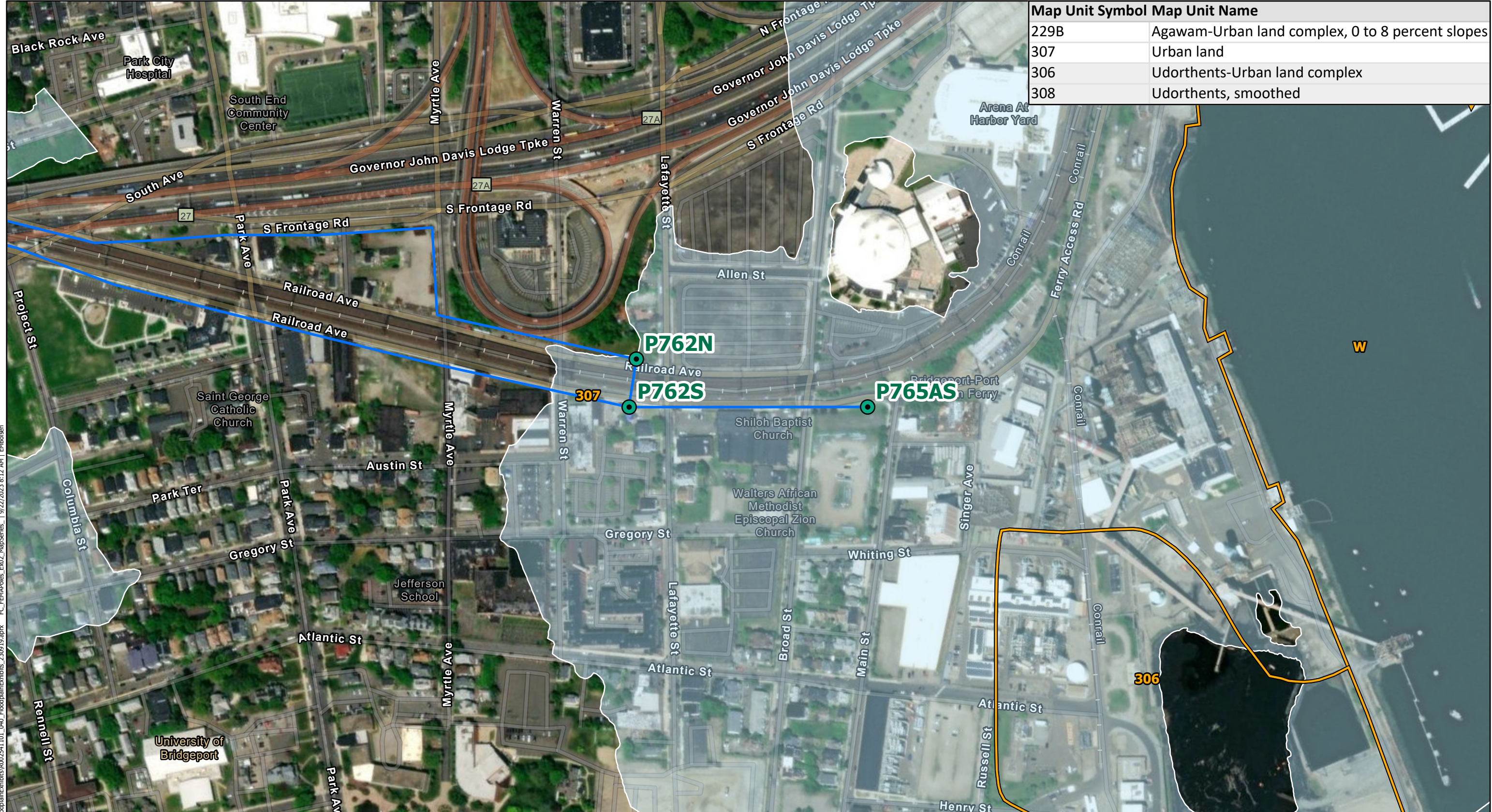
Revised: 9/22/2023

SHEET 5 OF 7





Map Unit Symbol	Map Unit Name
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307	Urban land
306	Udorthents-Urban land complex
308	Udorthents, smoothed



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**Map Legend**

- Proposed Transmission Structure within 100 Year Flood Hazard Zone
- Proposed Alignment of Rebuilt 115-kV Line
- 1% Annual Flood Chance
- Soil Unit Boundary (USDA NRCS Web Soil Survey)

**UI 115 KV RAILROAD PROJECT – FAIRFIELD TO CONGRESS**  
FAIRFIELD & BRIDGEPORT, CT

0 150 300 Feet  
 1" = 300'

Coordinate System:  
 NAD 1983 (2011) State Plane Connecticut FIPS 0600 (US Feet)  
 Linear Units: Foot US  
 Revised: 9/22/2023

**Westwood**

SHEET 6 OF 7





Map Unit Symbol	Map Unit Name
229B	Agawam-Urban land complex, 0 to 8 percent slopes
307	Urban land
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308	Udorthents, smoothed

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**Map Legend**

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**UI 115 KV RAILROAD PROJECT – FAIRFIELD TO CONGRESS**  
 FAIRFIELD & BRIDGEPORT, CT

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 Linear Units: Foot US

Revised: 9/22/2023

SHEET 7 OF 7