



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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March 1, 2016

TO: Parties and Intervenors

FROM: Melanie Bachman, Acting Executive Director *MB*

RE: **DOCKET NO. 466** - The Connecticut Light & Power Company d/b/a Eversource Energy application for a Certificate of Environmental Compatibility and Public Need for the Frost Bridge to Campville 115-kilovolt (kV) electric transmission line project that traverses the municipalities of Watertown, Thomaston, Litchfield, and Harwinton, which consists of (a) construction, maintenance and operation of a new 115-kV overhead electric transmission line entirely within existing Eversource right-of-way and associated facilities extending approximately 10.4 miles between Eversource's existing Frost Bridge Substation in the Town of Watertown and existing Campville Substation in the Town of Harwinton; (b) related modifications to Frost Bridge Substation and Campville Substation; and (c) reconfiguration of a 0.4 mile segment of two existing 115-kV electric transmission lines across the Naugatuck River in the Towns of Litchfield and Harwinton within the same existing right-of-way as the new 115-kV electric transmission line.

Comments have been received from the Department of Energy and Environmental Protection, dated February 29, 2016. A copy of the comments is attached for your review.

MB/RDM/laf

c: Council Members



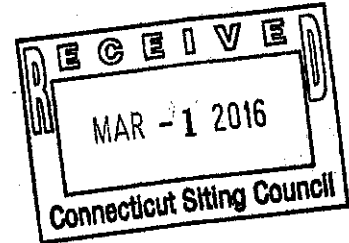
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Affirmative Action/Equal Opportunity Emplc

February 29, 2016

Robert Stein, Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051



RE: Frost Bridge to Campville 1115-kV Transmission Line Project
Eversource Energy
Watertown, Thomaston, Litchfield and Harwinton
Docket No. 466

Dear Chairman Stein:

Staff of this department has reviewed the above-referenced application for a Certificate of Environmental Compatibility and Public Need and conducted a field review of the corridor on February 22, 25 and 26. Based on these efforts, the following comments are offered to the Council for your use in this proceeding.

Eversource Energy proposes to construct a new 10.4-mile, 115-kV transmission line connecting the Frost Bridge Substation in Watertown to the Campville Substation in Harwinton, with the proposed line also crossing Thomaston and Litchfield. With the exception of 0.1 miles of the line which would be underground, the line would be supported on monopole towers located entirely within existing Eversource right-of-way. The Campville Substation would be enlarged with a 90' extension on its eastern end to accommodate a new position to receive the incoming transmission line. Modifications would also occur within the existing footprint of the Frost Bridge Substation. In addition, the Naugatuck River crossing of lines 1921 and 1191, which share the same right-of-way as the proposed new line at this location, would be modified by replacing the single set of lattice structures which support these lines with two sets of new monopoles, one on each side of the Naugatuck River, to separate these lines at the river crossing between Litchfield and Harwinton to meet contingency reliability standards.

The Eversource application is very detailed and comprehensive in terms of project description, justification and description of corridor resources.

DEEP Properties

The new line, designated at line 1304, will cross two DEEP properties, namely Mattatuck State Forest and Black Rock State Park, both in Watertown. In Mattatuck State Forest, line 1304 will be constructed between two existing lines, and the location of the new line is substantially cleared already with the exception of scattered cedars between the two adjacent lines. The terrain rising from Route 8 and Echo Lake Road is very steep and rugged, especially to the east of the location of proposed structure #5.

The right-of-way across Black Rock State Park crosses undeveloped portions of that park. Again, the terrain is very rugged, particularly for the descent to Branch Brook. Clearing and line construction would occur to the east of the existing line 1191.

No impacts to existing or proposed uses of Mattatuck State Forest or Black Rock State Park are envisioned as a result of the construction of line 1304. Eversource notes in the application its intent to contact property owners to inform them of the schedule for work on or adjacent to their property. Eversource should contact Graham Stevens of the DEEP Land Acquisition and Management Unit at (860) 424-3016 with this information for the two DEEP management units crossed by the line when scheduling information becomes available. Due to access considerations and the quality of the wood involved, DEEP has made a preliminary decision that we do not want the wood resulting from clearing activities in Black Rock State Park. As mentioned earlier, the right-of-way across Mattatuck State Forest is already substantially cleared so this matter does not arise with that unit.

Natural Diversity Data Base

Biologists for Eversource have been in contact with the DEEP Natural Diversity Data Base and with other biologists in the Wildlife Division during the development of this project. An updated letter to the applicant went out on February 19, 2016 from the Natural Diversity Data Base approving the protection strategies for the five state-listed species judged to be potentially affected by the new transmission line. Please find the February 19 letter attached to these comments.

Section 401 Water Quality Certification

The list of DEEP permits and approvals on page 9-2 of Volume 1 of the application is accurate. The Section 401 Water Quality Certification is the most comprehensive of these. The issue of invasive species control has undergone some changes since the permitting of the Interstate Reliability Project (Docket No. 424) in 2012. In response to some gas pipeline projects, the U.S. Army Corps of Engineers has taken the lead in developing new invasive species control language which recognizes the greater degree of difficulty controlling invasive species in areas where they occur not only in the right-of-way but also adjacent to it. DEEP will apply the most current regulatory standard to the Eversource application at the time of its receipt. Overall, the right-of-way for this project evidences a relatively low level of invasive species.

Two Miscellaneous Corrections to the Application

Page 1-6 of Volume 1 refers to the 'inactive railroad' to the east of the Frost Bridge Substation. This line is in fact actively operated by the Naugatuck Railroad for scenic excursion trips. Section 5.2.1.7 on page 5-33 does correctly note that occasional train movements occur on the tracks located east of the substation.

The application contains repeated references to Echo Valley Road, a term which is used seemingly interchangeably with Echo Lake Road. The latter is the correct name; there is no Echo Valley Road in Watertown.

Field Review of the Frost Bridge to Campville 115-kV Project

The DEEP field review for the Docket 466 application took place on February 22, 25 and 26. The entire corridor was walked, however access road alignments to the corridor were not

reviewed. The comments and observation below progress from Frost Bridge Substation to Campville Substation.

Overall, the 10.4 mile transmission line corridor exhibits very rough terrain. This is especially true of the portions crossing Mattatuck State Forest, Branch Brook, Northfield Brook and the Naugatuck River, and to a lesser extent across US Route 6. In recognition of the steepness of the terrain, two portions of the access road along the alignment are asphalted, namely a steep slope up to structure 8200 of the 352 line and then coming down the opposite side of this knoll after new structure 6. Mattatuck Trail crosses the right-of-way just before structure 5.

Upon entering an agricultural field just before structure 11 of the new line, there is a large collection of debris to the south side of the line including a water tank, plumbing fixtures, coils of fencing, barrels and other predominantly metal debris.

No structure 12 is shown either in Appendices 1B or 2B, with the structure numbering going directly from 11 to 13. Nor was any stake for a structure 12 found in the field. Is there a reason for this gap in structure numbering?

The developed portions of Veteran's Memorial Park are well screened by deciduous forest from the Eversource right-of-way.

The right-of-way makes a steep but relatively short ascent from US Route 6 to Purgatory Junction where it then turns north. Trees to be cleared here are mostly red oak and black birch of 50-60' height. A very steep rock cliff descends from the new line location down to Hannon Pond. Two homes on the upper portion of Hard Rock Road on the east side of the right-of-way have more screening between them and the new line than do the three homes on Old Farms Road to the west, on the opposite side of the right-of-way from the new line. A collection of lawn furniture sits in the right-of-way behind one of the homes on Old Farm Road.

A second crossing of Mattatuck Trail occurs between structures 43 and 44. Hemlock dominates the eastern side of the right-of-way in the more northerly portions of the Watertown segment. The right-of-way rapidly descends from the Mattatuck Trail crossing down to Branch Brook where it crosses first the emergency spillway of the Corps of Engineers' Black Rock Flood Control Dam and then crosses Branch Brook itself.

There is a very long span of the complete Black Rock Dam Flood Control Project from proposed structure 46 to 47. Access to structure 47 atop a rocky knoll south of Route 109 will be difficult, as will access to structure 48 to the north of Route 109. From structure 48, it is a steep climb through a dense thicket of mountain laurel to structure 49 where the access road within the right-of-way resumes. From structure 50 to Morton Pond, the right-of-way crosses the property of the Thomaston Fish and Game Club which is on both sides of the corridor. The stake for structure 57 is actually a couple of feet north of structure 3139 of line 1191 though Map 20 of 35 (Appendix 2B) shows it as slightly south of that structure. Vernal pool 5-1 sits beneath the new line between structures 54 and 55, and though spanned by the new line, it could be impacted during conductor stringing. Conductors should be supported during installation at that location to avoid this possibility unless construction is done at a dormant time of year.

Just across Morton Pond, a nursery of white and blue spruce to 5' in height is found in the right-of-way in the area of structure 58 but it is not directly under the new line.

Watercourse D-5 (Map 21 of 35 in Appendix 2B) contains three small stone dams of apparently historic vintage within the right-of-way, the middle one of which is 9' tall and fairly well preserved. The others are smaller and in poor condition, but the larger dam, which sits roughly under the new line, should be protected from any damage. This stream will then be crossed by a new access road shown on map 22. The natural stream bottom of this high quality stream should be preserved at this watercourse crossing either through bridging or with the use of an oversize culvert and depressed bottom allowing natural bottom sediments to accumulate in the culvert.

The stake for structure 62 is located right at the edge of wetland D-10 but there is no improvement to be gained by any southward adjustment of this structure.

There is a cluster of homes at Walnut Hill Road which the application considers an EMF focus area.

Line 1921 joins the project right-of-way at Walnut Hill Junction. The stake for structure 64 at Walnut Hill Junction was not found in the field but is shown on map 22 to be just outside the mapped wetland in this area. Vernal pool 12-1 at Walnut Hill Junction appears manmade but no less capable of functioning as a vernal pool.

The descent down to Route 254 and to Northfield Brook north of structure 69 is a very steep one.

The right-of-way access road between Mason Hill Road and structure 70 is very substantial, qualifying as a super-highway of access roads.

The stake for structure 75 is immediately adjacent to structure 3247 of line 1921, not north of it as shown on map 26 of 35. There is an impressive network of tubing for maple sugaring operations in the vicinity of structure 75 with tubing even extending under the Eversouce access road.

The home nearest to structure 77, which is 92 Hopkins Road, is probably the closest home to the right-of-way of any along the proposed new line. Three oak trees separate the house from the right-of-way. One of these will definitely be lost to clearing but the other two may be at least partially salvageable and should be preserved if possible. Coniferous plantings to provide some visual screening would be useful at this property.

West of Hopkins Road the right-of-way was extremely wet (as of February 25) with much of it under standing water.

North of Campville Road, *Phragmites* is found in the existing cleared right-of-way between structures 3238 and 3239. The right-of-way then crosses Route 8 and descends to the lattice tower which supports both lines 1191 and 1921 over the Naugatuck River using a very long span to reach

February 29, 2016

the corresponding lattice tower on the east side. The new line 1304 would employ a span of similar length. The application discusses the contingency planning requirements which necessitate separating the crossing structures for these two lines but it does not explicitly state why the existing lattice structures cannot be retained and used as one of the sets of crossing structures, thereby reducing the number of new crossing structures to be constructed at the Naugatuck River. Spacing issues within the limited width of the right-of-way may well be the reason to replace these structures but that is not given as a reason in the application.

Structure 88 is shown on map 32 as being offset from existing structure 3234 of line 1921 but the stake for structure 88 is directly adjacent to structure 3234.

Map 33 does not indicate a structure 89 for line 1304 but in fact structure 89 is staked in the field down a steep slope from existing structure 3233 is a very challenging location in terms of access and constructability. The ground drops off very rapidly to the east of the right-of way in this area, including the eastern portion of the right-of-way.

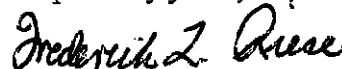
Four junk cars and an SUV reside just south of structure 94 in the alignment of the new line, with more abandoned cars adjacent to the new line. There is a garden in the right-of-way under the new line just north of structure 94. White pine pretty consistently line the eastern edge of the right-of-way from structure 94 to structure 89.

Structure 95 is cited in the application as the only one whose location could not be shifted out of a wetland. It is located at the base of the road embankment for Wildcat Hill Road. Though the structure itself will not impact any wetland function, the work pad for that structure will result in temporary wetland impacts. There is no opportunity to avoid wetland impacts with a shift of structure 95 to the south.

Campville Substation will be expanded to the east by 90' to add positions to receive the new line 1304. The wooded area to be cleared consists of white pine, ash, black birch, pin cherry, grape vines, and in the back section red oak as well. The expansion area supports an impressive collection of beer bottles. A historic gravestone sits within an enclosure to the south of the substation, a location not affected by the proposed work.

Thank you for the opportunity to review this application and to submit these comments to the Council. Should you, other 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

Attachment: (1)

cc: Commissioner Robert Klee



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

February 19, 2016

Mr. Robert Deptula
Eversource Energy
107 Seldon Street
Berlin, CT 06037
Robert.deptula@eversource.com

Project: Frost Bridge Substation to Campville Substation Project, New 115kV Transmission Line and Related Modifications in Watertown, Thomaston, Litchfield and Harwinton, Connecticut
NDDB Determination No.: 201501371 (Updated review for 2016)

Dear Robert,

I have re-reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed Frost Bridge to Campville Project, a new 115 kV transmission line and related modifications in the towns of Watertown, Thomaston, Litchfield and Harwinton Connecticut. Thank you for evaluating this project and its associated activities on the five state-listed species identified occurring within the project limits. The five species include: State Threatened *Gyrinophilus porphyriticus* (northern spring salamander), State Threatened *Callophrys irus* (frosted elfin butterfly), State Special Concern *Glyptemys insculpta* (wood turtle), *Clemmys guttata* (spotted turtle) and *Liocchorophis vernalis* (smooth green snake). Thank you for including the protection strategies and protocols that will be in place to protect these four species from project impacts. If these protection strategies are followed then the proposed activities will not have an adverse impact on the species. This project does not occur near any known bat hibernaculum. This determination is good until the end of December of 2017. Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by December 31, 2017.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov. Thank you for consulting the Natural Diversity Data Base. Also be advised that this is a preliminary review and not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEEP for the proposed site.

Sincerely,

A handwritten signature in black ink that reads "Dawn M. McKay".

Dawn M. McKay
Environmental Analyst 3

cc: Frederick Riese, DEEP-Environmental Review