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February 13, 2018

Melanie Bachman Executive Director Connecticut Siting Council Ten Franklin Square New Britain, CT 06051

RE:

Docket No. 468: Southwest Connecticut Reliability Project Development & Management Plan Change Request: Proposed Shift in Temporary Access Road, City of Danbury

Dear Ms. Bachman:

Pursuant to the Connecticut Siting Council's (the "Council") July 21, 2017 approval of the *Development and Management (D&M) Plan for the Southwest Connecticut Reliability Project ("Project"): New 115-kV Transmission Line* and in accordance with the procedures specified in the D&M Plan, Volume 3, Section A.3.2, The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") requests that Council staff review and approve a proposed shift in the location of the temporary access road between Structure 1011 and Structure 1012.

The approved access road location is within Eversource's existing right-of-way ("ROW") in the City of Danbury. Eversource proposes to shift the location of the access road to west, but it will remain within the ROW. As depicted on map sheet 6 (D&M Plan, Volume 2), the approved, approximately 490-foot long access road between Structure 1011 and Structure 1012 was to be located along the eastern edge of the ROW. The southern, approximately 225-foot section of the approved road is shown as a temporary timber mat access way within wetland W1. This large wetland area extends along approximately 1.3 miles of the Project ROW and encompasses most of the ROW segment between Structures 1011 and 1012. The remaining (northern) portion of the approved access road is depicted as a new access within an upland area, abutting wetland W1. In this area, the ROW is bounded on the east by an extensive sand, gravel, and soil storage operation, characterized by large (50 to100-feet tall) stockpiles of such materials.

After staking the ROW boundary and completing vegetation clearing within the ROW, Eversource discovered that large stockpiles of compacted soils and other materials extend into the ROW. These large stockpiles of compacted soils and other materials also have spread into the area where the northern portion of the approved access was to be located. Therefore, to install the approved access road in accordance with the D&M Plan mapping, extensive earth work would be required to grade the stockpiled materials sufficiently to create a safe work space for construction equipment. This would potentially destabilize the compacted soils, posing a risk of sedimentation into wetland W1. Extensive soil erosion and sedimentation controls would have to be installed and maintained to avoid or minimize this risk.

Consequently, Eversource proposes to shift the access road 8-20 feet west, farther into the ROW and away from the stockpiled materials. This proposed shift will place the entire access road in a level area within wetland W1. Map sheet 6 (attached) has been revised to show the proposed location of the access road.

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Along the proposed access road, approximately 5,290 square feet of wetland W1 will be temporarily affected.¹ In this area, dense stands of *Phragmites*, an invasive species, dominate the vegetation in wetland W1.

All activities within wetland W1 will be in accordance with the protocols identified in the D&M Plan (refer to Volume 1, Sections 5.2.2 – 5.2.4, and Volume 2, Detail Sheets 2A, 2B, 4, and 5A-C). The proposed access road will be temporary and will be constructed of timber mats (or equivalent), which will be removed after the new transmission line is installed. Any areas of the wetland affected by construction will be restored.

Eversource has informed the landowner of the proposed shift in the location of the access road. In addition, Eversource has informed the U.S. Army Corps of Engineers of the additional temporary timber matting in wetland W1. The Project falls under the USACE's Self-Verification Notification, under General Permit 6.

If you have any questions regarding this submission, please do not hesitate to contact me via e-mail at kathleen.shanley@eversource.com or by telephone at (860) 728-4527.

Sincerely,

Kathleen M. Shapley
Manager, Transmission Siting

Enclosure

¹ The 5,290 square feet represents the northern portion of the proposed 20-foot-wide timber mat road that will extend for about 265 feet within wetland W1. The remaining approximately 225 feet of the access road was approved as a timber mat access road in wetland W1 and will remain in wetland W1, but will be shifted slightly to the west. The ROW extends across wetland W1 between Plumtree Substation and Old Sherman Turnpike (D&M Plan Mapsheets 1-6). As summarized on Detail Sheet 1 (D&M Plan Volume 2), the Project will temporarily affect 160,860 square feet of this wetland due to the placement of temporary timber mats. The additional matting for the proposed access road shift will represent a minor (about 3%) increase in these temporary effects.

