



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL

June 7, 2018

TO: Parties and Intervenors

FROM: Melanie Bachman, Executive Director *MB*

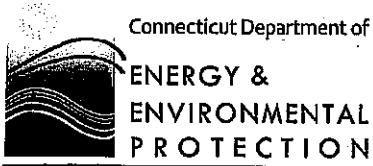
RE: **DOCKET NO. 483** - The United Illuminating Company application for a Certificate of Environmental Compatibility and Public Need for the Pequonnock Substation Rebuild Project that entails construction, maintenance, and operation of a 115/13.8-kilovolt (kV) gas insulated replacement substation facility located 700 feet southwest of UT's existing Pequonnock substation on an approximately 3.7 acre parcel owned by PSEG Power Connecticut, LLC at 1 Kiefer Street, Bridgeport, Connecticut, and related transmission structure and interconnection improvements.

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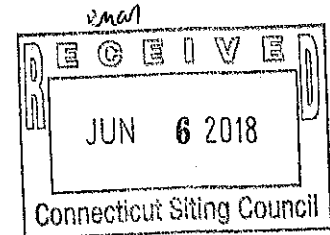
Comments have been received from the Connecticut Department of Energy and Environmental Protection, dated June 6, 2018. A copy of the comments is attached for your review.

MB/MP/lm

c: Council Members



June 6, 2018



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

RE: Pequonnock Substation Rebuild Project  
United Illuminating Company  
Bridgeport, Connecticut  
Docket No. 483

Dear Chairman Stein:

Staff of this department have reviewed the above-referenced application for a Certificate of Environmental Compatibility and Public Need and offer the following comments to the Council for your use in this docket. No site visit was performed as part of this review.

United Illuminating proposes to construct a 115-kV to 13.8-kV substation at 1 Kiefer Street in Bridgeport to replace the existing Pequonnock Substation located 700' to the northeast at 1 Atlantic Street. The existing substation, constructed in 1956, is vulnerable to coastal flooding and is experiencing ground and foundation settlement, structural deficiencies and is too cramped to allow for the placement of mobile transformer units.

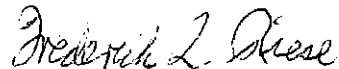
DEEP encourages efforts to increase resiliency of all public facilities and societal infrastructure. United Illuminating's efforts to increase the reliability of the Pequonnock Substation by relocation and elevation are appreciated. Though the recently enacted Public Act 18-82, *An Act Concerning Climate Change Planning and Resiliency*, is applicable to the facilities, hazard mitigation plans and evacuation plans of municipalities, we note that the proposed substation design, which elevates all substation components three feet above the base flood elevation of 14', is consistent with, and in fact exceeds, the design requirements of Section 9 of P. A. 18-82.

DEEP also notes that the location selected for the new substation is an appropriate site in an area of well-established industrial and utility land uses. As such, it is a logical and reasonable site for the substation. The justification for selecting the proposed site over the alternative site at 375 Main Street is also well presented and reasonable.

Lastly, the listing of permits and approvals needed from DEEP as provided in Section 9 of the application is accurate. We also note the applicant's commitment to retain a qualified ornithologist to monitor construction activities (p. 5-3) to prevent impacts to State Threatened peregrine falcons, *Falco peregrinus*. The DEEP Natural Diversity Data Base letter issued yesterday to consultants for United Illuminating specifies this step, along with other measures, be taken during the falcon nesting season of April 1 to June 30. The peregrine falcon has been reported as occurring within close proximity to the project site. A copy of the Natural Diversity Data Base letter is attached.

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 call me at (860) 424-4110.

Respectfully yours,



Frederick L. Riese  
Senior Environmental Analyst

cc: Commissioner Rob Klee  
Attachment: (1)



Connecticut Department of  
**ENERGY &  
ENVIRONMENTAL  
PROTECTION**

June 5, 2018

Mr. Josh Wilson  
Fuss & O'Neill  
146 Hartford Road  
Manchester, CT 06040  
[jwilson@fando.com](mailto:jwilson@fando.com)

Project: The United Illuminating Company Pequonnock Substation Relocation Project from the Substation to 1 Atlantic Street in Bridgeport, Connecticut  
NDDDB Determination No.: 201801803

Dear Josh,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map provided for the The United Illuminating Company Pequonnock Substation Relocation Project from the substation to 1 Atlantic Street in Bridgeport, Connecticut. As you are aware we have known extant records for State Threatened *Falco Peregrinus* (peregrine falcon) that occur in close proximity to your project boundaries. I did receive your proposed best management practices to protect the peregrine falcon from project activities. I concur with some of the best management practices you provided but have added a few modifications.

Protection Recommendation:

- No construction activities should occur between April 1st and June 30<sup>th</sup> to fully protect project workers and this State Threatened bird species.

If work needs to be conducted during the breeding season (April 1st to June 30<sup>th</sup>) then:

1. You must hire an ornithologist (bird expert) to evaluate and prepare a protection plan for the birds. You have outlined some best management practices that will be used to protect these birds from project activities in your letter. They include:
  - A. Between April 1st and July 31st UI will hire an ornithologist to perform (at minimum) weekly inspections to monitor the nesting and behavioral activity of nesting peregrine falcons. Construction schedule and specific construction activities will dictate when inspections by the ornithologist will occur. For example, more frequent inspections may be needed during the drilling of the piers/foundations versus when electrical work is occurring.
  - B. In addition to regular inspections, the ornithologist will provide training to all construction personnel prior to the commencement of construction. The training will consist of a review of construction limitation outlined in this document, visual identification methods of the peregrine falcon (i.e., Species Identification

Sheets), and a communication plan. The Communication Plan will require the construction contractor to, if peregrine falcon is observed, contact UI Environmental who in turn would contact the ornithologist. The ornithologist and UI Environmental will perform an immediate site inspection and if the peregrine falcon nest is within 600' of the project site all work will stop until the peregrine falcon nesting activities are completed.

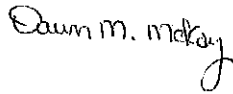
2. All work on this project must maintain a minimum buffer of 600' from any active nest. If a nest is identified by workers (or ornithologist) all work should stop immediately and this information should be reported to our program for further assistance and guidance to complete the work safely.

Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by June 5, 2020.

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. The result of this review does not preclude the possibility that listed species may be encountered on site and that additional action may be necessary to remain in compliance with certain state permits.

Please contact me if you have further questions at (860) 424-3592, or [dawn.mckay@ct.gov](mailto:dawn.mckay@ct.gov) . Thank you for consulting the Natural Diversity Data Base.

Sincerely,



Dawn M. McKay  
Environmental Analyst 3