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July 26, 2022

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

Re: Docket No. 3B - The United Illuminating Company Amended Certificate of Environmental Compatibility and Public Need for Replacement of a Portion of the Existing Derby – Shelton 115-kV Electric Transmission Line Facility

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council (“Council”) is a letter from the State Historic Preservation Office (“SHPO”) to The United Illuminating Company (“UI” or the “Company”), dated July 26, 2022.

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

Should you have any questions regarding this letter, please do not hesitate to contact me.

Very truly yours,



Bruce L. McDermott

Enclosures

cc: Service List

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July 26, 2022

Mr. David R. George
Heritage Consultants
PO Box 310249
Newington, CT 06131

Subject: Phase IA and IB Cultural Resource Surveys
United Illuminating Derby-Ansonia Corridor Upgrade Project
Shelton, Derby, Ansonia, Connecticut
ENV-23-0018

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the cultural resource reports prepared by Heritage Consultants, LLC (Heritage), dated October 2021 and March 2022, respectively. The proposed activities are under the jurisdiction of the Connecticut Siting Council and are subject to review by this office pursuant to the Connecticut Environmental Policy Act (CEPA). The project includes the rebuilding of a 115-kilovolt (kV) overhead line along a 4.1 mile long right of way (ROW) between the Derby Junction and Ansonia substations. The existing line infrastructure, a mix of steel monopoles and lattice towers (40 total structures, ranging in height from approximately 80 feet to 140 feet above ground level (AGL)), are proposed to be replaced with 40 new steel monopoles and 1 H-frame structure (41 total structures, ranging in height from approximately 100 feet to 170 feet AGL). The submitted reports are well-written, comprehensive, and meet the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

No previously identified archaeological sites are located within 500 feet of the utility ROW; however, soil profiles of segments of the ROW have a moderate to high degree to contain intact archaeological deposits, specifically the segment between structures 350 and 356 and Structure 1364, as well as areas where access roads are proposed (AR-351, AR-352, and AR-354; and Alternative Access Road ALT-AR-355). Although no properties listed or formally determined eligible to be listed on either the State or National Register of Historic Places are located within the project area, the Ousatonic Dam Complex is located within 500 feet of the ROW corridor, and is considered eligible for listing on the National Register of Historic Places, as expressed in letters from our Office dated June 20, 2000 and again February 1, 2008. Several industrial complexes within the vicinity of Structures 360, 2, 2A/2B, and 3 are potentially eligible for listing on the State Register of Historic Places:

State Historic Preservation Office

450 Columbus Boulevard, Suite 5 | Hartford, CT 06103 | P: 860.500.2300 | ct.gov/historic-preservation

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- Derby Gas and Electric Light Co., 134 Roosevelt Avenue, (1890-1920)
- Sponge Rubber Products Co., 150 Roosevelt Avenue, (1894-1965)
- Dairy Machinery and Construction Co., 249-251 Roosevelt Avenue (1910, c. 1920)
- Union Fabric Co. and F. Kelly Co., 253 Roosevelt Avenue (c. 1905)

However, the proposed action will have no direct impacts to any of the resources and any visual impacts will not impact character defining features.

Phase IB of the reconnaissance survey consisted of subsurface testing of areas deemed to have moderate to high archaeological sensitivity, and that would be subject to ground disturbing impacts as part of the proposed undertaking. A total of 39 of 56 planned shovel tests were excavated successfully throughout the proposed work area; the 17 unexcavated shovel tests were in areas characterized as having steep slopes, previous disturbance, and/or standing water. No prehistoric or historic period cultural artifacts or features were identified during the survey.

As a result of the information submitted, SHPO concurs with the findings of the report that additional archeological investigations of the project area are not warranted and that the proposed action will have no adverse effect to historic resources. However, please be advised that if construction plans change to include previously uninvestigated/undisturbed areas, this office should be contacted for additional consultation.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's cultural resources. These comments are provided in accordance with the Connecticut Environmental Policy Act. For additional information, please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or marena.wisniewski@ct.gov.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Kinney". The signature is written in a cursive style with a large, sweeping flourish at the end.

Jonathan Kinney
State Historic Preservation Officer

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