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May 31, 2022

Melanie Backman, Esq.
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Sub-Petition No. 1293-BPKP-01: 1505/1607 Transmission Line Structure Replacement Project
- Amendment to Sub-Petition pursuant to Condition 2 of the Connecticut Siting Council Sub-Petition Approval – Two Additional Replacement Structures (Eversource Property, Town of Brooklyn)

Dear Attorney Bachman:

On February 24, 2020, the Connecticut Light and Power Company, doing business as Eversource Energy ("Eversource"), filed a Sub-Petition for the above-referenced project with the Connecticut Siting Council ("Council"), regarding maintenance work within its 1505/1607 transmission line right-of-way ("ROW") in Brooklyn, Pomfret, Killingly, and Putnam Connecticut. As detailed in the Sub-Petition, the work included replacing 50 existing wood transmission structures with new weathering steel transmission structures.

On March 26, 2020, the Council issued a letter acknowledging that the subject project would not have an adverse environmental effect and would not require a Certificate of Environmental Compatibility and Public Need. Since the time of the Council's ruling, Eversource has identified two additional transmission structures on the 1505/1607 Line that require replacement due to asset condition. Eversource plans to conduct the transmission structure replacement work to remediate structure damage caused by age, weather, and woodpecker activity. In support of the additional structure replacements, the following work ("Work Activities") will be performed:

- Replace one existing double circuit laminate wood pole structure on the 1505/1607 Line, Structure 7311, with two single circuit weathering steel monopole structures, Structures 7311 and 7311A. The existing structure is 87 feet in height. To comply with current conductor clearance requirements, the replacement for Structure 7311 will increase in height to 100 feet.
- Replace one existing single circuit wood monopole structure on the 1505 Line, Structure 7311B, with a new weathering steel monopole structure. The existing structure is 85 feet in height. To comply with current conductor clearance requirements, the replacement for Structure 7311B will increase in height to 88.5 feet.

Please see revised map sheet 1 of 10 in Attachment A; *"1505 & 1607 Line - Structure Replacement Project" "Sub-Petition Map Set"*, dated February 17, 2020, revised May 3, 2022, and Attachment B; *"Brooklyn Tap – Brooklyn S/S 115-kV Transmission Line Right of Way Cross Section"*.

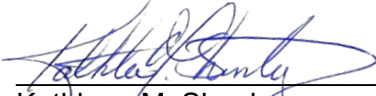
Eversource respectfully submits that the proposed structure replacements would have no "substantial adverse environmental effect" pursuant to Conn. Gen. Stat. § 16-50k, based on the following factors:

- All Work Activities would take place on Eversource property, utilizing an existing access road, (collectively the "Work Areas"). The existing access road will be improved, as needed.
- The Work Activities would not result in any impacts to wetlands or watercourses. Work would be conducted in accordance with Eversource's *Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements)*, April 2022 ("BMPs") to avoid impacts to the nearby watercourse.
- No vernal pools or vernal pool envelopes are located in proximity to the proposed Work Areas.
- Based on review of the Connecticut Department of Energy and Environmental Protection's ("CTDEEP") Natural Diversity Database ("NDDB"), no Work Areas are proposed within a NDDB buffered area. Therefore, the Work Areas would not be subject to an NDDB Review Request. Work would be conducted in accordance with Eversource's BMPs to avoid or minimize impact to terrestrial habitats that may support rare species. With these protective measures, no adverse impacts to state-listed rare species are anticipated.
- The Work Activities will not require any tree clearing. However, Eversource may need to undertake tree trimming and/or vegetation removal/mowing for conductor clearance and/or to improve access to portions of the Work Areas.
- A Phase 1A assessment review of previously recorded cultural resources on file with the Connecticut State Historic Preservation Office conducted by Heritage Consultants, LLC ("Heritage") did not identify any National or State Register of Historic Places properties/districts or archeological sites within 500 feet of the Work Areas. Based on the results of a Phase 1A and Pedestrian Survey conducted by Heritage, Structure 7311B has been identified to possess the potential for moderate to high archaeological sensitivity and Heritage recommended a Phase IB Cultural Resource Assessment and Reconnaissance Survey (shovel pit testing). Two historical period ceramics, including 1 creamware sherd and 1 stoneware sherd were recovered during the Phase IB Survey. Neither of these artifacts were found in association with any above-ground or buried architectural features; they were characterized as unassociated field scatter and were assessed not eligible for listing to the National Register of Historic Places applying the criteria for evaluation (36 CFR 60.4 [a-d]). Based on these findings, Heritage determined that no impacts to cultural resources are expected by the proposed construction and no additional archaeological examination of this location is recommended.
- There are no 100-year flood zones associated with the Work Areas.
- No change in noise levels would result from the installation of the new structures and the applicable lines would continue to comply with the State of Connecticut noise regulations.
- Any changes in electric and magnetic field levels outside the ROW would be negligible.
- Temporary environmental effects from construction will be mitigated as referenced in Sub-Petition 1293-BPKP-01.
- Eversource will access the Work Areas by entering its property from an existing access point off Day Street in Brooklyn.

- Prior to submitting this amendment Eversource representatives briefed officials in the Town of Brooklyn concerning the project modifications.

Eversource herewith respectfully requests approval for the requested changes. Enclosed please find an original and 3 copies of this submission. Should you, the Council members or Council staff have any questions regarding this request, please do not hesitate to contact me via e-mail at kathleen.shanley@eversource.com or telephone at (860)728-4527.

Sincerely,

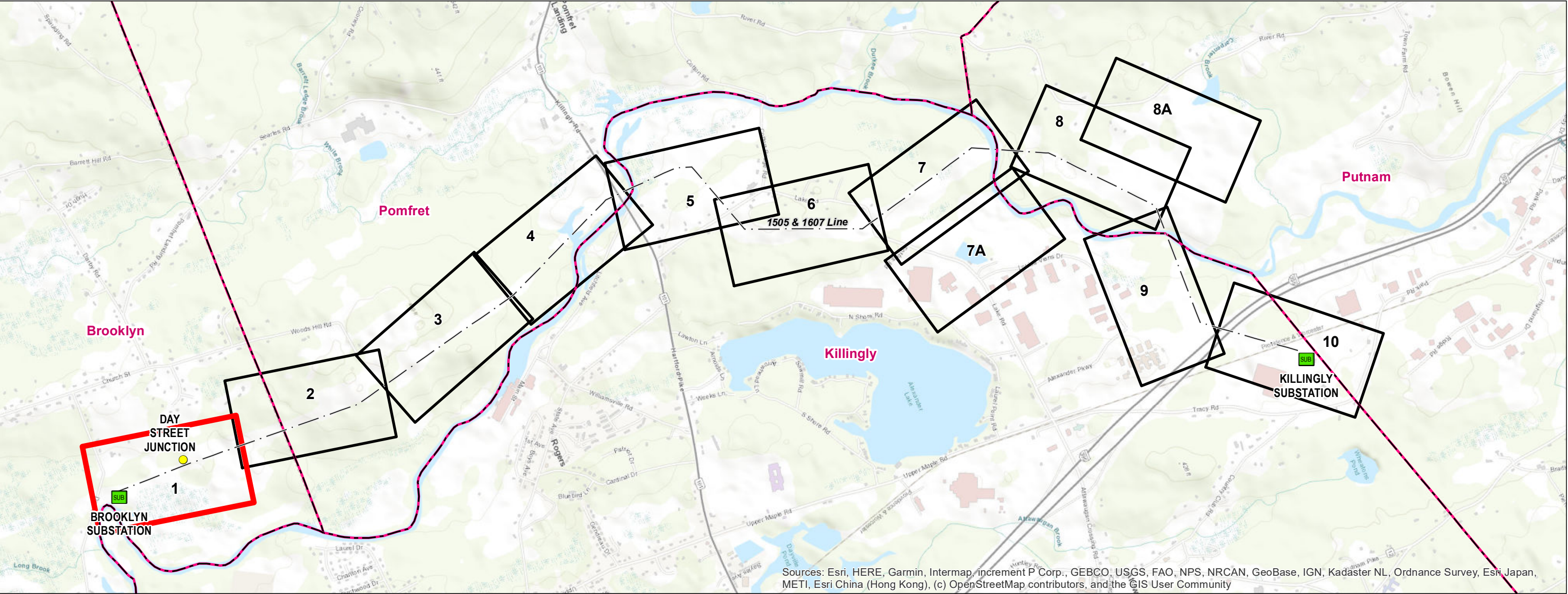


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Enclosure

1505 & 1067 Line - Structure Replacement Project

Brooklyn, Pomfret, Killingly, and Putnam, CT
Sub-Petition Map Set
Date: February 17, 2020
REVISED May 03, 2022



Legend

Substation Junction Map Sheet Revised Map Sheet Overhead Eversource Line Municipal Boundary

0 0.125 0.25 0.5 Miles



PREPARED FOR:

EVERSOURCE
ENERGY

107 Selden Street
Berlin, CT 06037

INDEX OF FIGURES

Title Sheet / Index Map
Abutter Tables & Map Sheets 1-10

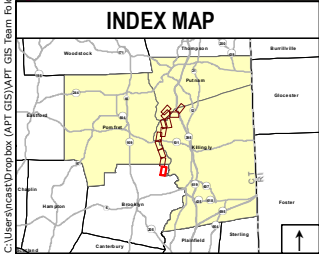
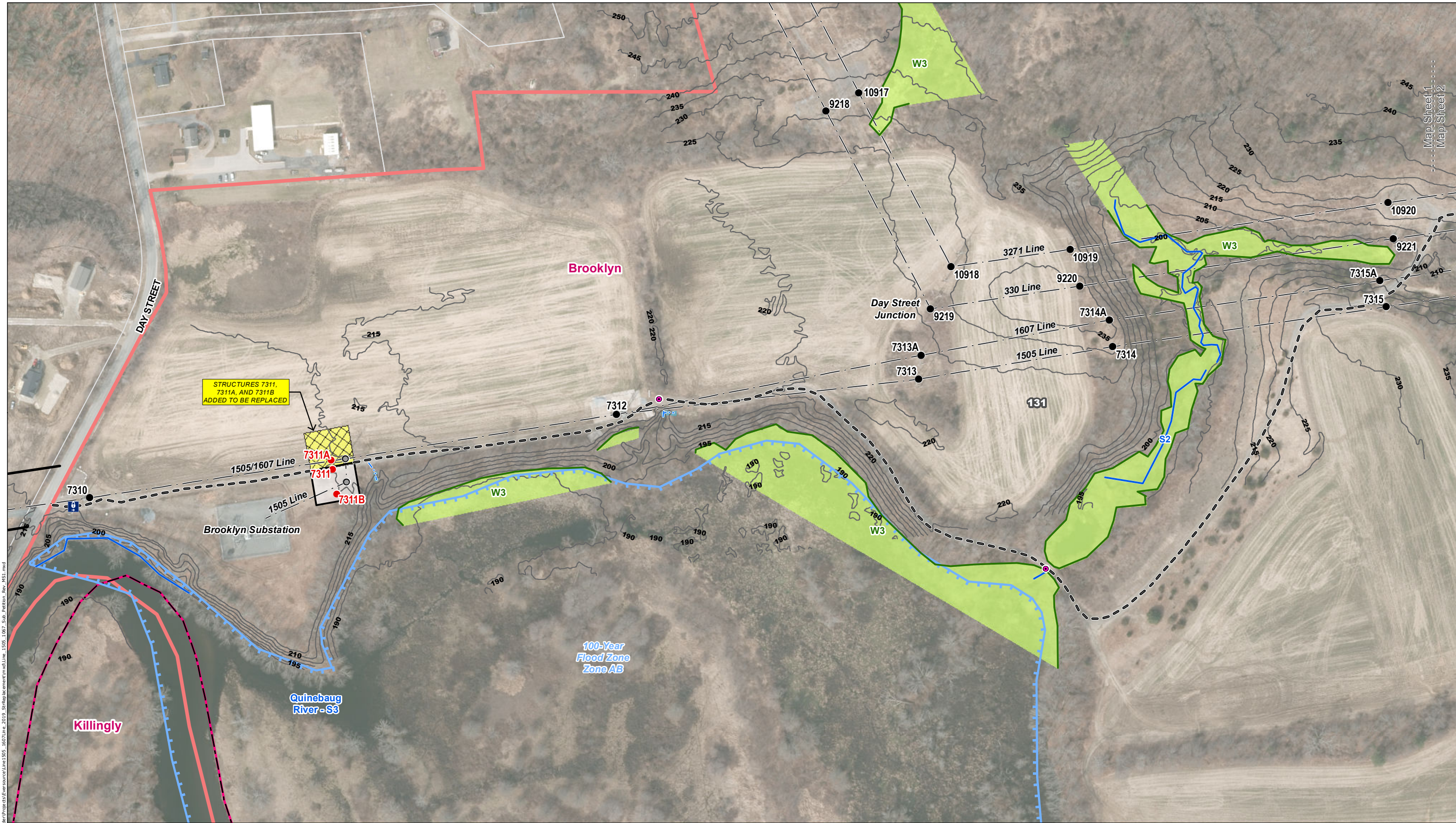
PREPARED BY:

ALL-POINTS
TECHNOLOGY CORPORATION


567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385

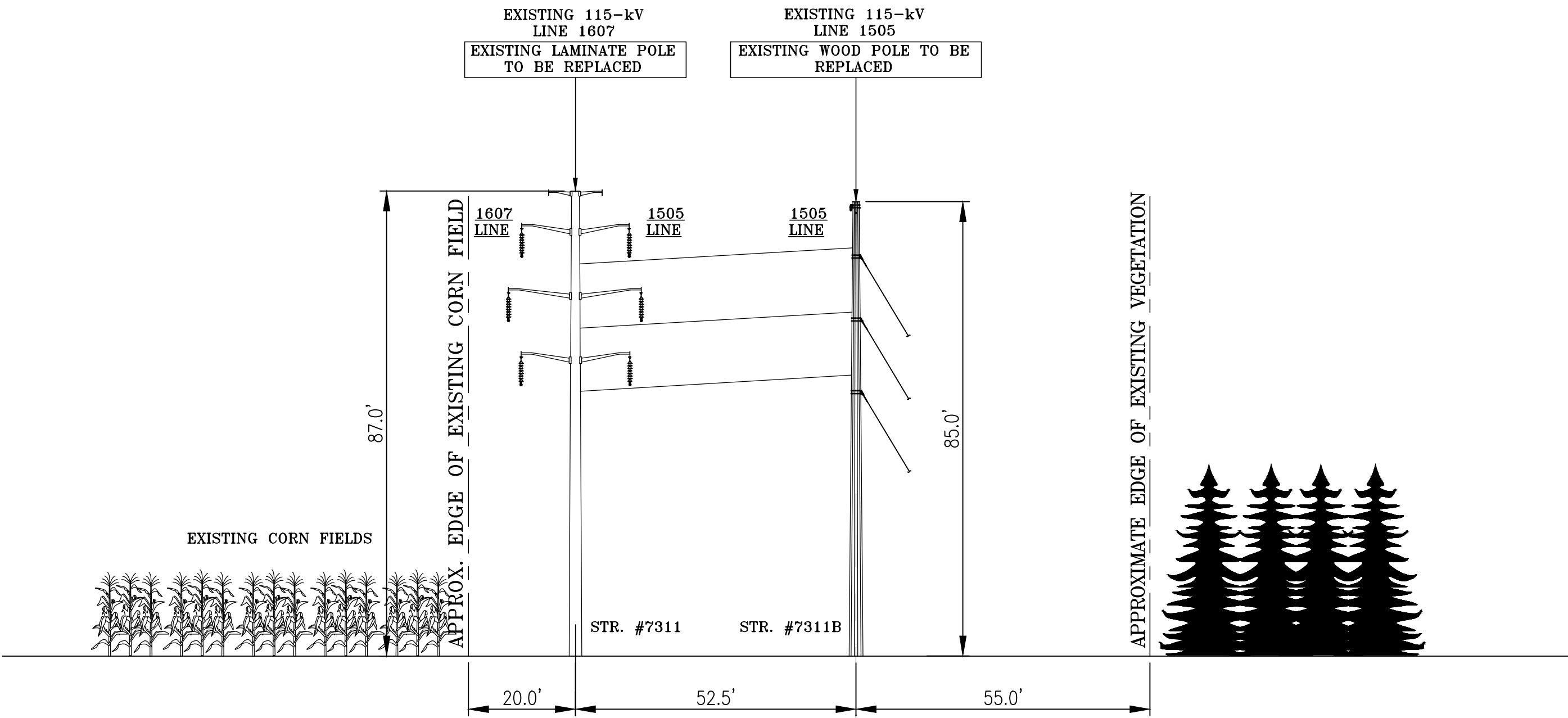
Map Sheet 01 of 10
1505/1607 Line - Structure Replacement Project
Sub-Petition Abutters List

<u>Line List Number</u>	<u>Owner Name</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>
131	ROCKY RIVER REALTY CO (EVERSOURCE)	DAY STREET	BROOKLYN	CT

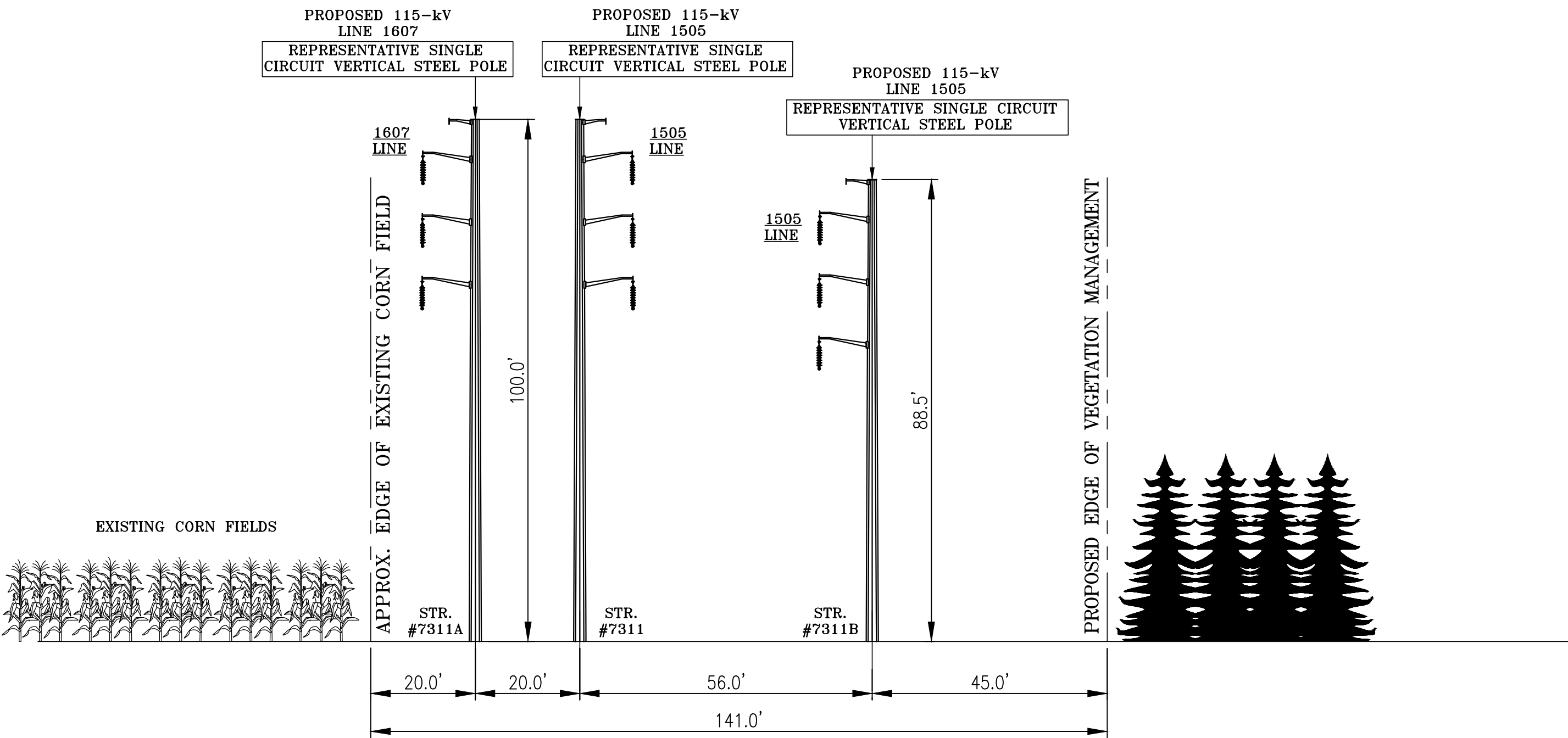


Legend									
● Proposed Structure	Existing Gate	Delineated Perennial Watercourse	100' Vernal Pool Envelope	Eversource Owned Property	1 inch = 200 feet 0 50 100 200 Feet				
● Existing Structure to be Removed	Existing Access	Delineated Intermittent Watercourse	FEMA 100-Year Flood Zone	State Owned Property					
● Existing Structure	Proposed Access	Delineated Wetland Boundary Outline	FEMA Floodway	Municipal Boundary	Map Sheet 1 Map Sheet 2				
Overhead Eversource Line	Proposed Alternate Access	Field Delineated Wetland	Natural Diversity Database Area (12/2021)	Railroad					
Existing Right-of-Way (ROW)	Stone Work Pad	Open Water	Critical Habitat (2009)	5' Contour Line	Map Sheet 1 Map Sheet 2				
Approximate AT&T Fiber	Temporary Construction Matting	Confirmed Vernal Pool Extent	Parcel Boundary	Construction Fence					
Approximate Gas Line	Culvert								

										EVERSOURCE ENERGY	
										1505 & 1607 Line Structure Replacement Project	
										Brooklyn & Killingly, CT	
1	5/3/22	Replacement Structures 7311, 7311A, and 7311B added							Map Sheet 01 of 10		
NO.	DATE	REVISIONS				BY	CHK	APP	APP	Date: February, 2020 REVISED May, 2022	



EXISTING R.O.W. CONFIGURATION
DOUBLE CIRCUIT LAMINATE POLE & SINGLE CIRCUIT WOOD POLE VERTICAL DESIGN
LOOKING FROM BROOKLYN SUBSTATION TO KILLINGLY SUBSTATION
IN THE TOWN OF BROOKLYN, CT
STRUCTURES #7311 & 7311B



PROPOSED R.O.W. CONFIGURATION
NO ADDITIONAL RIGHT-OF-WAY REQUIRED
SINGLE CIRCUIT STEEL POLE VERTICAL DESIGN
LOOKING FROM BROOKLYN SUBSTATION TO KILLINGLY SUBSTATION
IN THE TOWN OF BROOKLYN, CT
STRUCTURES #7311, 7311A & 7311B

NOTE:
LINE ARRESTERS TO BE
ADDED AS REQUIRED

XS-1

EVERSOURCE
ENERGY

TITLE
BROOKLYN TAP - BROOKLYN S/S
115-kV TRANSMISSION LINE
RIGHT OF WAY CROSS SECTION
BROOKLYN, CONNECTICUT

BY	PAD	CHKD	JSS	APP	JM	APP
DATE	06/23/21	DATE	06/23/21	DATE	06/23/21	DATE
H-SCALE	N.T.S.	SIZE	D	FIELD BOOK & PAGES		
V-SCALE	N.T.S.	V.S.		R.E. DWG		
R.E. PROJ. NUMBER	TMC83823			DWG NO.	01068-85000p001	