

September 7, 2022

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

RE: Sub-Petition No.1293-BR-03

Dear Attorney Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") is filing the attached Sub-Petition No.1293-BR-03 with the Connecticut Siting Council ("Council"), regarding maintenance work within its transmission right-of-way in Bethel and Redding, Connecticut. The work includes replacing 12 existing single circuit H-frame wood laminate transmission line support structures on the 3403 Line with new H-frame weathering steel structures.

Eversource sent the enclosed Sub-Petition to the towns of Bethel and Redding and notice to owners of directly abutting property (see Proof of Notice).

Please contact me at 860-728-4527 if you have any questions regarding the enclosed Sub-Petition.

Sincerely,



Kathleen M. Shanley  
Manager – Transmission Siting

Attachments:

- Exhibit A. Sub-Petition
- Exhibit B. Sub-Petition Maps
- Exhibit C. Abutter Letter and Proof of Notice
- Exhibit D. Pictures



ATTACHMENT A

**THE CONNECTICUT LIGHT AND POWER COMPANY doing business as  
EVERSOURCE ENERGY**

Sub-Petition  
CONNECTICUT SITING COUNCIL – PETITION NO. 1293  
TRANSMISSION FACILITY ASSET CONDITION  
MAINTENANCE IMPROVEMENTS TO COMPLY  
WITH THE UPDATED NATIONAL ELECTRIC  
SAFETY CODE CLEARANCE REQUIREMENTS

Towns: Bethel and Redding

Sub-Petition No-1293-BR-03

Project: 3403 Transmission Line Structure Replacement Project

Structure Locations: Transmission Line Structures located in Bethel and Redding, Connecticut

I. Introduction

In accordance with Condition 1 of the March 30, 2017 ruling by the Connecticut Siting Council (the "Council") (as set forth in the Council's March 31, 2017 letter) regarding Petition No. 1293 ("CSC Ruling"), The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") submits this Sub-Petition.

II. Description of Transmission Work Activities:

- Eversource's Laminated Wood Structure Replacement Program ("Project") is part of an ongoing maintenance program, which evaluates the integrity of its utility structures and implements repair, upgrade or replacement in order to assure safe and efficient transmission of power to its customers. Eversource plans to conduct transmission structure replacement work to remediate the Laminated Wood Structure ("LWS") damage caused by wood rot and pole top rot (see Exhibit D Photographs), though the integrity of the LWS cannot be completely measured by conventional visual inspection and the remaining strength cannot be accurately estimated because most of the wood is rotting from within, or under, the mounting brackets. An engineering evaluation has determined that twelve LWS H-frames require replacement on the 3403 Line, which is a 345-kV transmission line located in Bethel and Redding, Connecticut. The replacement structures require a slight increase in structure height to comply with current clearance requirements. The proposed structures will each have a final height that is no more than 5.8 feet greater than the height of the applicable existing structure being replaced.

The following work ("Work Activities") subject of this Sub-Petition will be performed:

- Replace 12 existing LWS H-frames with 12 new weathering steel H-frame structures.

### III. No Substantial Adverse Environmental Effect:

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

- i) Work would take place within Eversource’s existing right-of-way (“ROW”) utilizing existing access routes (collectively the “Work Areas”).
- ii) Work Activities would result in +/- 20,922 temporary impacts to wetlands. 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”).
- iii) Eversource consulted with the Connecticut Department of Energy and Environmental Protection’s (“CTDEEP”) Natural Diversity Data Base (“NDDB”), regarding protection of state-listed species within the Project area. An NDDB Review Request was submitted in June of 2022. Eversource received a Preliminary Assessment in June 2022 requesting surveys for possible State Listed Species before a final determination could be issued. Eversource has completed these surveys and is working with NDDB to finalize necessary species-specific protection and mitigation measures needed for issuance of a final determination. Eversource will implement these protection and mitigation measures to avoid impacts to the listed species and their habitats during Project construction.
- iv) The structure replacements would require minor tree trimming and/or vegetation mowing within the managed ROW corridor to improve access to portions of the Work Area.
- v) No National or State Register of Historic Places (NR/SR) properties or historic districts are located within 500 feet of the Work Area, however, a federal style single-family residence constructed in 1759 historic standing structure (70 Limekiln Road), was identified within 500 feet of the proposed work area for Structure 11023.

A review of previously recorded archeological resources on file with the Connecticut State Historic Preservation Office revealed that 14 Project features (i.e., structures, access roads, and/or work pads) are located in areas of moderate/high archaeological sensitivity including two previously identified archaeological sites. Based on a pedestrian survey Heritage Consultants, Inc. (“Heritage”) found that the proposed Project activities were found to retain qualities that suggests a moderate /high sensitivity for intact cultural deposits. Heritage recommended that a Phase 1B Cultural Resources Reconnaissance Survey (“shovel testing”) be conducted on the 14 Project items prior to construction and is currently underway.

- vi) Structure height increases of the replacement structures average approximately 2.6 feet. The maximum height of the existing structures is 125 feet above ground level.
- vii) There are no 100-year flood zones in the Work Areas where proposed Work Activities would be performed.
- viii) No vernal pools or vernal pool envelopes are located in proximity to the Work Areas.
- ix) There would be no change in noise levels following installation of the replacement



structures.

- x) Any changes in electric and magnetic field levels beyond the ROW edges would be negligible.
- xi) Four of the replacement structures would be located within 10 feet of existing structures. Other replacement structures would be positioned as follows:
  - a. Structure 11001 would be located 35 feet ahead of and 10 feet to the right of the existing structure to avoid environmental resource areas.
  - b. Structure 11003 would be located 20 feet ahead of and 12 feet to the left of the existing structure to avoid existing structure guys during construction and to maintain the position of associated proposed guys within the existing ROW.
  - c. Structure 11006 would be located 25 feet ahead of the existing structure to avoid environmental resource areas.
  - d. Structure 11012 would be located 15 feet ahead of and 9 feet to the left of the existing structure to avoid existing structure guys during construction and to maintain the associated proposed guys within the existing ROW.
  - e. Structures 11019, 11020 and 11021 would be located 10 feet ahead of and 9 feet to the right of the existing structures to meet conductor blowout clearance standards.
  - f. Structure 11028 would be located 18 feet back of and 12 feet to the left of the existing structure to avoid existing structure guys during construction and to maintain the associated proposed guys within the existing ROW.

#### IV. Mitigation:

Temporary environmental effects from construction will be mitigated as follows:

- (a) Erosion and sediment controls (“E&S”) will be employed and maintained, as needed, for the duration of the Work Activities in accordance with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control* and the BMPs.
- (b) Eversource’s contractor will perform construction sequencing such that any earth materials are exposed for a minimum of time before they are covered, seeded, or otherwise stabilized to prevent erosion.
- (c) During construction, when necessary, anti-tracking mats would be installed at construction entrances onto public roads to prevent tracking of soil onto local streets.
- (d) Upon completion of the Work Activities, all disturbed/exposed areas would be stabilized and revegetated. After the establishment of permanent ground cover, Eversource’s contractor would remove the temporary E&S controls and remove/dispose of any accumulated sediments and debris from areas where such measures were used.

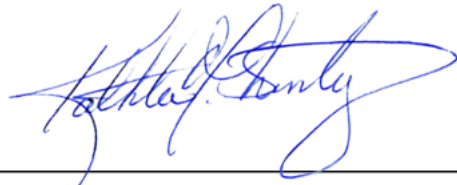
#### V. Access

No new access roads will be constructed. Existing access roads may be hardened and temporarily widened at turning areas to facilitate the safe passage of construction vehicles.

Eversource would access the Work Areas by entering its ROW from existing access points from public roads and then continue on existing access routes within the ROW to replace the twelve structures as follows:

- Hoyts Hill Road for structures 11001, 11002, 11003, 11004 and 11006
- Proposed from Webb Road for structures 11011, 11012, 11017 and 11019
- Existing access from John Todd Way for structures 11011, 11012, 11017 and 11019  
(Proposed from Webb Road for structures 11011, 11012, 11017 and 11019)
- John Todd Way for structures 11020 and 11021
- Costa Lane for structure 11028

By: \_\_\_\_\_



Kathleen M. Shanley  
Manager – Transmission Siting

# Attachment B:

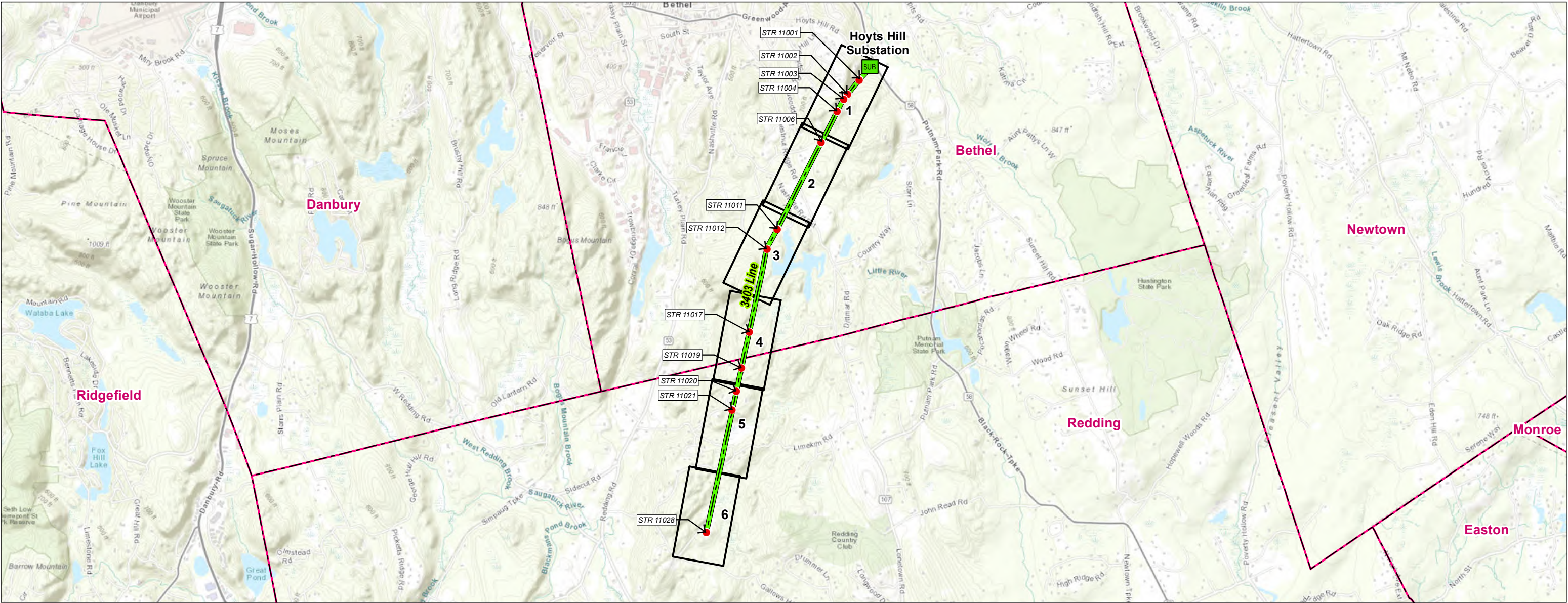
## Sub-Petition Maps





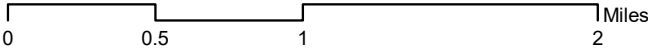
**3403 Line - Laminate Structures Project**

Bethel and Redding, CT  
Sub-Petition Map Set  
Date: August 05, 2022



**Legend**

- Substation    Proposed Structure    Project Corridor    Map Sheet    Municipal Boundary



**INDEX OF FIGURES**

Title Sheet / Index Map  
Abutter Tables & Map Sheets 1-6

PREPARED FOR:



107 Selden Street  
Berlin, CT 06037

PREPARED BY:



567 Vauxhall Street Extension – Suite 311  
Waterford, CT 06385



Map Sheet 1 of 6  
3403 Line – Laminate Structures Project  
Abutter Table

<u>Line List Number</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>	<u>Owner Name</u>
211A-128	7 PECK LANE	BETHEL	CT	REDDING LAND TRUST INC
211A-129	6 PECK LANE	BETHEL	CT	JOHN B SHEPARD AND MARY ELLEN CORBIERE
211A-131	68 PUTNAM PARK ROAD	BETHEL	CT	REDDING LAND TRUST INC
211A-134	117 HOYTS HILL ROAD	BETHEL	CT	CLEBER P DACOSTA





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### INDEX MAP

### Legend

<ul style="list-style-type: none"><li>Proposed Structure</li><li>Existing Structure to be Removed</li><li>Existing Structure</li><li>Existing Right-of-Way (ROW)</li><li>Overhead Eversource Line</li><li>Gate</li><li>Culvert</li><li>Existing Access</li></ul>	<ul style="list-style-type: none"><li>Proposed Access</li><li>Off-ROW Access Pending Rights</li><li>Stone Work Pad</li><li>Temporary Construction Matting</li><li>Delineated Perennial Watercourse</li><li>Delineated Intermittent Watercourse</li><li>Delineated Wetland Boundary Outline</li><li>Field Delineated Wetland</li></ul>	<ul style="list-style-type: none"><li>Open Water</li><li>Confirmed Vernal Pool Extent</li><li>100' Vernal Pool Envelope</li><li>Natural Diversity Database Area (Dec 2021)</li><li>CT NEC Focus Area</li><li>Public Water Supply Watershed</li><li>Water Company Land</li></ul>	<ul style="list-style-type: none"><li>FEMA 100-Year Flood Zone</li><li>Redding Land Trust Property</li><li>Eversource Owned Property</li><li>Parcel Boundary</li><li>Hiking Trail</li><li>10' Contour Line</li><li>2' Contour Line</li></ul>	<ul style="list-style-type: none"><li>Municipal Boundary</li><li>Map Sheet Matchline</li></ul>
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Map Notes:

Base Map Source: CTECO 2019 Aerial Imagery. This mapping product has been created to comply with submittal requirements to obtain certain regulatory approvals and, as such, there is no reliance on the information contained herein for any other purpose.

Wetland Data Source: APT April 2021

Structure locations, ROW, and Parcels are approximate (NOT from survey).

1 inch = 200 feet

0 100 200 Feet

NO.

DATE

REVISIONS

**EVERSOURCE**  
ENERGY

**3403 Line**  
**Laminate Structure Replacement Project**

Bethel, CT

Mapsheet 1 of 6

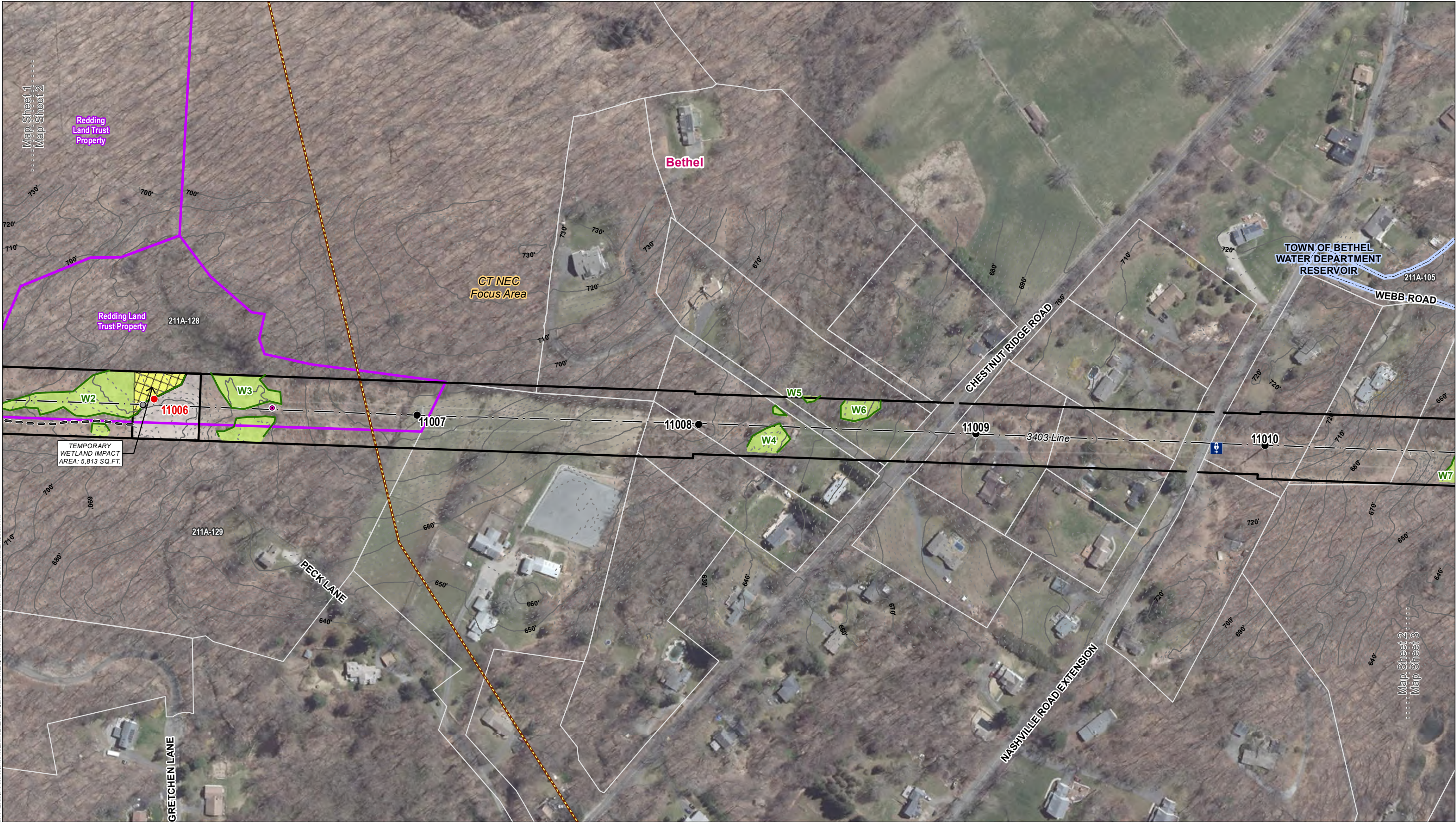
Date: August, 2022



Map Sheet 2 of 6  
3403 Line – Laminate Structures Project  
Abutter Table

<u>Line List Number</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>	<u>Owner Name</u>
211A-105	7U WEBB ROAD	BETHEL	CT	TOWN OF BETHEL AND WATER DEPARTMENT RESERVOIR
211A-128	7 PECK LANE	BETHEL	CT	REDDING LAND TRUST INC
211A-129	6 PECK LANE	BETHEL	CT	JOHN B SHEPARD AND MARY ELLEN CORBIERE





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**INDEX MAP**

**Legend**

●

Proposed Structure

●

Existing Structure to be Removed

●

Existing Structure

—

Existing Right-of-Way (ROW)

—

Overhead Eversource Line

●

Gate

●

Culvert

—

Existing Access

—

Proposed Access

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Off-ROW Access Pending Rights

—

Stone Work Pad

—

Temporary Construction Matting

—

Delineated Perennial Watercourse

—

Delineated Intermittent Watercourse

—

Delineated Wetland Boundary Outline

—

Field Delineated Wetland

—

Open Water

—

Confirmed Vernal Pool Extent

—

100' Vernal Pool Envelope

—

Natural Diversity Database Area (Dec 2021)

—

CT NEC Focus Area

—

Public Water Supply Watershed

—

Water Company Land

—

FEMA 100-Year Flood Zone

—

Redding Land Trust Property

—

Eversource Owned Property

—

Parcel Boundary

—

Hiking Trail

—

10' Contour Line

—

2' Contour Line

—

Municipal Boundary

—

Map Sheet Matchline

Map Notes:

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Wetland Data Source: APT April 2021

Structure locations, ROW, and Parcels are approximate (NOT from survey).

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NO.

DATE

REVISIONS

**EVERSOURCE**

ENERGY

3403 Line

Laminate Structure Replacement Project

Bethel, CT

Mapsheet 2 of 6

Date: August, 2022

ALL-POINTS  
TECHNOLOGY CORPORATION



Map Sheet 3 of 6  
3403 Line – Laminate Structures Project  
Abutter Table

<u>Line List Number</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>	<u>Owner Name</u>
211A-096	TURKEY PLAIN ROAD	BETHEL	CT	TOWN OF BETHEL
211A-101	CHESTNUT RIDGE ROAD	BETHEL	CT	TOWN OF BETHEL
211A-105	7U WEBB ROAD	BETHEL	CT	TOWN OF BETHEL AND WATER DEPARTMENT RESERVOIR
211A-106	NASHVILLE ROAD EXT	BETHEL	CT	TOWN OF BETHEL
211A-107	22 LONG LANE	BETHEL	CT	MARK C YOUNG AND KAREN R YOUNG



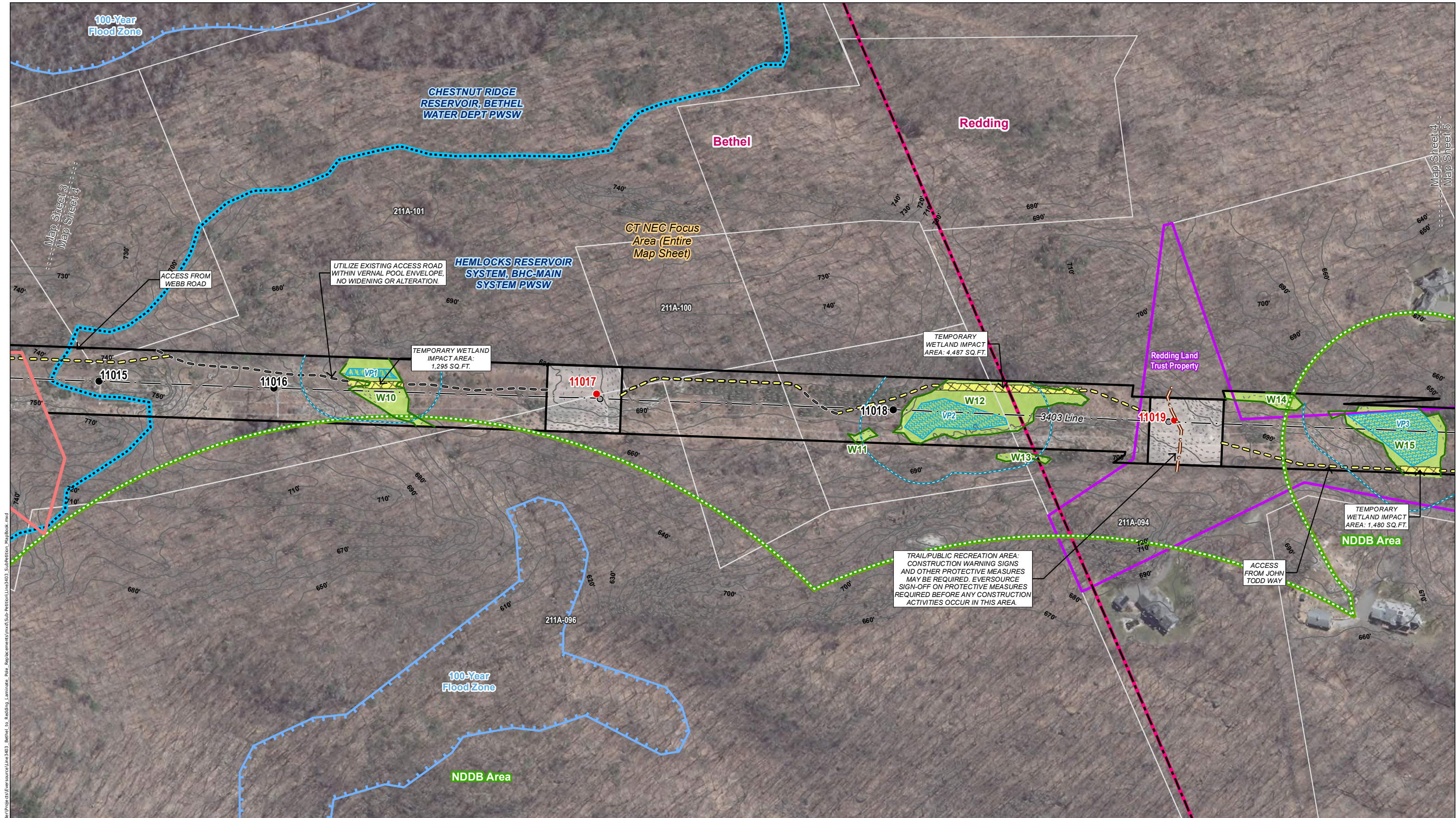




Map Sheet 4 of 6  
3403 Line – Laminate Structures Project  
Abutter Table

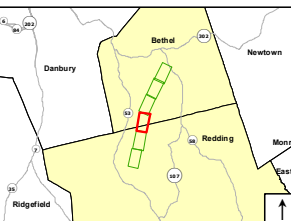
<u>Line List Number</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>	<u>Owner Name</u>
211A-094	16 JOHN TODD WAY	REDDING	CT	REDDING LAND TRUST INC
211A-096	TURKEY PLAIN ROAD	BETHEL	CT	TOWN OF BETHEL
211A-100	TURKEY PLAIN ROAD	BETHEL	CT	PETER KIRK AND THEODORE L. & ELIZABETH MODICA
211A-101	CHESTNUT RIDGE ROAD	BETHEL	CT	TOWN OF BETHEL





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### INDEX MAP



### Legend

- |  |   |   |  |  |
|--|---|---|--|--|
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Wetland Data Source: APT April 2021  
Structure locations, ROW, and Parcels are approximate (NOT from survey).

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0 100 200 Feet

NO.	DATE	REVISIONS

**EVERSOURCE**  
ENERGY

**3403 Line**  
**Laminate Structure Replacement Project**

Bethel and Redding, CT

Mapsheet 4 of 6

Date: August, 2022



Map Sheet 5 of 6  
3403 Line – Laminate Structures Project  
Abutter Table

<u>Line List Number</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>	<u>Owner Name</u>
211A-090	6 JOHN TODD WAY	REDDING	CT	HENRY EMANUEL AND CAROLINA EMANUEL
211A-094	16 JOHN TODD WAY	REDDING	CT	REDDING LAND TRUST INC



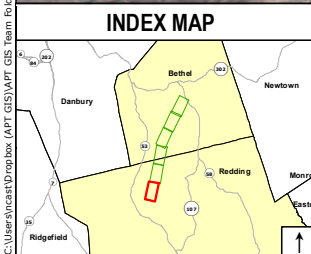




Map Sheet 6 of 6  
3403 Line – Laminate Structures Project  
Abutter Table

<u>Line List Number</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>	<u>Owner Name</u>
211A-068	142 GALLOWS HILL ROAD	REDDING	CT	TOWN OF REDDING
211A-073	10 COSTA LANE	REDDING	CT	COURTNEY L DELMORE V AND MICHELLE DELMORE
211A-074	14 COSTA LANE	REDDING	CT	TOWN OF REDDING
211A-075	16 COSTA LANE	REDDING	CT	PETRA KOEGEL





Legend		Map Notes:		EVERSOURCE ENERGY			
<div><div></div>Proposed Structure</div> <div><div></div>Existing Structure to be Removed</div> <div><div></div>Existing Structure</div> <div><div></div>Existing Right-of-Way (ROW)</div> <div><div></div>Overhead Eversource Line</div> <div><div></div>Gate</div> <div><div></div>Culvert</div> <div><div></div>Existing Access</div>	<div><div></div>Proposed Access</div> <div><div></div>Off-ROW Access Pending Rights</div> <div><div></div>Stone Work Pad</div> <div><div></div>Temporary Construction Matting</div> <div><div></div>Delineated Perennial Watercourse</div> <div><div></div>Delineated Intermittent Watercourse</div> <div><div></div>Delineated Wetland Boundary Outline</div> <div><div></div>Field Delineated Wetland</div>	<div><div></div>Open Water</div> <div><div></div>Confirmed Vernal Pool Extent</div> <div><div></div>100' Vernal Pool Envelope</div> <div><div></div>Natural Diversity Database Area (Dec 2021)</div> <div><div></div>CT NEC Focus Area</div> <div><div></div>Public Water Supply Watershed</div> <div><div></div>Water Company Land</div>	<div><div></div>FEMA 100-Year Flood Zone</div> <div><div></div>Redding Land Trust Property</div> <div><div></div>Eversource Owned Property</div> <div><div></div>Parcel Boundary</div> <div><div></div>Hiking Trail</div> <div><div></div>10' Contour Line</div> <div><div></div>2' Contour Line</div>	<div><div></div>Municipal Boundary</div> <div><div></div>Map Sheet Matchline</div>	<div>Base Map Source: CTECO 2019 Aerial Imagery. This mapping product has been created to comply with submittal requirements to obtain certain regulatory approvals and, as such, there is no reliance on the information contained herein for any other purpose. Wetland Data Source: APT April 2021 Structure locations, ROW, and Parcels are approximate (NOT from survey).</div> <div>1 inch = 200 feet</div> <div>0100200Feet</div> <div><div></div></div>	<div></div> <div></div> <div></div> <div></div> <div>NO.</div> <div>DATE</div> <div>REVISIONS</div>	<div>3403 Line Laminate Structure Replacement Project</div> <div>Redding, CT</div> <div>Mapsheet 6 of 6</div> <div>Date: August, 2022</div> <div><div></div>ALL-POINTS TECHNOLOGY CORPORATION</div>





Attachment C:

Abutter Letter and Proof of Notice



P.O. Box 270  
Hartford, CT 06141-0270

September 2022

Dear Neighbor,

As part of our everyday effort to deliver reliable energy to our customers and communities, we are planning work in your area to replace electric transmission structures in Redding and Bethel. Maintaining infrastructure is one of the many ways Eversource supports the safe and secure transmission of electricity throughout the region.

### **We Are Always Working to Serve You Better**

We are submitting a sub-petition to the Connecticut Siting Council (CSC) for proposed structure replacements in your area.

You're receiving this letter because the proposed work would be taking place within the existing Eversource right-of-way (power line corridor) on or near your property in Redding and Bethel, Connecticut. The Project, called the 3403 Laminate Wood Structure Replacement Project ("Project"), includes replacing select laminate wood structures with new, more durable steel structures, with a finish that "weathers" or darkens over time. The new structures will comply with current clearance requirements and provide continued reliability of the transmission system.

### **What You Can Expect**

Pending receipt of the necessary approvals for this proposed work, construction is expected to begin in the late-Q3 or early-Q4 of 2022. We anticipate to complete construction, including restoration of affected areas, by the end of 2022.

### **Contact Information**

Eversource is committed to being a good neighbor and doing our work with respect for you and your property. For more information, please call our projects hotline at 1-800-793-2202 or send an email to [ProjectInfo@eversource.com](mailto:ProjectInfo@eversource.com).

If you would like to send comments regarding Eversource's sub-petition to the CSC, please send them via email to [siting.council@ct.gov](mailto:siting.council@ct.gov) or send a letter to the following address: Melanie Bachman, Executive Director, Connecticut Siting Council, Ten Franklin Square, New Britain, CT 06051.

Sincerely,

*Ibraheem Kamona*

Ibraheem Kamona  
Project Managers on Behalf of Eversource - Transmission

AFFIDAVIT OF SERVICE OF NOTICE

STATE OF CONNECTICUT     )  
  ) ss. Berlin  
COUNTY OF FAIRFIELD     )

Sec. 16-50j-40 of the Regulations of Connecticut State Agencies ("RCSA") provides that proof of notice to the affected municipalities, property owners and abutters shall be submitted with a petition for declaratory ruling to the Connecticut Siting Council ("Council"). In accordance with that RCSA section, I hereby certify that I caused notice of the petition for a declaratory ruling of The Connecticut Light and Power Company doing business as Eversource Energy to be served by mail or courier upon the following municipal official:

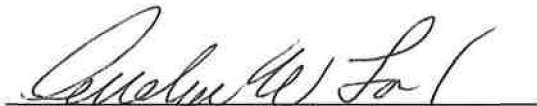
- First Selectman Matt Knickerbocker  
Town of Bethel  
Clifford J. Hurgin Municipal Center 1  
School Street  
Bethel, CT 06801
- First Selectwoman Julia Pemberton  
Town of Redding  
100 Hill Road  
Redding, CT 06875

I also certify that I caused notice of the proposed modifications to be served by mail or courier upon owners of abutting properties shown on the List of Abutters included in Attachment D of the Petition.

  
Ibraheem Kamona  
Project Manager

On this the 7th day of September 2022, before me, the undersigned representative, personally appeared, Ibraheem Kamona, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing instrument and acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

  
\_\_\_\_\_

Notary Public/My Commission expires: \_\_\_\_\_

Commissioner of the Superior Court/ Juris No.: 413393



# Attachment D:

## Pictures

Photographs of Structures with a priority rating of C



P















## 3403 Transmission Overhead Line



## 3403 Transmission Overhead Line





## Constructability Review Form: Transmission Overhead Line





## Constructability Review Form: Transmission Overhead Line





Sample  
Woodpecker holes



Woodpecker holes and splitting



# Cross Sectional Photos



Typical rot encountered behind vertical split  
throughout length of structure

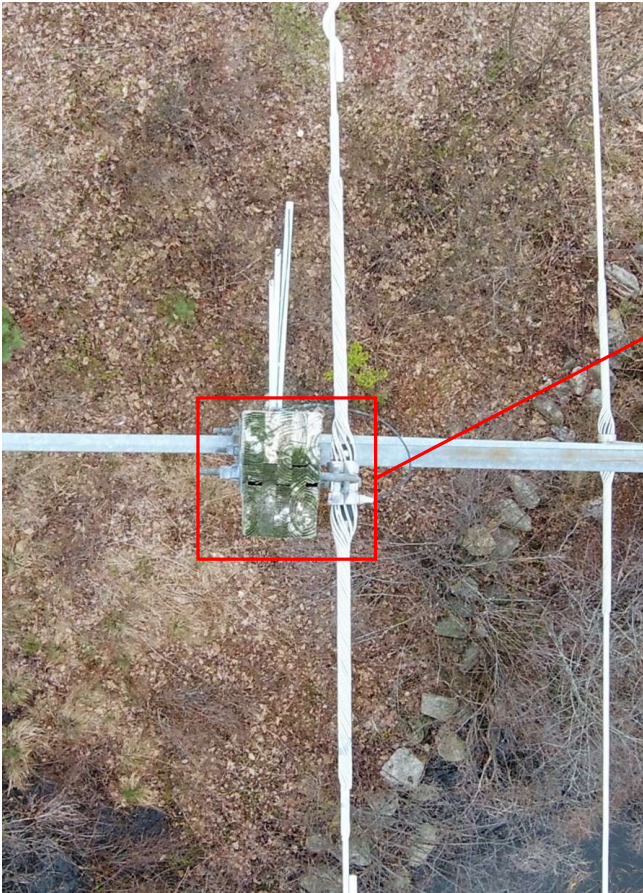




Insect damage targeting rotten wood locations



## Sample pole split



Top of Pole