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Hartford, CT 06103

Kathleen M. Shanley
Manager – Transmission Siting
Tel: (860) 728-4527

September 27, 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 Brookfield, Connecticut. The work includes replacing two existing transmission structures with new weathering steel transmission structures.

Eversource notified the officials of the municipality of Brookfield of Eversource's submission of the Sub-Petition (see Proof of Notice) and sent copies of the Sub-Petition to owners of directly abutting properties (see Proof of Notice).

Enclosed please find an original and three (3) copies of this filing.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen M. Shanley". The signature is fluid and cursive, with a large loop at the end.

Enclosures

Attachments:
Exhibit A: Sub-Petition
Exhibit B: Photographs
Exhibit C: Maps
Exhibit D: Abutter Letter and Proof of Notice

ATTACHMENT A
SUB-PETITION

**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
ELECTRICAL SAFETY CODE CLEARANCE REQUIREMENTS

Town: Brookfield

Sub-Petition: 1293-BR-03

Project: 321/1618 Transmission Line Structure Replacement Project

Structure Locations: 321/1618 Transmission Line Structures located in Brookfield, 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, The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") submits this Sub-Petition.

II. Description of Transmission Work Activities:

Eversource's 321/1618 Transmission Line Structure Replacement Project ("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 ensure the safe and reliable transmission of power to its customers.

Due to asset condition, two structures require replacement on the double-circuit segment of the 321/1618 Line in Brookfield at a location just north of Whisconier Road (State Route 25). The 321 Line, in its entirety, is a 345-Kilovolt ("kV") line that extends from Long Mountain Substation in New Milford to Plumtree Substation in Bethel. The 1618 Line, in its entirety, is a 115-kV line that extends from Rocky River Substation in New Milford to West Brookfield Substation in Brookfield. The 321/1618 Line extends as a double-circuit line and shares structures within Eversource's right of way (ROW") starting approximately two miles south of Rocky River Substation to West Brookfield Junction in Brookfield. Both structures are steel double-circuit monopole structures. To comply with current clearance requirements, each replacement structure will need to be taller than the associated existing structure.

Eversource plans to conduct transmission structure replacement work to remediate damage caused by rust, corrosion, and degradation due to age and weathering of the structures and/or foundations. The following work ("Work Activities") will be performed:

- Replace two existing steel monopole structures with new weathering steel monopole structures. Each replacement structure will be of the same design as its corresponding existing structure.

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:

- a) All Work Activities would take place within Eversource's existing ROW utilizing existing access roads as well as some temporary access roads (collectively the "Work Areas"). Some of the existing access roads would be improved. Eversource can access the structure replacement locations utilizing its existing rights, however, it is currently working with The Housatonic Railroad Company to obtain rights to utilize an alternative off-ROW access route along the railroad tracks that would provide a second means of ingress and egress to the structure replacement locations and facilitate the movement of heavy equipment within the ROW.
- b) Collectively, utilizing existing and temporary access roads, the Work Activities would result in approximately 29,588 square feet ("SF") of temporary wetland impacts from the temporary use of construction matting required for the construction of access roads and work pads for structures 10211 and 10213 as follows:

Wetland Number	Structure Number	Construction Work Pads Temporary Impacts (SF)	Access Roads Temporary Impacts (SF)
W01	10211	±1,725	0
W01	10211 & 10213	0	±2,504
W04	10211 & 10213	0	±4,852
W06	10213	±20,507	0
<i>Subtotals:</i>		±22,232	±7,356
TOTAL:		±29,588	

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 nearby wetland and watercourse resources.

- c) No vernal pools or vernal pool envelopes are located in proximity to the Work Areas.
- d) Based on review of the Connecticut Department of Energy and Environmental Protection's Natural Diversity Database ("NDDDB"), the Work Activities associated with Structures 10211 and 10213 are proposed within an NDDDB polygon area and wetland jurisdictional area and therefore are subject to a NDDDB review request. Consequently, Eversource submitted an NDDDB review request to CTDEEP regarding structure replacement work for the Project and received a response from NDDDB on August 10, 2022 with recommendations for the protection of rare species potentially present in the Work Areas. The recommended protection measures identified in the NDDDB letter have been accepted by Eversource and will be incorporated into the project plans and construction activities and the work would be conducted in accordance with Eversource's BMPs. With these protection measures no adverse impacts to state-listed rare species are anticipated.
- e) The Work Activities will not require any tree clearing. However, Eversource will need to undertake tree trimming and/or vegetation removal/mowing to establish required conductor clearance, to improve access roads and/or install work pads within the Work Areas.
- f) 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 Register of Historic Places properties/districts located within 500 feet of the Work Areas.

However, Heritage did identify two archeological sites, one State Register of Historic Places District and sixteen State Register of Historic Places listed Properties, located within 500 feet of the Work Areas. Heritage concluded that the Work Activities would not directly or indirectly impact the two archeological sites, the State Register of Historic Places District and fifteen of the sixteen State Register of Historic Places listed Properties. The remaining listed Property is located in close proximity to one of proposed access roads in an area of limited disturbance. While the proposed Work Activities will not directly impact the resource, there remains a potential for impact to intact archaeological deposits associated with the resource during construction of the proposed access road. To prevent potential impacts, Eversource is proposing to use temporary construction matting to construct the proximate section of the access road. Therefore, Heritage concluded that the matting would prevent any potential impacts to the possible intact archaeological deposits associated with the resource.

Based on a review of historic maps, aerial photographs, and available soil profiles, one work pad location and one access road location were identified to possess a potential for moderate to high archaeological sensitivity. Based on the results of a Pedestrian Survey, Heritage reclassified the areas as no to low archaeological sensitivity based on poor drainage characteristics, the presence of steep slopes, and/or obvious signs of previous ground disturbances. Therefore, Heritage advised that no additional archeological examination is recommended.

- g) To comply with current conductor clearance requirements the height of the replacement structures will be increased. The height of Structure 10211 will increase by 7 feet and the height of Structure 10213 will increase by 2 feet.
- h) There are no 100-year flood zones in the Work Areas.
- i) No change in noise levels will result from the installation of the new structures and the applicable line will continue to comply with the State of Connecticut noise regulations.
- j) Any changes in electric and magnetic field levels outside the ROW would be negligible.

IV. Mitigation:

Temporary environmental effects from construction will be mitigated as follows:

- Erosion and sediment ("E&S") controls 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 Eversource's BMPs.
- Potential impacts to wetlands and watercourses will be mitigated with the use of temporary construction matting and adherence to the BMPs.
- NDDDB recommended rare species protective measures will be incorporated into Eversource's BMPs during construction.
- Eversource's contractor will perform construction sequencing such that any earth materials are exposed for a minimum amount of time before they are covered, seeded, or otherwise stabilized to prevent erosion.
- During construction, when necessary, anti-tracking mats would be installed at construction entrances to public roads to prevent tracking of soil onto local roads.
- Upon completion of the Work Activities, all disturbed/exposed areas will be stabilized and revegetated as needed. After establishing permanent ground cover, Eversource's contractor will

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 permanent access roads would be constructed to facilitate access to structures within the ROW. Portions of the existing access roads may be hardened and widened at turning areas to facilitate the safe passage of construction vehicles. Construction matting will be used for temporary access roads within wetland areas, as well as sensitive and/or maintained upland areas. The matting will be removed upon completion of the Work Activities and the areas restored, as necessary.

Eversource will access the Work Areas by entering its ROW from existing access points on public roads in Brookfield as follows:

- Whisconier Road (State Route 25)
- Tucks Road

By:



Kathleen M. Shanley
Manager - Transmission Siting

ATTACHMENT B
PHOTOGRAPHS

Structure #10211



Structure #10211



Structure #10213



Structure #10213

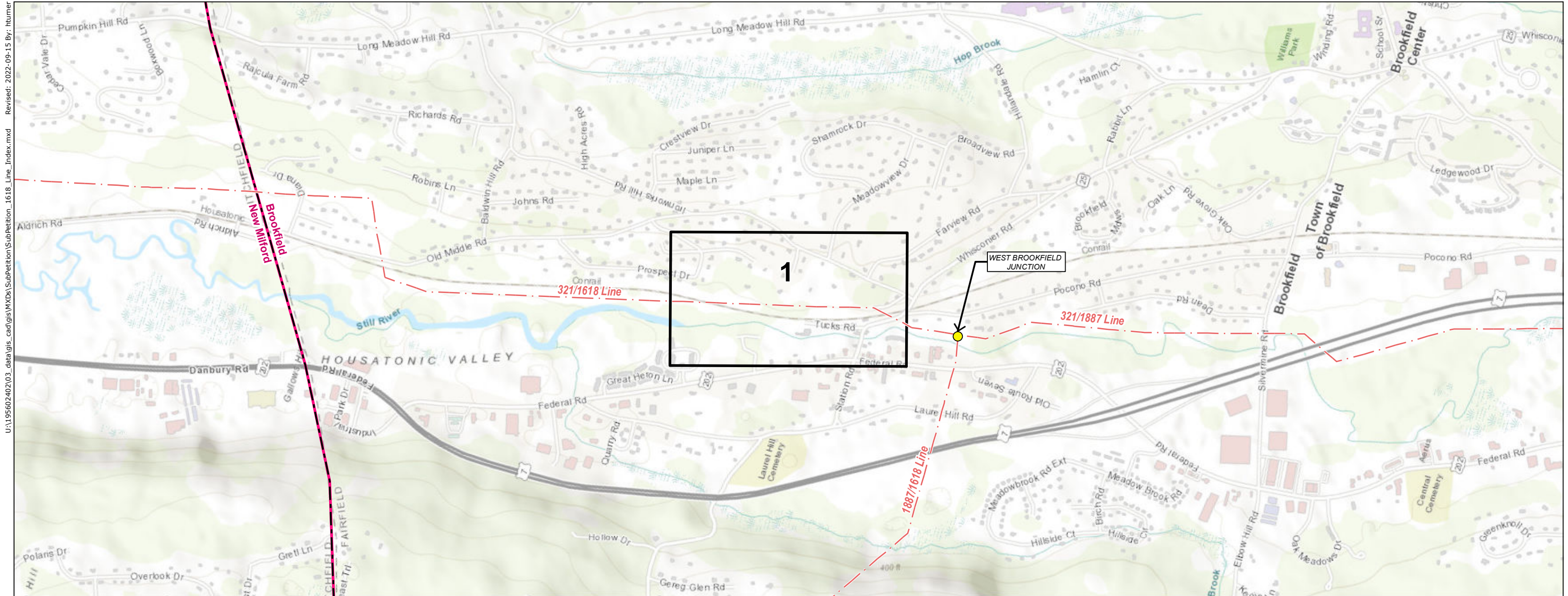


ATTACHMENT C

MAPS

321/1618 Line - Structure Replacement Project

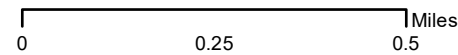
Brookfield, CT
Sub-Petition Map Set
Date: September 15, 2022



U:\195602402\03_data\gis_cad\gis\Subpetition\Subpetition_1618_Line_Index.mxd Revised: 2022-09-15 By: hturner

Legend

- Junction
- - - Overhead Eversource Line
- Map Sheet
- - - Municipal Boundary



INDEX OF FIGURES

Title Sheet / Index Map
Abutters Table & Map Sheet 1 of 1

PREPARED FOR:



107 Selden Street
Berlin, CT 06037

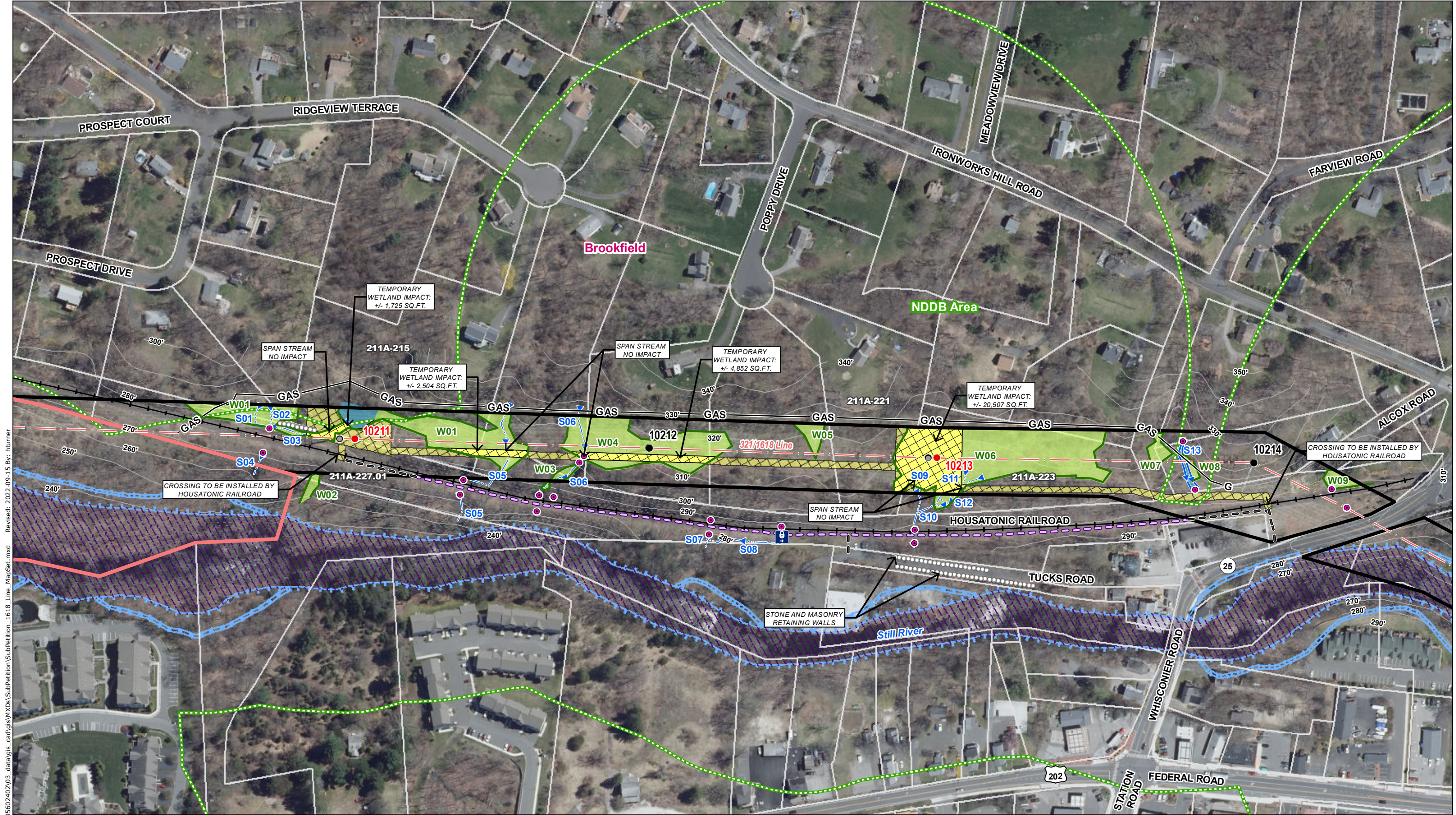
PREPARED BY:



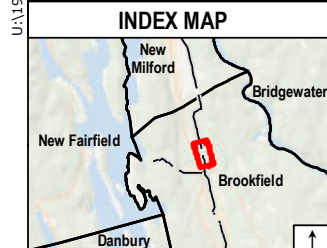
30 Park Drive
Topsham, ME 04086

321/1618 Line - Structure Replacement Project
Map Sheet 1 Abutters Table

ABUTTER NUMBER	OWNER NAME (First)	OWNER NAME (Last)	ADDRESS	CITY/TOWN	STATE	ZIP
211A-215	LUANN	DERRIG	3 RIDGEVIEW TERRACE	BROOKFIELD	CT	06804
211A-221	ANGEL E.	QUIZHPI-GUAMAN	5 POPPY DRIVE	BROOKFIELD	CT	06804
211A-223	DIEGO A	MAYA	10A IRONWORKS HILL ROAD	BROOKFIELD	CT	06804
211A-227.01	MAYBROOK RAILROAD COMPANY		1 FEDERAL RD (REAR)	BROOKFIELD	CT	06804



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- Legend**
- Existing Structure
 - Existing Structure to be Removed
 - Proposed Structure
 - Overhead Transmission Line
 - Existing Right-of-Way (ROW)
 - Existing Access
 - Off-ROW Access Pending Rights
 - Temporary Construction Matting
 - Eversource Owned Property
 - Abutter Number
 - Parcel Boundary
 - 2' Contour
 - 10' Contour
 - Perennial Watercourse
 - Intermittent Watercourse
 - Delineated Wetland Boundary Outline
 - Field Delineated Wetland
 - Open Water
 - FEMA Floodway
 - FEMA 100-Year Flood Zone
 - Natural Diversity Database (June 2022)
 - Railroad
 - Stone Wall
 - Culvert
 - Gate
 - GAS Approximate Gas Line

Map Notes:
 Coordinate System: NAD 1983 StatePlane Connecticut FIPS 0600 Feet
 Data source: Eversource easement lines, structures, transmission lines provided by Eversource Energy. Wetlands/watercourses delineated by Stantec in May 2022. Additional sources include: CT DEEP, FEMA.
 Basemap: 2019 Statewide Leaf-off Orthoimagery provided by Connecticut Environmental Conditions Online (CT ECO).

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.

Scale: 1 inch = 200 feet
 0 50 100 200 Feet

EVERSOURCE ENERGY		Stantec	
321/1618 Line - Structure Replacement Project Sub-Petition Map Set			
Brookfield, CT		MAP SHEET	
Date: September 15, 2022		1 of 1	
NO.	DATE	REVISIONS	

ATTACHMENT D
ABUTTER LETTER AND
PROOF OF NOTICE

September 27, 2022

Dear Neighbor,

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

You're receiving this letter and a copy of the Sub-Petition because the proposed work would be taking place within the Eversource right-of-way in Brookfield. A Sub-Petition is a document with detailed information about the proposed upgrades. Eversource is submitting Sub-Petition No. 1293-BR-03 this week to the Connecticut Siting Council (CSC) for its review.

About This Electric System Improvement: What You Can Expect

First, we want you to know that this work will not interrupt electric service to your area.

As part of this project, we are proposing to replace two structures to remediate damage caused by rust, corrosion, and degradation due to age and weathering of the structures and/or foundations. The new structures will be weathering steel, 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.

Connecticut Siting Council Process and Timing

With this letter, Eversource is providing notice to you of its proposed work activity, as described in the enclosed Sub-Petition. If you have any comments or concerns about the project, please send them to the CSC at the following address within 30 days of the date of this letter: Melanie Bachman, Executive Director; Connecticut Siting Council; Ten Franklin Square; New Britain, CT 06051. You may also email them to the siting.council@ct.gov. If you choose to send comments to the CSC, please reference Sub-Petition No. 1293-BR-03 in your correspondence.

Our Commitment to You

We are committed to being a good neighbor and doing our work with respect for you and your property. If you would like more information about this work, please call 1-800-793-2202, or send an email to ProjectInfo@eversource.com. Thank you.

Sincerely,

Kevin Nelson

Kevin Nelson
Eversource Project Manager – Transmission Projects

AFFIDAVIT OF SERVICE OF NOTICE

STATE OF CONNECTICUT)
) ss. Hartford
COUNTY OF HARTFORD)

In accordance with Condition 2 of the Connecticut Siting Council's ("Council") March 31, 2017 declaratory ruling on Petition No. 1293, I hereby certify that on September 27, 2022, I caused notice of the proposed maintenance activities including a copy of the Sub-Petition No.1293-BR-03 of The Connecticut Light and Power Company dba Eversource Energy ("Eversource") to be served on the municipality listed below and 4 abutters. The notice of the proposed maintenance activities states that comments or concerns regarding the maintenance activities described in the Sub-Petition should be submitted to the Council within 30 days of the date of such notice.

Municipal Officials:

Town of Brookfield
Tara Carr, First Selectwoman
100 Pocono Road
Brookfield, CT 06804



James L. Smith
Project Siting Specialist

On this the 27 day of September 2022, before me, the undersigned representative, personally appeared, James L. Smith, 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.



Signature

Officer of the Superior Court / Juris No. 413393