

October 14, 2022

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

Re: Sub-Petition No. 1293-BS-01: 1810/1825 Transmission Lines Structure Replacement Project - Amendment to Sub-Petition pursuant to Condition 2 of the Connecticut Siting Council Sub-Petition Approval – Four Additional Replacement Structures (Towns of Bristol and Southington)

Dear Attorney Bachman:

On October 23, 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 1810/1825 transmission lines right-of-way ("ROW") in Bristol and Southington Connecticut. As detailed in the Sub-Petition, the work included replacing 13 existing wood transmission structures with new weathering steel transmission structures.

On December 1, 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 Need¹. Since the time of the Council's ruling, Eversource has identified four additional transmission structures (Structures 1916, 1917, 1846, and 1848) on the 1810/1825 Lines 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 addition to the structure replacements, Eversource plans to install temporary construction matting in the upland area of the work pad for previously approved Structure 1845. Matting the upland portion of the work pad will provide additional protection to the adjacent wetland (W18) during construction.

In support of the additional structure replacements, the following work ("Work Activities") will be performed:

- Replace two existing single-circuit wood three-pole H-frame structures on the 1810 Line, Structures 1916 and 1917, with new single-circuit weathering steel three-pole H-frame structures. To comply with current conductor clearance requirements, the heights of the replacement structures will be increased. Structure 1916 will be 13.5 feet taller for an overall height of 79 feet and Structure 1917 will be 18 feet taller, for an overall height of 83.5 feet.
- Replace two existing double-circuit wood three-pole H-frame structures on the 1810/1825 Line, Structures 1846 and 1848, with new double-circuit weathering steel three-pole H-frame structures. To comply with current conductor clearance requirements, the heights of the replacement structures will be increased. Structure 1846 will be 4.5 feet taller for an overall height of 74.5 feet and Structure 1848 will be 13.5 feet taller, for an overall height of 74.5 feet.

¹ On October 3, 2022 the Council granted Eversource an extension of time until December 1, 2023 to complete the maintenance improvements associated with the above-referenced Sub-Petition.

Please see revised map sheets 4 and 7, and supplemental map sheet 4A, in Attachment A; “1810/1825 Line - Structure Replacement Project” “Sub-Petition Map Set”, dated October 20, 2020, revised Sept 23, 2022.

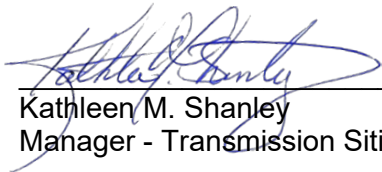
Eversource respectfully submits that the proposed structure replacements would have no "substantial adverse environmental effect" pursuant to Conn. Gen. Stat. § 16-50k, based on the following factors:

- All Work Activities would take place in areas within Eversource's property and existing ROW utilizing existing access roads, (collectively the "Work Areas"). Some of the existing access roads would be improved. Eversource can access each of the structure replacement locations utilizing its existing rights.
- 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 ("NDDDB"), no Work Areas are proposed within a NDDDB polygon area and jurisdictional wetland area and/or CT DEEP owned/managed land. Therefore, the Work Areas would not be subject to an NDDDB Review Request. Work will 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 a review of historic maps, aerial photographs, and available soil profiles, the proposed Work Areas were identified to contain steep slopes and have suffered disturbances in the past, therefore, they were classified to contain no/low archaeological sensitivity and Heritage advised that no additional examination is recommended or warranted.
- 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-BS-01.

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. Eversource will access the Work Areas by entering its property and/or ROW from existing access points on public roads as follows; Willis Street in Bristol for Structures 1916 and 1917 and West Street (State Route 229) in Southington for Structures 1846 and 1848

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,



Kathleen M. Shanley
Manager - Transmission Siting

Enclosure

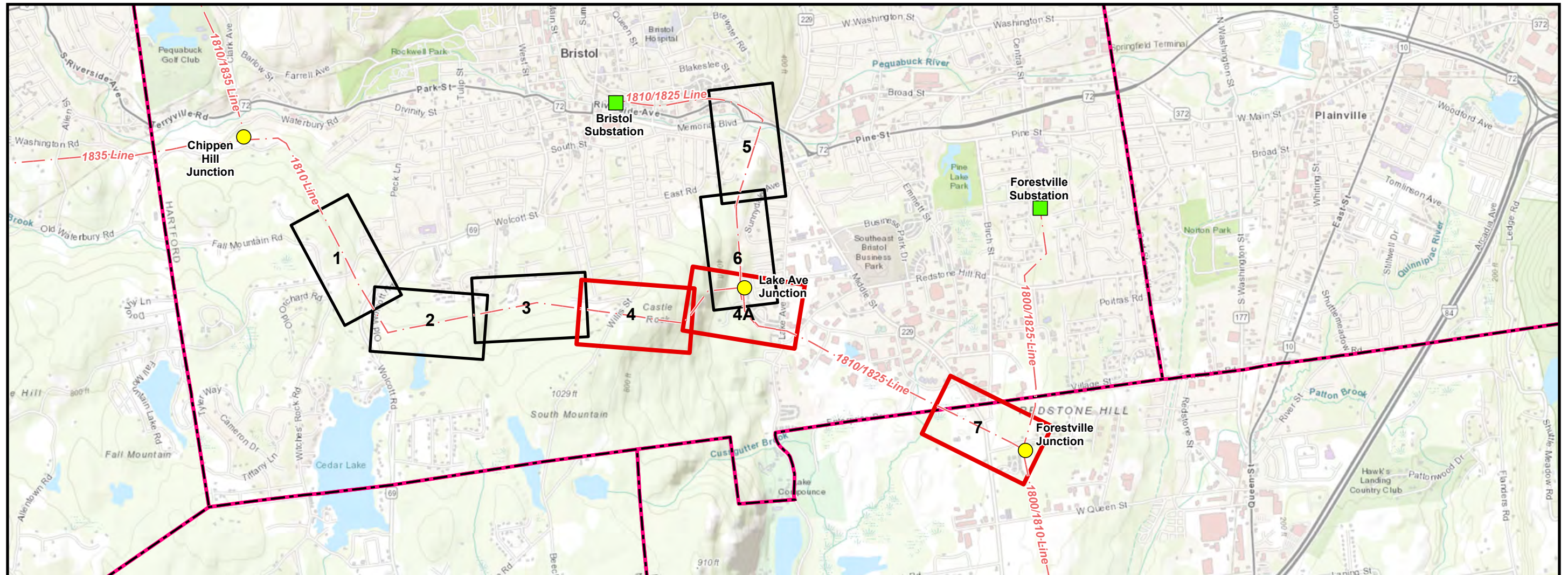
1810/1825 Line - Structure Replacement Project

Bristol and Southington, CT

Sub-Petition Map Set

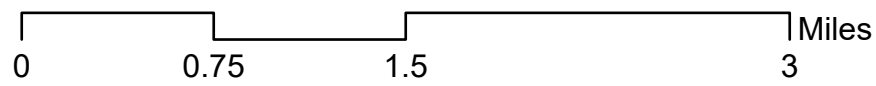
Date: October 20, 2020

Revised September 23, 2022



LEGEND

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



INDEX OF FIGURES

- T1 - Title Sheet
- 1-7 - Map Sheets

PREPARED FOR:
EVERSOURCE
ENERGY

107 Selden Street
Berlin, CT 06037

PREPARED BY:

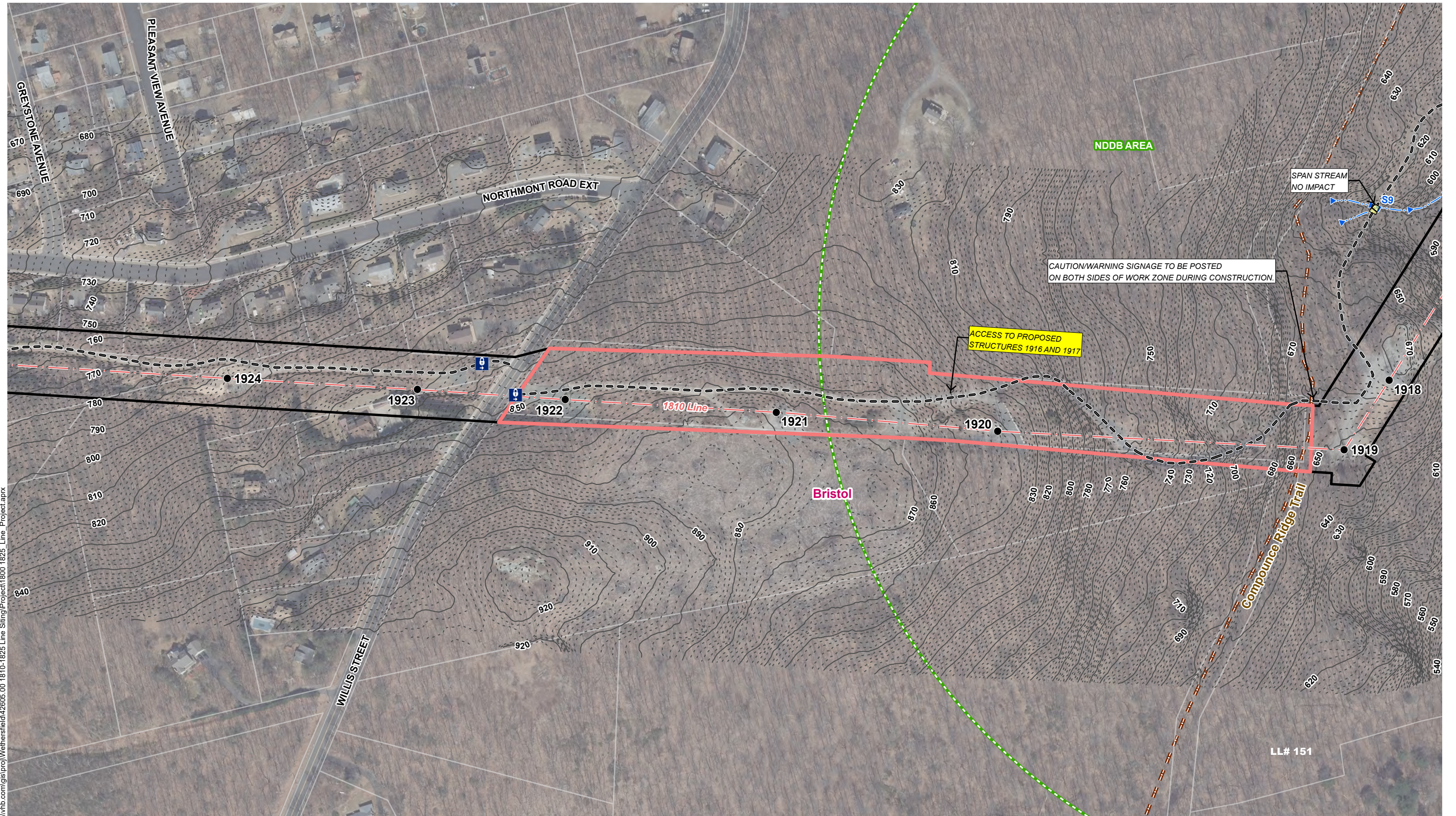


100 Great Meadow Road
Suite 200
Wethersfield, CT 06109

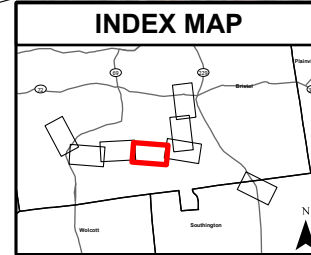
1810/1825 Line - Structure Replacement Project

Map Sheet 04 Abutter's Table

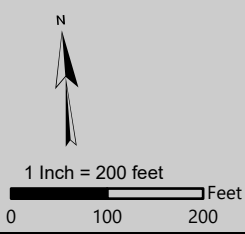
Line List Number	Owner First Name	Owner Last Name	Parcel Address	Town	State
151	CITY OF BRISTOL WATER DEPT	N/A	125 LAKESIDE DR	BRISTOL	CT



\\vhb.com\gis\proj\Wethersfield\42605.00\1810-1825 Line Siting\Project\1800_1825_Line_Project.aprx



Legend			
● Existing Structure	- - Existing Access	--- Delineated Intermittent Watercourse	▭ Rare Species (NDDB June 2020)
- - Overhead Eversource Line	▨ Temporary Construction Matting	— 10' Contour Line	- - - 2' Contour Line
— Existing Right-of-Way (ROW)	Ⓜ Gate	— Hiking Trail	▭ Parcel Boundary
▭ Eversource Owned Parcel		▭ Municipal Boundary	

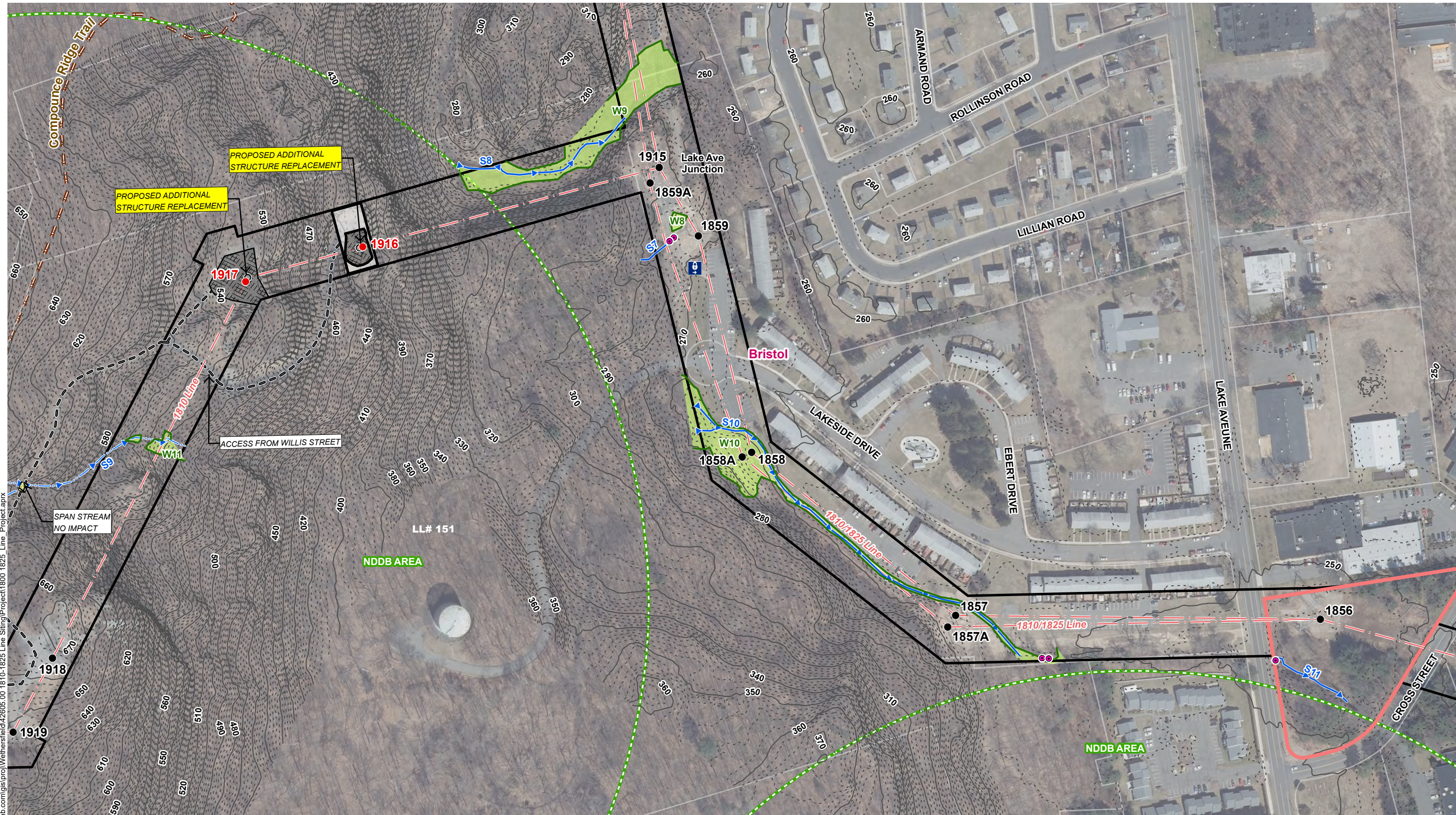


Base Map Source:
2019 Aerial Imagery (CTDEP)

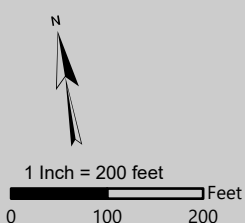
EVERSOURCE ENERGY	
1810/1825 Line - Structure Replacement Project	
Date: October 20, 2020 Revised September 23, 2022	
Bristol, CT	
	Map Sheet 4 of 7

1810/1825 Line - Structure Replacement Project
Map Sheet 04A Abutter's Table

Line List Number	Owner First Name	Owner Last Name	Parcel Address	Town	State
151	CITY OF BRISTOL WATER DEPT	N/A	125 LAKESIDE DR	BRISTOL	CT



Legend			
● Proposed Structure	--- Existing Access	— Delineated Perennial Watercourse	--- Rare Species (NDDB June 2020)
○ Existing Structure to be Removed	▭ Stone Work Pad	--- Delineated Intermittent Watercourse	--- 10' Contour Line
● Existing Structure	▨ Temporary Construction Matting	— Delineated Wetland Boundary Outline	--- 2' Contour Line
- - - Overhead Eversource Line	▩ Existing Gravel Work Pad	■ Field Delineated Wetland	--- Hiking Trail
— Existing Right-of-Way (ROW)	⊕ Gate		--- Parcel Boundary
▭ Eversource Owned Parcel			▭ Municipal Boundary



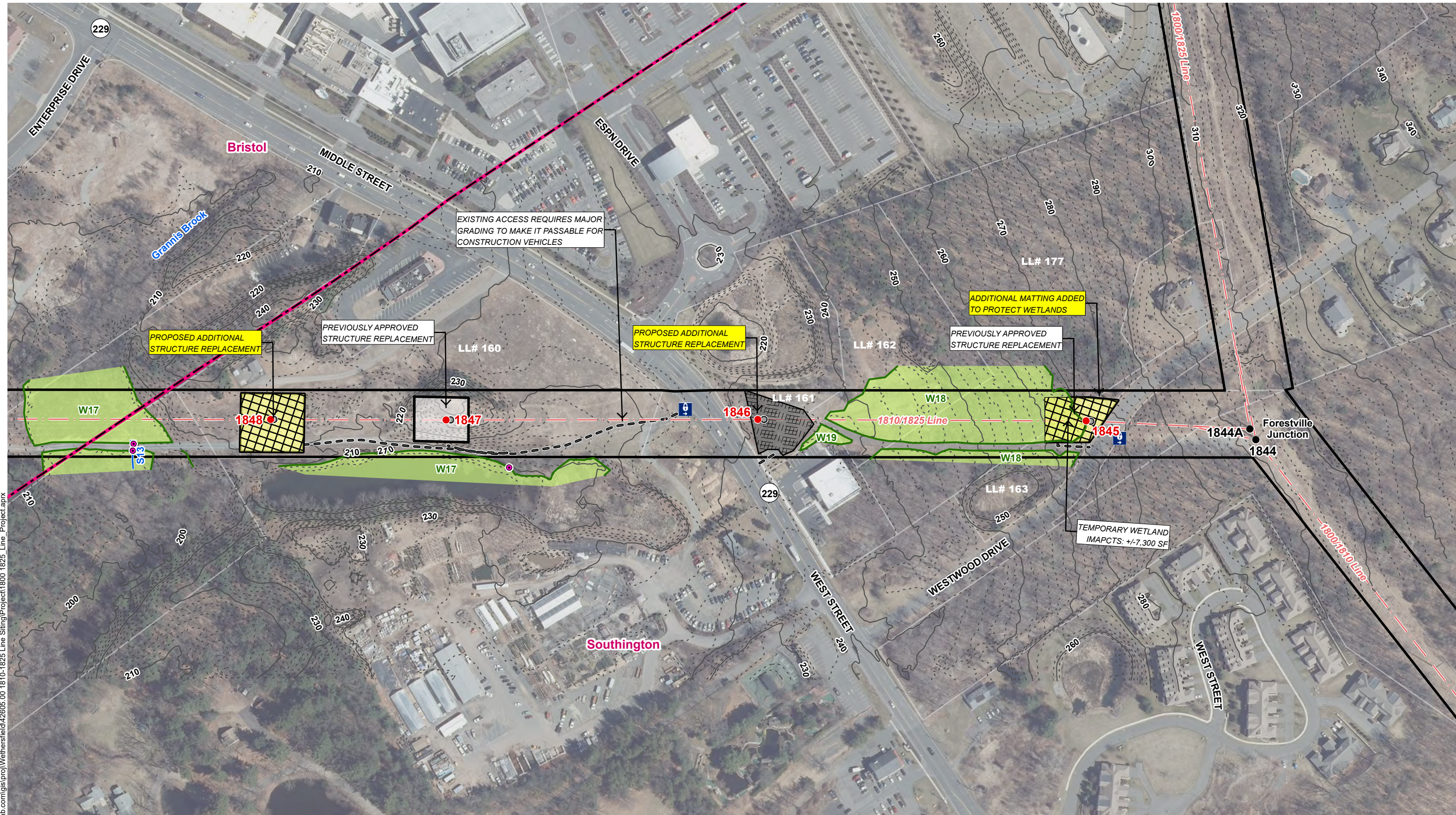
Base Map Source:
2019 Aerial Imagery (CTDEP)

EVERSOURCE ENERGY	
1810/1825 Line - Structure Replacement Project	
Date: October 20, 2020 Revised September 23, 2022	
Bristol, CT	
	Map Sheet 4A of 7

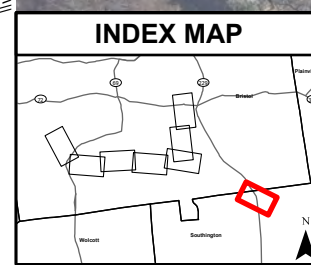
1810/1825 Line - Structure Replacement Project

Map Sheet 07 Abutter's Table

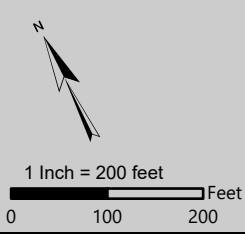
Line List Number	Owner First Name	Owner Last Name	Parcel Address	Town	State
160	2516 WEST STREET LLC	N/A	2156 WEST ST	SOUTHINGTON	CT
161	L I C WAREHOUSE REALTY CO INC	N/A	2165 WEST ST	SOUTHINGTON	CT
162	PRAYER HOUSE OF ALL GRACES AND TWO HEARTS AS ONE INC	N/A	2095 WEST ST	SOUTHINGTON	CT
163	SOUTHINGTON TOWN OF	N/A	35 WESTWOOD RD	SOUTHINGTON	CT
177	LOVLEY DEVELOPMENT INC	N/A	61 WESTWOOD RD	SOUTHINGTON	CT



\\vhb.com\gis\proj\Wethersfield\42605.00\1810-1825 Line Siting\Project\1800_1825_Line_Project.aprx



Legend		
● Proposed Structure	- - Existing Access	▶ Delineated Perennial Watercourse
○ Existing Structure to be Removed	▭ Stone Work Pad	▭ Delineated Wetland Boundary Outline
● Existing Structure	▨ Temporary Construction Matting	▭ Field Delineated Wetland
- - Overhead Eversource Line	▨ Existing Gravel Work Pad	— 10' Contour Line
— Existing Right-of-Way (ROW)	⚡ Gate	- - 2' Contour Line
		▭ Parcel Boundary
		▭ Municipal Boundary



Base Map Source:
2019 Aerial Imagery (CTDEP)

EVERSOURCE ENERGY	
1810/1825 Line - Structure Replacement Project	
Date: October 20, 2020 Revised September 23, 2022	
Bristol and Southington, CT	
	Map Sheet 7 of 7