

Deborah Denfeld

Team Lead – Transmission Siting
Tel: (860) 728-4654

February 7, 2023

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

Re: Sub-Petition No. 1293-HEHLELMW-01: 348/364 Transmission Line Structure Replacement Project - Amendment to Sub-Petition pursuant to Condition 2 of the Connecticut Siting Council Sub-Petition Approval – One Additional Replacement Structure (Town of East Haddam)

Dear Attorney Bachman:

On January 3, 2019, 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 348/364 transmission line right-of-way ("ROW") in Haddam, East Haddam, Lyme, East Lyme, Montville and Waterford, Connecticut. As detailed in the Sub-Petition, the work included replacing 115 existing wood transmission structures with new weathering steel transmission structures.

On February 4, 2019, 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 one additional transmission structure on the 348/364 Line that requires 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 replacement, the following work ("Work Activities") will be performed:

- Replace one existing single-circuit wood H-frame structure, Structure 9753, with a new single-circuit weathering steel H-frame structure. To comply with current conductor clearance requirements, the height of the replacement structure will be increased by 4.5 feet for an overall height of 88 feet.

Please see revised map sheets 14 and 15 in Attachment A; *"348/364 Line - Structure Replacement Project" "Sub-Petition Map Set"*, dated January 2, 2019, revised February 3, 2023. Eversource respectfully submits that the proposed structure replacement 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 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 location utilizing its existing rights.
- As detailed on revised Map Sheet 15, the Work Activities associated with the proposed access road to Structure 9753 will result in approximately 613 square feet of additional temporary wetland impacts from the use of temporary construction matting for the access road. 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 wetland and watercourse just west of Structure 5479.

- No vernal pools or vernal pool envelopes are located in proximity to the proposed Work Areas.
- Eversource consulted with the Connecticut Department of Energy and Environmental Protection Natural Diversity Data Base ("NDDDB") and has received recommendations from NDDDB (NDDDB Revised Determination No. 202207703) for the work activities associated with the access road and work pad at Structure 9753. The recommended protection measures identified in the NDDDB Determination have been accepted by Eversource and will be incorporated into the Company's BMPs, project plans and construction activities. With these protection 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 Pedestrian Survey conducted by Heritage, Structure 9753 has been classified as no to low sensitivity for cultural resources based on the presence of poor drainage characteristics, moderate/steep slopes, and/or obvious signs of previous ground disturbances. Therefore, Heritage concluded that no additional archeological examination of the Work Areas 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 structure 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-HEHLELMW-01.
- Eversource will access the Work Areas by entering its ROW from an existing access point off Norwich Salem Road (State Route 82) in East Haddam.

Eversource herewith respectfully requests approval for the requested change. 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 deborah.denfeld@eversource.com or telephone at (860) 728-4654.

Sincerely,



Deborah Denfeld
Team Lead - Transmission Siting

Enclosure

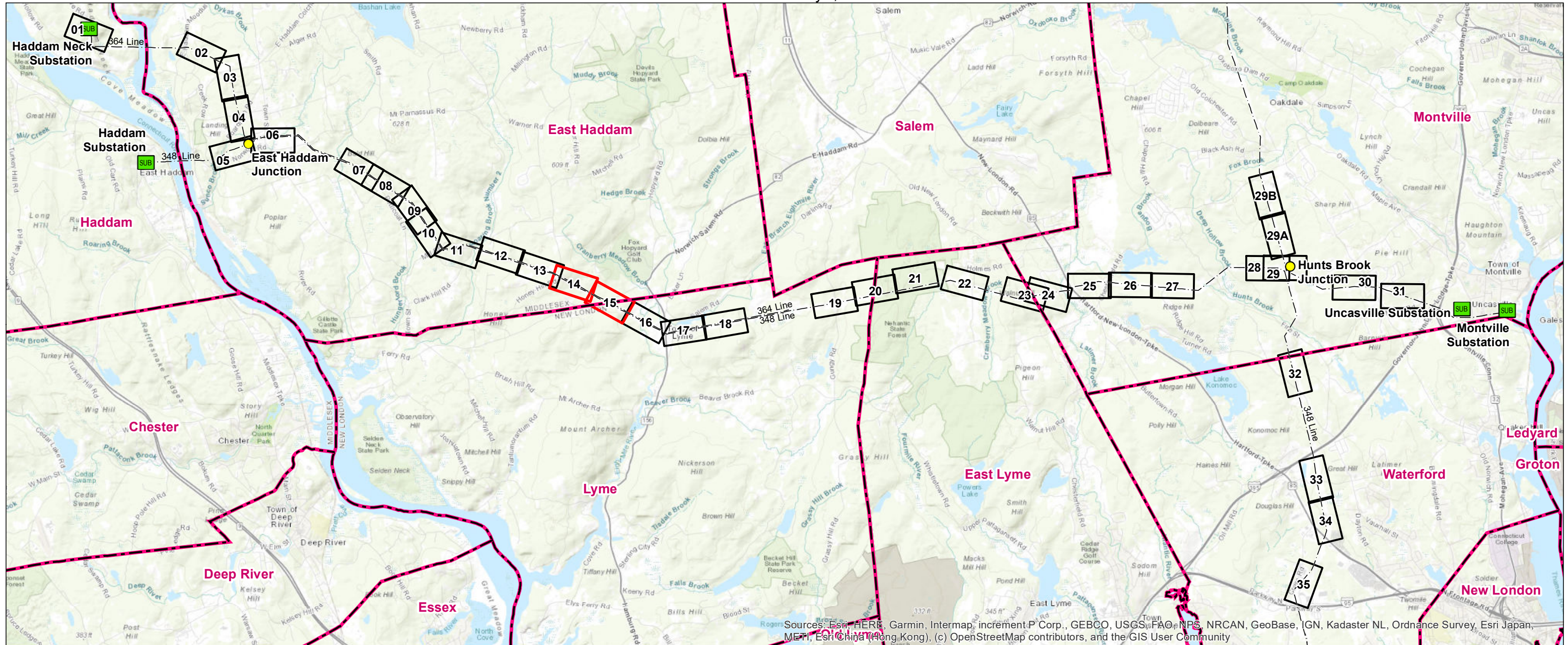
348/364 Line - Structure Replacement Project

Haddam, East Haddam, Lyme, East Lyme, Montville, and Waterford CT

Sub-Petition Map Set

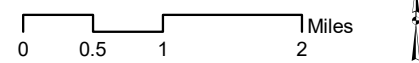
Date: January 2, 2019

REVISED: February 3, 2023



Legend

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



INDEX OF FIGURES

Title Sheet / Index Map
 Abutter Tables & Map Sheets 1-35

PREPARED FOR:



107 Selden Street
 Berlin, CT 06037

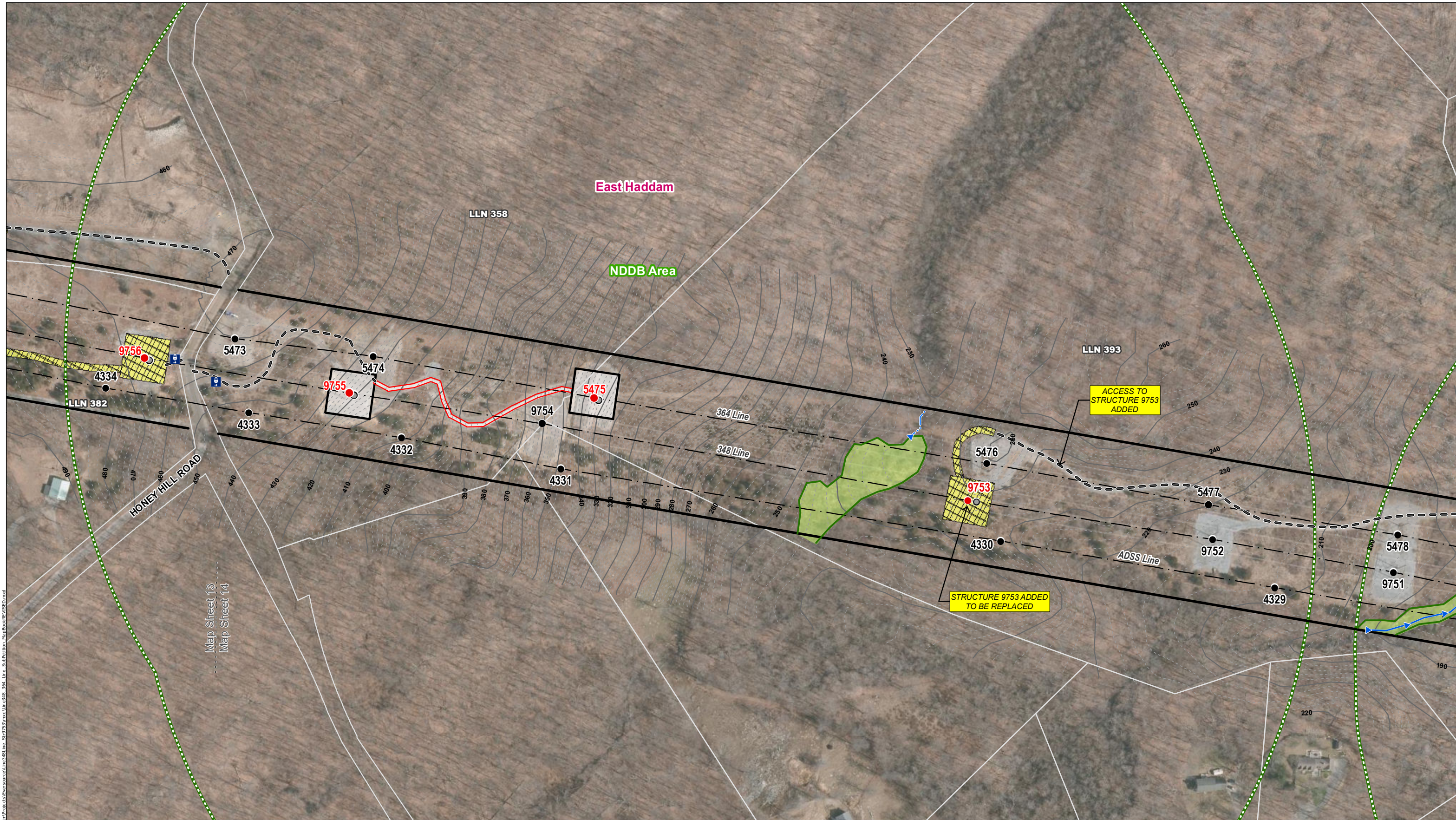
PREPARED BY:



3 Saddlebrook Drive
 Killingworth, CT 06419

Map Sheet 14 of 35
348/364 Line Structure Replacement Project
Abutters List

<u>Line List Number</u>	<u>Owner Name</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>
358	FOX HOPYARD ASSOC INC	TATER HILL RD	EAST HADDAM	CT
382	DONALD L & SUSAN L PORTER	HONEY HILL RD- CELL#302527	EAST HADDAM	CT
393	FRANK M GRAZIOSO TRUSTEE	NORWICH SALEM RD	EAST HADDAM	CT



Legend	
● Proposed Structure	Existing Access
● Existing Structure to be Removed	Existing Access to be Improved
● Existing Structure	Proposed Access
● Overhead Eversource Line	Proposed Alternate Access
— Existing Right-of-Way (ROW)	Stone Work Pad
— 10' Contour Line	Open Water
— 2' Contour Line	Watercourse (not delineated)
● Culvert	Ordinary High Water Mark
⊗ Gate	Delineated Perennial Watercourse
⊗ Fence	Delineated Intermittent Watercourse
⊗ Silt Fence	Delineated Wetland Boundary Outline
Field Delineated Wetland	Confirmed Vernal Pool Extent
Approximate Wetland	100' Vernal Pool Envelope
Temporary Construction Matting	Floodway
Critical Habitat (CTDEEP, 2009)	Public Water Supply Watershed
Natural Diversity Database Area (Dec 2022)	FEMA 100-Year Flood Zone
	Eversource Owned Property
	Parcel Boundary
	State-Owned Property
	Municipal Boundary
	Map Sheet Matchline

Map Notes:
 Not for Construction. Parcel and ROW boundaries are approximate (not survey). Repairs to existing access roads within wetlands with permanent fills are exempt discharges under 323.4(a)(2) provided that the limit of fill does not exceed the footprint of the existing fill through wetlands areas. Maintenance repairs do not include modifications that change the character, scope, and size of the original fill design. Temporary impacts associated with construction mats in previously disturbed wetland and upland areas either within vernal pool (VP) depressions or management area (100' of VP's edge) are eligible under the Army Corps of Engineers CT General Permit as a Self-Verification eligible activity. Base Map Source: 2019 CTECO Orthophotography

1 inch = 200 feet
 0 50 100 200 Feet

NO.		DATE	REVISIONS	BY	CHK	APP	APP
1	2/3/23		REPLACEMENT STRUCTURE 9753 AND ASSOCIATED ACCESS ADDED				

EVERSOURCE ENERGY

348/364 Line
Structure Replacement Project

East Haddam, CT

Date: January, 2019
REVISID: February 3, 2023

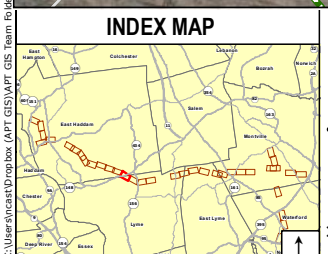
Map Author: N. Castro

Map Sheet 14 of 35

ALL-POINTS TECHNOLOGY CORPORATION

Map Sheet 15 of 35
348/364 Line Structure Replacement Project
Abutters List

<u>Line List Number</u>	<u>Owner Name</u>	<u>Parcel Address</u>	<u>City</u>	<u>State</u>
393	FRANK M GRAZIOSO TRUSTEE	NORWICH SALEM RD	EAST HADDAM	CT
425	JAMES O & MABEL S MATSCHULAT	NORWICH SALEM RD	EAST HADDAM	CT
450	ANTONIA I HONISS	630 HAMBURG RD AKA RT 156	LYME	CT



Legend	
● Proposed Structure	Field Delineated Wetland
○ Existing Structure to be Removed	Approximate Wetland
● Existing Structure	Confirmed Vernal Pool Extent
— Overhead Eversource Line	100' Vernal Pool Envelope
— Existing Right-of-Way (ROW)	Temporary Construction Matting
— 10' Contour Line	Open Water
— 2' Contour Line	Watercourse (not delineated)
○ Culvert	Ordinary High Water Mark
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— Existing Access	Public Water Supply Watershed
— Existing Access to be Improved	Proposed Access
— Proposed Access	Proposed Alternate Access
— Stone Work Pad	FEMA 100-Year Flood Zone
— Floodway	Eversource Owned Property
— Critical Habitat (CTDEEP, 2009)	Parcel Boundary
— Natural Diversity Database Area (Dec 2022)	State-Owned Property
— Municipal Boundary	Map Sheet Matchline

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										EVERSOURCE ENERGY	
										348/364 Line Structure Replacement Project	
										East Haddam/Lyme, CT	
										Map Sheet 15 of 35	
										Date: January, 2019 REVISID: February 3, 2023	
										Map Author: N. Castro	
1	2/3/23	REPLACEMENT STRUCTURE 9753 AND ASSOCIATED ACCESS ADDED		BY	CHK	APP	APP				