



56 Prospect Street
P.O. Box 270
Hartford, CT 06103
Kathleen M. Shanley
Manager – Transmission Siting
Tel: (860) 728-4527

February 3, 2022

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

Re: Sub-Petition No. 1293-LG-01: 400/1410 Line 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 at Whalehead Junction, Town of Ledyard)

Dear Attorney Bachman:

On September 30, 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 400 Line (69-kilovolt ["kV"]) /1410 Line (115-kV) transmission line right-of-way ("ROW") between Ledyard Junction and the Ledyard-Groton boundary, where ownership of the lines transition to Groton Public Utilities. The work detailed in the Sub-Petition included replacing 33 existing wood transmission structures with new weathering steel transmission structures, all within the Town of Ledyard.

On November 20, 2020, the Council issued a letter acknowledging that the above-reference project would not have an adverse environmental effect and would not require a Certificate of Environmental Compatibility and Public Need. Accordingly, Eversource commenced work on the asset condition improvements specified in the Sub-Petition, as well as on the replacement of structures not subject to Council jurisdiction (i.e., structures to be replaced due to asset condition issues, but that required no increase in height compared to the existing structure to be removed).¹

However, when excavating foundations for two of the structures at which no height increase was anticipated (Structure 7406 on the 1410 Line and Structure 7406A on the 400 Line), Eversource encountered unsuitable subsurface conditions. Both existing structures, which are located on Eversource property (Whalehead Junction), are guyed wood three-poles with existing structure heights of 61 feet above ground level.

As a result, Eversource reevaluated the design plans for these two replacement structures, determining that both must now be three-pole engineered weathering steel structures with drilled shaft foundations in order to provide suitable support. Each new structure would have a height of 66 feet above ground level (5 feet taller than the existing wood pole structures). The replacement structures will not require guying.

The attached Sub-Petition Map Sheet 1 has been updated to include the locations of Structures 7406 and 7406A.

¹ On September 14, 2021, the Council approved Eversource's request for an extension of time (until November 20, 2022) to complete the asset condition maintenance improvements on the 400/1410 lines.

Eversource respectfully submits that the Structure 7406 and Structure 7406A replacement activities will not result in any substantial adverse environmental impacts pursuant to Conn. Gen. Stat. §16-50K, based on the following factors:

The replacement structure work (“Work Activities”) will be on Eversource’s property, located directly south of Whalehead Road. Construction access to the replacement structures will be via an existing access road that was included in the Sub-Petition. The Work Activities will be performed on a temporary work pad (refer to the attached revised Sub-Petition Map 1).²

- The Work Activities associated with the replacement of Structures 7406 and 7406A will result in approximately 17,140 square feet of temporary wetland impacts from the use of timber mats for the work pad in Wetland W3. Work would be conducted in accordance with Eversource’s *Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements)*, September 2016 (“BMPs”) to minimize impacts to Wetland W3 and a small watercourse. Further, the wetland areas affected by the Work Activities will be restored in accordance with applicable regulatory requirements and Eversource’s BMPs.
- No vernal pools or vernal pool envelopes are located near Structure 7406 and Structure 7406A.
- Eversource will restore the Structure 7406 and Structure 7406A work areas in accordance with its New England Cottontail BMPs.
- Eversource reviewed the Connecticut Department of Energy and Environmental Protection, Natural Diversity Data Base (“NDDB”). The NDDB has no records of State or Federally listed species in the vicinity of Structure 7406 or Structure 7406A.
- Eversource retained Heritage Consultants, LLC (“Heritage”) to perform a Phase 1A cultural resource assessment of the 400/1410 Line project area. Heritage analyses determined that there are no known historic or archaeological sites in or near the vicinity of Structure 7406 or Structure 7406A or the structures’ associated work pad and access road. Heritage also determined that the area in the vicinity of the two structures has a no/low sensitivity with respect to the potential for locating archaeological deposits. Therefore, Heritage concluded that no additional archaeological examination of these areas was warranted.
- The Work Activities will not be located in a 100-year flood zone.
- Temporary environmental effects from the Work Activities at Structure 7406 and Structure 7406A will be mitigated as referenced in Sub-Petition 1293-LG -01.

Eversource has notified the Town of Ledyard and the abutting landowner regarding the modifications to the heights of replacement Structure 7406 and Structure 7406A.

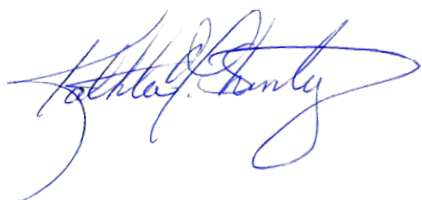
² The temporary work pad at Whalehead Junction also will be used as a pull pad for optical groundwire installation for Eversource’s Eastern Connecticut Reliability Project: Montville Junction to Ledyard Junction (Petition 1475; refer to Map Sheet 5 of that Petition filing).

Ms. Bachman
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Eversource respectfully seeks Council approval of this proposed amendment to Sub-Petition 1293- LG-01.

Please contact me at 860-728-4527 if you have any questions regarding this request.

Sincerely,

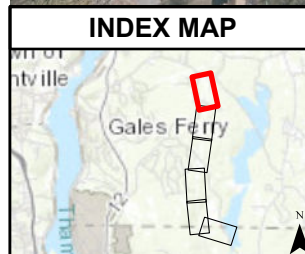
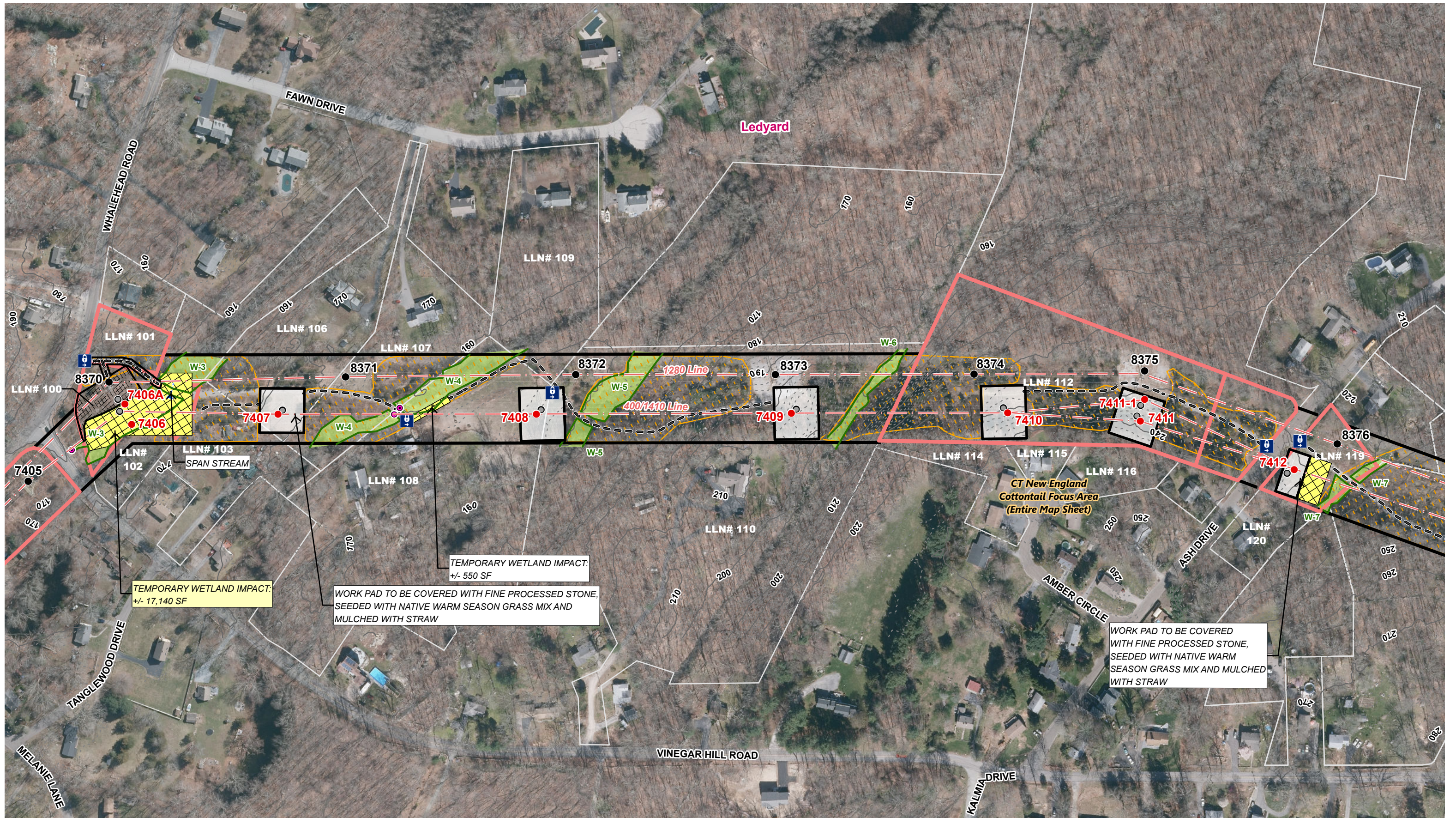
A handwritten signature in blue ink, appearing to read "John J. Dwyer". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Attachment: Revised Map Sheet 1 and Line List

400/1410 Line - Structure Replacement Project

Map Sheet 01 Abutter's Table

Line List Number	Owner First Name	Owner Last Name	Parcel Address	Town	State
100	Conn Light & Power	N/A	71 Whalehead Road	Ledyard	CT
101	Conn Light & Power	N/A	67 Whalehead Road	Ledyard	CT
102	Terry L & Nanette C	Ault	3 Vinegar Hill Road	Ledyard	CT
103	Charles & Wendy	Leyko	7 Vinegar Hill Road	Ledyard	CT
106	Kathryn A.	Bruciati	8 Fawn Drive	Ledyard	CT
107	Mary Jane	Peterson	10 Fawn Drive	Ledyard	CT
108	Edward R. & Elizabeth A.	Titus	15 Vinegar Hill Road	Ledyard	CT
109	Lawrence C. & Janet K.	Erhart	14 Fawn Drive	Ledyard	CT
110	John R. & Coral J.	Crandall	27A Vinegar Hill Road	Ledyard	CT
112	Conn Light & Power	N/A	19R Ash Drive	Ledyard	CT
114	Richard T.	Overholt	5 Amber Circle	Ledyard	CT
115	Roscoe T. & Mary E.	Van Dyne Jr.	7 Amber Circle	Ledyard	CT
116	Alexander V.	Haeseler	6 Amber Circle	Ledyard	CT
119	Conn Light & Power	N/A	18 Ash Drive	Ledyard	CT
120	Miriam	Nieves	14 Ash Drive	Ledyard	CT
124	Erwin L. & Jacqueline	Bieber	61 Vinegar Hill Road	Ledyard	CT



Legend	
● Proposed Structure	⊗-⊗ Fence
○ Existing Structure to be Removed	⋯ Delineated Intermittent Watercourse
● Existing Structure	⋯ Delineated Perennial Watercourse
— Existing Right-of-Way (ROW)	— Delineated Wetland Boundary Outline
— Overhead Eversource Line	— Open Water
⊠ Temporary Construction Matting	⊠ Field Delineated Wetland
⊠ Stone Work Pad	⊠ Potential Vernal Pool
— Existing Access	⊠ Potential Vernal Pool Extent
— Proposed Access	⊠ FEMA 100-Year Flood Zone
— Proposed Alternative Access	— 10' Contour Line
⊠ Existing Gravel	⋯ 2' Contour Line
⊠ Gate	⊠ New England Cotton Tail Preservation Area
⊠ Culvert	⊠ Parcel Boundary
⊠ Stonewall	⊠ Eversource Owned Parcel
	⊠ Municipal Boundary

EVERSOURCE ENERGY

400/1410 Line Structure Replacement Project

Date: September 18, 2020 (Rev January 28, 2022)

Ledyard, CT

Map Sheet 1 of 6

Base Map Source:
2019 Aerial Imagery (CTDEP)

1 Inch = 200 feet