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

April 20, 2020

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

#### Re: Sub-Petition No. 1293-NMWRWW-01: 352 Transmission Line Structure Replacement Project, Amendment to Sub-Petition

Dear Attorney Bachman:

On September 30, 2019, the Connecticut Siting Council ("Council") issued a ruling 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 five additional transmission structures on the 352 Line 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 support of the additional structure replacements, the following work ("Work Activities") will be performed:

Replace five existing wood H-Frame structures with new weathering steel H-Frame structures. With • the exception of Structure 8113, which would change from a 2-Pole H-Frame design to a 3-Pole H-Frame design, to increase the phase-to-phase clearance requirements, the remainder of the structures will be replaced with the same H-Frame design. Two of the additional structures, 8113 and 8204, will be installed within 15 feet of the existing structure locations. Structure 8105 would be repositioned 70 feet from the existing structure to reduce impacts to a watercourse. Structure 8121 would be repositioned 20 feet from the existing structure to relocate it off a small rocky knoll, enabling a level work pad to be safely constructed for the structure replacement work and Structure 8185 would be repositioned 65 feet from the existing structure to move it away from an access road and an underground propane line associated with an existing commercial greenhouse operation. To comply with current conductor clearance requirements, Structures 8121, 8185 and 8204 will be raised in height by 13.5 feet and Structure 8113 will be raised in height by 4.5 feet. Structure 8105 would not require a height increase. Work Activities would take place in areas within Eversource's property and existing right-of-way ("ROW") utilizing existing and proposed new permanent access roads, as well as some temporary access roads (collectively the "Work Areas"). Some of the existing access roads will be improved. See revised Attachment A; "352 Line - Structure Replacement Project" "Sub-Petition Map Set", dated August 29, 2019, revised April 10, 2020.

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;

Work Activities associated with the five additional replacement structures will result in approximately 5,015 square feet of temporary wetland impacts, limited to temporary construction matting required for the construction of the work pads for Structures 8105, 8185 and 8204 and the access for Structure 8113. There are no flood zones or vernal pools associated with the Work Areas.

Based on a review of the Connecticut Department of Energy and Environmental Protection's ("CTDEEP") Natural Diversity Database ("NDDB"), no Work Areas are proposed within a NDDB buffered area and wetland jurisdictional area and/or CTDEEP owned/managed land; therefore, they would not be subject to a NDDB review request. Work would be conducted in accordance with Eversource's Best Management Practices 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 within the managed ROW corridor to improve access to the Work Areas.

A Phase IA 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 located within 500 feet of the Work Areas. Based on a review of historic maps, aerial photographs, and available soil profiles, the proposed structure replacement locations were identified by Heritage as possessing no to low archaeological sensitivity. Therefore, no protective measures are required for the proposed activity and no further investigation is recommended or warranted.

No change in noise levels would result from the installation of the replacement structures and the applicable lines would continue to comply with the State of Connecticut noise regulations. Any changes in electric and magnetic field levels off the ROW would be negligible.

Three new permanent access roads would be constructed to facilitate access to two of the proposed additional structures. Existing access roads in upland areas associated with the proposed additional structures may be hardened and temporarily widened at turning areas to facilitate the safe passage of construction vehicles. Construction matting would be used as temporary access roads in wetlands. The matting will be removed upon completion of the Work Activities and the areas restored, as necessary.

Temporary environmental effects from construction will be mitigated using appropriate erosion and sediment controls ("E&S") in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and Eversource's Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements), dated September 2016. 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 temporary E&S controls and remove/dispose of any accumulated sediments and debris from areas where such measures were used.

Prior to submitting this amendment Eversource representatives briefed officials in the towns of Roxbury, Woodbury and Watertown concerning the project modifications. In addition, Eversource provided abutters with written notice of the filing of the Amendment. Eversource will access Work Areas using existing access roads within the right-of-way ("ROW") from existing access points on public roads as follows:

#### Roxbury

- Painter Ridge Road for Structure 8105
- Washington Woodbury Road for Structures 8113

#### Woodbury

• Nettleton Hollow Road for Structure 8121

#### Watertown

- Nova Scotia Hill Road for Structure 8185
- Echo Lake Road for Structure 8204

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,

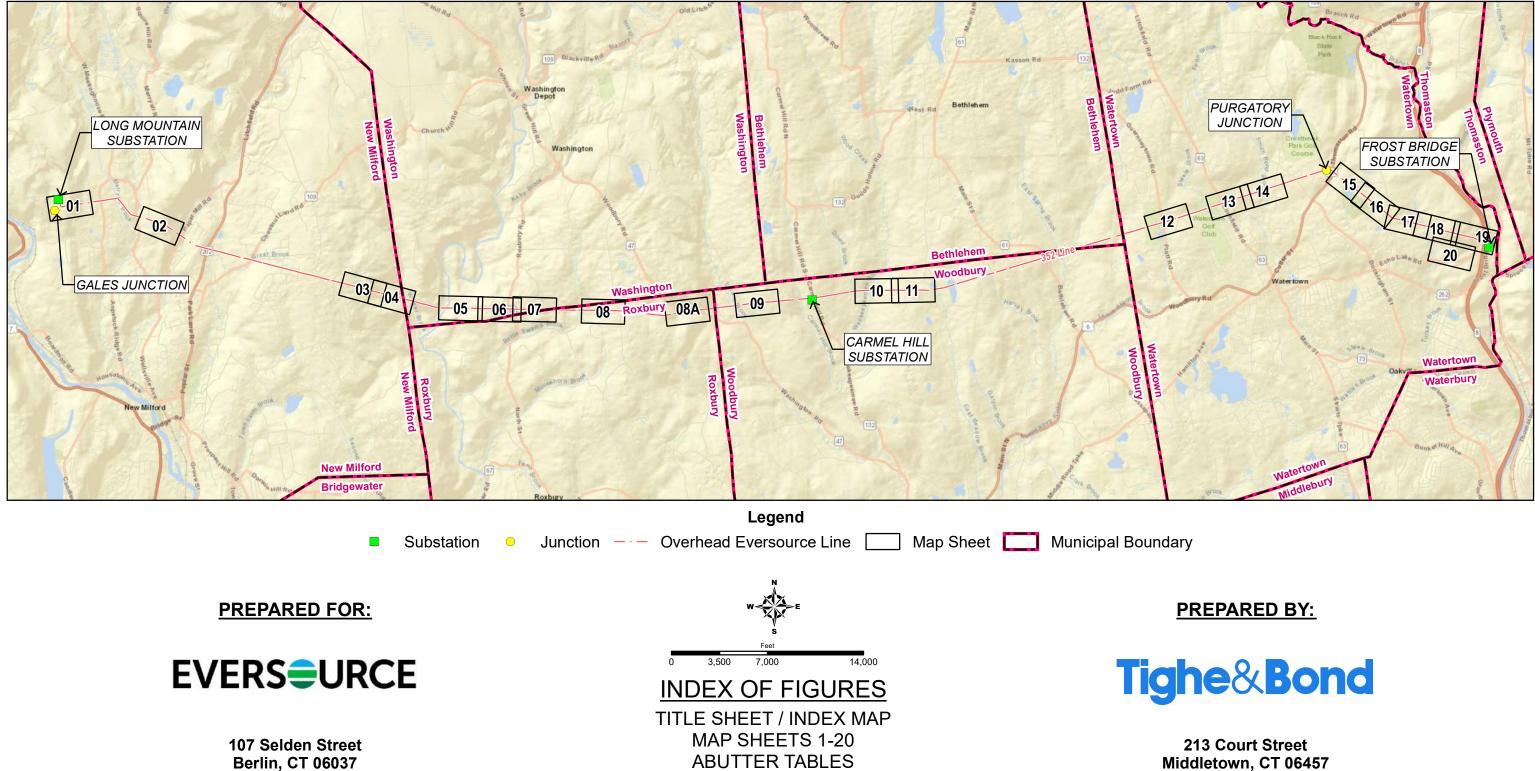
Kathleen M. Shanley Manager - Transmission Siting

Enclosure

#### **352 LINE STRUCTURE REPLACEMENT PROJECT**

New Milford, Washington, Roxbury, Woodbury, & Watertown, Connecticut **SUB-PETITION MAP SET** 

Date: August 29, 2019 (Revised: April 13, 2020)



### Middletown, CT 06457

Map Sheet 1 Abutters List

Line List #	Owner Name	Parcel Address	Town	
LL107	CONNECTICUT LIGHT + POWER	LONG MTN RD	NEW MILFORD	C
LL109	103 JACKS HILL ROAD LLC	9 OAKWOOD LN	NEW MILFORD	С

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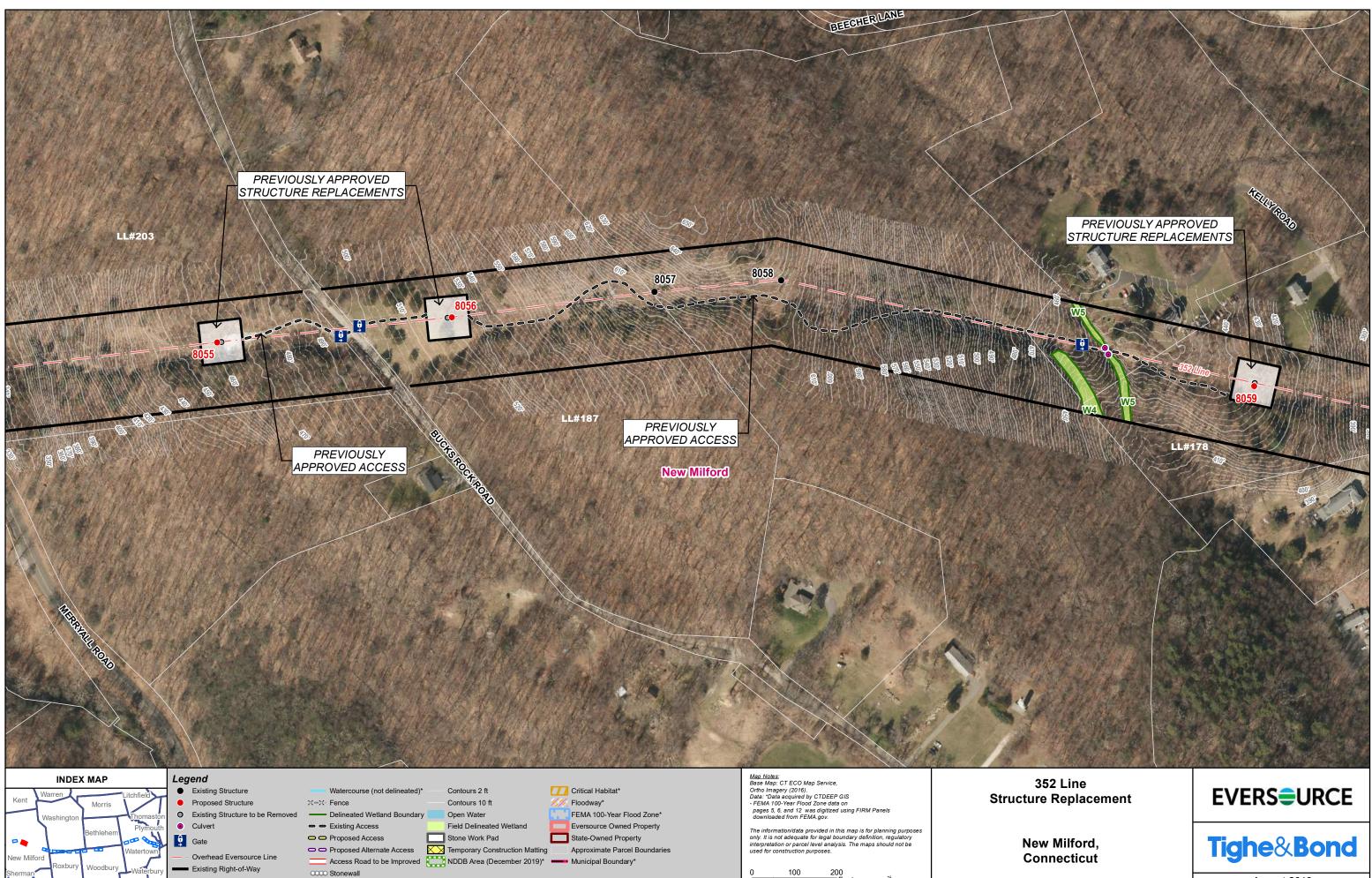
---- Matchlines

Mapsheet 01 of 20

Map Sheet 2 Abutters List

Line List #	Owner Name	Parcel Address	Town	
LL178	JAMES N + HEIDI G KELLY	27 KELLY RD	NEW MILFORD	(
LL187	JONATHAN PERLOWSKY	122 BUCKS ROCK RD	NEW MILFORD	(
LL203	GREGORY R MILLER	127 BUCKS ROCK RD	NEW MILFORD	(

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<sup>e</sup> • **—** Hiking Trail\*

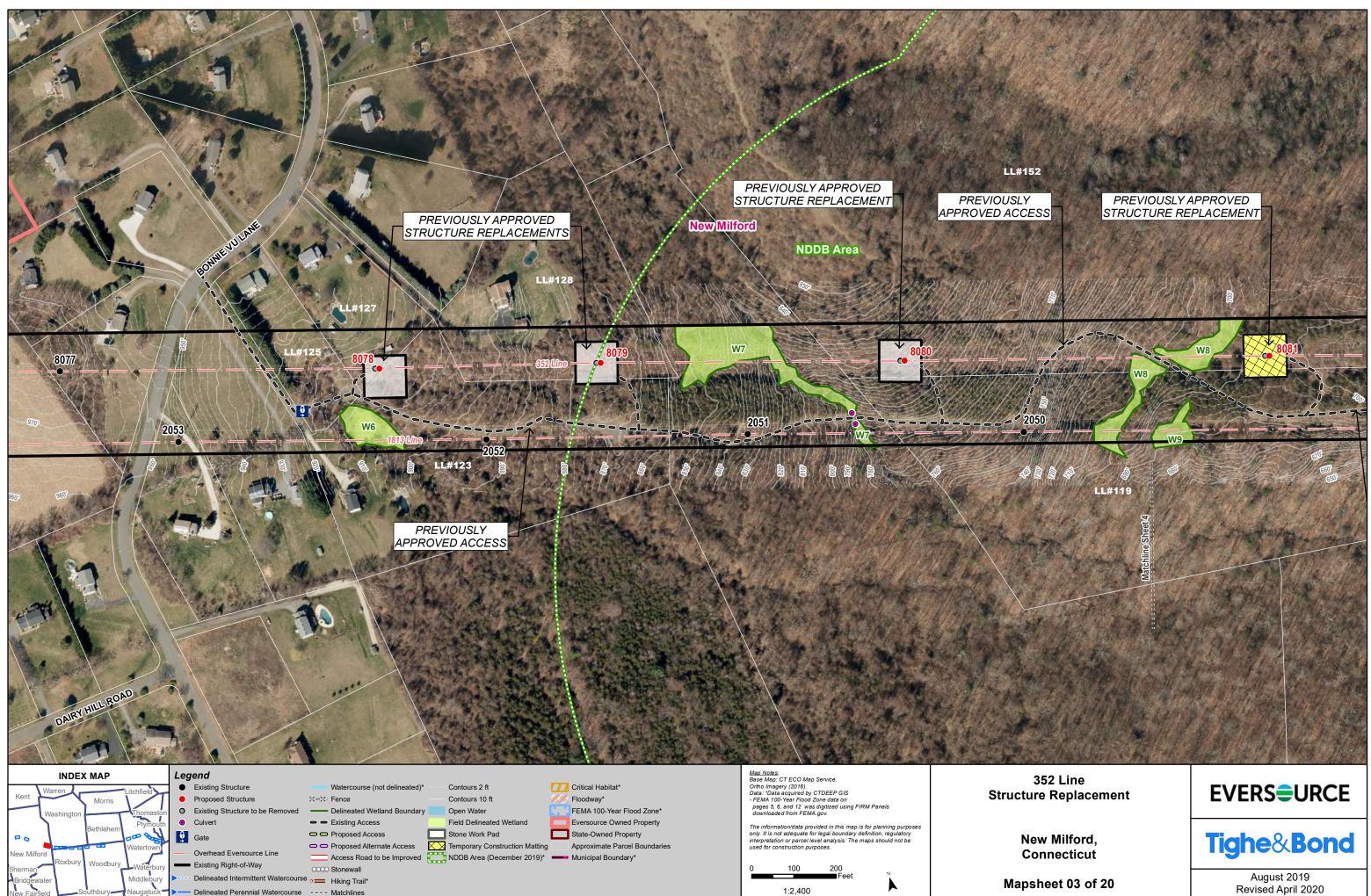
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Mapsheet 02 of 20

### Map Sheet 3 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL119	STEEP ROCK ASSOC INC	WALKER BROOK RD	NEW MILFORD
LL123	WILLIAM R + LUCA ANAMARIA OLSEN	35 BONNIE VU LN	NEW MILFORD
LL125	TAWAN TARANTO	31 BONNIE VU LN	NEW MILFORD
LL127	MICHAELANGELO + KATHY ROCCHIO	29 BONNIE VU LN	NEW MILFORD
LL128	LISA M FARKAS	25 BONNIE VU LN	NEW MILFORD
LL152	GENERAL REAL ESTATE HOLDINGS LLC	CHAPIN RD	NEW MILFORD

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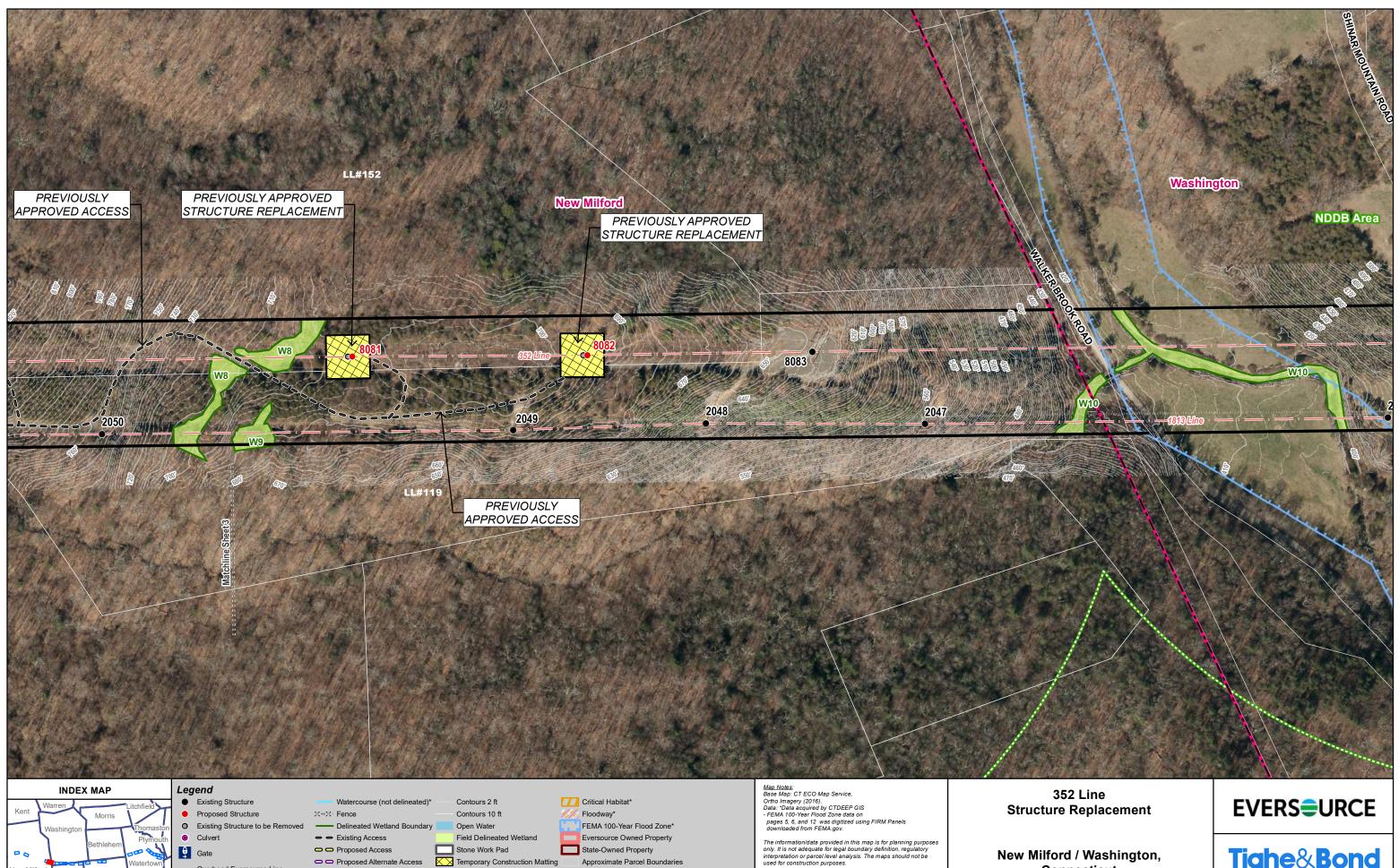
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Mapsheet 03 of 20

Map Sheet 4 Abutters List

	Line List #	Owner Name	Parcel Address	Town	
I	LL119	STEEP ROCK ASSOC INC	WALKER BROOK RD	NEW MILFORD	0
l	LL152	GENERAL REAL ESTATE HOLDINGS LLC	CHAPIN RD	NEW MILFORD	C

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Overhead Eversource Line

Existing Right-of-Way

Proposed Access

0000 Stonewall

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Proposed Alternate Access

Stone Work Pad

Access Road to be Improved III NDDB Area (December 2019)\* — Municipal Boundary\*

Temporary Construction Matting

State-Owned Property

Approximate Parcel Boundaries

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New Milford / Washington, Connecticut

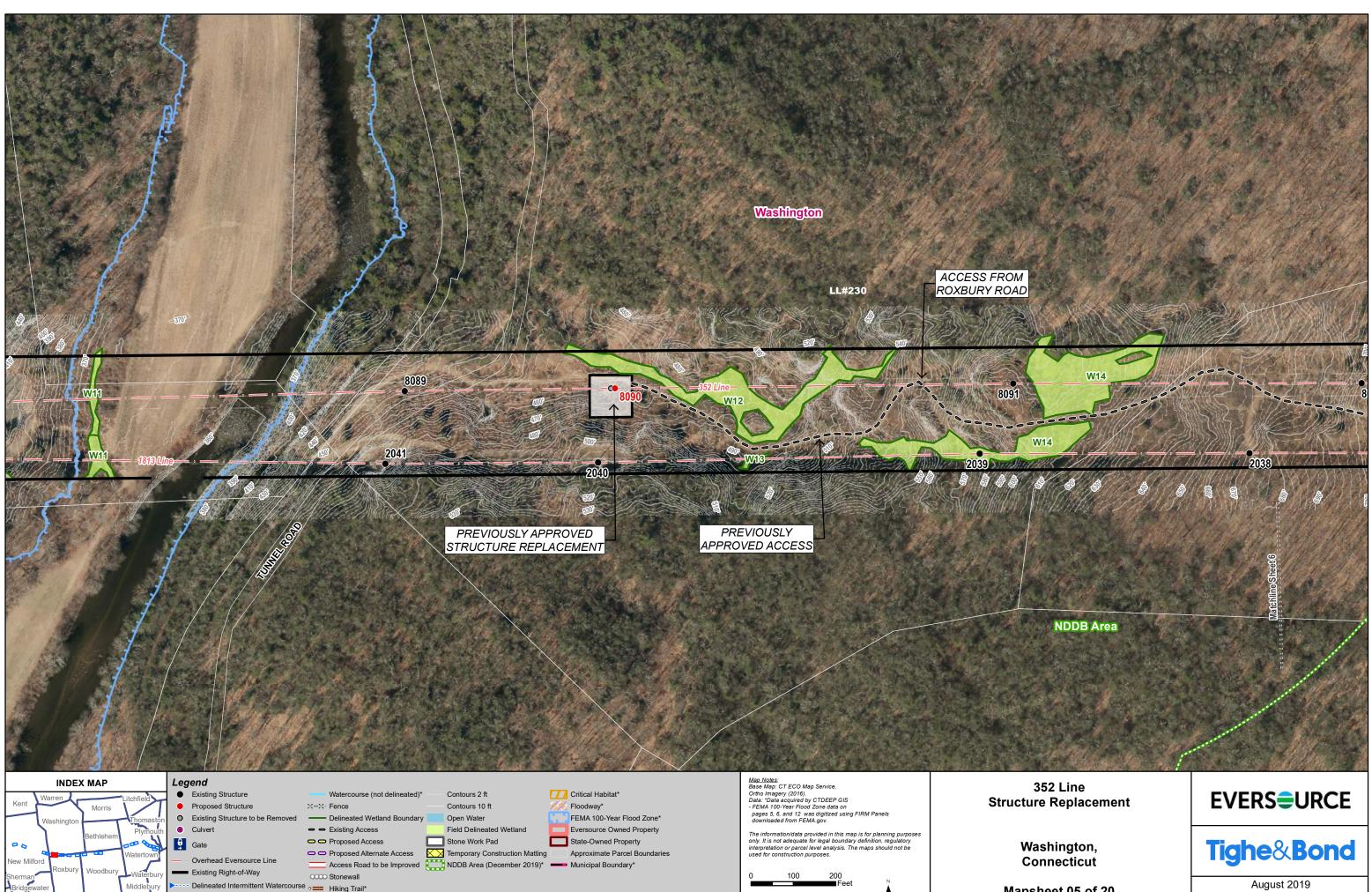
Mapsheet 04 of 20



Map Sheet 5 Abutters List

Line List #	Owner Name	Parcel Address	Town	
LL230	STEEP ROCK ASSOCIATION INC	198 TUNNEL RD	WASHINGTON	С

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Delineated Perennial Watercourse

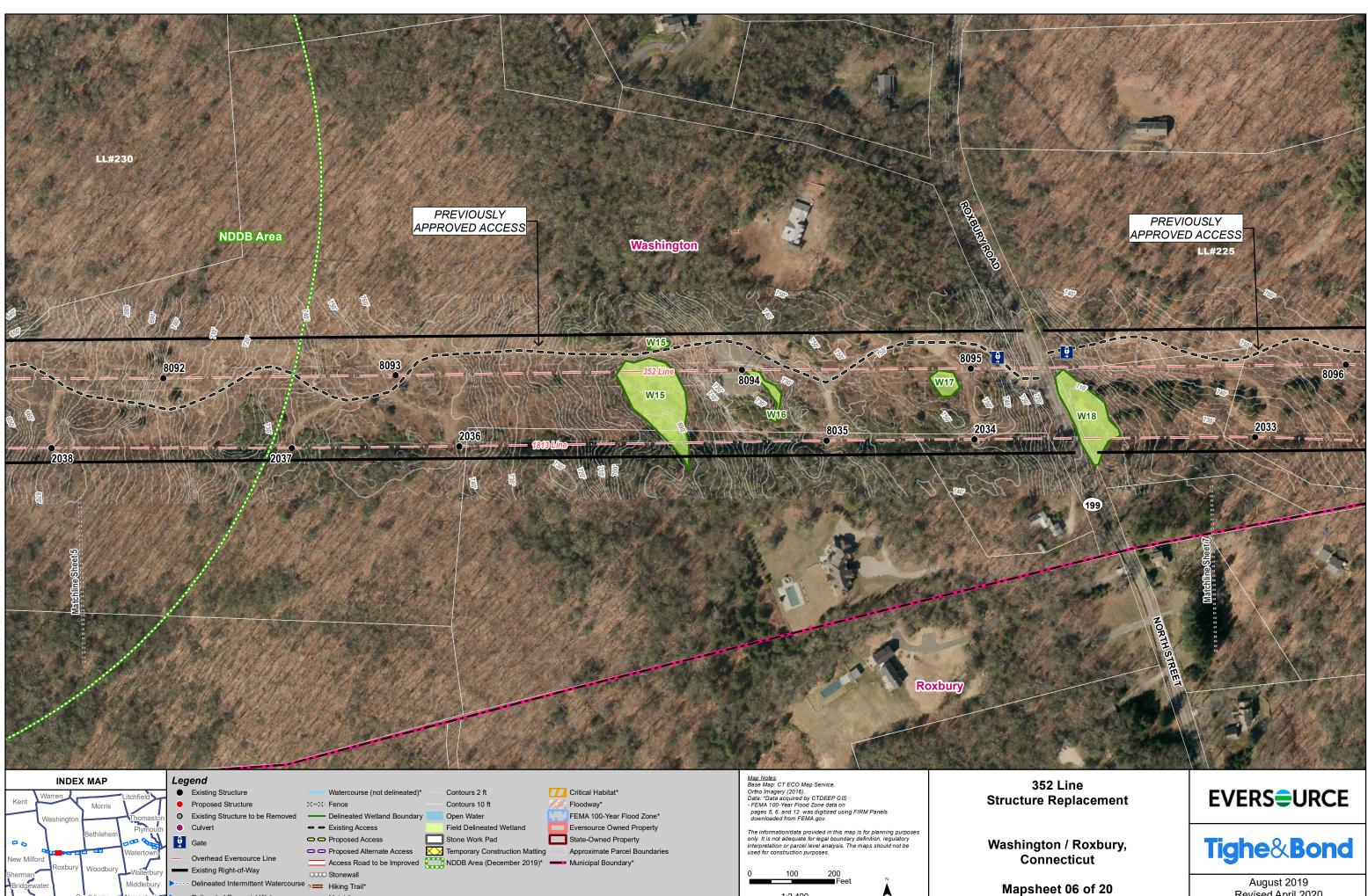
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Mapsheet 05 of 20

Map Sheet 6 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL225	JONATHAN L + CRISTIAN A BANKS	238 ROXBURY RD	WASHINGTON
LL230	STEEP ROCK ASSOCIATION INC	198 TUNNEL RD	WASHINGTON

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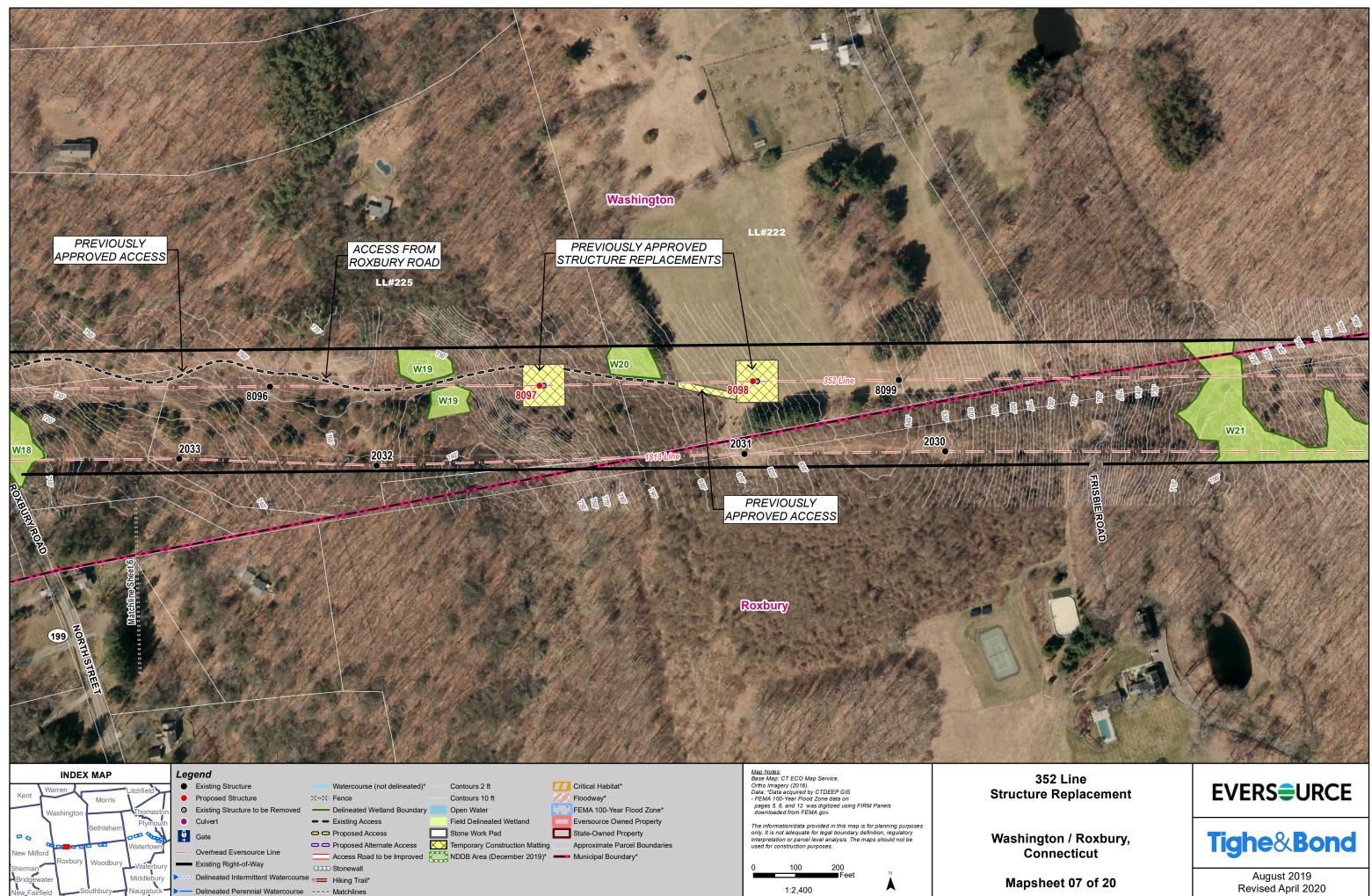
Delineated Perennial Watercourse

Mapsheet 06 of 20

Map Sheet 7 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL222	JANE WHITNEY + LINDSEY GRUSON	61 FRISBIE RD	WASHINGTON
LL225	JONATHAN L + CRISTIAN A BANKS	238 ROXBURY RD	WASHINGTON

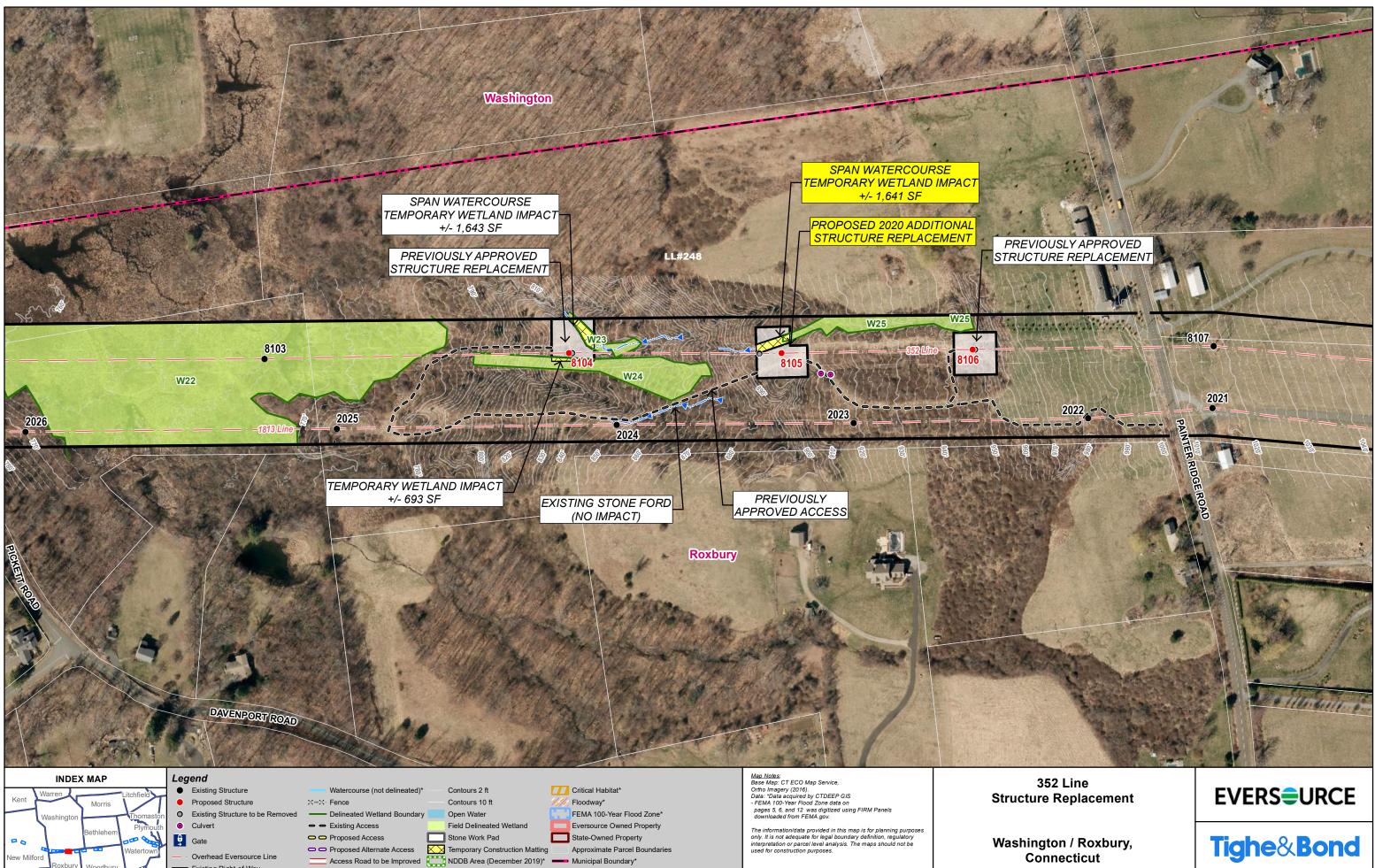
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Map Sheet 8 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL248	BRIAN ARMENT	85 PAINTER RIDGE RD	ROXBURY

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Existing Right-of-Way

Delineated Perennial Watercourse

00000 Stonewall

<sup>e</sup> • **—** Hiking Trail\*

---- Matchlines

Mapsheet 08 of 20

Connecticut

Map Sheet 8A Abutters List

Line List #	Owner Name	Parcel Address	Town
LL240	GAMELIN RICHARD J JR	1045 WASHINGTON WOODBURY RD	ROXBURY
LL253	ODOWD DENNIS C & STEINHEBER RICHARD	0 WASHINGTON WOODBURY RD	ROXBURY

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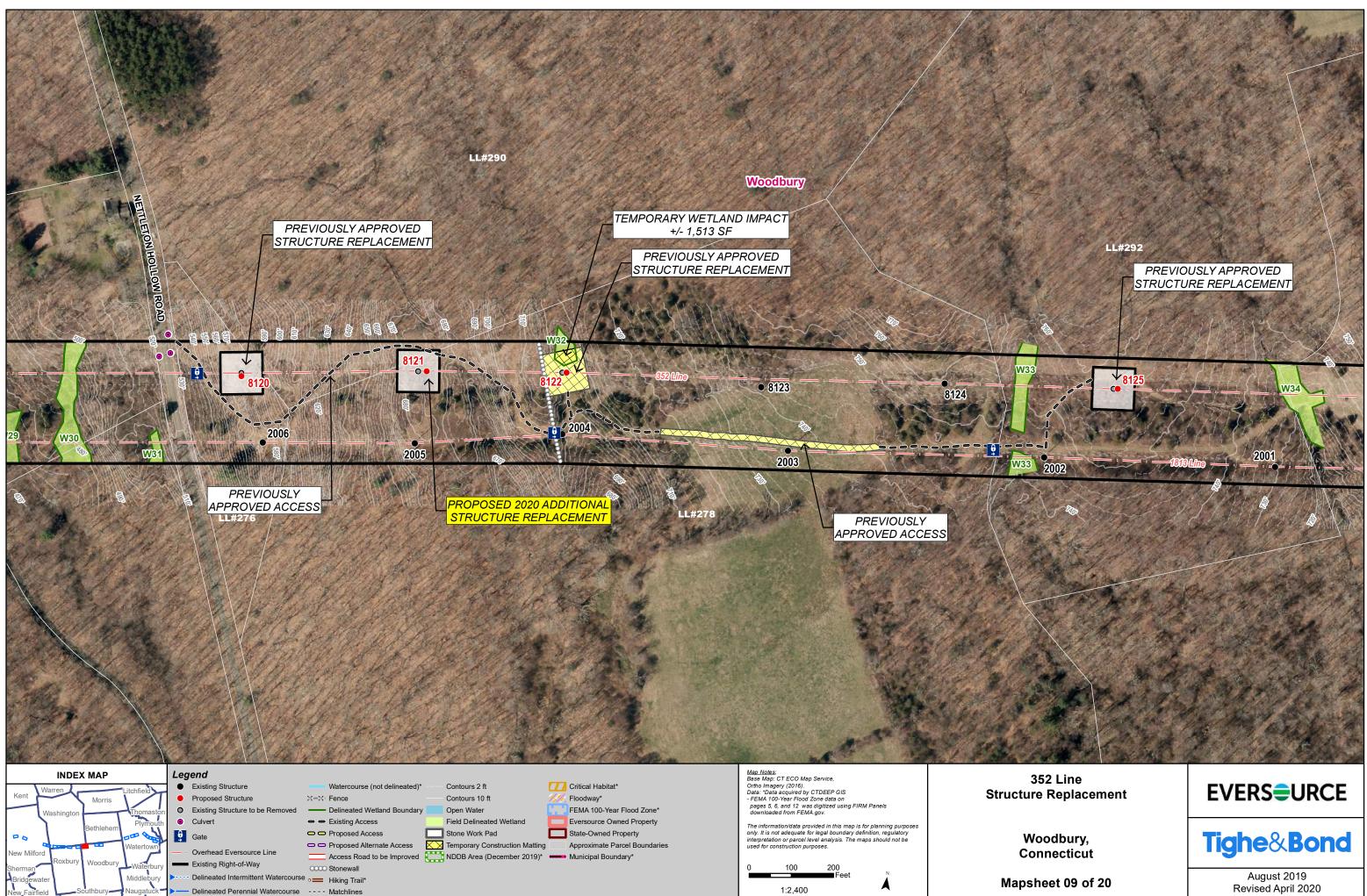
Mapsheet 08A of 20

April 2020

### Map Sheet 9 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL276	DAVID & NANCY L LEWIS	NETTLETON HOLLOW RD	WOODBURY
LL278	RICHARD CHARLES & JOAN K BUTKUS	WASHINGTON RD	WOODBURY
LL290	DAVID & NANCY L LEWIS	NETTLETON HOLLOW RD	WOODBURY
LL292	IMF ASSOCIATES	CARMEL HILL RD	WOODBURY

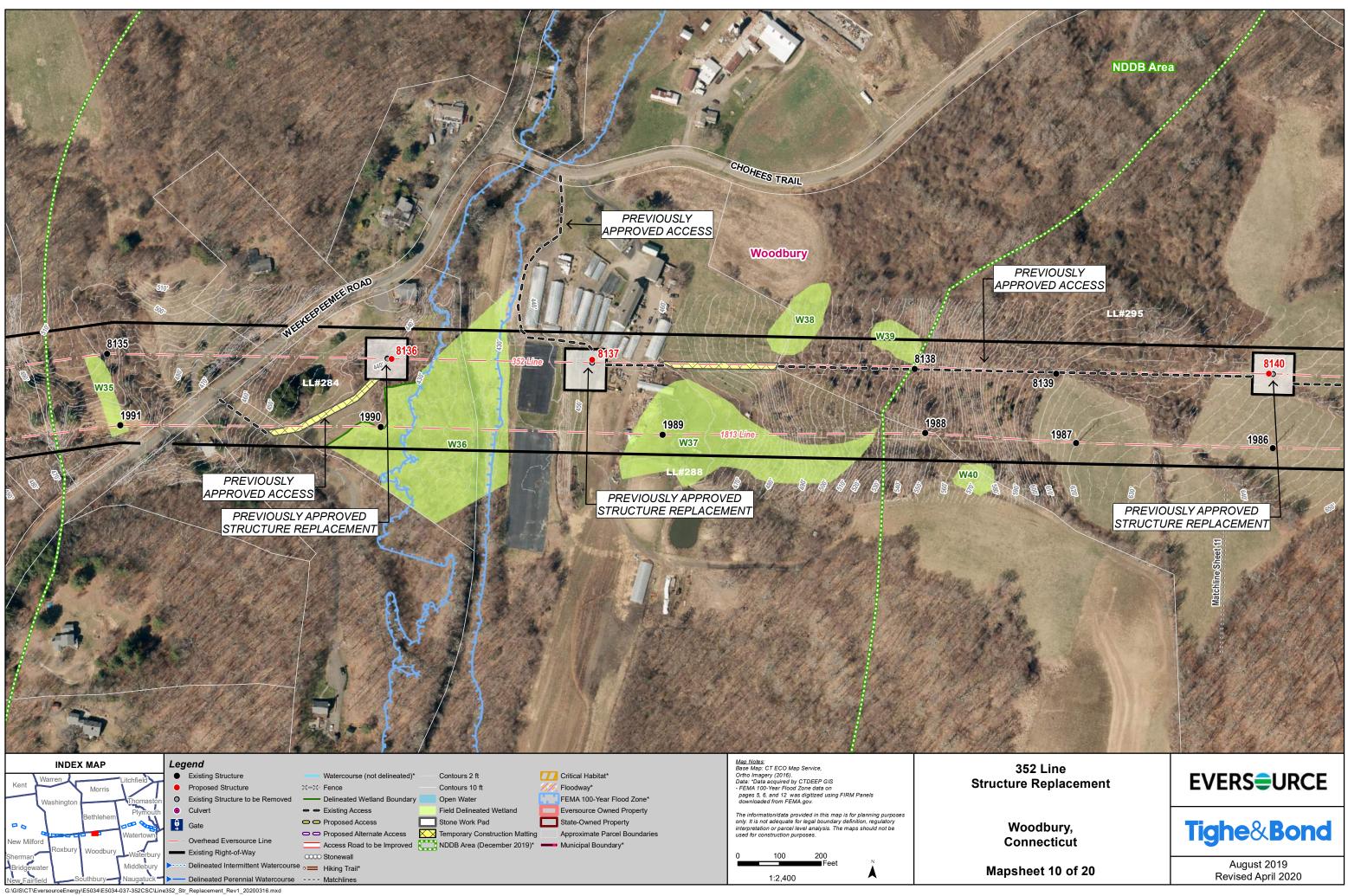
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### Map Sheet 10 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL284	JOHN W HOYT + ALLISON L TESTA	636 WEEKEEPEEMEE RD	WOODBURY
LL288	ALAN P DAYTON	161 CHOHEES TRAIL	WOODBURY
LL295	JAMES J METER - ADMIN DBN OF EST OF ADAM M LIZAUSKAS SR	CHOHEES TRAIL	WOODBURY

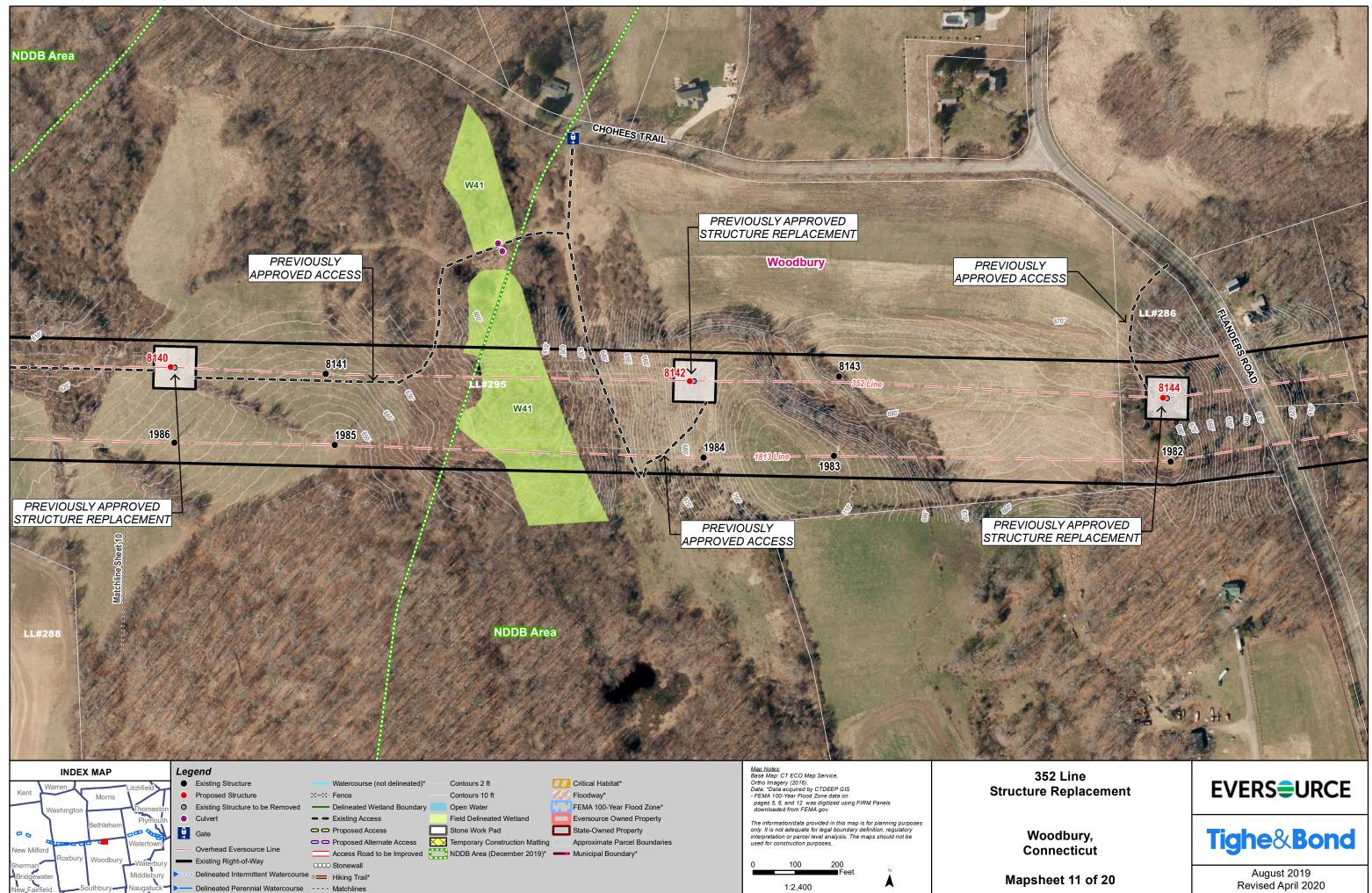
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### Map Sheet 11 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL286	ADAM MATTHEW LIZAUSKAS	FLANDERS RD	WOODBURY
LL288	ALAN P DAYTON	161 CHOHEES TRAIL	WOODBURY
LL295	JAMES J METER - ADMIN DBN OF EST OF ADAM M LIZAUSKAS SR	CHOHEES TRAIL	WOODBURY

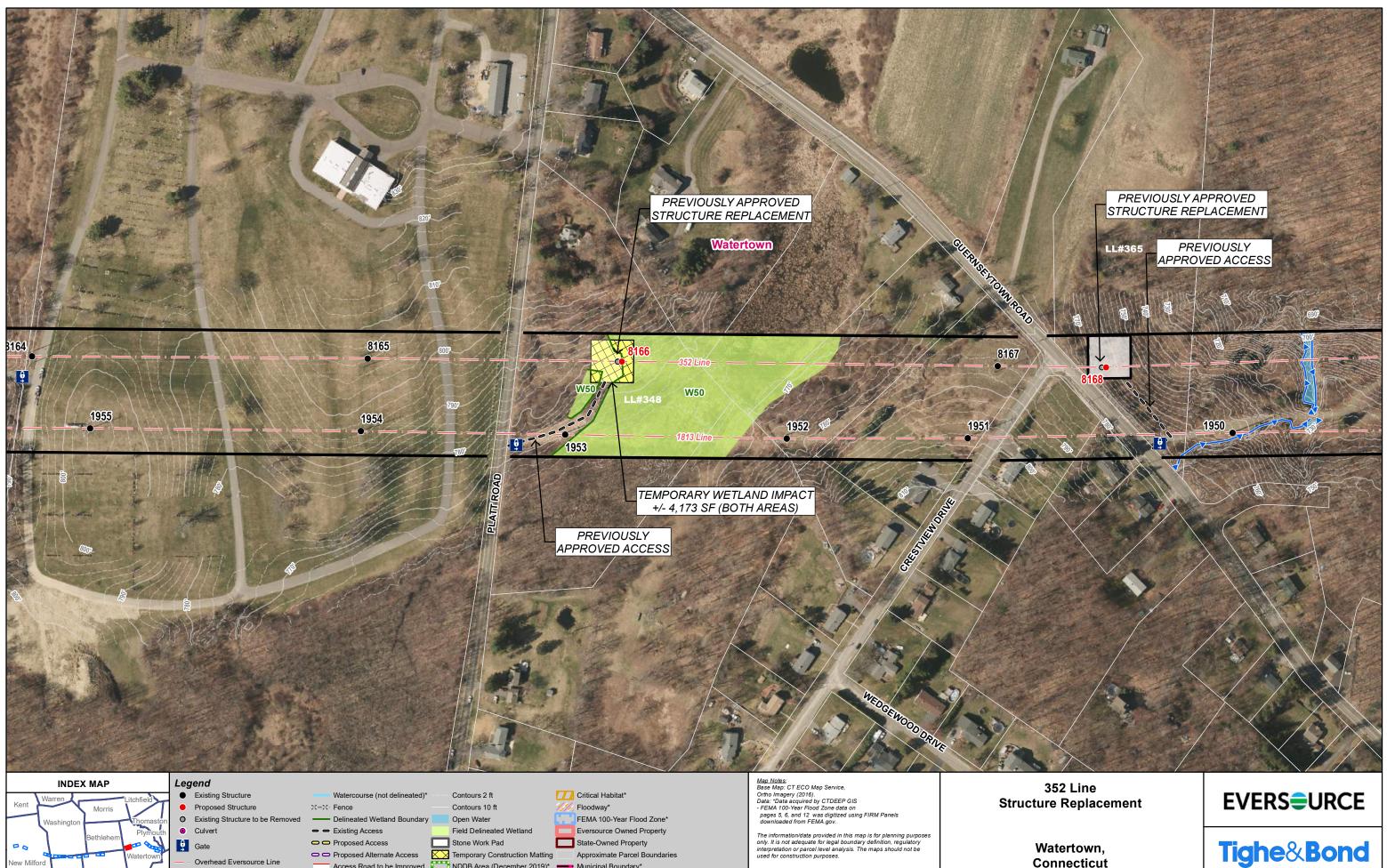
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# Map Sheet 12 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL348	MARK R & MARCIA F WERENKO	636 PLATT RD	WATERTOWN
LL365	WATERTOWN GOLF CLUB	0 GUERNSEYTOWN RD	WATERTOWN

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Existing Right-of-Way

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Access Road to be Improved

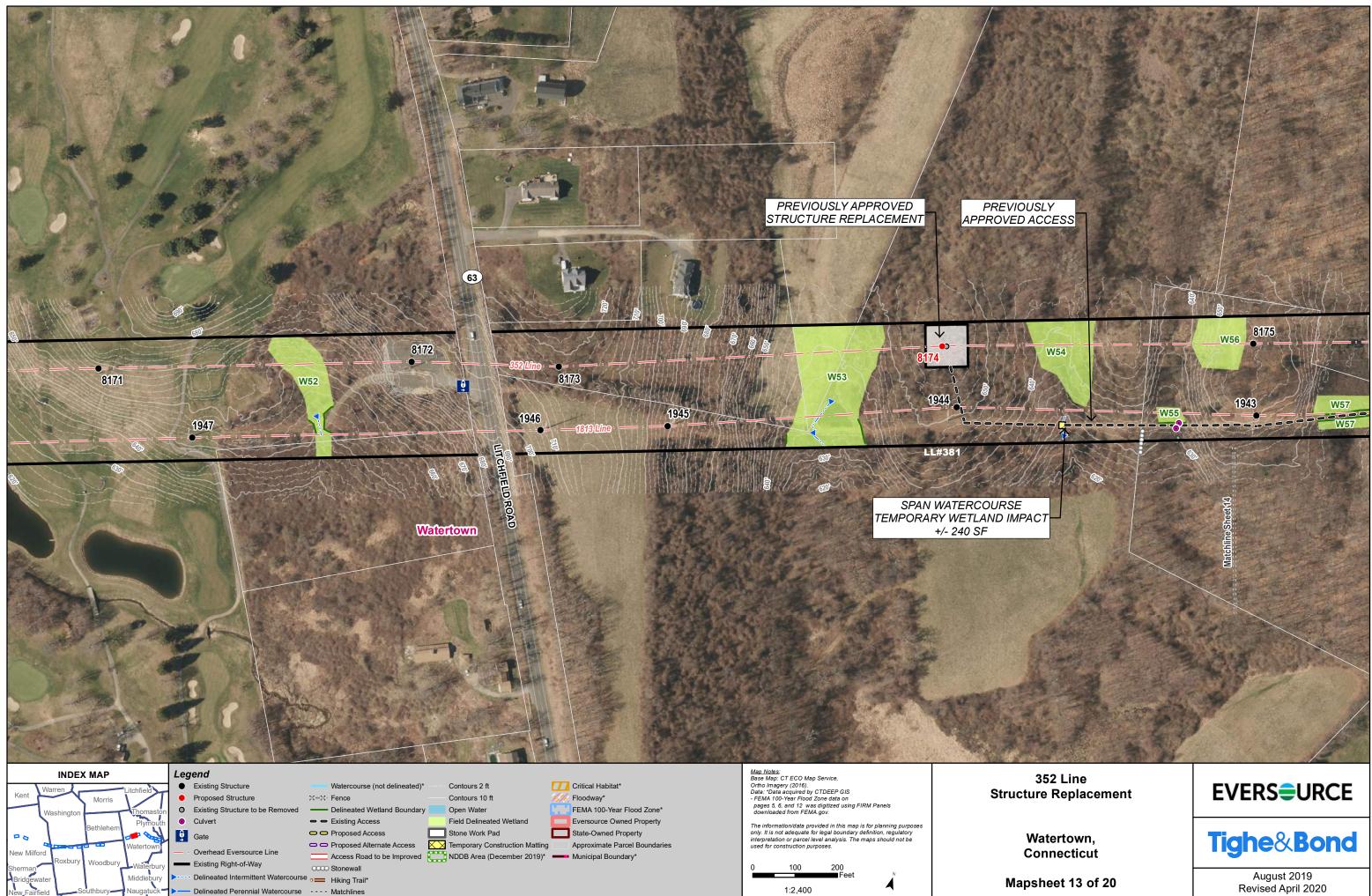
Connecticut

Mapsheet 12 of 20

# Map Sheet 13 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL381	PATRICK M GRAZIANO	384 LITCHFIELD RD	WATERTOWN

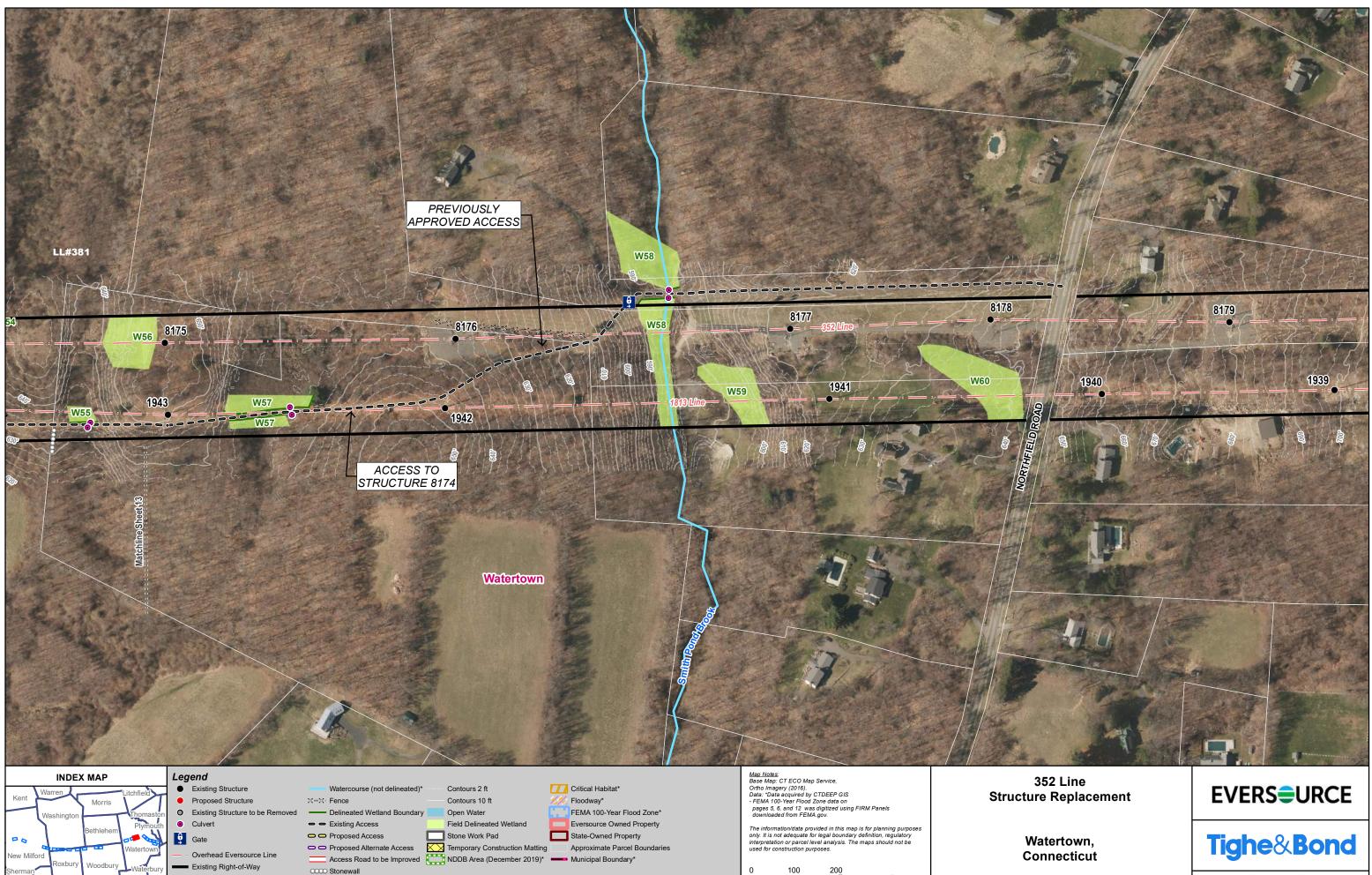
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### Map Sheet 14 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL381	PATRICK M GRAZIANO	384 LITCHFIELD RD	WATERTOWN

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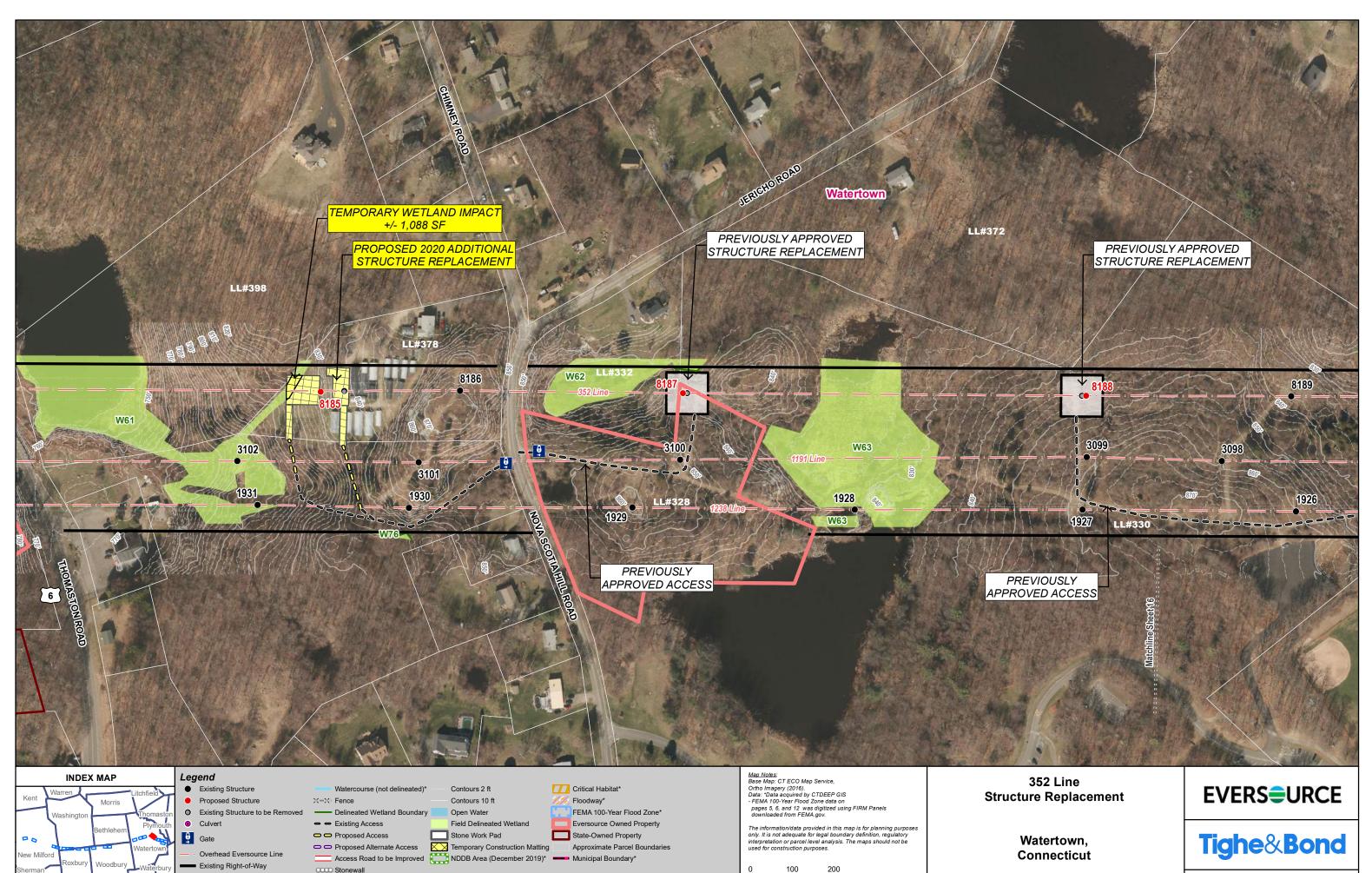
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Mapsheet 14 of 20

# Map Sheet 15 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL328	CONN LIGHT & POWER CO	0 NOVA SCOTIA HILL RD	WATERTOWN
LL330	TOWN OF WATERTOWN	580 NOVA SCOTIA HILL RD	WATERTOWN
LL332	MARIO GUERRERA	30 JERICHO RD	WATERTOWN
LL372	G&A III LLC	96 JERICHO RD	WATERTOWN
LL378	KARAS JOHN J & BARBARA A	6 CHIMNEY RD	WATERTOWN
LL398	LUPOI CATHERINE C	17 OLD HIGHWAY RD	WATERTOWN

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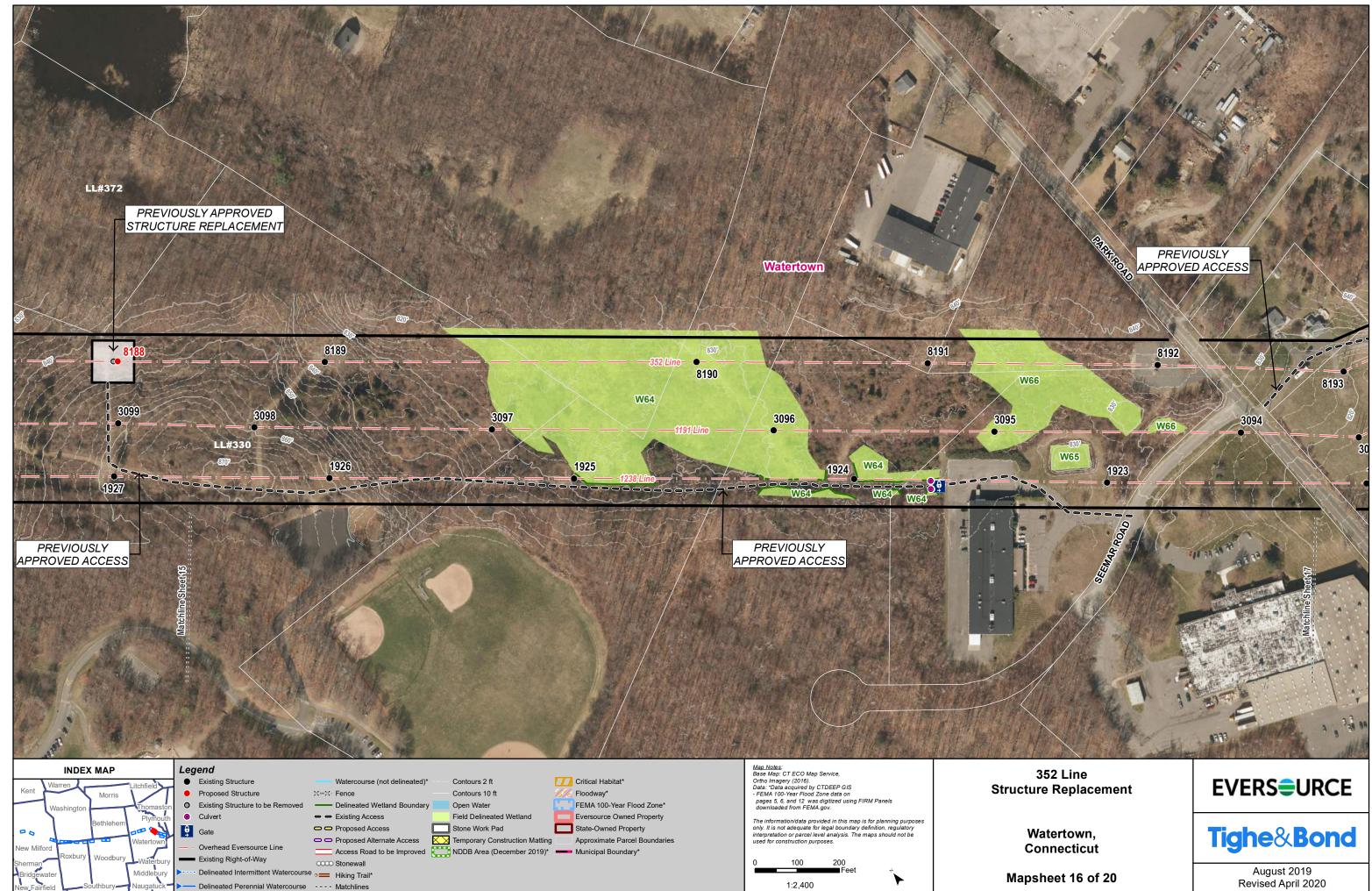
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Mapsheet 15 of 20

### Map Sheet 16 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL330	TOWN OF WATERTOWN	580 NOVA SCOTIA HILL RD	WATERTOWN
LL372	G&A III LLC	96 JERICHO RD	WATERTOWN

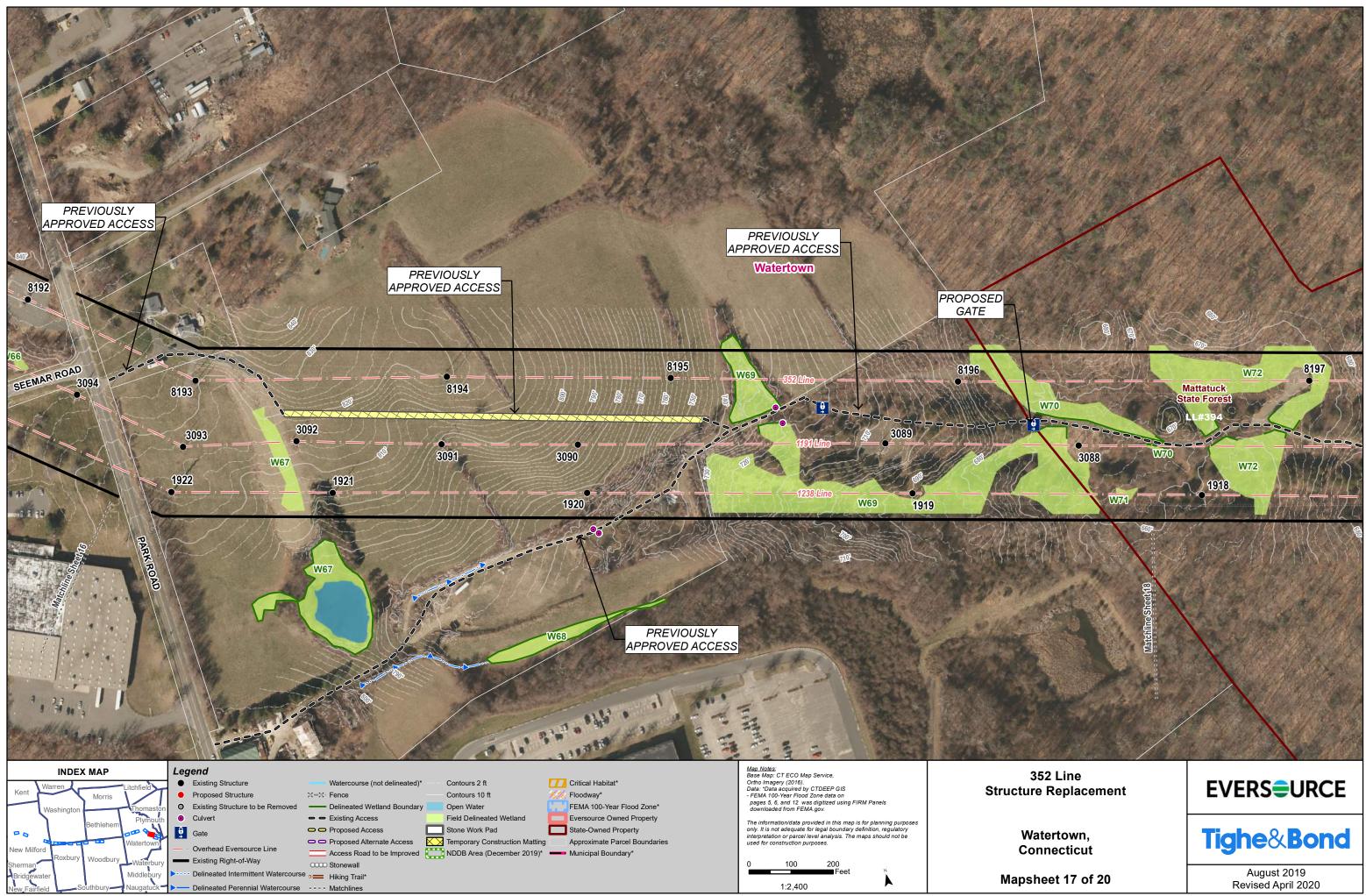
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### Map Sheet 17 Abutters List

Line	List #	Owner Name	Parcel Address	Town
LL394	4	STATE OF CONNECTICUT	0 THOMASTON RD	WATERTOWN

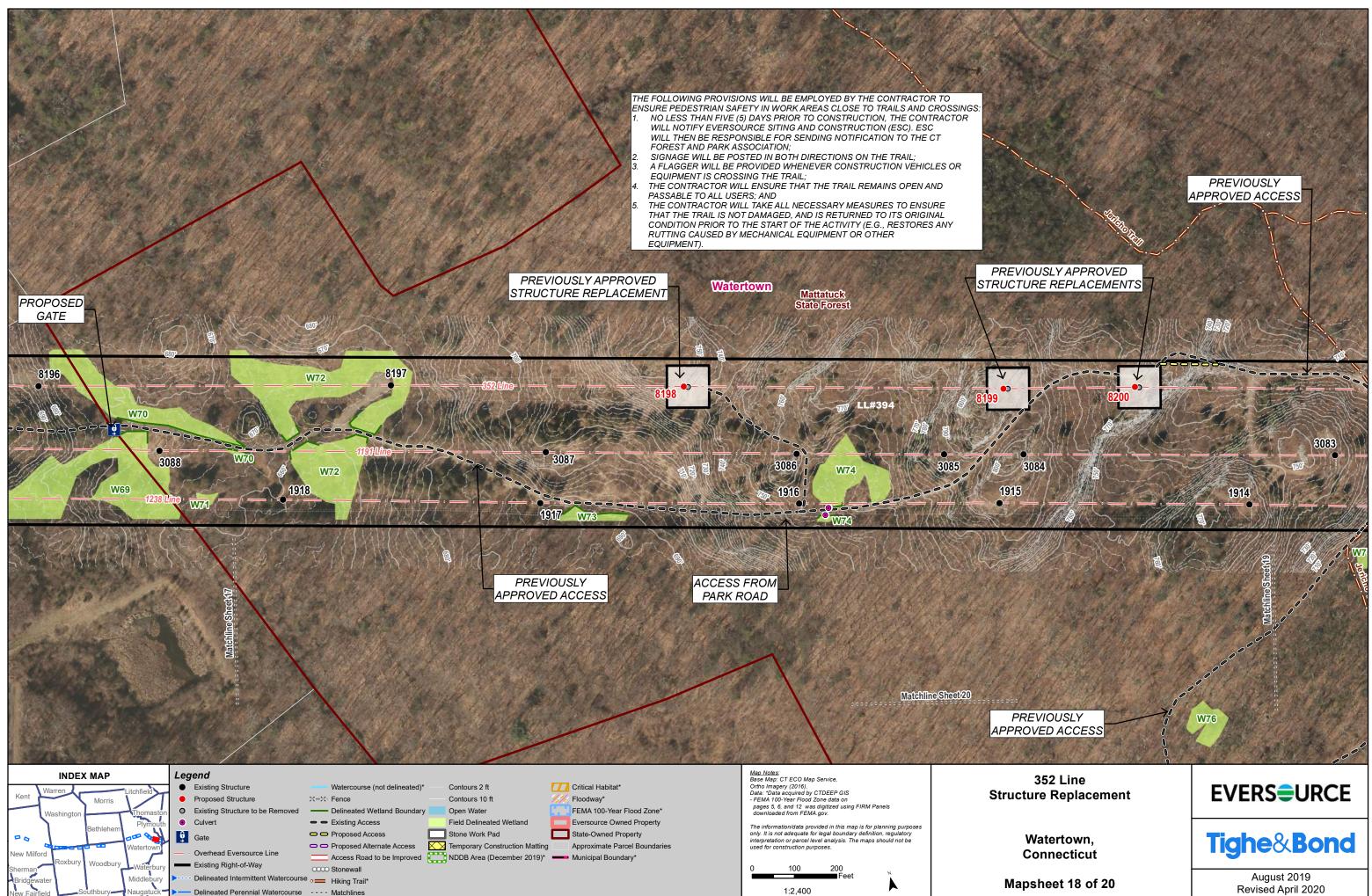
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# Map Sheet 18 Abutters List

Line List	Owner Name	Parcel Address	Town	
LL394	STATE OF CONNECTICUT	0 THOMASTON RD	WATERTOWN	

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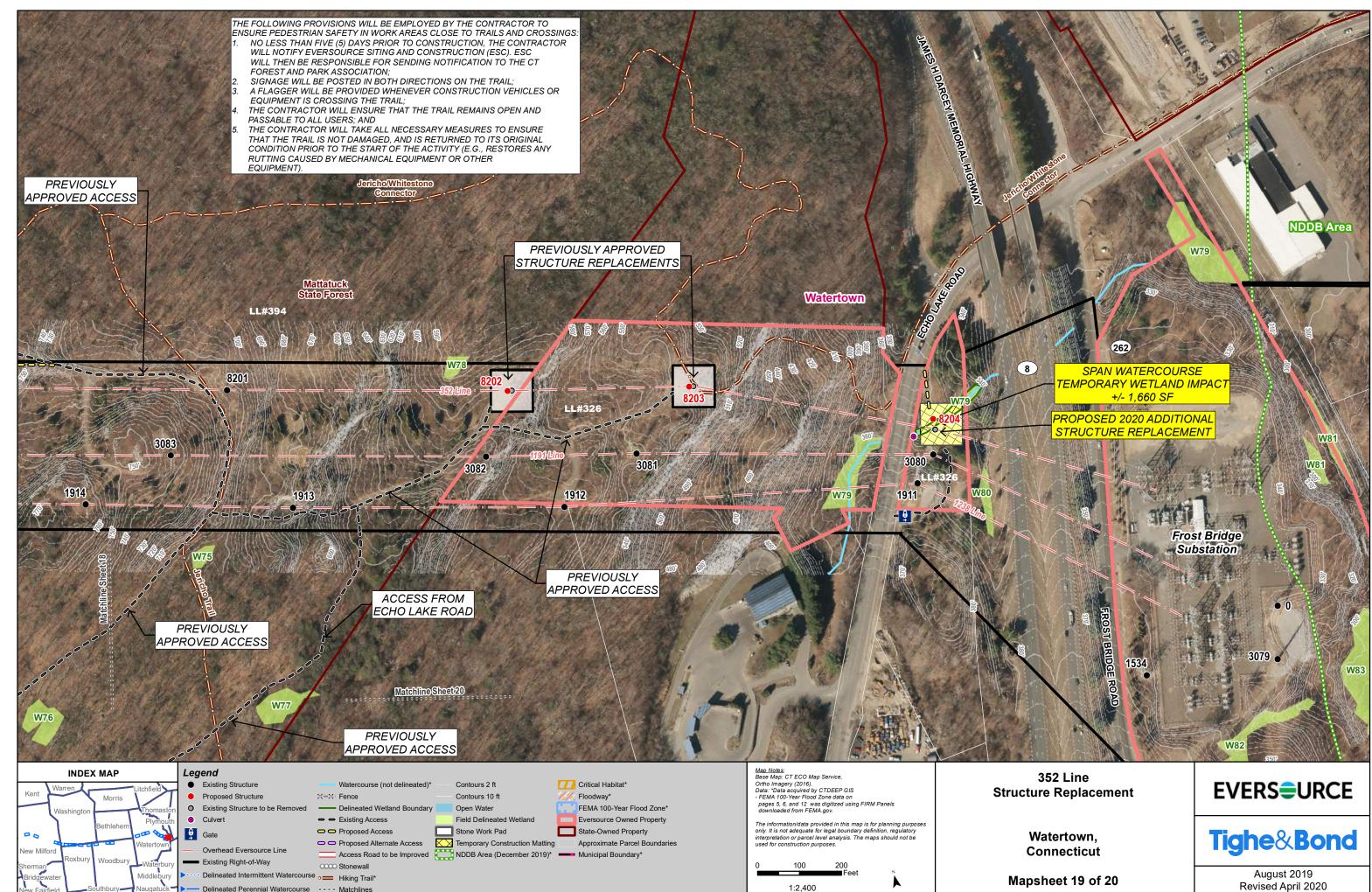


Revised April 2020

# Map Sheet 19 Abutters List

Line List #	Owner Name	Parcel Address	Town
LL326	CONN LIGHT & POWER CO	0 FROST BRIDGE RD	WATERTOWN
LL394	STATE OF CONNECTICUT	0 THOMASTON RD	WATERTOWN

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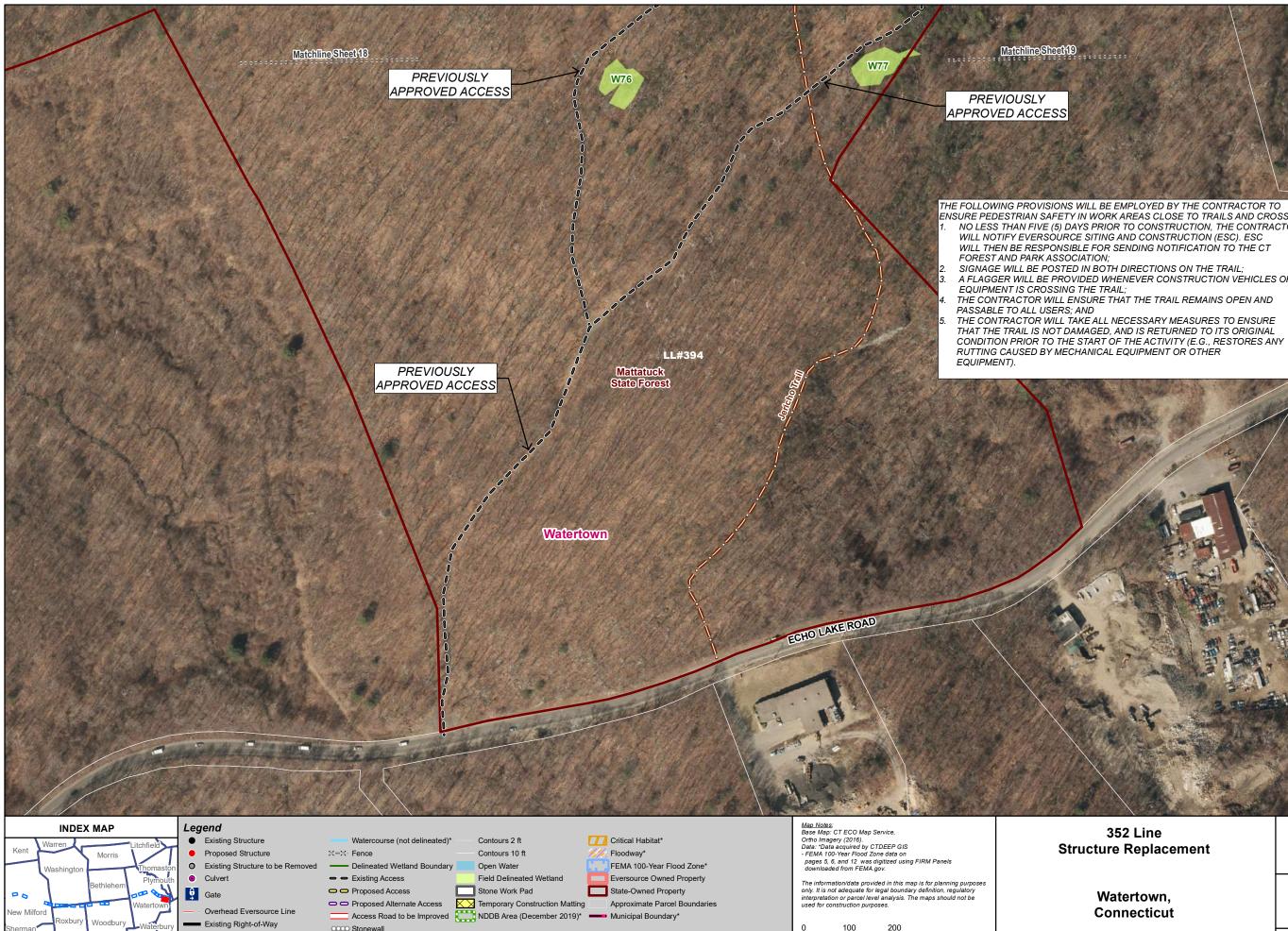


Revised April 2020

### Map Sheet 20 Abutters List

Line	List #	Owner Name	Parcel Address	Town	
LL394	4	STATE OF CONNECTICUT	0 THOMASTON RD	WATERTOWN	

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THE FOLLOWING PROVISIONS WILL BE EMPLOYED BY THE CONTRACTOR TO ENSURE PEDESTRIAN SAFETY IN WORK AREAS CLOSE TO TRAILS AND CROSSINGS: NO LESS THAN FIVE (5) DAYS PRIOR TO CONSTRUCTION, THE CONTRACTOR WILL NOTIFY EVERSOURCE STITUC TO CONSTRUCTION (ESC). ESC WILL THEN BE RESPONSIBLE FOR SENDING NOTIFICATION TO THE CT FOREST AND PARK ASSOCIATION;

SIGNAGE WILL BE POSTED IN BOTH DIRECTIONS ON THE TRAIL; A FLAGGER WILL BE PROVIDED WHENEVER CONSTRUCTION VEHICLES OR THE CONTRACTOR WILL ENSURE THAT THE TRAIL REMAINS OPEN AND

352 Line **Structure Replacement** 

> Watertown, Connecticut

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Mapsheet 20 of 20

#### **EVERSURCE**

#### Tighe&Bond