



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONI MAIL

July 27, 2022

William Dyer
Chairman
City of Shelton Trails Committee
54 Hill Street
Shelton, CT 06484
conservation@cityofshelton.org

RE: **PETITION NO. 1527** – The Connecticut Light and Power Company d/b/a Eversource Energy petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed Stevenson to Pootatuck Rebuild Project consisting of the replacement and reconductoring of electric transmission line structures along approximately 8 miles of its existing Nos. 1560, 1808 and 1580 115-kilovolt (kV) electric transmission lines within existing Eversource electric transmission line right-of-way between Eversource’s Stevenson Substation, 1 Roosevelt Drive in Monroe and The United Illuminating Company's Pootatuck Substation, 14 Old Stratford Road in Shelton, Connecticut, and related electric transmission line and substation improvements.

Dear Chairman Dyer:

The Connecticut Siting Council (Council) is in receipt of City of Shelton’s Trails Committee correspondence dated July 18, 2022 concerning the above-referenced petition. Thank you for taking the time to provide the Council with the comments.

This petition will be placed on a future Council meeting agenda for discussion and decision. Please note that you can view all of the documents related to this petition on our website at portal.ct.gov/csc under the “Pending Matters” link. You may also keep apprised of Council events on the website calendar and agenda.

Before reaching a final decision on any petition, the Council carefully considers all of the facts contained in the record that is developed by the Council, the petitioner, parties and intervenors to the petition, and all of the concerns received from members of the public who submit written statements to the Council.

Copies of your correspondence will be distributed to the service list for the petition.

Thank you for your interest and concern in these very important matter.

Sincerely,

Melanie A. Bachman
Executive Director

MAB/laf

c: Service List
Council Members



City of Shelton

Shelton Trails Committee

54 Hill Street, Shelton, Connecticut 06484



July 18, 2022

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

RE: Petition No. 1527
Eversource Stevenson to Pootatuck Rebuild Project

Dear Ms. Bachman:

The Shelton Trails Committee has numerous concerns about the impact of the Pootatuck Rebuild Project where it passes through the Shelton Lakes Greenway and French's Hill Open Space. About one third of the project crosses City of Shelton conservation lands that are used for passive recreation such as hiking, with about two miles of trails to be impacted. The City has spent millions of dollars to preserve this land and build these trails for the benefit of the general public.

The Committee would like to note for the record its disappointment that, when meeting with Eversource representatives, and suggesting a shift to a tower or road shown on the plans to minimize trail impacts or preserve scenic ledges, were told that nothing could be changed because they had already applied for, and received, all the required permits and permissions needed for wetlands or the natural diversity database, and they were therefore locked into the current site plans. It does not seem appropriate that the property owner for about a third of the length of this project is the last entity to be considered when plans are being drawn up. Eversource staff have instead emphasized their ability to take restoration measures after construction has been completed.

The Shelton Trails Committee maintains 31 miles of recreational trails throughout the City of Shelton in partnership with the Connecticut Forest and Park Association (CFPA). Our most popular trail system is the 11-mile network located within the City's Shelton Lakes Greenway. The core of this natural area consists of surplus water company lands that were acquired with the help of state open space funding for the purpose of conservation and passive recreation.



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About 2.5 miles of the proposed project passes through the Shelton Lakes Greenway and will significantly impact our trails. Because of the rugged terrain in this area, characterized by a series of parallel ledges and swamps, our hiking trails have made use of the powerline corridor. CFPA's Blue-Blazed Paugussett Trail, a regional hiking path established in the 1930's, runs along or near the powerlines for the entire 2.5 miles. The Shelton Lakes Recreation Path, a 4-mile handicapped-accessible trail built with funding from the CT DEEP, runs along the powerlines, as do Oak Valley Trail, Turkey Trot Trail (the High School Cross Country track), and Nells Rock Trail.

The Trails Committee reviewed the proposed plans and met with Eversource representatives on several occasions, including a site walk. The Trails Committee recognizes the need for updating the state's power infrastructure and understands that impacts to the trail system are unavoidable. However, it appears that substantial changes to the topography are planned in order to create level gravel pads at each new monopole, and a new road system is planned. While these changes will undoubtedly be more efficient and simplify construction and maintenance for Eversource, it will come at the cost of a degraded public recreation system for which much time and money has been invested by the City of Shelton and the State of Connecticut for the general public good.

The existing conditions along most of the powerline corridor is predominantly natural except for periodic tree clearing and the existence of the towers, and is considered scenic by trail users. The plan is to remove attractive ledge outcrops surrounded by mountain laurel and replace them with flat gravel pads. This will be a significant loss of natural scenery. The existing utility access roads are narrow and have a mostly natural surface for pleasant walking. Plans are to widen and harden these existing roads with crushed stone, and to add new roads. Our trail users have indicated that they prefer the narrower roads that are in a more natural state.

After reviewing the site grading plans and walking the Shelton Lakes Greenway with Eversource staff, the Trails Committee requests the following:

General Project Recommendations:

- The Shelton Trails Committee should be actively involved in restoration efforts.
- Access roads should be topcoated with finer material and left in as natural a condition as possible from Soundview Ave to Buddington Road.
- Discourage ATV use with gates and boulders of local rock at road crossings.
- A maintenance bond should be considered to ensure that restoration efforts are satisfactory.



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- Public safety measures must be taken to ensure safety of trail users, and city staff must be notified of pending work schedules for public posting on social media.

Site Specific Recommendations:

FRENCH'S HILL

Pole #19638 - French's Hill, Red Access Trail

- When construction is complete, hikers should be able to use the pad to walk across the powerline corridor, which is wet. Any slopes should be less than 10%.

Pole #19637 - French's Hill Trail (white)

- Eliminate the short stretch of proposed gravel access road that leads from this pole north to a stone wall next to French's Hill Trail, a scenic location for hikers. Eversource access is from Grandison Place over City property and via temporary wood mats for most of the way except for this small section of proposed permanent gravel access road about 170 feet long.
- Rebuild the scenic stone wall that was previously dismantled by Eversource so there is no gap and to discourage ATVs.

SHELTON LAKES

Pole #19624 - Paugussett Trail (blue) near Soundview Ave.

- This trail was relocated a few years ago and is shown in the wrong location on the plans. It is now located further north, closer to the proposed access road or possibly across it. Remove this 115' section of new gravel access road near the trail.

Pole #19623 to Constitution Blvd - former Paugussett Trail (blue)

- Resurface the previously "improved" gravel access road that is crossing City open space so that it is pedestrian friendly. This was formerly the location of the Paugussett Trail, but the trail had to be moved after Eversource placed large-sized crushed stone on the access road a few years ago. Residents want to walk on the road to gain access to the Wiacek meadows.

Pole #19624 (between Const. Blvd and Wellington Court) - Paugussett Trail

- The plans seem to show a 4-foot embankment placed on top of the trail.
- No grading should be done on the trail, which follows the edge of the easement and the edge of the proposed fill slope as drawn.



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- Pull back the grading associated with the new pad from the trail.

Wellington Drive (Paugussett Trail):

- Add a gate to discourage ATVs.

Pole #19622 Wellington Drive (Paugussett Trail)

- The fill slope for the new pad location being built across the trail should have a slope of 10% or less so that the Trails Gator and DR mower can continue to navigate along the Paugussett Trail.

Pole #19621 at edge of Independence Drive (Paugussett Trail)

- Resurface the new permanent access road coming off of Independence Drive for pedestrians where it is co-aligned with the trail.
- A new gate may be needed.

Access Road between Independence Drive and Shelton Ave (multiple trails)

- This entire stretch of access road is heavily used by pedestrians, bikers, and the Trails Committee's gator/DR mower, even sections not formally marked as hiking trails.
- Waterbars shown should not impede these users.
- Restoration and topcoating will be needed to keep the access trail user-friendly and not an eyesore.

Pole #19620 at top of hill between Independence Drive and Shelton Ave (Paugussett)

- This is a scenic vista for the CT Blue Trail and it's important to restore the area to be as natural as possible.

Turkey Trot Trail Crossing:

- Maintain the existing trail crossing as natural as possible.

Pole # 19618 - Turkey Trot Trail (High School 5K Cross-Country Track)

- The toe of a fill slope is shown covering up the existing trail where the new monopoles will be installed uphill from the trail. Use a stone retaining wall to eliminate the toe of this slope and preserve the existing trail grade.
- Upsize the existing nearby culverts, which become clogged and overflow.

Shelton Ave (Oak Valley Trail)

- Reset the trail kiosk if moved.



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- Install new gates and block ATVs with locally-sourced boulders in both directions.
- Maintain the Oak Valley Trail crossing as natural as possible.

Pole #19615 (Rec Path/Oak Valley Trail Junction near Oak Valley Road)

- Plans show a large fill slope next to the Shelton Lakes Recreation Path (Rec Path) and over the top of Oak Valley Trail.
- Pull the corner of the fill slope back so that Oak Valley Trail can continue up the hill at a more natural grade, no more than 10%.
- The bottom of the fill slope is alongside the Rec Path and measures should be taken so that it is not an eyesore. Using lichen-covered rocks from further up the hill and planting mountain laurel to blend in with the surrounding terrain are options.

Oak Valley Road

- Ensure the gate and parking area remain after restoration.

End of Oak Valley Road to Pole #19612 (Rec Path to “Great Ledge”)

- Plans show the Rec Path (outside of the easement area) as being upgraded to access this pole from Oak Valley Road. Per previous discussion with Eversource staff, the Rec Path through this area will be used only by small vehicles such as pickup trucks, and does not need to be upgraded.
- Replace the gate damaged by a hurricane.

Pole #19612 to #19611

Rec Path at Great Ledge to junction with Nells Rock Trail

- The Rec Path should be restored at existing grade to a width of 8-12 feet and topcoated with $\frac{3}{8}$ " minus material consistent with other sections of the Rec Path.

Pole #19611 Nells Rock Trail

- The scenic ledgetop with vista is being lowered several feet. Place sitting boulders at the vista.
- Eliminate the new 150' long gravel access drive located between Wetland #32 and Wetland #33. This orphan section of gravel road would be adjacent to Nells Rock Trail and would be an eyesore next to the hiking trail.

Pole #19609 Paugussett Trail

- The City of Shelton will relocate the Paugussett Trail north away from the towers to cross the utility corridor at the base of the ledge ridge on which the existing tower is located.



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- The north face of the ledge should remain undisturbed as viewed from both the relocated Paugussett and from a scenic view point located about 2000 feet to the north.

Buddington Road - Paugussett Trail

- The trailhead parking area should be undisturbed during construction.
- Eversource personnel should not use the trailhead parking area for parking or equipment storage, taking limited space from regional hikers.

The City of Shelton recognizes the need to replace aging infrastructure, especially in this case to improve the reliability of providing electric power to our residents and businesses. As owners of one third of the area impacted over which considerable hiking trails now exist, we are disappointed not to have been involved in the new tower locations. We realize that the new construction and existing tower demolition will have a significant impact on our trails during that period. Our major concern is the impact of the extensive pad footprints and haul roads after the construction is completed. The existing trails and power towers blend well together, but the planned construction seems to lead to massive pads and permanent "driveways through the woods." We are most concerned about the need for restoration after the project is completed and want to be sure that our trails will eventually have rural nature and viewshed they now enjoy.

Sincerely,

William Dyer
Chairman

Cc: Mayor Mark Lauretti
John Anglace, President, Board of Aldermen
Tom Harbinson, Chairman, Conservation Commission
Clare Cain, Connecticut Forest & Park Association