

56 Prospect Street P.O. Box 270 Hartford, CT 06103

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

July 13, 2022

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

Re: <u>1200/1300 Line Structure Replacement Project</u>

Dear Ms. Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") is requesting a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed modifications to the existing 115-killovolt transmission lines, ("1200/1300 Line Structure Replacement Project") in the Towns of East Windsor and Windsor Locks, Connecticut ("Petition").

Prior to submitting this Petition, representatives from Eversource briefed municipal officials in East Windsor and Windsor Locks about the Project. Eversource provided written notice of the proposed work to all abutters and of the filing of this Petition with the Council. Maps and line lists identifying the abutting property owners who were notified of the Project are provided in the Petition as Attachment A: 1200/1300 Line Structure Replacement Project.

Eversource is submitting this filing electronically and will deliver an original and 15 copies, along with a check for the \$625 filing fee to the Council.

Please contact me at 860-728-4527 if you have any questions regarding the enclosed Petition.

Sincerely,

Kathleen M. Shanley

Enclosure

cc: The Honorable Jason E. Bowsza, First Selectman, Town of East Windsor The Honorable Paul M. Harrington, First Selectman, Town of Windsor Locks

THE CONNECTICUT LIGHT AND POWER COMPANY doing business as EVERSOURCE ENERGY

PETITION TO THE CONNECTICUT SITING COUNCIL FOR A DECLARATORY RULING OF NO SUBSTANTIAL ADVERSE ENVIRONMENTAL EFFECT FROM MODIFICATIONS TO THE 1200 and 1300 LINES IN THE TOWNS OF EAST WINDSOR AND WINDSOR LOCKS, CONNECTICUT

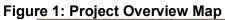
1. Introduction

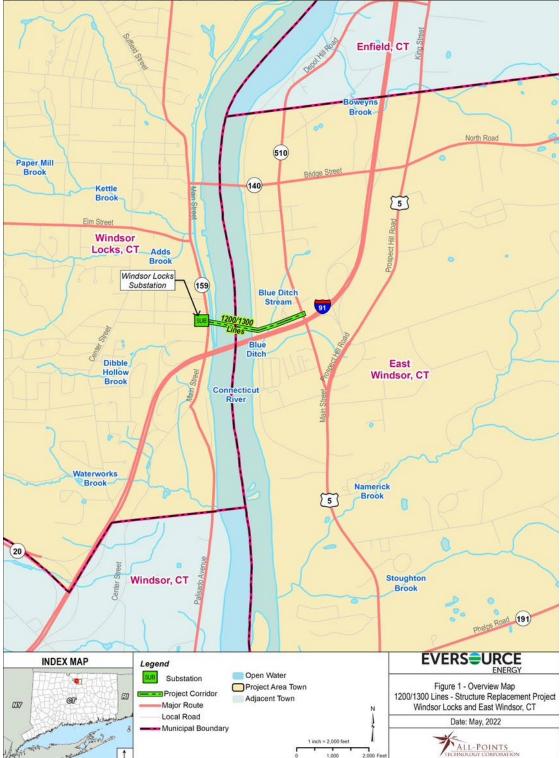
The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource" or the "Company") hereby petitions the Connecticut Siting Council ("Council") for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required pursuant to Section 16-50g et seq. of the Connecticut General Statutes for modifications to the 1200 and 1300 Lines, 115-kilovolt ("kV") transmission lines located within existing transmission right-of-way ("ROW") in the Towns of East Windsor and Windsor Locks, Connecticut ("Towns"), as described herein (the "Project") (See Figure 1, below). Eversource submits that a Certificate is not required because the proposed modifications would not have a substantial adverse environmental effect.

2. Purpose of the Project

The purpose of the Project is to improve system reliability on the 1200 and 1300 Lines by reconductoring a section of each line, which will also require replacing one steel double-circuit H-frame structure (Structure 6207) with two new single circuit monopole structures needed to accommodate the increased conductor load. The replacement structures will be taller than the existing structure due to the modified alignment with the adjacent structures 6208 and 6208A.

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3. Project Description

The Project scope consists of installation of approximately 0.39 mile of conductor between Structures 6207 and 6207A in East Windsor and Structures 6209 and 6209A in Windsor Locks, along with optical ground wire ("OPGW") between Structure 6203 at Warehouse Point Junction in East Windsor and Structures 6209 and 6209A in Windsor Locks. One double circuit steel H-frame structure (Structure 6207 in East Windsor) will also be replaced with two single circuit dead end engineered monopole steel structures on foundations.

The 1200 Line extends from the Windsor Locks Substation located in Windsor Locks to Barbour Hill Substation located in South Windsor. The 1300 Line extends from Windsor Locks Substation to Enfield Substation located in Enfield. The 1200 and 1300 Lines are located within existing ROWs and are collocated within the same ROW from Windsor Locks Substation east to Windsor Locks Junction.

Details of the proposed scope of work are summarized as follows:

- Replace one double circuit weathering steel 3-pole H-frame structure with two single circuit weathering steel monopole structures on foundations. The height of existing Structure 6207 is 65.5 feet and the height of the two replacement structures (Structures 6207 and 6207A) will each be 76 feet;
- Replace the existing 556 24/7 kcmil Aluminum Conductor Steel Reinforced (ACSR) with 1590 54/19 kcmil Aluminum Conductor Steel Supported (ACSS) conductor over the Connecticut River on the 1200 Line from new structure 6207 to existing structure

6209 (located within Windsor Locks Substation) and on the 1300 line from new structure 6207A to existing structure 6209A¹

- Replace the existing Alumoweld overhead shield wire with OPGW on both the 1200 and 1300 Lines from Warehouse Point Junction², located in East Windsor about 1/3 mile east of Structure 6207 to structures within Windsor Locks Substation; and,
- Improve and/or install access roads and work pads to support the proposed scope of work.

The map sheets in Attachment A: "1200/1300 Lines Structure Replacement Project", dated May 27, 2022 depict the location of the existing and proposed structures, existing and proposed access roads, and work pads to be used for the Project, wetland areas and other ROW features and Project elements³.

The cross-section drawing in Attachment B – "Structure 6207 to 6208 – Right-of-Way Cross Section" depicts the views along the ROW of the existing and proposed structures and the existing limits of the ROW areas.

4. Existing Environment, Environmental Effects and Mitigation

The Project construction would be performed entirely within the existing transmission ROW. No expansion of the existing ROW or maintained corridor would be required. Eversource is currently securing expanded aerial rights from the National Passenger Railroad Corporation

¹ Structures 6209 and 6209A to be replaced subject to Sub-Petition 1293-WLEW

² Warehouse Junction is not depicted on the mapping.

³ The entirety of the static wire replacement with OPGW is not depicted on the mapping.

(Amtrak) to accommodate the alignment of the conductors over the railroad. The Project would not have a substantial adverse environmental effect, for reasons explained more fully below.

Land Use

The Project area is located within the Towns of Windsor Locks and East Windsor, Connecticut, originating at Eversource's Windsor Locks Substation and running in an easterly direction across the Connecticut River into East Windsor.

Land use within and surrounding the Project Area consists of a mix of residential, commercial, municipal, and transportation areas as well as undeveloped lands such as forests and recreational properties.

Notable features within the Project Area are the Connecticut River, Eversource's Windsor Locks Substation, Interstate 91 and the East Windsor Water Pollution Control Facility. See Attachment A: "1200/1300 Line Structure Replacement Project" for further details.

Vegetation Removal

The Project's ROW, in which both the 1200 and 1300 Lines are located, is 100 feet wide on the east side of the Connecticut River in East Windsor and is 150 feet (over Amtrak railroad tracks) and 340 feet (over Windsor Locks Canal) on the west side of the Connecticut River. Some limited vegetation removal and tree trimming would be required in select areas in the ROW in East Windsor to accommodate access road installation and improvements, for work pad installation, and along the Project ROW where conductor clearance needs to be extended to meet current standards.

Vegetation removal would be accomplished primarily using mechanical methods. This work typically requires the use of flat-bed trucks, brush hogs or other types of mowing equipment, skidders, forwarders, bucket trucks for canopy trimming, and chippers. Eversource would require the vegetation removal contractor to use low-impact clearing methods to remove brush vegetation to protect wetlands, watercourses, state-listed species and their habitats, and cultural resources. Low-impact clearing incorporates a variety of approaches, techniques, and equipment to minimize site disturbance. Eversource would require the contractor to use some or all of the following low impact vegetation removal methods, depending on site-specific considerations:

- Take into consideration soil and weather conditions when scheduling vegetation removal activities, such as during periods of heavy rainfall.
- Maximize the use of uplands for vegetation removal access routes.
- Use appropriately sized equipment for the site conditions, where possible, to minimize impacts; and,
- Where practical, cut brush close to the ground, leaving root systems and stumps, to retain soil stability.

After construction is complete, Eversource would perform ROW restoration in accordance with the protocols specified in Eversource's April 2022 Construction & Maintenance Environmental Requirements, Best Management Practices Manual for Massachusetts and Connecticut ("BMPs") and based on consultations with any property owners affected by the Project.

Scenic, Recreational and Cultural Resources

The Project is not anticipated to have a substantial adverse effect to scenic, recreational, or cultural resources. No portion of the ROW/Project area traverses and/or is located near a locally or state designated scenic roadway⁴.

A desktop review of the Connecticut Department of Energy and Environmental Protection's ("CT DEEP") GIS and field investigations data identified the Connecticut River as the only publicly accessible resource that the existing ROW is proximate to. The Project does not anticipate any interference with recreational activities associated with the Connecticut River.

The Project area neither crosses nor is proximate to any Connecticut Blue-blazed hiking trails. The nearest Connecticut Blue-blazed hiking trail, the Metacomet Trail, is located approximately 6.0 miles to the west of the Project Area.

A Phase IA Cultural Resources Assessment Survey ("Phase 1A") of the proposed Project area, which included the assessment of previously recorded cultural resources on file with the Connecticut State Historic Preservation Office, was conducted by Heritage Consultants, LLC ("Heritage") in April 2021. The Phase 1A did not identify any State Register of Historic Places properties/districts or archeological sites within 500 feet of the Project area. However, the Windsor Locks Canal (historically known as the Enfield Canal) is listed on the National Register of Historic Places and is located approximately 0.3 mile to northwest of proposed Structures 6207 and 6207A. Heritage has determined that this historical resource would not be impacted by the Project.

⁴ Connecticut Department of Transportation (CTDOT), October 1, 2019 Connecticut State Scenic Roads. Accessed May 6, 2022. Available URL: https://portal.ct.gov/DOT/Programs/Connecticut-Scenic-Roads. The Towns of Windsor Locks and East Windsor do not have any listed scenic roads in proximity to the Project area.

Work areas associated with the Project were classified as no/low for cultural/archaeological sensitivity and Heritage determined that no further examination of those locations was recommended or warranted.

Wetlands, Watercourses, Waterbodies, Flood Zones and Aquifers

Eversource identified and delineated water resources in the Project area in April of 2021 (see Attachment C: Wetlands, Watercourses and Vernal Pool Reports; see also the map sheet provided in Attachment A, which depicts such water resources). Water resources include inland wetlands, watercourses (perennial and intermittent streams), and Federal Emergency Management Agency ("FEMA") Flood Zones. All work in or near these areas would be conducted in accordance with Eversource's BMPs as well as permit conditions and approvals. Details on each of these resource areas are provided below.

Wetlands

Wetlands in the Project area were identified and delineated in accordance with industry standard methodology. Work activities in wetlands will be conducted in accordance with Eversource's BMPs and comply with Project permits and approvals. A total of three wetlands were identified in or proximate to the Project area. While there will be no permanent effects to these wetlands from the Project, construction activities would result in approximately 591 square feet of temporary effects to Wetland 3 due to the placement of temporary construction mats needed for access to Structures 6207 and 6207A. Following the completion of construction, all temporary construction mats will be promptly removed, and wetland areas will be restored in accordance with Eversource's BMPs. See Attachment A: 1200/1300 Line Structure Replacement Project for further details.

Watercourses and Waterbodies

Two watercourses were delineated within the Project area: the Connecticut River and the Blue Ditch Stream. Neither of these resources will be impacted by the Project. All construction activities associated with Project would be in accordance with Eversource BMPs for the protection of any water resources proximate to the Project Area.

Vernal Pools

Project area wetlands were inspected for potential vernal pool habitat in April of 2020. Wetlands were investigated for suitable hydrology that would support breeding by vernal pool indicator species. No vernal pools or indicators for vernal pools were observed within the Project area wetlands. See Attachment D: Wetland, Watercourses and Vernal Reports.

FEMA Flood Zones

The Project ROW extends across a 100-year FEMA Flood Zone and FEMA Floodway associated with the Connecticut River. There are no 500-year FEMA Flood Zones located within the Project area. Work associated with reconductoring/OPGW would occur above the 100-year Flood Zone and Floodway with no structures proposed in these zones No impacts to the floodplain or floodway are anticipated.

Water Supply

Based on Aquifer Protection Areas ("APA") mapping maintained by CT DEEP, there are no APAs within or proximate to the Project ROW. The Project is not located within a public water supply watershed and no public supply reservoirs or public water supply wells are located within the Project area. No private water supply wells were observed within the Project area during field investigation activities.

Eversource would require its contractors to employ best practices for the proper storage, secondary containment, and handling of diesel fuel, motor oil, grease and other lubricants, to protect water quality within the Project area. Construction activities would conform to Eversource's BMPs, as well as to the requirements of Project-specific plans (e.g., Spill Prevention and Control Plan).

Wildlife and Habitat

The Project area is characterized by ravine, forest edge, riverine and scrub-shrub habitat types. Project area habitat is capable of supporting a variety of shrubland birds typical to the managed ROW. To the west of the Project Area is the Connecticut River. The Connecticut River, in this location, is at the upper fringes of tidal influence and provides open water habitat for a variety of waterfowl as well as wading birds, along with wetland species including a variety of fish and other aquatic species. The Project transmission line structure and conductor replacement work will occur within Eversource's ROW or on Eversource-owned property and thus would not be anticipated to have a substantial adverse environmental effect on wildlife habitat.

In April of 2021, Eversource submitted a Natural Diversity Database ("NDDB") State-listed Species Review request to the CT DEEP for the proposed structure construction activities on the 1200/1300 Line within the NDDB-mapped habitat area. The NDDB response received in January of 2022 identified two state-listed species⁵ known to occur within or near the Project

⁵ To protect the state listed rare, threatened and special concern species and their habitats, no details are included in this Petition regarding species/habitat types, names or locations. The Attachment A mapping provides only general areas of the Project area as identified publicly by NDDB.

area. Eversource will implement species-specific protection and mitigations measures to avoid impacts to the listed species and their habitats during Project construction.

In addition to coordinating with the NDDB for the protection of state-listed species, Eversource consulted with the U.S. Fish & Wildlife Service's ("USFWS") Information, Planning, and Consultation ("IPac") service regarding federal-listed species that may be present within the Project area. The IPaC report indicated one federal-listed species; the Northern Long-eared Bat ("NLEB"; *Myotis septentrionalis*) may potentially occur in proximity to the Project area.

NLEB roosts in certain trees in the warmer months of the year and at other times hibernates in caves and mines (bat "hibernacula"). However, according to the NLEB Areas of Concern in Connecticut map (dated February 2016), there are no known roost trees within 150 feet of the Project area while the nearest hibernacula is approximately 6 miles away to the northwest in East Granby. In addition, no tree clearing is proposed. Therefore, no impacts to this species are anticipated.

Visual Effects

The Project would result in some change to the visual character of the line, though Eversource does not believe that the change would result in a substantial change. Replacement structures 6207 and 6207A will be approximately 10.5 feet taller than the corresponding existing structure 6207 and will be located as close as possible to the location of the existing structure. Visual effects would be mitigated by utilizing weathering steel for the new structures allowing them to blend in more easily from views through existing vegetation. As a result, the Project would not result in a detrimental change to the existing visual character of the line in this area, from nearby residential developments, the Connecticut River and publicly accessible land.

Sound Levels along the Transmission ROW

The construction of the Project would result in short-term and localized noise, as is typical of similar construction projects. The temporary increase in noise would likely raise localized ambient sound levels immediately surrounding the work areas due to the operation of standard types of construction equipment. (e.g., backhoe, bulldozer, crane, trucks, etc.)⁶. Upon completion of construction and during operation, the proposed modifications would not have any effect on noise or sound pressure levels. Once in service, the rebuilt lines would not result in any changes to ambient noise levels.

Air Quality

Short-term, localized effects on air quality may result from the Project construction work, primarily from fugitive dust and equipment emissions. To minimize the amount of dust generated by construction activities, the extent of exposed/disturbed areas at any one time would be minimized. Vehicle emissions will be limited by requiring contractors to properly maintain construction equipment and vehicles, and by minimizing the idling time of equipment and vehicles, including diesel construction equipment, in accordance with Connecticut regulatory requirements⁷. Temporary gravel tracking pads would be installed at points of construction vehicle ingress/egress from the ROW to minimize the potential for equipment to track dirt onto local roads. To further minimize dust, water may be used to wet down disturbed soils or work areas with heavy tracking as needed.

⁶ Construction noise is exempted under the Connecticut regulations for the control of noise, RCSA 22a-69-1.8(g).

⁷ Regulations of Connecticut State Agencies (RCSA) Section 22a-174-18(b)(3)(C) generally prohibits the idling of motor vehicles for more than three consecutive minutes when not in motion.

Radio and Television Interference

There will be no increase in radio interference or audible noise from the operation of the new transmission facilities.

5. Traffic Management

Construction vehicles and equipment associated with the work would include, but are not limited to, pickup trucks, bucket trucks, flat-bed trucks, excavators, concrete trucks, drill rigs, front loaders, reel trailers, bulldozers, woodchippers, brush hogs/mowers, forklifts, side booms, dump trucks and cranes. Pullers and tensioners will be used for the line and OPGW work. Guard trucks and/or temporary guard structures and methods would be used for protection of roads and boat traffic on the Connecticut River during the line and OPGW work.

Construction-related vehicular and equipment movements would utilize public roads in the Project area to access the ROW. However, the Project-related traffic is generally expected to be temporary and highly localized in the vicinity of the ROW access points and at the staging areas. Due to phasing of construction work, these Project-related traffic movements are not expected to significantly affect transportation patterns or levels of service on public roads.

To safely move construction vehicles and equipment onto and off of the ROW while minimizing disruptions to vehicular traffic along public roads, Eversource or its Project contractor would, as appropriate, work with the Towns and the Connecticut Department of Transportation to develop and implement traffic management procedures, as needed. The construction contractor is typically responsible for posting and maintaining construction warning signs along public roads near work sites and for coordinating the use of flaggers or police personnel to direct traffic, as necessary.

6. Construction Sequence

Project construction would include the following activities:

Soil Erosion and Sediment Control Installation

Project construction would conform to best management practices for E&S control, including those provided in the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control ("Connecticut Guidelines") and Eversource's BMPs.

Typical E&S control measures include, but are not limited to, straw blankets, hay bales, silt fencing, gravel anti-tracking pads, soil and slope protection, water bars, check dams, berms, swales, plunge pools, and sediment basins. Silt fence would be installed prior to construction, as needed, to intercept and retain sediment and/or construction materials from disturbed areas and prevent such materials from migrating from work areas and discharging to water resources and/or off ROW. Temporary E&S control measures would be maintained and inspected throughout the Project to ensure their integrity and effectiveness. Following completion of the 1200/1300 Line construction activities, seeding and mulching would be completed to permanently stabilize the areas disturbed by the work. The temporary E&S control measures would remain in place until the Project work is complete and all disturbed areas have been deemed and remain stabilized.

Access Roads and Work Pads

Access to the proposed transmission structure location will be required during Project construction. As a result of the operation and maintenance of the existing lines within this ROW, some access roads are already established and Eversource will utilize these existing access roads to the extent possible. However, one new in-ROW access road will be required. In areas where the new access road crosses Wetland 3, temporary construction matting will

be utilized. The proposed access road for the Project is illustrated on the maps in Attachment A.

Existing access roads may need to be improved (graded, widened, and/or reinforced) with additional stone material to accommodate the safe passage of construction vehicles and equipment. Access road improvements typically include trimming adjacent vegetation and widening roads, as needed, to provide a maximum travel surface that is approximately 16 feet wide (additional width may be needed at turning or passing locations). Access roads would typically be graveled; however, where access roads traverse streams or wetlands, timber construction mats would be used. E&S controls would be installed as necessary before the commencement of any improvements to or development of access roads.

One matted work pad is required for the Project to stage material for final on-site assembly and/or removal of the existing structure, to pull conductors and to provide a safe, level work base for the construction equipment. Dimensions for the proposed work pad would be approximately 100 feet by 200 feet. The location and configuration of the work pad, as determined based on environmental field studies and constructability reviews, are shown on Attachment A.

The proximate locations and configuration of the work pad, as determined based on the environmental field studies and constructability reviews, are shown on Attachment A.

Foundation Installation

The proposed structures will have drilled concrete pier (caisson) foundations. Foundation installation work would require the use of equipment such as drill rigs, pneumatic hammers, augers, dump trucks, concrete trucks, grapple trucks and light duty trucks. If groundwater is encountered, pumping (vacuum) trucks or other suitable equipment would be used to pump

water from the excavated areas as the shaft is being drilled or as the structure is being set. The water would then be discharged in accordance with applicable local, state and federal requirements.

Excavated soils that are generated during construction activities would be stored or spread in an upland area within the ROW, to the extent practicable. Materials that cannot be utilized as backfill would be disposed of in accordance with applicable regulations.

As needed, counterpoise installation may also take place at this time. Depending on sitespecific soil conductivity, supplemental grounding will be installed. A quad "ditch-witch" plowcable trencher would be used to install the counterpoise.

Structure Assembly/Installation

Structure sections, structure components and hardware would be delivered to the individual structure locations using flat-bed trucks and assembled on-site using a crane, excavator and bucket trucks. After assembly, the area around caisson foundations would be backfilled with processed gravel.

Conductor and OPGW Installation

The installation of the new conductors and OPGW would occur after the new structures have been erected. The equipment required for these activities would include cable reels, pulling and tensioning rigs, and bucket trucks.

Structure, Conductor and Static Wire Removal

The removal of the existing conductor and shield wire would take place during the active installation of the new conductor and OPGW because the existing conductor and shield wire

will be used as pulling lines, if possible. Conductor dead-ending and splicing will be accomplished with pressed hardware.

The existing structures would be removed after the new conductor and OPGW are installed.

Restoration

Once the new structures are erected, the line is re-energized and the existing structure has been demolished and removed, restoration activities would commence and would include the removal of construction debris, signage, flagging, and temporary fencing, as well as the removal of construction mats and work pads that are designated for removal. Areas affected by construction would be re-graded as practical and stabilized using revegetation or other measures before removing temporary E&S controls. Eversource would perform ROW restoration in accordance with the protocols specified in Eversource's BMPs, applicable permits and in consultation with affected property owners.

Waste Management

Waste materials, such as structure components (i.e., materials from the removed structures, conductor, shield wire, associated hardware, etc.) and any other construction debris would be disposed of in accordance with Eversource's BMPs, applicable regulations or recycled consistent with applicable rules and regulations and Eversource policies. As described above, excess soils would be managed in accordance with the Company's BMPs, applicable regulations and disposal facility policies. Dewatering during construction activities would be conducted in accordance with the *Connecticut Guidelines*, Eversource's BMPs and applicable regulations.

7. Construction Schedule and Work Hours

Eversource proposes to begin construction in September 2022. Normal work hours would be Monday through Saturday from 7:00 AM to 7:00 PM. Sunday work hours or evening work hours past 7:00 PM may be necessary based on Connecticut Department of Transportation permitting requirements and restrictions for accessing the work areas off, and pulling wire over, Main Street/Route 510 in East Windsor and South Main Street/Route 159 in Windsor Locks. Additional work hours may also be required due to delays caused by inclement weather, and/or outage constraints. In the event this is necessary, the Council, Town(s) and abutters will be provided advanced notice of the proposed Sunday and/or evening work hours.

8. Electric and Magnetic Fields

Eversource prepared calculations of the existing and post-Project Electric and Magnetic fields ("EMF"). The calculations were based on average annual loading conditions, because these are most representative of typical conditions. The calculations are made relative to the centerline of the proposed, modified transmission lines. The calculations apply at one meter (3.28 feet) above grade and assume that the lowest conductor for each 115-kV circuit is 60 feet above grade because of the Connecticut River crossing.

Eversource's proposes to replace double-circuit steel lattice towers with two single-Circuit steel monopoles. Magnetic field levels will increase by approximately 1.0 milligauss ("mG") within the ROW. Magnetic fields at and beyond the edges of the ROW will remain essentially unchanged. Electric fields both inside and beyond the edges of the ROW will see negligible changes.

Table 1 summarizes the calculated electric and magnetic fields at the ROW edges before and after the modifications.

Summary of Fields		CT River Crossing EMF			
Summary	of Fields	South Edge	Max	North Edge	
MF (mG)	Existing	0.3	1.4	0.1	
	Proposed	0.6	2.5	0.0	
	Existing	0.04	0.51	0.03	
EF (kV/m)	Proposed	0.04	0.51	0.04	

Table 1 - Summary of Calculated Electric and Magnetic Fields

The results of the calculations show that the proposed modifications would not substantially increase electric or magnetic fields at the edge of the corridor. See Attachments X and Y: EMF graphs and Tabulated Field Calculations.

Comparison of Calculated Fields to International Guidelines

The anticipated fields from the proposed transmission lines are well below the internationally established exposure limits for 60-Hz electric and magnetic fields, specifically, the limits identified by the International Council on Electromagnetic Safety ("ICES") and the International Council on Non-Ionizing Radiation Protection ("ICNIRP"). These standards are summarized below in Table 2.

 Table 2 - International Guidelines for EMF Exposure

	<u>EF (kV/m)</u>	<u>MF(mG)</u>
ICES	5	9,040
ICNIRP	4.2	2000

9. Municipal and Property Owner Outreach

In June 2022, Eversource consulted with the municipal officials of the Towns of East Windsor and Windsor Locks to brief them on the proposed Project. Additionally, Eversource provided representatives of the towns with a copy of the Petition filing. In May 2022 Eversource initiated outreach to property owners located along the Project route. In conjunction with the submission of this Petition, all abutting property owners were notified of the filing and provided information on how to obtain additional information on the Project, as well as how to submit comments to the Council. Eversource representatives will continue contact with adjacent property owners to provide advance notification as to the start of construction activities and will continue to update property owners throughout construction and restoration.

10. Conclusion

Based on the foregoing, Eversource respectfully submits that the proposed modifications would not result in a substantial adverse effect on the environment, nor would they damage existing scenic, historical, or recreational values. Accordingly, Eversource requests that the Council issue a declaratory ruling that the proposed modifications would have no substantial adverse environmental effect.

Communications regarding this Petition for a Declaratory Ruling should be directed to:

Kathleen M. Shanley Manager – Transmission Siting Eversource Energy PO Box 270 Hartford, CT 06141-0270 Telephone: (860) 728-4527

By: Kathleen M. Shanley

List of Attachments

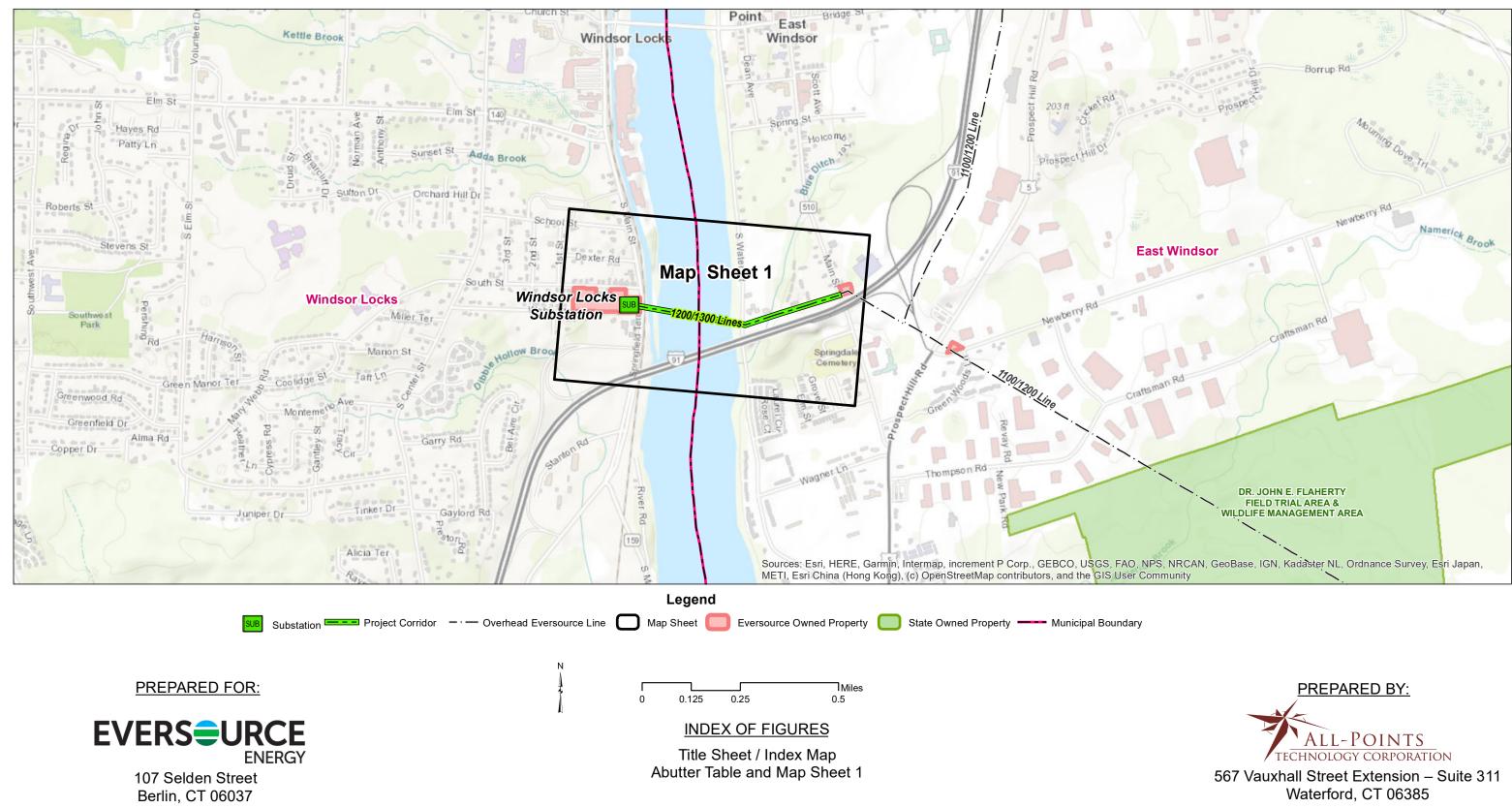
- Attachment A: 1200/1300 Line Structure Replacement Project Maps
- Attachment B: Structure 6207 to 6208 Right-of-Way Cross Section
- Attachment C: Wetlands and Watercourses and Vernal Pool Reports
- Attachment D: EMF Graphs and Tabulated Field Calculations

Attachment E: Letter to the Abutters and Affidavit of Notice of Service

Attachment A 1200/1300 Line Structure Replacement Project Maps

1200/1300 Lines Structure Replacement Project

East Windsor, CT **Petition Map** Date: July 11, 2022



MAP SHEET 01 1200/1300 Lines Structure Replacement Project Structures 6207A and 6207 Town of East Windsor, CT

AREA DESCRIPTION

Existing Land Use & Resource Areas

- Connecticut River
- Windsor Locks Substation
- Natural Diversity Data Base Area
- 100-year Flood Zone
- Eversource Owned Property
- Residential
- Industrial
- Commercial
- Transportation
- Municipal (Wastewater Treatment Plant)

RIGHT-OF-WAY DESCRIPTION

Right-of-Way Land Use & Resource Areas

- Maintained ROW
- Rail Line east of Structure 6209
- Connecticut River between Structures 6209 and 6208A
- 100-year Flood Zone east and south of Structures 6207
- Natural Diversity Data Base Area

Water Resources

- Connecticut River
- Wetlands: W1, W2, & W3
- Wetland Cover Types: PFO, PSS, & PEM
- Watercourses: S1

Wetland and Watercourse Crossings

Wetland W3 – Construction mats for access road

Right-of-Way Vegetation

Scrub-shrub

Access

Existing access of Main Street (CT510)

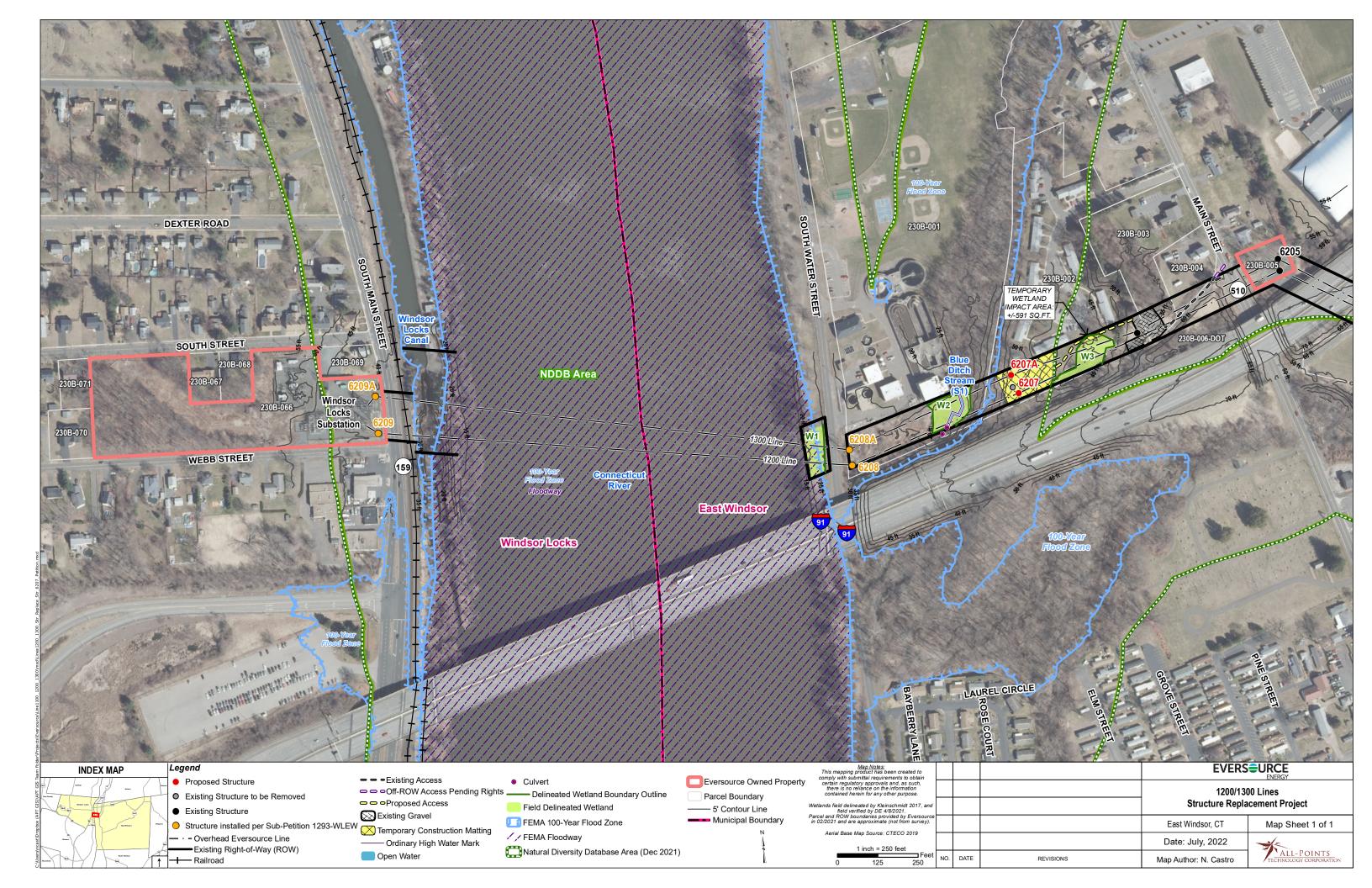
Road Crossings

- South Main Street (Windsor Locks)
- South Main Street (East Windsor)
- Main Street/CT510 (East Windsor)
- Interstate 91

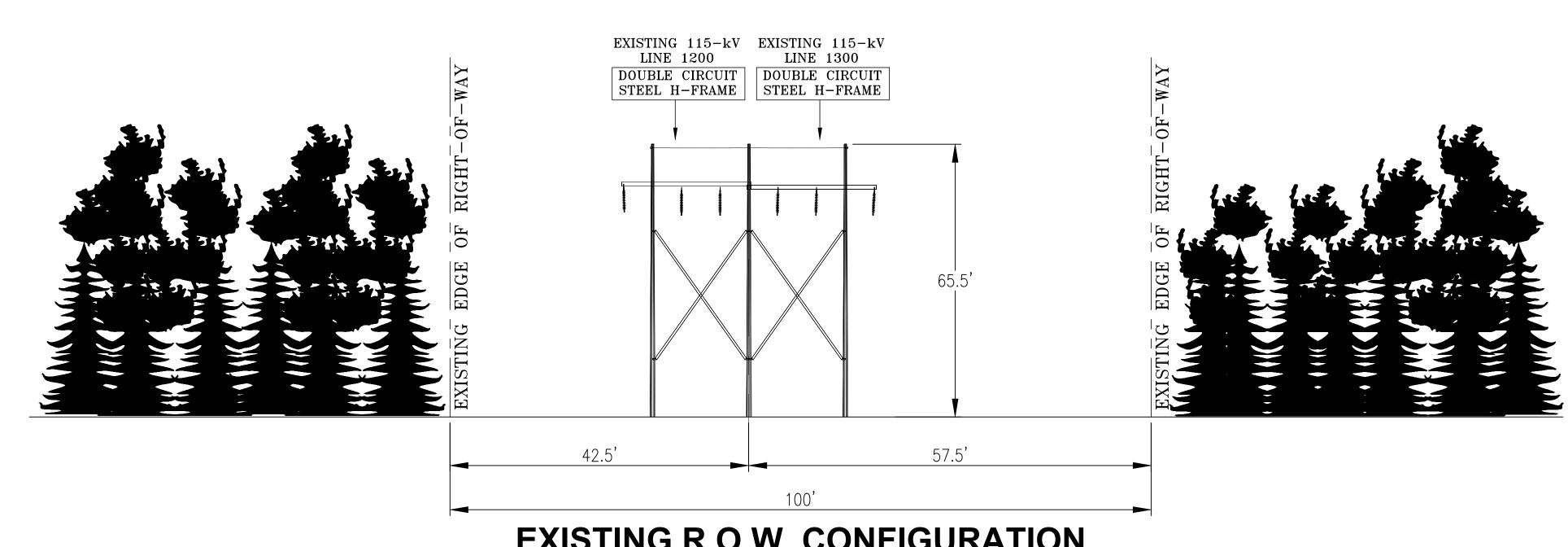
Existing Maintained Right-of-Way Width / Proposed Right-of-Way Clearing

100 Feet – No clearing proposed

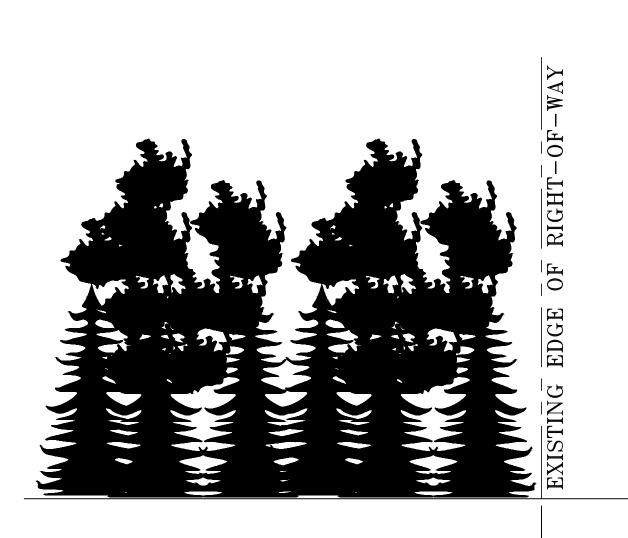
	ABUTTERS					
<u>Line List</u> <u>Number</u>	Parcel Address	Town	Owner Name			
230B-001	192 SOUTH WATER ST	EAST WINDSOR	TOWN OF EAST WINDSOR			
230B-002	235 MAIN ST	EAST WINDSOR	WAREHOUSE POINT HOUSING FOR ELDERLY			
230B-003	237 MAIN ST	EAST WINDSOR	KING STREET ASSOCIATES LLC			
230B-004	239 MAIN ST	EAST WINDSOR	DORIERRZA LISBOA			
230B-005	MAIN ST	EAST WINDSOR	CONNECTICUT LIGHT & POWER			
230B-006- DOT	MAIN ST	EAST WINDSOR	CONNECTICUT DEPARTMENT OF TRANSPORTATION			
230B-066	SOUTH MAIN ST	WINDSOR LOCKS	CONNECTICUT LIGHT & POWER			
230B-067	14 SOUTH ST	WINDSOR LOCKS	JUNE M. TRASKA			
230B-068	12 SOUTH ST	WINDSOR LOCKS	DOROTHY F. HAMILTON			
230B-069	49 SOUTH MAIN ST	WINDSOR LOCKS	WALTER & CAROL OFSURYK			
230B-070	36 WEBB ST	WINDSOR LOCKS	PETER JR. SLOMSKI			
230B-071	26 SOUTH ST	WINDSOR LOCKS	MARK PAYETTE			

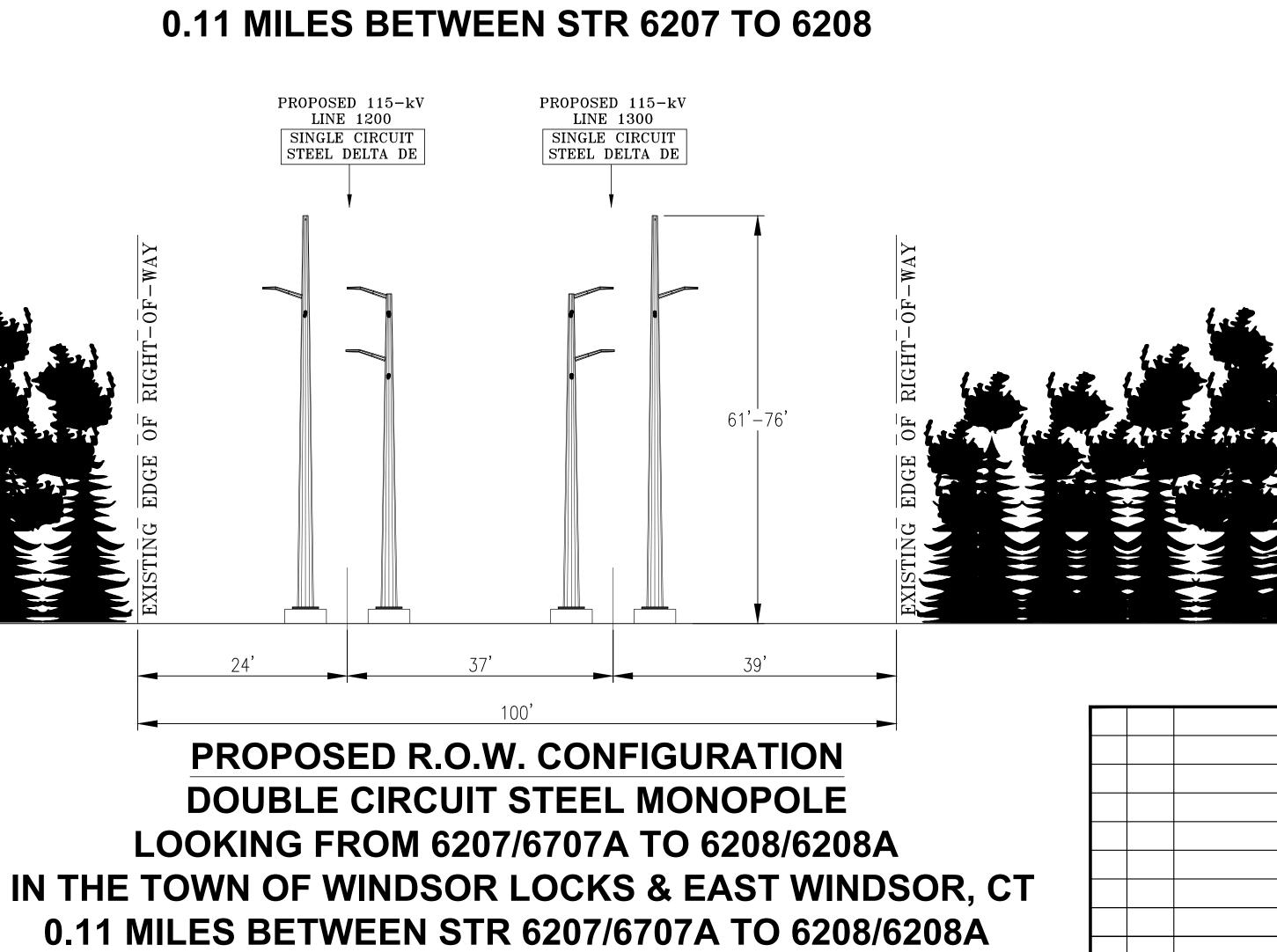


Attachment B Structure 6207 to 6208 – Right-of-Way Cross Section



EXISTING R.O.W. CONFIGURATION DOUBLE CIRCUIT STEEL H-FRAME LOOKING FROM 6207 TO 6208 IN THE TOWN OF WINDSOR LOCKS & EAST WINDSOR, CT 0.11 MILES BETWEEN STR 6207 TO 6208





NO. DATE

								RE	VISIONS	DURIN	G CON	ISTRUCTI	ION			
					1 03	3/29/21 IS	SUED FOF	CONS	STRUCTION	WO #405	14901,	40515001,	4051510	1 MMM	CJS	GEL
					2 06	6/18/21 IS	SUED FOF	R CONS	STRUCTION	WO# 405	514901,	40515001,	, 4051510 ⁻	1 SAL	CJS	GEL
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Attachment C Wetlands and Watercourses and Vernal Pool Reports



Biodiversity Studies • Wetland Delineation & Assessment • Habitat Management • GIS Mapping • Permitting • Forestry

Wetland Delineation

June 1, 2021

DE Project No.: 2021-24

Prepared For:	Eversource Energy 56 Prospect Street Hartford, CT 06103 Attn: Ian Cole
Eversource Project Name:	1200-1300 Line Structure Replacement Project
Project Location:	East Windsor, Connecticut
Date of Investigations:	April, 2021
Field Conditions:	Weather: variable Soil Moisture: moist
Wetland/Watercourse	
Delineation Methodology ¹ :	⊠Connecticut Inland Wetlands and Watercourses
	□Connecticut Tidal Wetlands
	□Massachusetts Wetlands
	⊠U.S. Army Corps of Engineers

The wetlands inspection was performed by²:

Davison Environmental, LLC

Matthew Davison Professional Soil Scientist Professional Wetland Scientist

¹Wetlands and watercourses were delineated in accordance with applicable local, state and federal statutes, regulations and guidance.

²Wetlands were delinetead by Davison Environmental Professional Soil Scientist Matthew Davison in April, 2021. All established wetlands boundary lines are subject to change until officially adopted by local, state, or federal regulatory agencies.

Attachments

- Table 1: Delineated Wetlands and Watercourses within the 1200-1300 Line Structure Replacement Project Area
- Wetland Delineation Field Forms

Aerial Map Sheet No.	Wetland No. ¹	Dominant NWI Class ²	Other NWI Classes	Dominant Water Regime	Associated Watercourse ³	Associated Vernal Pool ⁴		
1	W1	R1US	PFO	Permanently Flooded	Connecticut River			
1	W2	PEM	PSS	Permanently Saturated	S1 (Blue Ditch Stream)			
1	W3	PEM		Seasonally Saturated- seepage				

Table 1: Delineated Wetlands and Watercourses within the1200-1300 Line Structure Replacement Project Area

¹Wetland No. refers to the number generated during the 2021 field survey within the 1200-1300 Line Structure Replacement Project area. This Wetland No. is keyed to those depicted on the 200 scale Aerial Maps (Attached to the Petition).

²Wetlands classified according to Cowardin et al 1979; PFO = Palustrine Forested; PSS = Palustrine Scrub-Shrub; PEM =

Palustrine Emergent; POW = Palustrine Open Water; R1US = Riverine Tidal Unconsolidated Bottom

³Associated Watercourse refers to the identification number assigned during the 2021 field survey to identify watercourses within the 1200-1300 Line Structure Replacement Project area.

⁴ Vernal pool inspections were conducted in 2021 by Davison Environmental

Wetland Delineation Field Form

Wetland I.D.:	W1	Stream I.D.:		Connecticut River
Flag Location Method:	Site Sketch \Box		GPS (sub	-meter) located \boxtimes

WETLAND HYDROLOGY:

NONTIDAL

Intermittently Flooded \Box	Artificially Flooded \Box	Permanently Flooded ⊠		
Semipermanently Flooded \Box	Seasonally Flooded \Box	Temporarily Flooded ⊠		
Permanently Saturated \Box	Seasonally Saturated – seepage \Box	Seasonally Saturated - perched \Box		
Comments: Connecticut River (east side) including its bordering forested floodplain				

TIDAL

Subtidal 🗆	Regularly Flooded	Irregularly Flooded 🛛
Irregularly Flooded		
Comments: None		

WETLAND TYPE:

SYSTEM:

Estuarine 🗆	Riverine 🖂	Palustrine
Lacustrine	Marine	
Comments: None		

CLASS:

Emergent 🗆	Scrub-shrub 🗆	Forested 🖂
Open Water 🖂	Disturbed 🗆	Wet Meadow 🗆
Comments: None		

WATERCOURSE TYPE:

Perennial 🖂	Intermittent	Tidal 🗆			
Watercourse Name: Connecticut River					
Comments: None					

SPECIAL AQUATIC HABITAT:

Vernal Pool Yes 🗆 No 🗵 Potential 🗆	Other 🗆
Vernal Pool Habitat Type: None	
Comments: None	

SOILS:

DOMINANT PLANTS:

Silver Maple (Acer saccharinium)	
Red Maple (Acer rubrum)	

* denotes Connecticut Invasive Species Council invasive plant species

Wetland Delineation Field Form

Wetland I.D.:	W2	Stream I.D.:		S1 (Blue Ditch Stream)
Flag Location Method:	Site Sketch \Box		GPS (sub	-meter) located \boxtimes

WETLAND HYDROLOGY:

NONTIDAL

Intermittently Flooded \Box	Artificially Flooded \Box	Permanently Flooded \Box
Semipermanently Flooded \Box	Seasonally Flooded 🗆	Temporarily Flooded \Box
Permanently Saturated 🖂	Seasonally Saturated – seepage \Box	Seasonally Saturated - perched \Box
Comments: None		

TIDAL 🗆

Subtidal 🗆	Regularly Flooded	Irregularly Flooded
Irregularly Flooded		
Comments: None		

WETLAND TYPE:

SYSTEM:

Estuarine 🗆	Riverine 🗆	Palustrine 🛛
Lacustrine	Marine	
Comments: None		

CLASS:

Emergent 🖂	Scrub-shrub 🖂	Forested
Open Water 🗆	Disturbed 🗆	Wet Meadow 🗆
Comments: None		

WATERCOURSE TYPE:

Perennial 🖂	Intermittent	Tidal 🗆
Watercourse Name: Blue Ditch Str	ream	
Comments: None		

SPECIAL AQUATIC HABITAT:

Vernal Pool Yes \Box No \boxtimes Potential \Box	Other 🗆
Vernal Pool Habitat Type: None	
Comments: None	

SOILS:

Are field identified soils consistent with NRCS mapped soils?	Yes 🖂	No 🗆
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DOMINANT PLANTS:

Common Reed* (Phragmites australis)	
Pussywillow (Salix discolor)	
Multiflora Rose* (Rosa multiflora)	
Bush Honeysuckles* (Lonicera spp.)	

* denotes Connecticut Invasive Species Council invasive plant species

Wetland Delineation Field Form

Wetland I.D.:	W3	Stream I.D.:		NA
Flag Location Method:	Site Sketch \Box		GPS (sub	-meter) located \boxtimes

WETLAND HYDROLOGY:

NONTIDAL

Intermittently Flooded \Box	Artificially Flooded \Box	Permanently Flooded \Box
Semipermanently Flooded \Box	Seasonally Flooded \Box	Temporarily Flooded \Box
Permanently Saturated \Box	Seasonally Saturated – seepage ⊠	Seasonally Saturated - perched \Box
Comments: None		

TIDAL 🗆

Subtidal 🗆	Regularly Flooded	Irregularly Flooded
Irregularly Flooded		
Comments: None		

WETLAND TYPE:

SYSTEM:

Estuarine 🗆	Riverine 🗆	Palustrine 🖂
Lacustrine	Marine	
Comments: None		

CLASS:

Emergent 🖂	Scrub-shrub 🖂	Forested
Open Water 🗆	Disturbed 🗆	Wet Meadow 🗆
Comments: None		

WATERCOURSE TYPE:

Perennial 🗆	Intermittent	Tidal 🗆		
Watercourse Name: None				
Comments: None				

SPECIAL AQUATIC HABITAT:

Vernal Pool Yes \Box No \boxtimes Potential \Box	Other 🗆
Vernal Pool Habitat Type: None	
Comments: None	

SOILS:

Are field identified soils consistent with NRCS mapped soils?	Yes 🖂	No 🗆
---	-------	------

DOMINANT PLANTS:

Common Reed* (Phragmites australis)	
Pussywillow (Salix discolor)	
Multiflora Rose* (Rosa multiflora)	
, , , , , , , , , , , , , , , , , , ,	

* denotes Connecticut Invasive Species Council invasive plant species



Biodiversity Studies • Wetland Delineation & Assessment • Habitat Management • GIS Mapping • Permitting • Forestry

Vernal Pool Survey

June 1, 2021

DE Project No.: 2021-24

Prepared For:	Eversource Energy 107 Selden Street Berlin, CT 06037 Attn: Ian Cole		
Eversource Project Name:	1200-1300 Line Structure Replacement Project		
Project Location:	East Windsor, Connecticut		
Date(s) of Investigations:	April, 2020		
Survey Methodology:	Visual & Audial Survey, Dip Netting		

The vernal pool survey was performed by:

Davison Environmental, LLC

Matthew Davis

Matthew Davison Professional Soil Scientist Professional Wetland Scientist

INTRODUCTION

The following report details vernal pool habitat assessments conducted by Davison Environmental in support of The Connecticut Light and Power Company doing business as Eversource Energy's ("Eversource") Petition to the Connecticut Siting Council for the 1200-1300 Line Structure Replacement Project within an existing transmission line right-of-way ("ROW") in East Windsor, Connecticut ("Project").

VERNAL POOL DEFINITION

Several vernal pool definitions have been developed by both regulatory authorities and conservation organizations. The Connecticut Department of Energy and Environmental Protection (CT DEEP) generally describes vernal pools on its website but cautions that the data provided is informational in nature and should not supplant regulations of municipal inland wetlands agencies. CT DEEP describes vernal pools as *"small bodies of standing fresh water found throughout the spring"* that are *"usually temporary"* and *"result from various combinations of snowmelt, precipitation and high water tables associated with the spring season"*.

Calhoun and Klemens (2002) *Best development practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United States* (BDP Manual) provides the following operational definition of vernal pools:

Vernal pools are seasonal bodies of water that attain maximum depths in the spring or fall, and lack permanent surface water connections with other wetlands or water bodies. Pools fill with snowmelt or runoff in the spring, although some may be fed primarily by groundwater sources. The duration of surface flooding, known as hydroperiod, varies depending upon the pool and the year; vernal pool hydroperiods range along a continuum from less than 30 days to more than one year. Pools are generally small in size (<2 acres), with the extent of vegetation varying widely. They lack established fish populations, usually as a result of periodic drying, and support communities dominated by animals adapted to living in temporary, fishless pools. In the region, they provide essential breeding habitat for one or more wildlife species including Ambystomid salamanders (Ambystoma spp., called "mole salamanders" because they live in burrows), wood frogs (Rana sylvatica), and fairy shrimp (Eubranchipus spp.).

Vernal pool physical characteristics can vary widely while still providing habitat for indicator species. "Classic" vernal pools are natural depressions in a wooded upland with no permanent hydrologic connection to other wetland systems. Anthropogenic depressions such as quarry holes, old farm ponds and borrow pits can also provide similar habitat. Most commonly in Connecticut vernal pools are depressions or impoundments embedded within forested wetlands, most typically red maple-dominated swamps. These vernal pool habitats are commonly referred to as "cryptic" vernal pools.

Several species of amphibians depend on vernal pools for reproduction and development. These species are referred to as indicator¹ vernal pool species, and their presence in a temporary

¹ Calhoun and Klemens (2002) argue that "indicator" species is a better word than the commonly used "obligate" species, as they will occasionally breed in roadside ditches and small ponds that are not vernal pools.

wetland during the breeding season helps to identify that area as a vernal pool. Indicator species present in Connecticut include the following:

- Blue-spotted salamander (Ambystoma laterale);
- Wood frog (Rana sylvatica);
- Spotted salamander (Ambystoma maculatum);
- Jefferson salamander (Ambystoma jeffersonianum);
- Marbled salamander (Ambystoma opacum); and
- Fairy shrimp (*Branchiopoda anostraca*).

Facultative vernal pool species are fauna that utilize but do not necessarily require vernal pools for reproductive success. Examples of facultative species include spotted turtles (*Clemmys guttata*) and four-toed salamander (*Hemidactylium scutatum*). These species may breed or feed in vernal pools but are also capable of carrying out all phases of their lifecycle in other types of wetlands or water bodies. Evidence of breeding by facultative species alone is not considered indicative of the presence of a vernal pool.

EXISTING WETLANDS ALONG THE PROJECT ROW

Project wetlands are predominantly characterized by wetlands with a "seasonally saturated" or "saturated" hydrology. Mitsch and Gosselink (2007)² defines a saturated hydrology as a wetland with a substrate that is saturated for extended periods during the growing season, but standing water is rarely present. Wetlands with a saturated hydrology are not capable of supporting breeding by vernal pool indicator species, as they lack prolonged standing water. In order for successful breeding by vernal pool amphibians to occur, a wetland must have standing water from approximately March through June for most indicator species³. Such wetlands, referred to as seasonally flooded wetlands, provide optimal habitat for vernal pool indicator species. Additionally, while seasonally flooded conditions are optimal, permanently (or semi-permanently) flooded wetlands can also provide suitable breeding habitat, particularly if they occur in a forested landscape and contain shallow water with emergent and/or submergent vegetation.

VERNAL POOL HABITAT ASSESSMENT

Matthew Davison of Davison Environmental, LLC conducted field surveys of the wetlands within the Project area in April 2021 to identify vernal pools. Only three wetlands occur within the Project area, none with suitable hydrology to provide vernal pool habitat. No vernal pools were identified during the survey.

² Mitsch, W.J. and Gosselink, J.G. 2007. Wetlands, fourth edition. John Wiley and Sons, Inc.

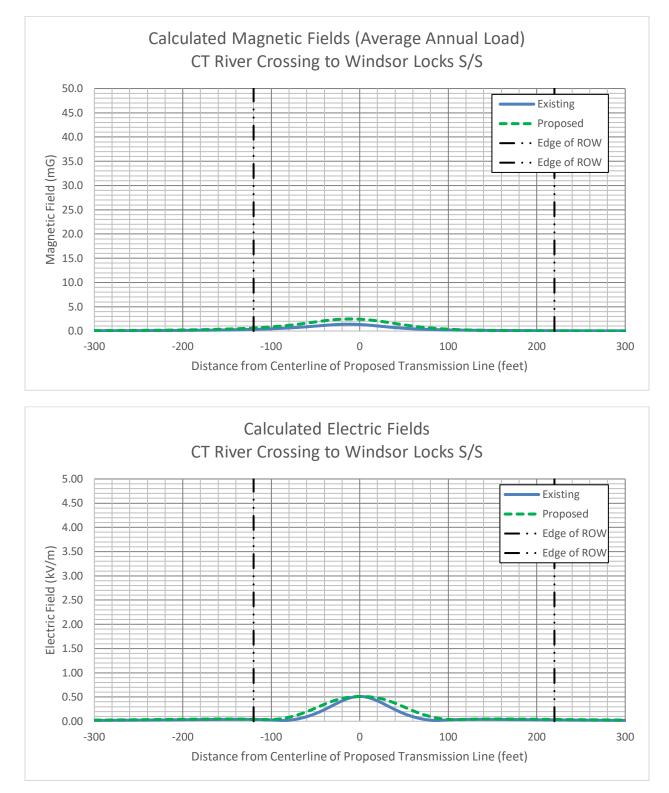
³ The indicator species marbled salamander (*Ambystoma opacum*) breeds in late-summer and fall, with larval development throughout the winter and spring.



View of Wetland W3 (common reed marsh) from Structure 6206 looking west towards Structure 6207 (proposed for replacement. This wetland does not possess suitable hydrology (seasonally flooded) to provide vernal pool habitat.

Attachment D EMF Graphs and Tabulated Field Calculations

Appendix X



Appendix Y

Distance from Proposed	Magnetic Field		Electric Field	
Transmission Line	Existing	Proposed	Existing	Proposed
-300	0.1	0.1	0.02	0.02
-275	0.1	0.1	0.02	0.03
-250	0.1	0.1	0.02	0.03
-225	0.1	0.2	0.03	0.04
-200	0.1	0.2	0.03	0.04
-175	0.2	0.3	0.04	0.04
-150	0.2	0.4	0.04	0.05
-125	0.3	0.6	0.04	0.04
-100	0.5	0.9	0.03	0.03
-75	0.7	1.3	0.03	0.11
-50	1.0	1.9	0.16	0.27
-25	1.3	2.4	0.38	0.45
0	1.3	2.4	0.51	0.51
25	1.0	2.0	0.38	0.46
50	0.6	1.3	0.16	0.30
75	0.3	0.7	0.03	0.12
100	0.2	0.4	0.03	0.04
125	0.2	0.2	0.04	0.04
150	0.1	0.1	0.04	0.05
175	0.1	0.1	0.04	0.05
200	0.1	0.0	0.03	0.04
225	0.1	0.0	0.03	0.04
250	0.1	0.0	0.02	0.03
275	0.0	0.0	0.02	0.03
300	0.0	0.0	0.02	0.02

Attachment E Letter to the Abutters and Affidavit of Notice of Service



P.O.Box 270 Hartford, CT 06141-0270

July 13, 2022

Dear Neighbor,

Maintaining infrastructure is one of the many ways Eversource supports the safe and secure transmission of electricity throughout the region. We are submitting a Petition to the Connecticut Siting Council (CSC) for a proposed transmission line and structure replacement project in your area.

Proposed Project Information

The proposed project, called the 1200/1300 Line Structure Replacement Project ("Project"), includes replacing one wood H-frame structure with two weathering steel monopole structures in East Windsor between South Water Street and Main Street (Route 510). In addition, the Project proposes to replace the existing conductor with a new conductor that runs from this new structure across the Connecticut River into a structure at the Windsor Locks Substation off South Main Street.

Finally, the existing ground wire located at the top of new and existing structures from Warehouse Point Junction in East Windsor to the structure at the Windsor Locks Substation is proposed to be replaced with new fiber optic communication wire (called OPGW). The OPGW improves electric reliability by enabling efficient communication between substations.

This proposed work is necessary to ensure the continued reliability, safety and security of the transmission of electricity throughout the region. If the CSC approves the proposed work, construction is expected to begin in September 2022 and conclude by the end of December 2022 Restoration of any affected areas may continue into January 2023.

Health and Safety Is Our Top Priority

Please know that Eversource remains committed to prioritizing public health as well as the health of employees and contractors. All Eversource personnel follow applicable health and safety guidelines to help prevent the spread of COVID-19.

Contact Information

Eversource is committed to being a good neighbor and doing our work with respect for you and your property. For more information please call our project hotline at 1-800-793-2202 or send an email to <u>ProjectInfo@eversource.com</u>.

If you would like to send comments regarding Eversource's Petition to the CSC, please send them via email to siting.council@ct.gov or send a letter to the following address: Melanie Bachman, Executive Director, Connecticut Siting Council, Ten Franklin Square, New Britain, CT 06051.

Sincerely,

Abigail Bowersox

Abigail Bowersox Eversource Project Manager – 1200/1300 Line Structure Replacement Project

AFFIDAVIT OF SERVICE OF NOTICE

STATE OF CONNECTICUT

ss. Fairfield

COUNTY OF FAIRFIELD

Sec. 16-SOj-40 of the Regulations of Connecticut State Agencies ("RCSA") provides that proof of notice to the affected municipalities, property owners and abutters shall be submitted with a petition for declaratory ruling to the Connecticut Siting Council ("Council"). In accordance with that RCSA section, I hereby certify that I caused notice of proposed construction of The Connecticut Light and Power Company doing business as Eversource Energy to be served by mail or courier upon the following municipal officials:

The Honorable Jason E. Bowsza, First Selectman Town of East Windsor, First Selectman's Office 11 Rye Street Broad Brook, CT 06016

The Honorable Paul M. Harrington, First Selectman Town of Windsor Locks 50 Church Street Windsor Locks, CT 06096

I also certify that I caused notice of the proposed modifications to be served by mail or courier upon 10 owners of abutting properties shown on the maps in Attachment A in the Petition.

Bellion

Project Siting Specialist

On this the 13th day of July, 2022, before me, the undersigned representative, personally appeared, Susan J. Bellion, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing instrument and acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

Signature 12026

Notary Public/My Commission expires: 12

Officer of the Superior Court/Juris No .:

1

CHIP KEATING NOTARY PUBLIC - CONNECTICUT MY COMM. EXPIRES 12/31/2026