

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

February 27, 2023

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

Re: Petition No. 1535: Ledyard Junction to Mystic Substation Upgrade Project – Amendment to Petition Pursuant to Condition 1 of the Connecticut Siting Council Petition Approval - Three Additional Replacement Structures and Access Road Modifications (Towns of Ledyard and Stonington)

Dear Attorney Bachman:

On August 11, 2022, the Connecticut Light and Power Company, doing business as Eversource Energy ("Eversource"), filed a Petition for the above-referenced project with the Connecticut Siting Council ("Council"), regarding upgrades to its 1280 transmission line right-of-way ("ROW") in Ledyard, Groton and Stonington, Connecticut. As detailed in the Petition, the work included replacing 34 transmission line structures with new weathering steel transmission structures.

On December 23, 2022, the Council issued a letter ruling that the subject project would not have a substantial 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 three additional transmission structures (Structures 8416, 8463, and 8463A) that require replacement due to asset condition.¹ Eversource plans to conduct the transmission structure replacement work to remediate structure damage caused by age, weather, and woodpecker activity. In addition, due to safety concerns, Eversource is proposing to eliminate temporary construction matting at two in-ROW access road locations and will utilize existing gravel roads. The temporary construction matting has the potential to create slippery conditions during foul weather due to terrain (i.e., slope). The pull pad, north of structure 8463, will not require a matted surface application.² Also, at the owner's request, the off-ROW access from Clara Drive through the commercial business parking area (Parcel 282-041) will be adjusted to traverse along the north side of the building instead of the south side of the building.

In support of these proposed modifications, the following work ("Work Activities") will be performed:

- 1) Replace Structure 8416, a single-circuit wood 3-pole structure supporting the 1280 Line, with a new weathering steel 3-pole structure. To comply with current conductor clearance requirements, the height of the replacement structure will be increased by 4.5 feet. To accommodate the structure replacement the existing 75' x 80' gravel work pad will be increased in size to 100' x 100'.

¹ The two single circuit structures (8463 and 8463A) will be combined onto a double-circuit structure (8463) to carry the 1280/1465 Lines.

² After further evaluation, it was determined that the gravel pull pad north of structure 8463 was more extensive than previously shown and requires only minor gravel improvements for construction vehicle use.

- 2) Replace Structures 8463 and 8463A, both single-circuit wood H-frame structures supporting the 1465 and 1280 Lines respectively, with a new double-circuit weathering steel H-frame structure, Structure 8463. To comply with current conductor clearance requirements, the height of the replacement structure will be increased by 5 feet. In addition, the matted pull pad adjacent to Structure 8463A will be eliminated and the existing gravel surface will be utilized and the off-ROW access route from Clara Drive leading to Structure 8463 will be rerouted from the south side of the building to the north side of building.
- 3) Eliminate the addition of matting application across the existing gravel access road leading to the pull pad, adjacent to Structure 8443-2, and add edge fencing or wattles along both sides of the gravel access.
- 4) Eliminate the addition of matting application across the existing gravel access road between the work pads of Structures 8452 and 8453.
- 5) Utilize the existing gravel pull pad north of structure 8463 for construction vehicle access within the ROW and eliminate the addition of pull pad matting application in the same footprint.

Reference is made to Map Sheets 12, 13, 18, 20 and 22 in Attachment A; *“Ledyard Junction to Mystic Substation Upgrade Project” “Petition Map Set”*, dated August 9, 2022, revised February 17, 2023, and Attachment B *“Cross Section – Structure 8416”* and *“Cross Section – Structure 8463”*.

Eversource respectfully submits that the proposed structure replacements and access road modifications would have no "substantial adverse environmental effect" pursuant to Conn. Gen. Stat. § 16-50k, based on the following factors:

- All Work Activities would take place in areas within Eversource’s existing ROW, utilizing existing access roads, (collectively the "Work Areas"). Eversource can access the structure replacement locations utilizing its existing rights.
- The Work Activities would not result in any impacts to wetlands or watercourses. Work would be conducted in accordance with Eversource’s *Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements)*, April 2022 ("BMPs") to avoid impacts to the nearby water resources.
- The Work Activities will have no adverse impacts to Vernal Pool 15 ("VP15") and/or the VP15 envelope . Eversource would continue to use the VP protective measures described in the Petition associated with the pull pad adjacent to Structure 8443-2.
- Based on 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. Therefore, the Work Areas would not be subject to an NDDB Review Request. Work would be conducted in accordance with Eversource’s BMPs 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 new Work Activities will not require any tree clearing. However, Eversource may need to undertake tree trimming and/or vegetation removal/mowing for conductor clearance and/or to improve access to portions of the Work Areas.
- A Phase 1A assessment review of previously recorded cultural resources on file with the Connecticut State Historic Preservation Office conducted by Heritage Consultants, LLC ("Heritage") did not

identify any National or State Register of Historic Places properties/districts or archeological sites within 500 feet of the Work Activities. Based on a review of historic maps, aerial photographs, and available soil profiles, the proposed Work Areas were identified to possess no/low archaeological sensitivity: therefore, Heritage advised that no additional archeological investigation is recommended or warranted.

- There are no 100-year flood zones associated with the Work Areas.
- No change in noise levels would result from the installation of the new structures and the applicable lines would continue to comply with the State of Connecticut noise regulations.
- Any changes in electric and magnetic field levels outside the ROW would be negligible.
- Temporary environmental effects from construction will be mitigated as referenced in the Petition.
- Eversource will access the two replacement structures as follows: for structure 8416 by entering the ROW from Colonel Ledyard Highway (Groton), and for structures 8463 and 8463A from Clara Drive and the off-ROW access through parcel 282-041 (Stonington).
- Prior to submitting this amendment Eversource representatives briefed officials in the Towns of Groton and Stonington concerning the proposed project modifications.

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 deborah.denfeld@eversource.com or telephone at (860) 728-4654.

Sincerely,



Deborah Denfeld
Team Lead - Transmission Siting

Attachments:

- A: Map Sheets
- B: Cross Sections

Attachment A

Map Sheets

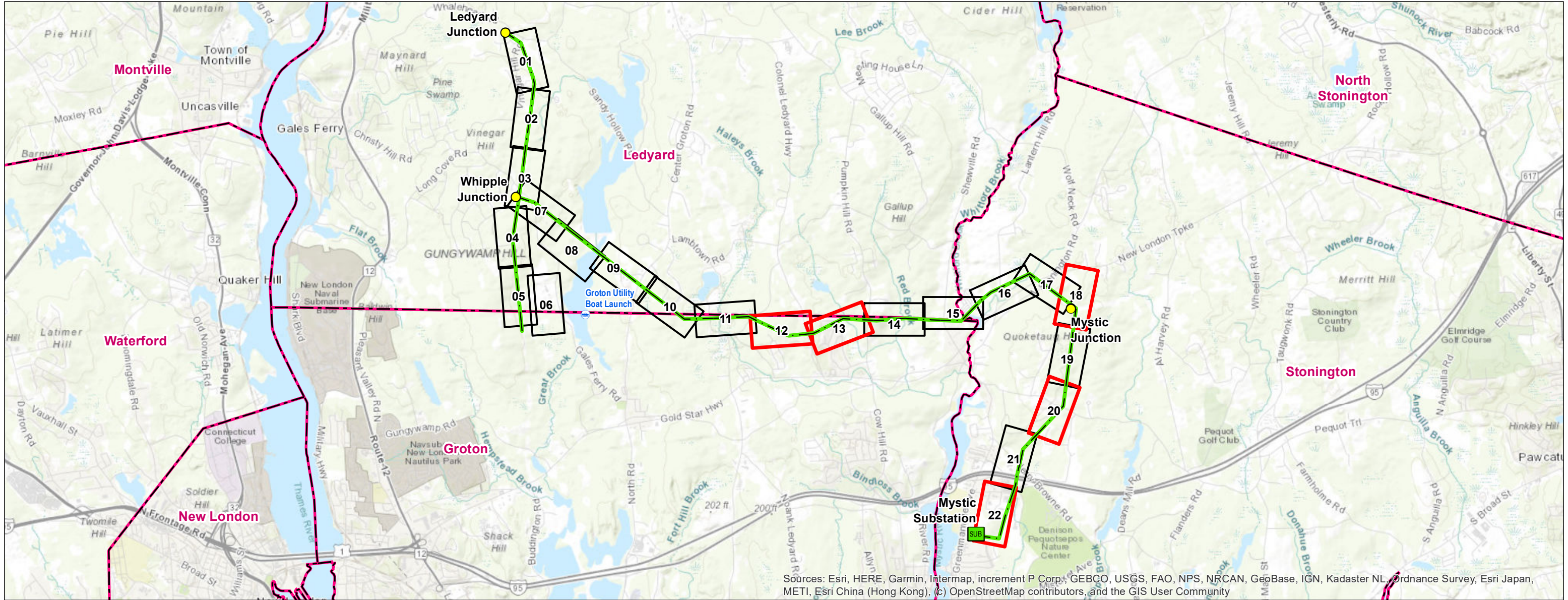
Ledyard Junction to Mystic Substation Upgrade Project

Ledyard, Groton, and Stonington, CT

Petition Map Set

Date: August 09, 2022

Revision Date: February, 17, 2023



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

Legend

- SUB Substation
- Junction
- Project Corridor
- Map Sheet
- Revised Map Sheet
- Municipal Boundary



INDEX OF FIGURES

Title Sheet / Index Map
Abutter Tables and Map Sheets 01-22

PREPARED FOR:

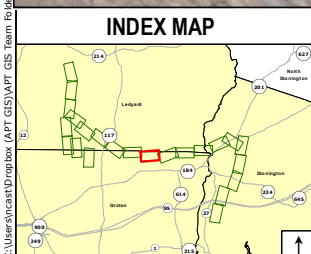
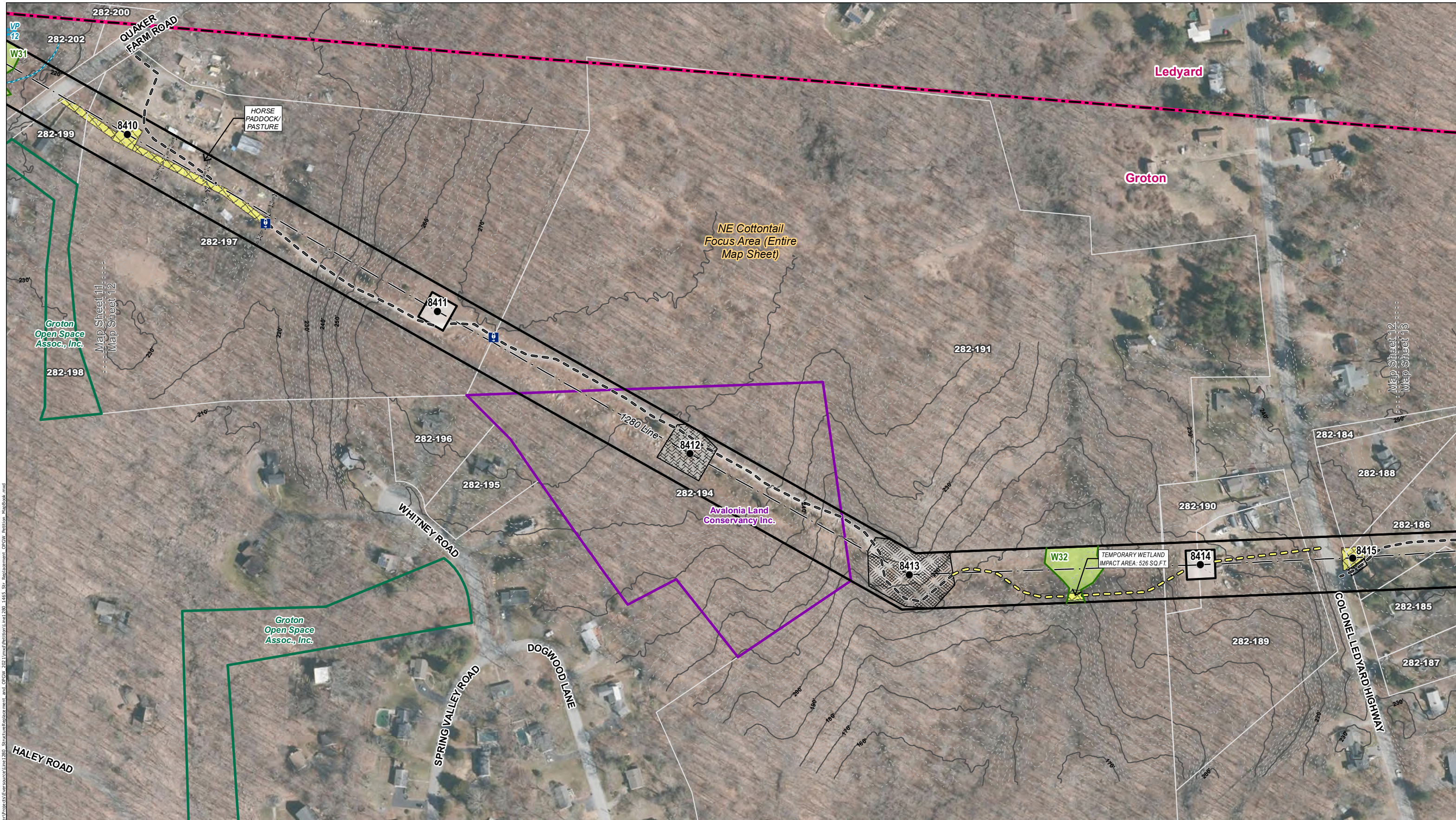


107 Selden Street
Berlin, CT 06037

PREPARED BY:



567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385



Legend	
● Proposed Structure	● Existing Structure
● Existing Structure to be Removed	— Existing Right-of-Way (ROW)
— 10' Contour Line	— 2' Contour Line
— Overhead Eversource Line	— Fence
— Turbidity Silt Curtain	— Gate
— Existing Access	— Proposed Access
— Off-ROW Access Pending Rights	— Hiking Trail
— Stone Work Pad	— Existing Gravel
— Area of Limited Tree Removal	— Temporary Construction Matting
— Delineated Wetland Boundary Outline	— Field Delineated Wetland
— Culvert	— Watercourse (not delineated)
— Delineated Intermittent Watercourse	— Delineated Perennial Watercourse
— Ordinary High Water Mark	— Confirmed Vernal Pool Extent
— 100' Vernal Pool Envelope	— Natural Diversity Database Area (Dec 2021)
— NE Cottontail Focus Area	— Critical Habitat
— FEMA 100-Year Flood Zone	— FEMA 500-Year Flood Zone
— FEMA Floodway	— Public Water Supply Watershed
— Coastal Boundary	— Parcel Boundary
— Eversource Owned Property	— Avalonia Land Conservancy Inc. Property
— Groton Open Space Assoc., Inc.	— Municipal Boundary
— Map Sheet Matchline	

Map Notes:
 Base Map Source: CTECO 2019 Aerial Imagery
 This mapping product has been created to comply with submittal requirements to obtain certain regulatory approvals and, as such, there is no reliance on the information contained herein for any other purpose. Wetland Data Source: F&O March 2020 / BSC 2018, field verified by APT 2021-2022. Vernal pools field confirmed by APT in April 2022. ROW boundary, Parcels, and abutter information provided by Eversource (Jan 2021). Structure locations, ROW, and Parcels are approximate (NOT from survey).

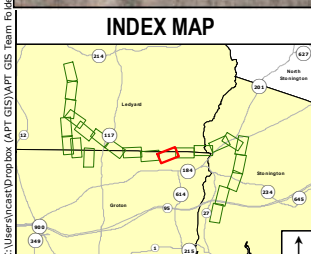
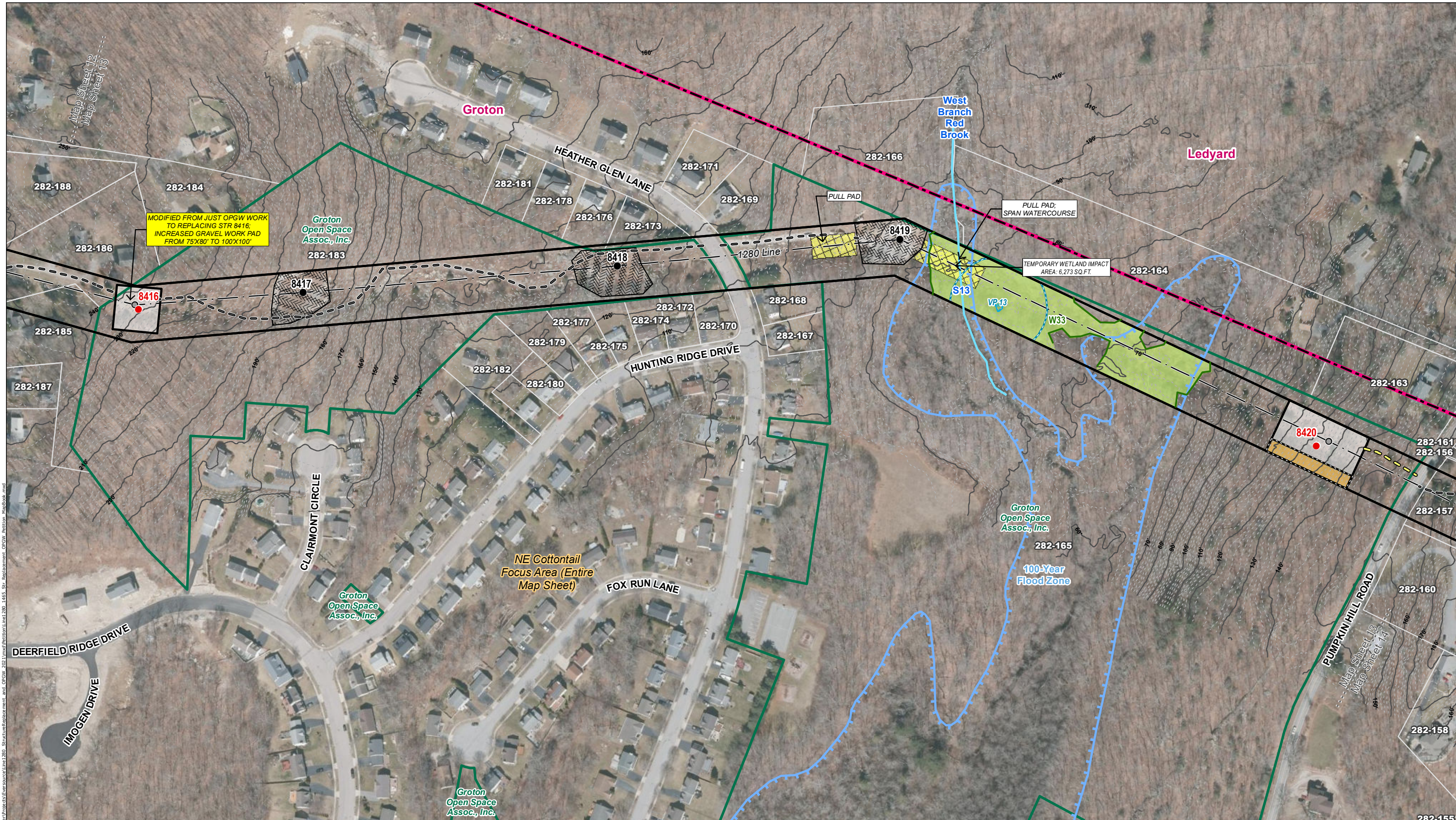
1 inch = 200 feet
 0 100 200 Feet

EVERSOURCE
ENERGY

Ledyard Junction to Mystic Substation Upgrade Project

NO.	DATE	REVISIONS

Groton and Ledyard, CT
 Map Sheet 12 of 22
 Date: August, 2022



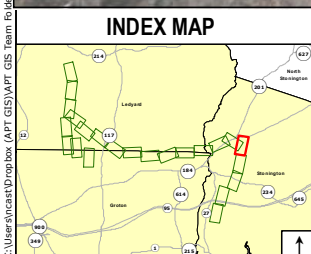
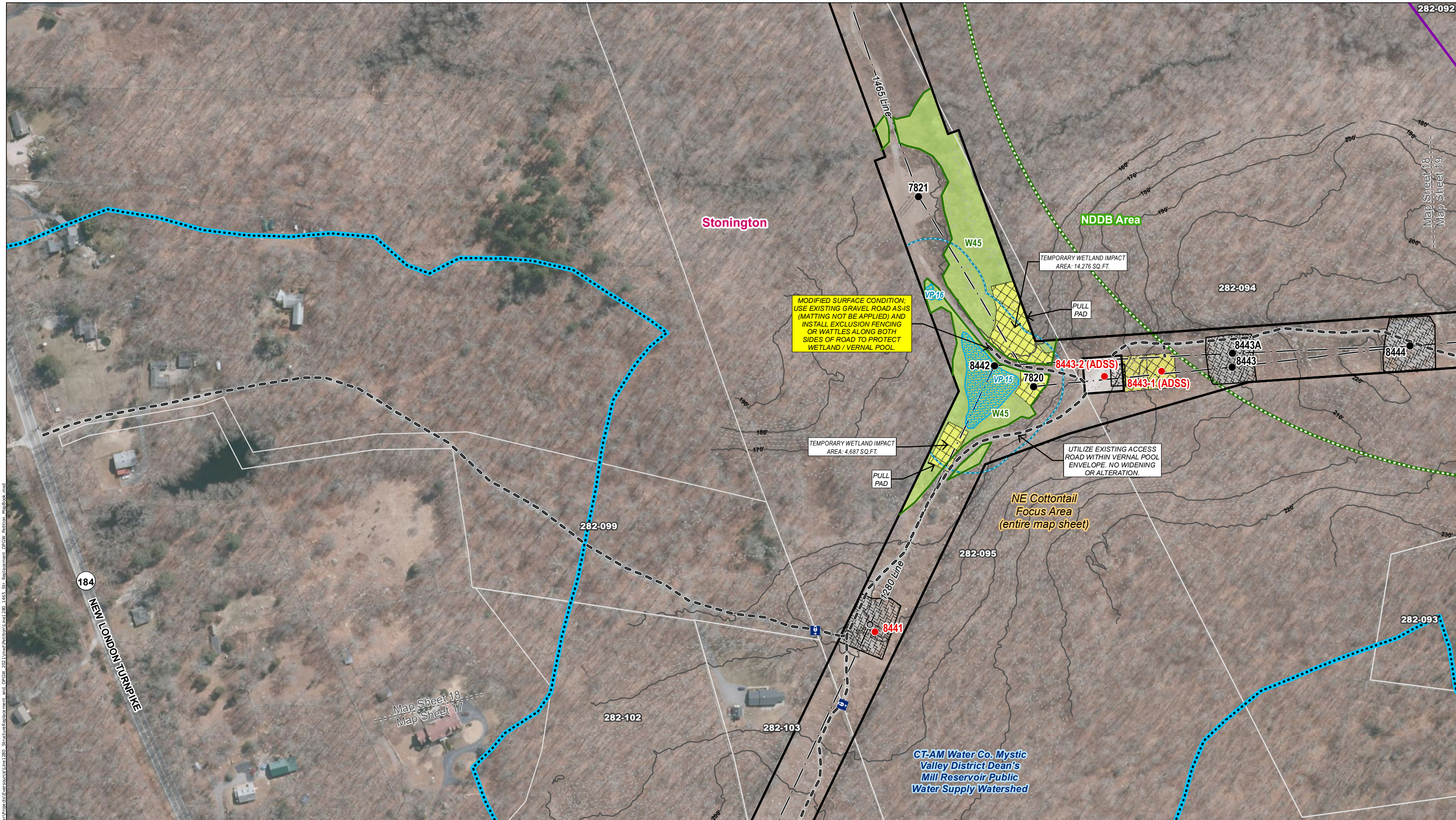
Legend	
● Proposed Structure	Gate
● Existing Structure	Existing Access
● Existing Structure to be Removed	Off-ROW Access Pending Rights
— Existing Right-of-Way (ROW)	Proposed Access
— 10' Contour Line	Hiking Trail
— 2' Contour Line	Stone Work Pad
— Overhead Eversource Line	Existing Gravel
— Fence	Area of Limited Tree Removal
— Turbidity Silt Curtain	Temporary Construction Matting
— Delineated Wetland Boundary Outline	Natural Diversity Database Area (Dec 2021)
— Field Delineated Wetland	NE Cottontail Focus Area
— Culvert	Critical Habitat
— Watercourse (not delineated)	FEMA 100-Year Flood Zone
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— Delineated Perennial Watercourse	FEMA Floodway
— Ordinary High Water Mark	Public Water Supply Watershed
— Confirmed Vernal Pool Extent	Coastal Boundary
— 100' Vernal Pool Envelope	Parcel Boundary
— Eversource Owned Property	
— Avalonia Land Conservancy Inc. Property	
— Groton Open Space Assoc., Inc.	
— Municipal Boundary	
— Map Sheet Matchline	

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 0 100 200 Feet

EVERSOURCE ENERGY	
Ledyard Junction to Mystic Substation Upgrade Project	
Groton and Ledyard, CT	
Map Sheet 13 of 22	
Date: January, 2023 REVISED February, 2023	
NO.	DATE
1	2/8/23
Revisions Noted in Yellow Callout on Map	
REVISIONS	





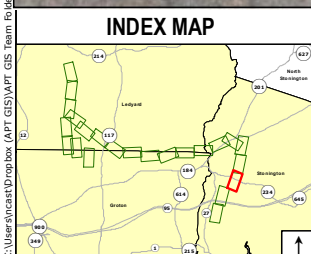
Legend	
● Proposed Structure	Gate
● Existing Structure	Existing Access
● Existing Structure to be Removed	Off-ROW Access Pending Rights
— Existing Right-of-Way (ROW)	Proposed Accesses
— 10' Contour Line	Hiking Trail
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— Eversource Owned Property	
— Avalonia Land Conservancy Inc. Property	
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 0 100 200 Feet

EVERSOURCE ENERGY	
Ledyard Junction to Mystic Substation Upgrade Project	
Stonington, CT	
Map Sheet 18 of 22	
Date: January, 2023 REVISED February, 2023	
NO.	DATE
REVISIONS	
1	2/8/23
Revisions Noted in Yellow Callout on Map	





Legend	
● Proposed Structure	Gate
● Existing Structure	Existing Access
● Existing Structure to be Removed	Off-ROW Access Pending Rights
— Existing Right-of-Way (ROW)	Proposed Access
— 10' Contour Line	Hiking Trail
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— Map Sheet Matchline	

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NO.	DATE	REVISIONS
1	2/8/23	Revisions Noted in Yellow Callout on Map

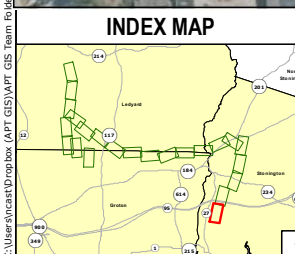
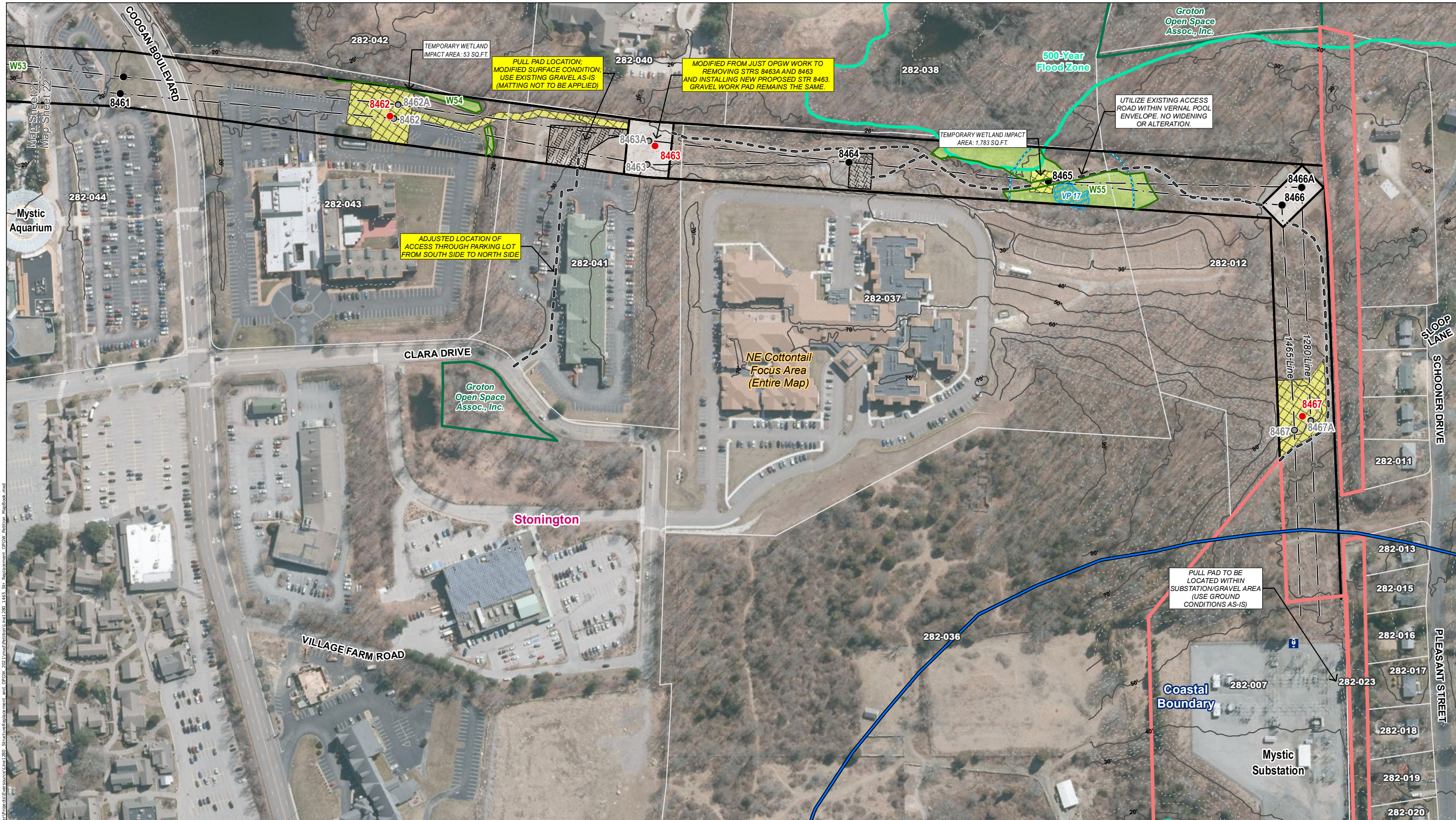
EVERSOURCE ENERGY

Ledyard Junction to Mystic Substation Upgrade Project

Stonington, CT

Map Sheet 20 of 22

Date: January, 2023
 REVISED February, 2023



Legend	
● Proposed Structure	Gate
● Existing Structure	Existing Access
● Existing Structure to be Removed	Off-ROW Access Pending Rights
— Existing Right-of-Way (ROW)	Proposed Access
— 10' Contour Line	Hiking Trail
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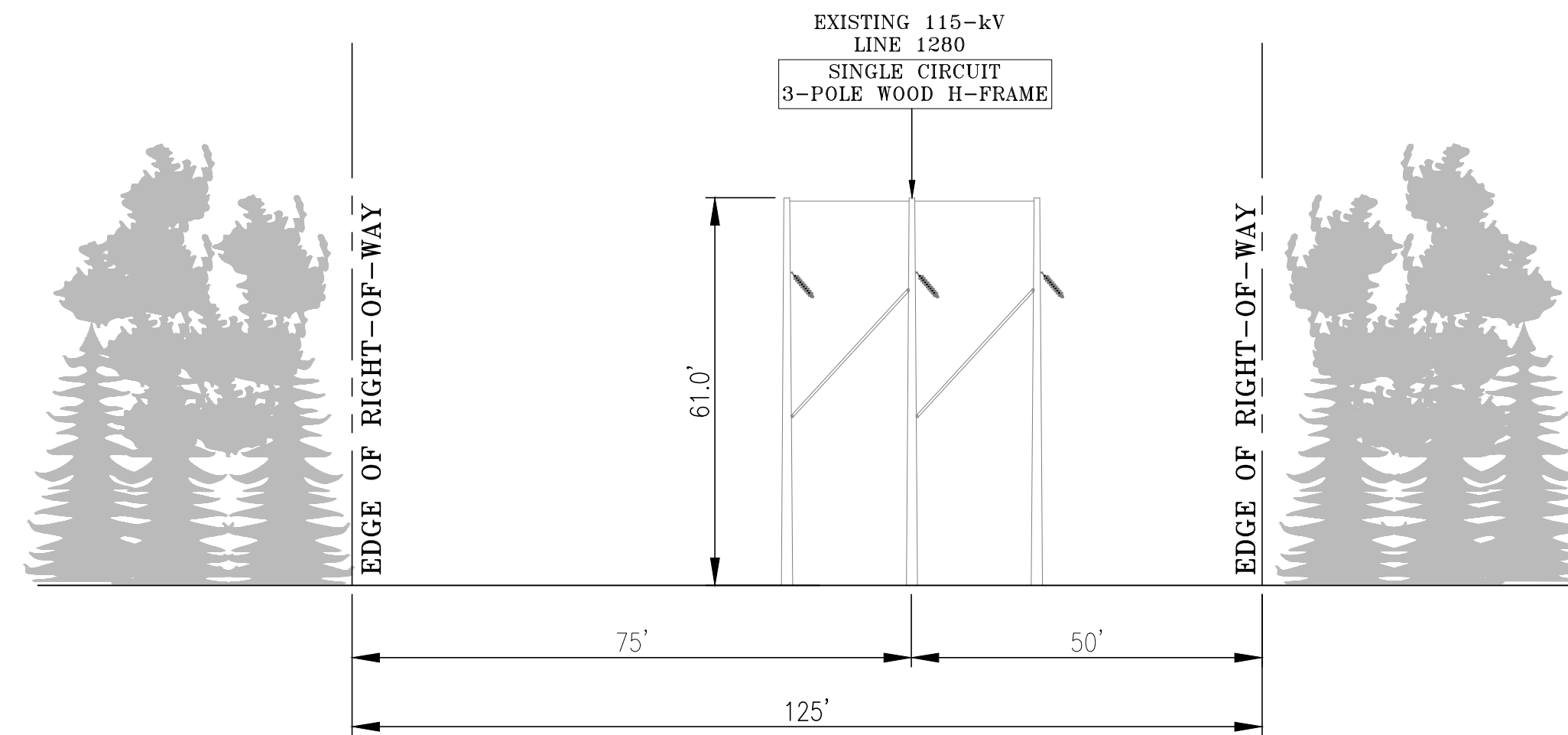
1 inch = 200 feet
 0 100 200 Feet

EVERSOURCE ENERGY	
Ledyard Junction to Mystic Substation Upgrade Project	
Stonington, CT	
Map Sheet 22 of 22	
Date: January, 2023 REVISED February, 2023	

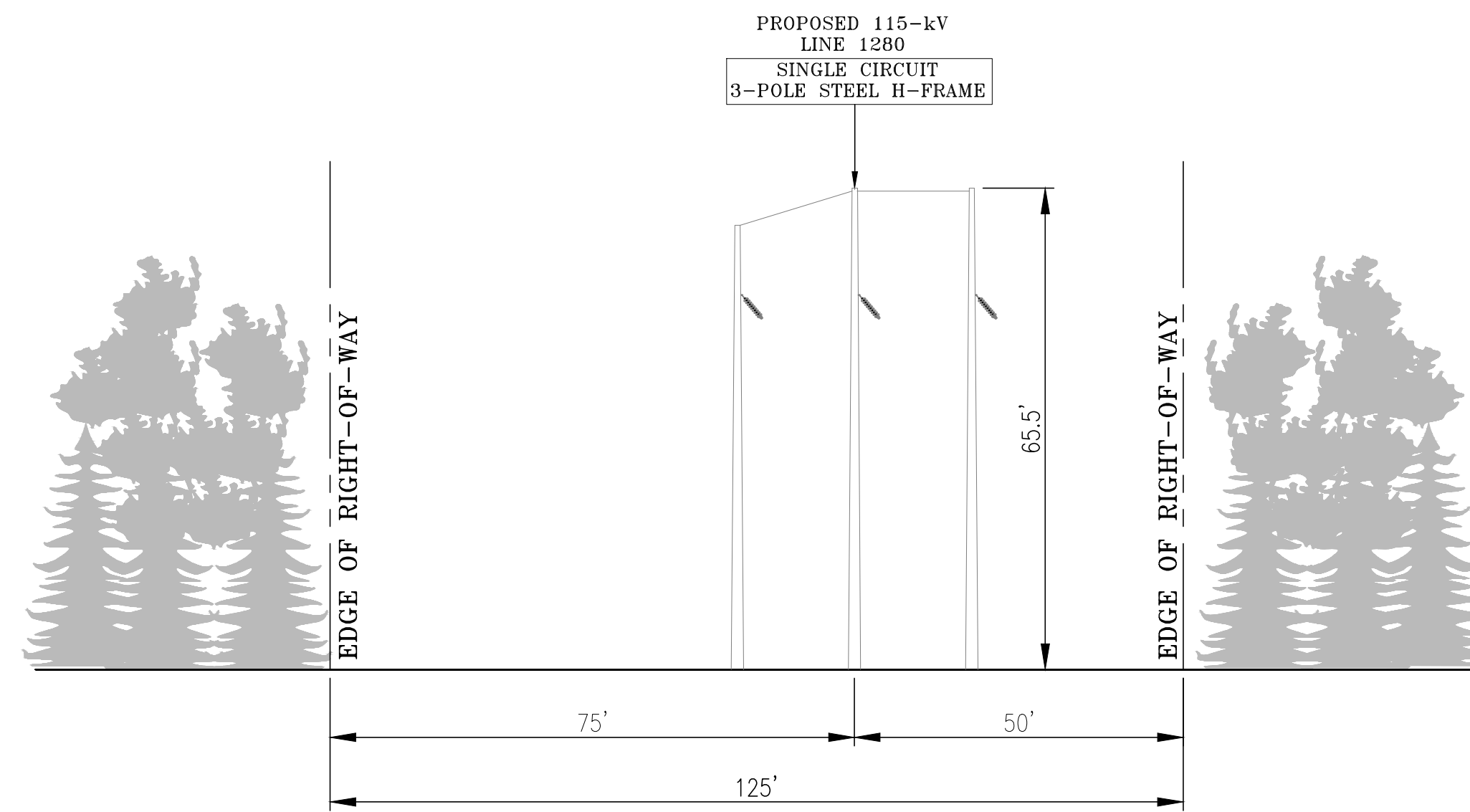
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 Map Sheet 21
 Map Sheet 22

Attachment B

Cross Sections



**EXISTING R.O.W. CONFIGURATION
SINGLE CIRCUIT HORIZONTAL DESIGN
LOOKING FROM MYSTIC JCT TO WHIPPLE JCT
IN THE TOWN OF GROTON, CT
STRUCTURE #8416**



**PROPOSED R.O.W. CONFIGURATION
SINGLE CIRCUIT HORIZONTAL DESIGN
LOOKING FROM MYSTIC JCT TO WHIPPLE JCT
IN THE TOWN OF GROTON, CT
STRUCTURE #8416**

REVISIONS DURING CONSTRUCTION				
A	2/22/23	ISSUED FOR USE WO #80158669	MMM	GEL

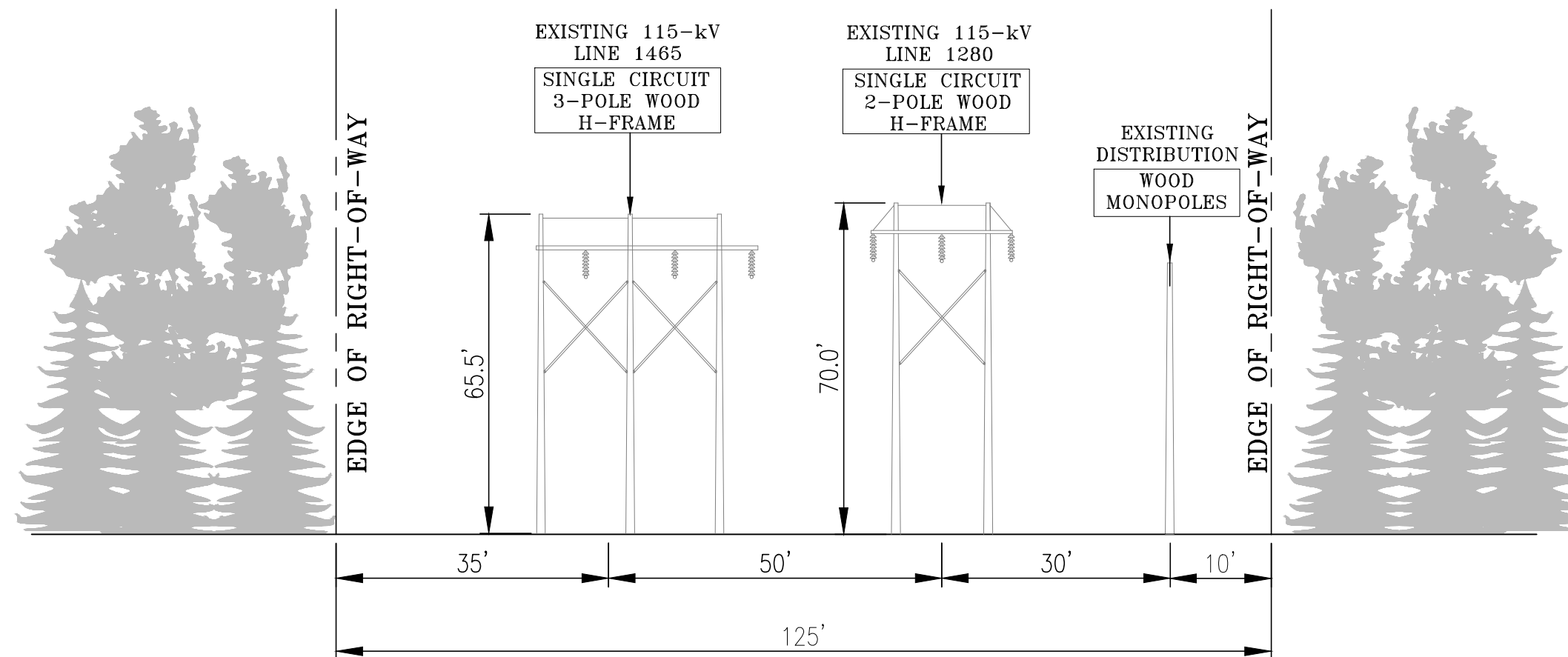
EVERSOURCE ENERGY

TITLE
**MYSTIC JCT TO WHIPPLE JCT
115-kV TRANSMISSION LINE 1280
RIGHT OF WAY CROSS SECTION
LEDYARD, CONNECTICUT**

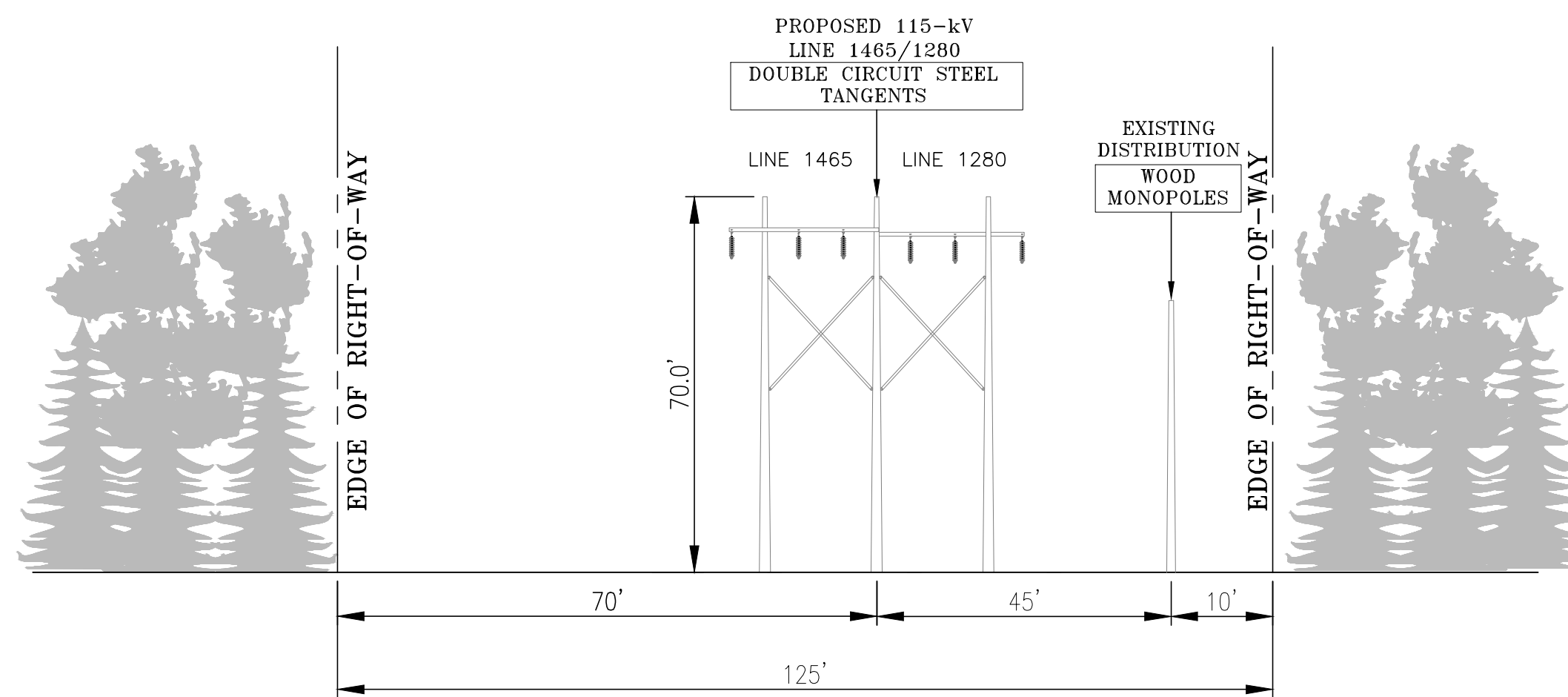
BY	DATE	CHK	DATE	APP	DATE	APP	DATE
MMM/TRC	02/22/23	GEL/TRC	02/22/23	APP	02/22/23	APP	
H-SCALE	N.T.S.	SIZE	D	FIELD BOOK & PAGES			
V-SCALE	N.T.S.	V.S.		R.E. DWG			

NO.	DATE	AS BUILT	REVISIONS	BY	CHK	APP	APP

R.E. PROJ. NUMBER 80158669 DWG NO. 01182-85003p002



**EXISTING R.O.W. CONFIGURATION
SINGLE CIRCUIT WOOD H-FRAMES
LOOKING FROM MYSTIC SUBSTATION TO MYSTIC JCT
SUBSTATION IN THE TOWN OF STONINGTON, CT
STRUCTURE #8463 (LINE 1280) & 8463A (LINE 1465)**



**PROPOSED R.O.W. CONFIGURATION
DOUBLE CIRCUIT STEEL H-FRAME
LOOKING FROM MYSTIC SUBSTATION TO MYSTIC JCT
IN THE TOWN OF STONINGTON, CT
STRUCTURE #8463**

<small>REVISIONS DURING CONSTRUCTION</small>			
<small>A</small>	<small>2/22/23</small>	<small>ISSUED FOR USE WO #80158669</small>	<small>MMM GEL GEL</small>
EVERSOURCE ENERGY			
MYSTIC S/S TO MYSTIC JCT 115-kV TRANSMISSION LINE 1280 RIGHT OF WAY CROSS SECTION STONINGTON, CONNECTICUT			
<small>BY</small>	<small>MM/TRC</small>	<small>CHKD</small>	<small>GEL/TRC</small>
<small>DATE</small>	<small>2/22/23</small>	<small>DATE</small>	<small>2/22/23</small>
<small>H-SCALE</small>	<small>N.T.S.</small>	<small>SIZE</small>	<small>D</small>
<small>V-SCALE</small>	<small>N.T.S.</small>	<small>V.S.</small>	<small>FIELD BOOK & PAGES</small>
<small>R.E. PROJ. NUMBER</small>	<small>80158669</small>	<small>R.E. DWG</small>	<small>DWG NO.</small>
			01182-85002p002