



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: [siting.council@ct.gov](mailto:siting.council@ct.gov)

Web Site: [portal.ct.gov/csc](http://portal.ct.gov/csc)

VIA ELECTRONIC MAIL

September 12, 2022

TO: Service List, dated August 12, 2022

FROM: Melanie Bachman, Executive Director *MB*

RE: **PETITION NO. 1535** – 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 Ledyard Junction to Mystic Substation Upgrade Project consisting of the replacement and reconductoring of approximately 12.8 miles of its existing No. 1280 115-kilovolt (kV) electric transmission line within existing Eversource electric transmission right-of-way between Eversource's Ledyard Junction in Ledyard and Mystic Substation in Stonington, Connecticut and related electric transmission line and substation improvements.

---

Comments have been received from the Department of Public Health – Drinking Water Section on September 9, 2022. A copy of the comments is attached for your review.

MB/RDM/laf

c: Council Members

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

Manisha Juthani, MD  
Commissioner



Ned Lamont  
Governor  
Susan Bysiewicz  
Lt. Governor

### Drinking Water Section

September 7<sup>th</sup>, 2022

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

RE: PETITION NO. 1535 – 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 Ledyard Junction to Mystic Substation Upgrade Project consisting of the replacement and reconductoring of approximately 12.8 miles of its existing No. 1280 115-kilovolt (kV) electric transmission line within existing Eversource electric transmission right-of-way between Eversource's Ledyard Junction in Ledyard and Mystic Substation in Stonington, Connecticut and related electric transmission line and substation improvements.

Dear Ms. Bachman,

The Department of Public Health Drinking Water Section has reviewed the project in the referenced Petition No. 1535 for potential impacts to any sources of public drinking water supply. Please refer to the attached report for our comments.

If you have any questions, you may contact Lisette Stone of this office at [lisette.stone@ct.gov](mailto:lisette.stone@ct.gov).

Sincerely,

*Eric McPhee*

Eric McPhee  
Supervising Environmental Analyst  
Drinking Water Section

Cc: Lori Mathieu, Public Health Branch Chief, Environmental Health & Drinking Water  
Ronald Gaudet, Director of Utilities, Groton Utilities  
Robert Ulrich, Director of Supply Operations, Aquarion Water Company  
Stephen Mansfield, Director of Health, Ledge Light Health District



Phone: (860) 509-7101 • Fax: (860) 509-7111  
Telecommunications Relay Service 7-1-1  
410 Capitol Avenue, P.O. Box 340308  
Hartford, Connecticut 06134-0308  
[www.ct.gov/dph](http://www.ct.gov/dph)

*Affirmative Action/Equal Opportunity Employer*



## MEMORANDUM

From: Lisette Stone, Environmental Analyst  
Source Water Assessment and Protection Unit  
Drinking Water Section, Department of Public Health

Subject: PETITION NO. 1535 – 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

DPH #: 2022-0124

Date: September 7<sup>th</sup>, 2022

---

The Department of Public Health Drinking Water Section (DWS) has reviewed the project in the referenced Petition No. 1535 for potential impacts to any sources of public drinking water supply.

The scope of the project is proposed along approximately 12.8 miles Eversource's Ledyard Junction in Ledyard and Mystic Substation in Stonington, Connecticut. The proposed construction activities will occur in direct vicinity to the following Public Drinking Water Resources:

- Palmer/Dean System Drinking Water Watershed associated with Dean's Mill Reservoir, an active Public Drinking Water supply for Aquarion Water Company - Mystic System (PWSID CT1370011) that serves an estimated population of 10,784 through 5,076 service connections.
- Ledyard Reservoir and Groton Reservoir System Drinking Water Watersheds associated with Ledyard Reservoir, Buddington Pond Reservoir and Morgan Pond Reservoir, active Public Drinking Water supplies for Groton Utilities (PWSID CT0590011) that serves an estimated population of 30,200 through 5,261 service connections.

The Department of Public Health DWS provides the following comments in consideration of potential impacts to the referenced public drinking water resources:

1. Eversource cites the use of temporary "construction mats" in the direct vicinity of public drinking water reservoirs and wetlands associated with public drinking water watersheds to provide a stable base for equipment. It is recommended that any matting in the vicinity of public drinking water resources be impermeable and provide adequate containment to protect against fuel or other hazardous material contamination to drinking water supply.
2. It is recommended that Eversource provide a detailed pollution prevention plan, including remediation measures and clear definitions of the "best management practices" referenced in the Petition. The aforementioned pollution prevention plan should be provided to the Department of Public Health, Groton Utilities, and Aquarion Water Co. for review.
3. It is recommended that Eversource work closely with Groton Utilities and Aquarion Water Co. to ensure any temporary structures, mechanical equipment and handling of fuel or other hazardous materials

associated with the construction activities pose no threat to drinking water resources, will not result in disruption of service or compromise the quality of water distributed to consumers of the associated water utilities.

4. Excavated soils generated during construction activities are suggested for use on site as backfill. Any imported, non-native backfill including “processed gravel” to be used around embedded structures must be “clean” and free of potential contaminants that may mobilize in the groundwater table. Wherever possible, disturbed vegetation as a result of soil excavation should be restored to mitigate erosion or further degradation to the surrounding area. Appropriate, low-impact controls for brush management should be incorporated into the permanent maintenance plan for the project.
5. Proposed construction activities include utilizing flat-bed trucks, brush hogs, skidders, bucket trucks and other heavy equipment for the permanent conversion of approximately 2.2 acres of upland forest to brush. As forested areas are ideal for the preservation of ground and surface water drinking water supply sources, it is recommended that tree removal be limited in scope to that which is necessary to promote the structural integrity of and access and maintenance of the electrical transmission lines.
6. It is recommended that all machinery associated with construction activities be serviced and refueled outside of any public drinking water watersheds or associated reservoirs. In the event it is necessary to refuel within public drinking water watersheds or associated reservoirs, this should be conducted on an impervious pad with secondary containment designed to contain fuels.
7. All fuel and other hazardous materials should not be stored within any public drinking water watersheds or associated reservoirs. Any fuel or hazardous materials that must be kept within public drinking water watersheds or associated reservoirs during working hours should be stored on an impervious surface utilizing secondary containment. A fuel spill remediation kit should be stored on-site so that any spills may be contained and cleaned quickly.
8. Groton Utilities and Aquarion Water Company personnel should be allowed to periodically conduct inspections throughout the course of this project to ensure that drinking water source quality is not being adversely impacted and that construction activities are conducted in accordance with best management practices.