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July 13, 2023

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

Re: Petition 1574– Interrogatory

Dear Ms. Bachman,

This letter provides the response to requests for information listed below.

Response to CSC-01 Interrogatories dated July 13, 2023
CSC-Petition 1574 Interrogatory responses

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen M. Shanley". The signature is stylized and cursive.

Kathleen M. Shanley
Manager – Transmission Siting

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 1

Referencing Petition p. 41, were there any comments received from the Towns of Southington, Cheshire and Wallingford, the City of Meriden or abutting property owners since the filing of the Petition? If so, what were their concerns, and how were these concerns addressed?

Response:

Eversource has not received additional comments from the Towns of Southington, Cheshire and Wallingford or the City of Meriden since the filing of the Petition.

As part of Eversource's pre-Petition and post-Petition filing activities, Eversource project outreach specialists completed a series of outreach activities with abutting property owners to inform them of the proposed Project, discuss impacts, restoration and potential mitigation if necessary. Several abutting property owners requested advanced notification prior to work occurring on or near their property, and Eversource agreed to provide such notification. Eversource also communicated to abutting property owners that if their property is disturbed, Eversource is committed to working with them on restoring the property. *Please see the response to Question 2 for a more complete description of Eversource's public engagement and outreach efforts.*

Since the Petition filing, Eversource has been working with one abutting property owner regarding a proposed structure that would be located on the owner's property. Eversource met with the owner onsite to discuss the proposed structure location, including potential visual impact mitigation measures that may be implemented after construction.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 2

Describe outreach efforts to project abutters. Have any abutters requested further information? Were right-of-way (ROW) restoration measures described during public outreach?

Response:

Eversource has a dedicated outreach department that communicates with affected and interested stakeholders throughout the phases of a Project, from planning and inception through completion. On this Project, Eversource completed a series of outreach activities with abutting property owners to inform them of the proposed Project, discuss impacts, restoration and potential mitigation if necessary. Eversource will continue to connect with property owners, municipal officials, and other interested stakeholders throughout the duration of the Project.

Outreach on the Project began in June 2022, when Eversource sent abutting property owners a notice to introduce the Project and explain the proposed scope and its schedule. Following the mailing of this introduction letter, Eversource connected with abutting property owners in person by executing “door-to-door” outreach. During this type of outreach, if no one is home, a door hanger is left containing Project information and contact information for follow up. As a part of door-to-door outreach, Eversource meets with property owners and answers any questions or concerns, oftentimes walking the property to review the limits of the easement area and site-specific impacts. Any follow-up topics or specific restoration requests are noted and appropriate followed up is completed. Eversource is committed to continuing these conversations with property owners and will continue to conduct mailings as well as in-person door-to-door outreach throughout the extent of the Project. Further, Eversource has a dedicated hotline (1-800-793-2202) and e-mail address (ProjectInfo@eversource.com) available for abutting property owners and other interested stakeholders to contact Project representatives. This hotline and e-mail account are monitored throughout the day, and most inquiries are acknowledged within two business days. Fourteen property owners asked site-specific questions about proposed structure locations, including direct property impacts and perceived visual impacts. Eversource met with these property owners onsite to explain design limitations, engineering standards, and potential visual impact mitigation measures and receive site-specific property restoration requests. In a few instances, where requested by property owners, Eversource committed to evaluate work pad limits with the contractors prior to construction to determine if they can be reduced and still support the construction needs.

Eversource will work with impacted property owners on a site-specific restoration plan if requested by the property owner. Mitigation measures will be documented, reviewed, tracked, and completed by the end of Project as agreed to by Eversource.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 3

Referencing Petition p. 21, identify any proposed new and/or replacement structures that are pending Federal Aviation Administration obstruction evaluation. Are any of the existing structures that would be replaced currently marked/lighted?

Response:

Structures that are pending FAA Obstruction Evaluation are: 3663-1, 3666-1, 4066-1, and 4069-1.

The existing transmission structures that are currently marked/lighted and would be replaced are: 4078, 4079, and 2516.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 4

Referencing Petition p. 2, what public utility uses/rights are identified under the easements along the existing ROW?

Response:

Although some of the easements have minor wording differences, in general the easements grant Eversource public utility uses/rights consistent with the following:

The right and easement to enter upon and travel and transport materials over and across the right of way, and the right and easement to erect, construct, repair, maintain, replace, relocate, inspect, operate and remove upon, over, under and across said right of way, poles, towers, crossarms, guys, foundations, anchors, braces, ducts, manholes and other structures, wires, cables and other conductors, and other fixtures and appurtenances useful for the conduction of electricity and/or for providing and maintaining electric and/or communication service, and monuments and signs to locate said right of way; and the right to conduct electricity and to provide electric and/or communication service, and monuments by means of the same.

Also, the right to remove any structures within or projecting into the ROW. The right to trim and keep trimmed, cut clear and remove by mechanical means or otherwise, trees or limbs and branches thereof, underbrush and other growth other than crops, any part of which are within the limits of the ROW or adjoining land of Grantor and which may interfere with the exercise of the rights and or easements granted.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 5

Under Regulations of Connecticut State Agencies (RCSA) 16-50j-2a(29), Site means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located. Is the Project area described in the Petition synonymous with the existing facility site? Explain.

Response:

Yes, the "Project area" described in the Petition is synonymous with the existing facility "Site" described in RCSA §16-50j-2a (29). In the Petition, "site" is typically used to refer to a portion of the Project area, such as "At each transmission line structure site a work pad is required", "assembled on-site", "work sites" and the yet-to-be identified Project construction staging area.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 6

When was the most recent vegetation management conducted in the ROW? What work was performed?

Response:

Eversource's vegetation management workers performed herbicide application in November 2021.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 7

Is the proposed project identified in any ISO-New England, Inc. (ISO-NE) needs and solutions analyses? Is the proposed project on the ISO-NE Regional System Plan (RSP), Project List and/or Asset Condition List? If yes, identify.

Response:

The Southington Substation to Cook Hill Junction Rebuild Project (the Project) was not identified by an ISO-New England Inc. needs and solution analysis. The Project is associated with the Asset Condition List (Project numbers 362 and 363) as well as Eversource's Local System Plan (Project reported as "115-kV Line 1690 Copper Retirement").

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 8

Are any generation facilities listed on the ISO-NE interconnection queue associated with the proposed project? If so, please identify the generation facilities and the queue position.

Response:

No, there are no generation facilities listed on the ISO-NE interconnection queue associated with the proposed project.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 9

What is the total estimated cost of the project? Of this total, what costs would be regionalized, and what costs would be localized? Estimate the percentages of the total cost that would be borne by Eversource ratepayers, Connecticut ratepayers, and the remainder of New England (excluding Connecticut) ratepayers, as applicable.

Response:

The total estimated cost of the project is approximately \$80.9 million. Of the total, \$24.7 million is associated with non-Pool Transmission Facilities (non-PTF). Eversource anticipates that the remaining costs will be regionalized pending the final determination of ISO-New England's Schedule 12 C review.

The Company anticipates the following overall allocations for the total cost:

- Customers of Eversource: 42.8%
- Other Connecticut customers: 5.3%
- Other New England customers: 51.9%

The estimated allocations are based on 2022 actual loads.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 10

How does the project relate to other proposed, planned or constructed Connecticut reliability and asset condition projects?

Response:

This Project is comparable to many other Eversource proposed, planned or constructed projects across Connecticut. The main purpose of such projects is first and foremost to improve transmission system reliability, which is achieved not only by expanding and upgrading existing infrastructure, but also by replacing aged infrastructure, such as structures, conductors or shield wire.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 11

Please describe how the proposed project is consistent with the recommendations of the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) Report on Transmission Facility Outages During the Northeast Snowstorm of October 29-30, 2011 Causes and Recommendations.

Response:

The Company plans to perform vegetation management maintenance after Project construction is complete as part of the Transmission Right-of-Way ("ROW") Reliability Program ("TRRP") in the same corridor as the Project. TRRP is an Eversource maintenance program to increase the maintained portion of ROW to be easement edge to easement edge, which is consistent with the recommendations in the referenced FERC and NERC report.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 12

Identify all other permits required to perform the proposed work.

Response:

The following permits and agency consultation are associated with this Project:

Wetlands Permits: Clean Water Act – Sections 404 & 401

- United States Army Corps of Engineers General Permit (“USACE GP”) Self-Verification (“SV”)
- Connecticut Department of Energy and Environmental Protection (“CT DEEP”) 401 Water Quality Certification
- CT DEEP GP SV process

CT DEEP Construction Stormwater General Permit

CT DEEP Natural Diversity Data Base Review Request

United States Fish and Wildlife Service Information for Planning and Consultation Review

State Historic Preservation Office and Tribal Historic Preservation Office Notifications

Connecticut Department of Transportation Encroachment Permits to pull Optical Ground Wire and Conductor over Routes 68 (Wallingford), 322 (Southington), 70 (Meriden), 120 (Southington) and Interstate 691 (Southington).

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 13

Referencing Petition p. 2, after the structure replacements for Sub-Petitions 1293-CW-01 and 1293-SCMW-01 and the structure replacements for the project, what number of existing structures would remain and when is replacement of those structures anticipated?

Response:

After the scopes of work in the referenced Sub-Petitions and Petition are completed, the structures remaining that will not have been replaced are as follows:

On the 1208 line, between Southington Substation and Cook Hill Junction, there are 13 remaining natural wood structures that will not be replaced out of 82 total structures.

On the 1610 line, between Schwab Junction and Cook Hill Junction, there are 12 remaining natural wood structures that will not be replaced out of 42 total structures.

All of the 1355/1690 and 1355/1610 double-circuit lattice towers will have been replaced.

Eversource does not have current plans to replace any of the remaining 25 structures because they were neither required to be replaced for asset condition reasons, nor overloaded by the new work being done in the Project area.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 14

Referring to Petition pp. 8 and 12, provide more information regarding the current National Electrical Safety Code (NESC) clearance requirements that require the addition of five mid-span structures. Provide the span lengths with and without the proposed mid-span structures.

Response:

Eversource design criteria for conductor sway (blowout) is primarily based on National Electrical Safety Code (NESC) established horizontal clearance requirements to buildings. Since it is impractical for Eversource to control development activity outside of its rights-of-way (ROW), transmission lines are typically designed with the assumption that a building could be erected at any location along the ROW edge. NESC Rules 234C and 234G result in a calculated clearance requirement of 9.1 feet of clearance to the edge of ROW for 115-kV conductors displaced by a 6 pounds per square foot wind. To provide a buffer for construction tolerance, Eversource typically designs transmission corridors to have 11 feet of clearance to the edge of ROW.

Tables of existing span lengths associated with the proposed midspan structures, as well as span lengths with the proposed midspan structures installed, are presented below.

Existing Spans		
From	To	Span Length (ft)
4098	4097	799
4097	4096	781
4096	4095	595
4095	4094	721
4094	4093	650
4093	4092	667
4067	4066	1048
4070	4069	1105
3664	3663	1105
3667	3666	1111
Proposed Span with Midspan Structures		
From	To	Span Length (ft)
4098	4097-2	490
4097-2	4097-1	370
4097-1	4096	615
4096	4095-2	485
4095-2	4095-1	360
4095-1	4094	332
4094	4093-2	340
4093-2	4093-1	532
4093-1	4092	564
4067	4066-1	622
4066-1	4066	426
4070	4069-1	651
4069-1	4069	385
3664	3663-1	653
3663-1	3663	470
3667	3666-1	680
3666-1	3666	432

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 15

Could the number of additional mid-span structures proposed within the existing ROW be reduced by utilization of anti-galloping devices or other design options including, but not limited to, taller structures at both ends of the spans? Explain.

Response:

Anti-galloping devices work by changing the way that wind passes over the conductor, especially during iced conditions. Installing these devices would have no considerable effect on the distance that conductor displaces horizontally (blowout) in weather conditions. Other design options, such as strut insulators (to stop insulator swing) and higher design tensions, were considered and implemented in many areas. These mitigation measures avoided the need for mid-span structures in some spans, while other spans were just too long to maintain blowout clearances without the use of mid-span structures. The number of additional mid-span structures proposed within the existing ROW cannot be further reduced because they serve to limit the span length between structures, which is the largest variable contributing to blowout distance.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 16

Referencing Petition Map Sheet 6, Structure 3674 is marked for replacement; however, this structure was also marked for replacement in Council Sub-Petition No. 1293-SCMW-01, approved by the Council on September 24, 2020 (with an extension to complete improvements to September 24, 2022). Has this structure been replaced prior to the filing of the petition? If yes, why does it need to be replaced again?

Response:

Structure 3674 was not previously replaced. The replacement of Structure 3674 was removed from the scope of the Sub-Petition No. 1293-SCMW-01 work and added to the scope of this Project due to construction constraints related to the prior replacement work at Lucchini Junction. The replacement for Structure 3674 was added to this Project with the re-design of Lucchini Junction.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 17

Referencing Petition Map Sheets 1 through 10, Structures 5235, 5238, 5242 through 5244, 5248, 5251 through 5254, 5256, 5258, 5261, and 5268 are marked for replacement; however, these structures were also marked for replacement in Council Sub-Petition No. 1293-CW-01, approved by the Council on July 31, 2017 and completed on December 15, 2017. Why do these structures need to be replaced again?

Response:

Structures 5235, 5238, 5242, 5243, 5244, 5248, 5251, 5252, 5253, 5254, 5256, 5258, 5261 and 5268 are marked on the map-sheets as existing structure to be maintained. They are not being replaced.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 18

Referencing Petition pp. 4-13, the existing conductors on the 1208 Line are approximately 34 years old. Why aren't the conductors scheduled for replacement at this time? What is the life span of these conductors?

Response:

Eversource estimates the approximate life span of the conductors to be between 60 and 70 years.

Conductors frequently go beyond, sometimes well beyond, the 40-year life span referenced in the Council's 2022 Life Cycle Report. The 40-year life reflects an average period utilized for assessing depreciation for transmission system assets, and in some cases 40 years proves to be the life span of such assets depending on the environmental conditions that the particular asset is exposed to.

However, Eversource performs regular inspections and maintenance on its infrastructure with the goal to reasonably maximize the remaining useful life of its installed assets, provided that such assets continue to meet transmission system needs. While some transmission system assets are replaced around the 40-year mark, Eversource will keep the assets in operation provided that they are assessed to be reliable, in good condition, and sufficient for transmission system needs.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 19

Referencing Petition pp. 6 and 12, the existing conductors on the 1610 Line are approximately 71 years old. Why aren't the conductors scheduled for replacement within the Schwab Junction to Cook Hill Junction portion of the Project at this time? What is the life span of these conductors?

Response:

Eversource estimates the approximate life span of the conductors to be between 60 and 70 years.

Conductors frequently go beyond, sometimes well beyond, the 40-year life span referenced in the Council's 2022 Life Cycle Report. The 40-year life reflects an average period utilized for assessing depreciation for transmission system assets, and in some cases 40 years proves to be the life span of such assets depending on the environmental conditions that the particular asset is exposed to.

However, Eversource performs regular inspections and maintenance on its infrastructure with the goal to reasonably maximize the remaining useful life of its installed assets, provided that such assets continue to meet transmission system needs. While some transmission system assets are replaced around the 40-year mark, Eversource will keep the assets in operation provided that they are assessed to be reliable, in good condition, and sufficient for transmission system needs, including the conductors between Schwab Junction and Cook Hill Junction.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 20

Referencing Petition p. 9, why is optical ground wire (OGPW) being utilized in the underground portion of the 1690 Line rather than all dielectric self-supporting (ADSS) fiber?

Response:

Optical ground wire (OGPW) being utilized in the underground portion of the 1690 Line was listed in error. All dielectric self-supporting (ADSS) fiber will be used in the underground portion of the 1690 Line.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 21

How would OPGW installation avoid contact with water at crossings?

Response:

The new conductor and OPGW would be installed such that the wire would avoid contact with water at crossings throughout the construction process. Conductor and OPGW are typically installed using “traveler blocks” (a series of pulleys) and rope. The conductor and OPGW installation process is as follows:

1. The existing static wire or existing conductor will be unclipped from the existing structures.
2. “Traveler blocks” will be installed at each replacement structure and to the existing structures that are not going to be replaced so that the wire can be pulled.
3. The existing static wire will be connected either to a rope or directly to the new OPGW (depending on the condition of the existing static wire).
4. If a rope is used, the OPGW will be connected to the rope and then pulled into position. If no rope is used, the new OPGW will be pulled in directly using the existing static wire.
5. The new conductor will be connected to a wire rope and then pulled into position.
6. After the OPGW or new conductor is pulled into position, the traveler blocks will be removed and the OPGW will be clipped in.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 22

Referencing Petition p. 28, footnote 8, a 25-foot structure is proposed to support ADSS. However, page 10 of the Petition notes that the Southington Substation to Lucchini Junction portion of the Project would utilize OPGW for the 1208 Line. Why is ADSS proposed for Structure 3679-1? Why is proposed Structure 3679-1 necessary to support ADSS or OPGW? Explain.

Response:

The 1208 Line has existing ADSS strung underneath the conductors. At the location of proposed structure 3679-1, it was found that there is currently insufficient clearance. The purpose of the proposed 25-foot-tall structure is to create adequate vertical clearance for the ADSS along the span.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 23

In addition to Eversources Best Management Practices, what other specific environmental mitigation measures and/or monitoring would be conducted for construction within environmentally sensitive areas?

Response:

Specific Eversource Best Management Practices (“BMPs”) and protection measures are typically incorporated into contractors’ agreements for the Project work. Further, all contractors will be required to sign off on specific documents, such as BMPs, prior to conducting any work on the Project. Each contractor is made aware of specific environmental and/or cultural measures as part of the bid process. After a contractor is selected and the agreement signed, the Project team will hold a “kick-off” meeting where the Eversource Environmental Specialist reviews all environmental protection measures, including those for cultural resources. During construction, a daily “tail board” meeting is held to review the details of each day’s work, which may include work in environmentally sensitive areas. An Environmental monitor is responsible for inspecting site conditions in the field and, if necessary, due to special species requirements, an additional inspector that has specific species qualifications will be used on site to ensure compliance with all protection measures. In addition to these monitors/inspectors, the Project Management personnel and Construction Managers are also responsible for compliance and adherence to the BMPs and protection measures that are incorporated in the agreements with the contractors that perform the Project work.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 24

Would Eversource implement the same mitigation measures and/or use the same construction methods (ex. watercourse crossings, secured mats in flood zone areas, etc.) for areas of the Project as were implemented and used in Sub-Petitions 1293-CW-01 and 1293-SCMW-01? Explain how these areas overlap.

Response:

Yes, Eversource would implement the same mitigation measures and/or use the same construction methods (e.g., watercourse crossings, secured mats in flood zone areas, etc.) for areas of the Project as were implemented and used in Sub-Petitions 1293-CW-01 and 1293-SCMW-01. For the proposed Project, different work pad configurations would be used in overlapping areas, as the scope of the currently proposed work differs from the previous Sub-Petition scopes. Areas of existing gravel work pads will be re-used and/or upgraded wherever possible and timber matting and other BMPs would be used in sensitive areas.

Each of the 16 weathering steel structures installed under Sub-Petition 1293-CW-01 will remain in place and optical ground wire (“OPGW”) will be added as part of the currently proposed Project. The Petition Project area overlaps Sub-Petition 1293-CW-01 work area from the Sub-Petition Structure 5268 (just outside Chimney Hill Junction) to Sub-Petition Structure 5243 (off Cook Hill Road).

Work completed under Sub-Petition 1293-SCMW-01 was for replacement of 9 structures along the 1208 Line. The current Project proposes structure replacements on the 1355/1610 and 1690 Lines in the vicinity of the Sub-Petition work. The Petition Project area overlaps Sub-Petition 1293-SCMW-01 work area from Sub-Petition Structure 3704 (just outside of Southington Substation) to Structure 3666 (just before Schwab Junction). 1355/1610 and 1690 Lines are located on the east and west sides of the ROW, adjacent to the 1208 Line. Overlap between work implemented under Sub-Petition 1293-SCMW-01 and current Project scope is limited to use of existing access roads and to work pad locations to support the proposed Project work.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 25

Has Eversource developed a Protection Plan for wetlands, watercourses and vernal pools in its construction plans for the project? If yes, submit the plan. If no, when would such a plan be developed?

Response:

Eversource has not developed a single Protection Plan for wetlands, watercourses and vernal pools for the Project.

The Project Stormwater Pollution Control Plan (“SWPCP”) that was submitted the Connecticut Department of Energy and Environmental Protection on April 26, 2023, details work areas, erosion and sedimentation control measures and matting configurations. These measures and configurations are intended to protect sensitive resource areas (e.g., wetlands, watercourses, and vernal pools) during construction. Approval of the SWPCP is still pending but would be issued prior to the start of construction.

Project work will comply with the SWPCP, Eversource’s BMP Manual, which focuses on the protection of wetlands, watercourses, and vernal pools, and the U.S. Army Corps of Engineers Self-Verification Authorization Conditions for work in wetlands. Eversource will also conduct weekly inspections to ensure compliance with the General Permit, BMPs, authorizations, and permit conditions.

Eversource believes that the protection measures defined in the SWPCP, authorizations, and BMP Manual are comprehensive and meet the intent and spirit of a single Protection Plan.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 26

Referencing Petition Attachment E, Vernal Pool Assessment, p. 3, how would Eversource deter and/or prevent ATV use of the ROW?

Response:

Existing gates, existing pole barriers and signage are utilized to discourage ATV's from accessing the ROW. It is standard work practice to close and lock all gates at the end of the workday. In addition, for any new access points that currently do not have gates or pole barriers installed, Eversource will install these measures upon request by the property owner during and/or after construction. During construction, Eversource will make every attempt to barricade open access points using natural features such as large rocks and downed trees.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 27

What measures would be taken, if necessary, to determine if excavated soils are suitable for reuse or redistribution in other Project areas?

Response:

Excavated soils from the Project that cannot be used as backfill would first be used for gravel work pads within the subject property and New England Cottontail Focus and Key Habitat Areas and then regraded into adjacent uplands and stabilized in accordance with Eversource's Best Management Practices ("BMPs") manual and the Project Stormwater Pollution Control Plan. Any excavated soils that cannot be reused on the property from which they were excavated would be transported from the Project area and properly managed off-site in accordance with Eversource's BMPs and any applicable local, state, or federal laws.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 28

Referencing Petition pp. 8, 9 and 11-13, 17 existing wood pole structures would be removed. If known, were the wooden poles chemically treated at the time of installation? Describe any best management practices associated with the disposal of the wooden poles.

Response:

Although no specific data is available, it is likely that the wood poles of the H-frame structures were treated prior to installation.

Eversource's Best Management Practice ("BMP") Manual, Section 3.12.1 – Pole Butt Removal, addresses the BMPs regarding wooden pole removal. Specifically, the BMP Manual states:

When transmission poles are decommissioned or otherwise taken out of service, in most cases the entire pole shall be removed. Treated wood pole butts shall be removed completely from the ground and properly disposed at an off-site location. Locations where the removal of pole butts may cause significant disturbance to wetlands or other sensitive environmental areas will be considered for exception to this practice on a site-by-site basis. The Transmission Line Construction and Maintenance Manager, in consultation with Eversource Environmental Licensing and Permitting, will be responsible for determining if a pole butt can be removed if located in a sensitive environmental area.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 29

Referencing Petition p. 26, provide more information as to the specific best management practices that would be employed for work within Aquifer Protection Areas.

Response:

As stated in the Petition under Section 5, Water Resources, Eversource would require its contractors to employ best management 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 Best Management Practices, as well as to the requirements of Project-specific plans (e.g., Stormwater Pollution Control Plan), which are filed prior to the commencement of construction.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 30

Referencing Petition p. 26, provide a copy of the Department of Energy and Environmental Protection (DEEP) Natural Diversity Database Determination including any recommended protective measures.

Response:

Eversource has received the four Natural Diversity Database Determinations (“NDDB”) for the Project. Copies of these determinations, including the recommended protective measures, are attached for reference. Protective measures recommended by NDDB for this Project include, but are not limited to: completing land disturbance activities outside of identified sensitive habitat areas and at select (breeding) times of year (for one listed bird species); installing exclusionary measures, consulting with a herpetologist, completing contractor training, pre-construction and periodic sweeps, utilizing appropriate construction materials, and observing and adjusting measures based on time of year restrictions (for State Special Concern Turtles); and conducting botanical surveys and implementing construction practices accordingly.

Additional detail on NDDB recommendations are provided in the accompanying materials. Project contractors will be required to comply with all applicable regulatory conditions, and Eversource will monitor for continued compliance, as outlined in response # 33.

April 12, 2022

Michelle Ford
Eversource Energy Service Company
107 Selden St.
Berlin, CT 06037
MICHELLE.FORD@EVERSOURCE.COM

NDDB DETERMINATION NUMBER: 202204177

Project: Eversource 1610 Line Rebuild and Copper Replacement and 1208 Line ACR, (Structures 5239, 5240, 5241), Schwab Junction to Cook Hill Junction, Boulder Rd, Cheshire, CT

Expiration: April 12, 2024

I have reviewed Natural Diversity Database (NDDB) maps and files regarding this project. According to our records, there are State-listed species (RCSA Sec. 26-306) documented within the proposed project area.

American kestrel (*Falco sparverius*) State Status: Special Concern

Eastern box turtle (*Terrapene carolina carolina*) State Status: Special Concern

American Kestrel

Habitat for this bird consists of open grassy or shrubby areas with short vegetation and natural tree cavities or nest boxes for nesting. This bird returns to breed in March - July. This bird is limited by habitat in Connecticut. It can benefit from active nest box monitoring and management to decrease competition by starlings. Availability of early successional habitat benefits this species during the post fledgeling period and during migration.

Land disturbance activities including digging, ground clearing, heavy machinery driving staging, or trampling that will occur more than 100 feet into or cut across in a way that fragments large parcels of grassland or shrubland habitat should be done when birds are not breeding. Breeding primarily takes place between **March 1- July 30**. Conducting land disturbance activities outside of the breeding season will avoid impact to the individuals.

- Do not introduce new traffic or construction noise within a 200m buffer of an active nest or nest box.
- The nest box is recorded to be on the south side of the white barn on the south side of Boulder Rd adjacent to the Utility ROW.

Eastern box turtle

Land disturbance activities that will crush adult turtles or unearth hibernating turtles or turtle nests need to consider local habitat features and apply fencing and/or time of year restrictions as appropriate. We recommend you consult with a herpetologist familiar with preferred habitats to assist you with proper techniques to ensure the best protection strategies are employed for your site. Keep the following guidelines in mind as you formulate a protection plan for this site.

For work that occurs between April 1- October 31:

- Exclusionary practices should be used to prevent any turtle access into disturbance areas. These measures will need to be installed based on local site characteristics with the assistance of a herpetologist, or at the limits of disturbance.
- Exclusionary fencing be at least 20 in tall and must be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through.
- All staging and storage areas, outside of previously paved locations, regardless of the duration of time they will be utilized, must be reviewed to remove individuals and exclude them from re-entry.
- All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species.
- The Contractor search the work area each morning prior to any work being done.
- Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and fencing should be inspected to identify and remove access point. This animal is protected by law and should not be relocated off-site.
- In areas where silt fence is used for exclusion, it shall be removed as soon as the area is stable and disturbance is finished to allow for reptile and amphibian passage to resume.
- Work conducted during early morning and evening hours should occur with special care not to harm basking individuals.
- Your project indicated use of timber mats. Timber mats have the potential to entrap wildlife (especially turtles) that may fall into the crevices and gaps, where they may be exposed to predation or dangerous temperatures on a sunny day. Take precautions to block or stop wildlife from trying to cross the mat. Especially in areas where sensitive turtles may occur, inspect swamp mats at the beginning and end of workday to ensure turtles have not become trapped. Additionally clean mats between use locations to avoid invasive species transfer.

Natural Diversity Database information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Bureau of Natural Resources and cooperating units of DEEP, independent conservation groups, and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the NDDB should not be substituted for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated in the NDDB as it becomes available.

Please contact me if you have any questions (shannon.kearney@ct.gov). Thank you for consulting with the Natural Diversity Database and continuing to work with us to protect State-listed species.

Sincerely,

/s/ Shannon B. Kearney
Wildlife Biologist



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

July 21, 2022

Ms. Michelle Ford
Eversource Energy Service Company, Inc.
107 Seldon Street
Berlin, CT 06037
Michelle.ford@eversource.com

Project: Eversource Energy Service Company, LLC Transmission Lines 1355, 1610, 1690, 1208
Structure and Copper Replacement in Meriden, Southington and Wallingford, Connecticut
NDDDB Determination No.: 202203858
Expiration Date: July 21, 2024

Dear Michelle Ford,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed Eversource Energy Service Company, LLC Transmission Lines 1355, 1610, 1690, 1208 Structure and Copper Replacement in Meriden, Southington and Wallingford, Connecticut.

According to our information there are State Special Concern *Terrapene carolina carolina* (eastern box turtle), *Clemmys guttata* (spotted turtle) and *Glyptemys insculpta* (wood turtle) within your entire project area.

Protection for State Special Concern Turtles

Best management practices to protect these turtles should be implemented throughout the entire work area. For all upland work, crushed stone should be avoided as much as possible and temporary mats should be used instead. I also recommend that no wood chips be placed along this right-of-way. Instead, these wood chips should be removed and used elsewhere (off site).

Protection for Turtles during Inactive Period (October 1st through March 30th):

- Keeping heavy equipment in the open ROW to the greatest extent possible and hand-felling trees to the greatest extent possible will minimize the potential for heavy machinery to crush hibernating turtles located in the forested edges along the ROW (a preferred habitat for box turtles to hibernate in).
- Overall, minimizing ground disturbance along the forest edges will minimize the potential for box turtle mortality during the winter months.
- Avoid and limit any equipment use within 100 feet of streams and brooks
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species, and instructed to notify the appropriate authorities to relocate any observed turtle.

- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

Protection for Turtles during Active Period (April 1st through September 30th):

- Hiring a qualified herpetologist to be on site to ensure these protection guidelines remain in effect and prevent turtles from being run over when moving heavy equipment. This is especially important in the month of June when turtles are selecting nesting sites. All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species and instructed to relocate turtles found inside work areas or notify the appropriate authorities to relocate individuals. The Contractor and consulting herpetologist must search the work area each morning prior to any work being done. If a turtle is discovered later in the day after the initial search work should stop until the turtle can be relocated by the qualified herpetologist or educated construction worker. Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and any exclusionary fencing should be inspected to identify and remove access point. The goal is to keep turtles from being unintentionally killed during this project.
- Exclusionary practices will be required to prevent any turtle access into construction areas. These measures will need to be installed at the limits of disturbance.
- Exclusionary fencing must be at least 20 in tall and must be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through. Do not use plastic or netted silt-fence.
- All staging and storage areas, outside of previously paved locations, regardless of the duration of time they will be utilized, must be reviewed to remove individuals and exclude them from re-entry.
- In areas where silt fence is used for exclusion, it shall be removed as soon as the area is stable to allow for reptile and amphibian passage to resume.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- Special precautions must be taken to avoid degradation of wetland habitats including any wet meadows and seasonal pools.
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- Avoid and limit any equipment use within 100 feet of streams and brooks.
- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

Protection for State Listed Plant Species

According to our information, there is a record for the following state listed plant along East Street, Southington, in the vicinity of a portion of this project:

***Asclepias purpurascens* (Purple Milkweed)**

State Status: Special Concern

Habitat: Roadsides, old fields, former hayfields, borders of woods, floodplains, wet meadows, on moist,

dry, or hydric soil.

Blooms late Jun, Jul. Immature fruits by the end of July, mature fruits late Aug-Oct.

This plant potentially occurs in the portion of the project west of East Street where temporary matting will be used to create work pads and service road. In order to protect the *Asclepias purpurascens* plants that potentially occur there, there are two options:

Option 1. You may forego conducting surveys for the *Asclepias purpurascens* and place the matting down only outside of the growing season, between November 15 and March 15.

Option 2. If you want to use matting during the growing season, outside of the November 15 to April 15 period, the areas that you intend to mat must be surveyed for *Asclepias purpurascens* by a qualified botanist or plant ecologist at a time of year when this species is detectable and identifiable. The results of that survey must be provided to the NDDB and accepted/approved by NDDB before any matting is installed. Any plants discovered should be flagged and matting should not be placed in those areas. If it is not possible to avoid those areas with the matting, then matting may only be placed there outside of the growing season, between November 15 and March 15.

This determination is good for two years. Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by July 21, 2024.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov. Thank you for consulting the Natural Diversity Data Base. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEEP for the proposed site.

Sincerely,

A handwritten signature in blue ink that reads "William A. Moorhead". The signature is written in a cursive style with a horizontal line underneath the name.

Bill Moorhead
Botanist/Plant Community Ecologist



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

July 25, 2022

Ms. Michelle Ford
Eversource Energy Service Company
107 Seldon Street
Berlin, CT 06037
Michelle.ford@eversource.com

Project: Eversource Energy Service Company Eversource Transmission Structure (STR 4679A) Replacement along the 1208 Line ACR Project, Ball Street, Wallingford, Connecticut
NDDDB Final Determination No.: 202203860

Dear Michelle Ford,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map provided for the Eversource Energy Service Company Eversource Eversource Transmission Structure (STR 4679A) Replacement along the 1208 Line ACR Project, Ball Street, Wallingford, Connecticut.

According to our records there are known extant populations of State Endangered *Floerkea proserpinacoides* (False mermaid-weed) and State Special Concern *Terrapene c. carolina* (Eastern box turtle) that occur within the vicinity of this project.

Recommended Protection Strategies for State Listed Plants

I do not anticipate adverse impacts to State Endangered *Floerkea proserpinacoides* (False mermaid-weed) from this project and no further conservation action is required.

Recommended Protection Strategies for Special Concern Box Turtles:

Work normally should occur when these turtles are active (April 1st to October 30th). Conducting land clearing while the turtle is active will allow the animal to move out of harm's way and minimize mortality to hibernating individuals. A qualified herpetologist should be hired to work on site with your construction crew during the project construction period to be sure that turtles will not be unintentionally killed during the moving of heavy equipment and tree clearing. This is especially important in May, June and July when turtles are choosing nest sites.

I recommend the following protection strategies in order to protect these turtles:

- Exclusionary practices will be required to prevent any turtle access into construction areas. These measures will need to be installed at the limits of disturbance.
- Exclusionary fencing must be at least 20 in tall and must be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through. Do not use plastic netted or any netted silt-fence.
- All staging and storage areas, outside of previously paved locations, regardless of the duration of time they will be utilized, must be reviewed to remove individuals and exclude them from re-entry.
- All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species and instructed to relocate turtles found inside work areas or notify the appropriate authorities to relocate individuals.
- Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and fencing should be inspected to identify and remove access point.

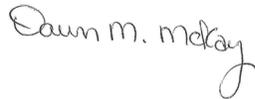
- In areas where non-netted silt fence is used for exclusion, it shall be removed as soon as the area is stable to allow for reptile and amphibian passage to resume.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- Special precautions must be taken to avoid degradation of wetland habitats including any wet meadows and seasonal pools.
- The Contractor must search the work area each morning prior to any work being done.
- Avoid and limit any equipment use within 50 feet of streams and brooks. If trees must be removed cut them to fall away from the waterway and do not drag trees across the waterway or remove any stumps.
- Any confirmed sighting of box, wood or spotted turtles will be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

This determination is good for two years. Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by July 25, 2024.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available. The result of this review does not preclude the possibility that listed species may be encountered on site and that additional action may be necessary to remain in compliance with certain state permits.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov . Thank you for consulting the Natural Diversity Data Base.

Sincerely,



Dawn M. McKay
Environmental Analyst 3



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

August 11, 2022

Ms. Michelle Ford
Eversource Energy Service Company, Inc.
107 Seldon Street
Berlin, CT 06037
Michelle.ford@eversource.com

Project: Eversource Energy Service Company, LLC Transmission Lines 1355, 1610, 1208 Structure Replacement (Structures 4069-1 on the 1355/1610 Line and 3666-1 on the 1208 Line) on New Cheshire Road in Meriden, Connecticut
NDDB Determination No.: 202207534
Expiration Date: August 11, 2024

Dear Michelle Ford,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed Eversource Energy Service Company, LLC Transmission Lines 1355, 1610, 1208 Structure (Structures 4069-1 on the 1355/1610 Line and 3666-1 on the 1208 Line) on New Cheshire Road in Meriden, Connecticut.

According to our information there are State Special Concern *Terrapene carolina carolina* (eastern box turtle) within your project area.

Protection for State Special Concern Turtles

Best management practices to protect these turtles should be implemented throughout the entire work area.

For all upland work, crushed stone should be avoided as much as possible and temporary mats should be used instead. I also recommend that no wood chips be placed along this right-of-way. Instead, these wood chips should be removed and used elsewhere (off site).

Protection for Turtles during Inactive Period (October 1st through March 30th):

- Keeping heavy equipment in the open ROW to the greatest extent possible and hand-felling trees to the greatest extent possible will minimize the potential for heavy machinery to crush hibernating turtles located in the forested edges along the ROW (a preferred habitat for box turtles to hibernate in).
- Overall, minimizing ground disturbance along the forest edges will minimize the potential for box turtle mortality during the winter months.
- Avoid and limit any equipment use within 100 feet of streams and brooks
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species and instructed to notify the appropriate authorities to relocate any observed turtle.
- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

Protection for Turtles during Active Period (April 1st through September 30th):

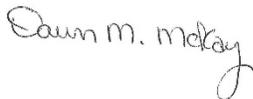
- Hiring a qualified herpetologist to be on site to ensure these protection guidelines remain in effect and prevent turtles from being run over when moving heavy equipment. This is especially important in the month of June when turtles are selecting nesting sites. All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species and instructed to relocate turtles found inside work areas or notify the appropriate authorities to relocate individuals. The Contractor and consulting herpetologist must search the work area each morning prior to any work being done. If a turtle is discovered later in the day after the initial search work should stop until the turtle can be relocated by the qualified herpetologist or educated construction worker. Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and any exclusionary fencing should be inspected to identify and remove access point. The goal is to keep turtles from being unintentionally killed during this project.
- Exclusionary practices will be required to prevent any turtle access into construction areas. These measures will need to be installed at the limits of disturbance.
- Exclusionary fencing must be at least 20 in tall and must be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through. Do not use plastic or netted silt-fence.
- All staging and storage areas, outside of previously paved locations, regardless of the duration of time they will be utilized, must be reviewed to remove individuals and exclude them from re-entry.
- In areas where silt fence is used for exclusion, it shall be removed as soon as the area is stable to allow for reptile and amphibian passage to resume.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- Special precautions must be taken to avoid degradation of wetland habitats including any wet meadows and seasonal pools.
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- Avoid and limit any equipment use within 100 feet of streams and brooks.
- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

This determination is good for two years. Please re-submit an NDDDB Request for Review if the scope of work changes or if work has not begun on this project by August 11, 2024.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov. Thank you for consulting the Natural Diversity Data Base. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEEP for the proposed site.

Sincerely,



Dawn M McKay
Environmental Analyst 3

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 31

Referencing Petition p. 26, did Eversource consult with the U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Consultation (IPaC) service regarding federally-listed species? If yes, would the Project impact any federally-listed species (e.g. northern long-eared bat)? Explain.

Response:

Eversource consultation with the USFWS via the IPaC tool has been completed. Copies of the IPaC determination and accompanying northern long-eared bat determination key will be submitted as part of the United States Army Corps of Engineers Connecticut General Permit ("USACE CT GP") process. A preliminary determination of "may affect, but not likely to adversely affect the Endangered northern long-eared bat ('NLEB')" has been received and additional consultation with the USFWS (via the lead federal agency, USACE CT GP) is anticipated as part of the federal regulatory permitting process. Agency recommended measures for protection of the NLEB will be employed by the Project.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 32

Referencing Petition p. 20, has Eversource received any comments from the State Historic Preservation Office (SHPO) and/or the Tribal Historic Preservation Offices (THPOs)?

Response:

The State Historic Preservation Office (“SHPO”) and various Tribal Historic Preservation Officers (“THPOs”: Mohegan; Mashantucket-Pequot; and Wampanoag) have not commented on the Phase 1A or Pedestrian surveys, which were submitted to the SHPO and THPOs on July 1, 2022.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 33

Explain how the work contractor is made aware of sensitive environmental and cultural resources along the ROW that require certain protective work procedures? What entity ensures that specified work procedures are adhered to?

Response:

Specific Eversource Best Management Practices (“BMPs”) and protection measures are typically incorporated into contractors’ agreements for the Project work. Further, all contractors will be required to sign off on specific documents, such as BMPs, prior to conducting any work on the Project. Each contractor is made aware of specific environmental and/or cultural measures as part of the bid process. After a contractor is selected and the agreement signed, the Project team will hold a “kick-off” meeting where the Eversource Environmental Specialist reviews all environmental protection measures, including those for cultural resources. During construction, a daily “tail board” meeting is held to review the details of each day’s work, which may include work in environmentally sensitive areas. An Environmental monitor is responsible for inspecting site conditions in the field and, if necessary, due to special species requirements, an additional inspector that has specific species qualifications will be used on site to ensure compliance with all protection measures. In addition to these monitors/inspectors, the Project Management personnel and Construction Managers are also responsible for compliance and adherence to the BMPs and protection measures that are incorporated in the agreements with the contractors that perform the Project work.

Date Filed: July 13, 2023

Request from: Connecticut Siting Council

Question: 34

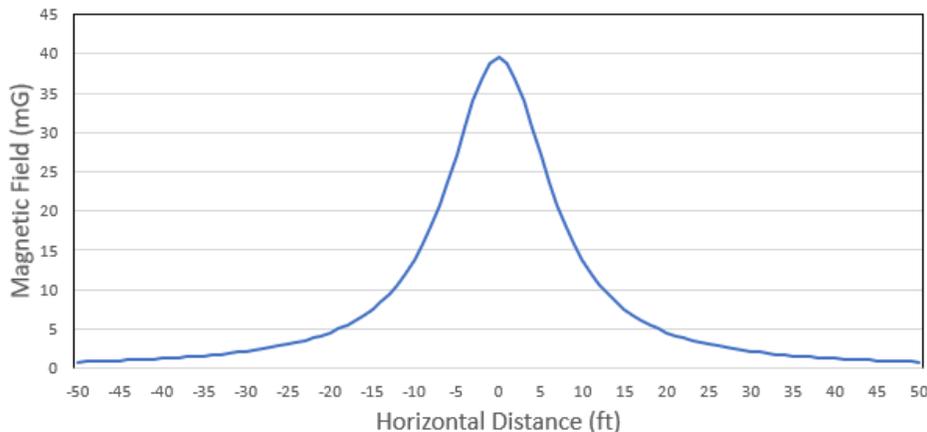
Referencing Petition pp. 30-32, electric and magnetic field (EMF) tables are included for the Project. Is the underground transmission segment at Lucchini Junction taken into account in the EMF tables? If no, would it be expected to materially impact EMF at the ROW edges

Response:

The underground transmission segment at Lucchini Junction was not included in the graphs or tables presented in the Petition.

The duct bank is proposed to be located close to an angle point with an easement leaving the west side of the junction occupied by a distribution line. Taking that location as a ROW edge point, the predicted magnetic field due to the underground portion of the 1690 Line is approximately 35.4 milligauss (“mG”) at that ROW edge. This value, while elevated as compared to the calculations for the overhead design, remains well below the agency guidelines presented in Table 5 of the Petition. Further, the graph provided shows that magnetic field levels are predicted to decrease quickly within a distance of 50 feet from the duct bank.

Magnetic Field Strength at 1m Above Ground Surface



Underground cable does not generate an electric field as it will be shielded by the duct bank and the earth. Therefore, an increase in the electric field due to the underground 1690 Line is not anticipated.

April 12, 2022

Michelle Ford
Eversource Energy Service Company
107 Selden St.
Berlin, CT 06037
MICHELLE.FORD@EVERSOURCE.COM

NDDB DETERMINATION NUMBER: 202204177

Project: Eversource 1610 Line Rebuild and Copper Replacement and 1208 Line ACR, (Structures 5239, 5240, 5241), Schwab Junction to Cook Hill Junction, Boulder Rd, Cheshire, CT

Expiration: April 12, 2024

I have reviewed Natural Diversity Database (NDDB) maps and files regarding this project. According to our records, there are State-listed species (RCSA Sec. 26-306) documented within the proposed project area.

American kestrel (*Falco sparverius*) State Status: Special Concern

Eastern box turtle (*Terrapene carolina carolina*) State Status: Special Concern

American Kestrel

Habitat for this bird consists of open grassy or shrubby areas with short vegetation and natural tree cavities or nest boxes for nesting. This bird returns to breed in March - July. This bird is limited by habitat in Connecticut. It can benefit from active nest box monitoring and management to decrease competition by starlings. Availability of early successional habitat benefits this species during the post fledgeling period and during migration.

Land disturbance activities including digging, ground clearing, heavy machinery driving staging, or trampling that will occur more than 100 feet into or cut across in a way that fragments large parcels of grassland or shrubland habitat should be done when birds are not breeding. Breeding primarily takes place between **March 1- July 30**. Conducting land disturbance activities outside of the breeding season will avoid impact to the individuals.

- Do not introduce new traffic or construction noise within a 200m buffer of an active nest or nest box.
- The nest box is recorded to be on the south side of the white barn on the south side of Boulder Rd adjacent to the Utility ROW.

Eastern box turtle

Land disturbance activities that will crush adult turtles or unearth hibernating turtles or turtle nests need to consider local habitat features and apply fencing and/or time of year restrictions as appropriate. We recommend you consult with a herpetologist familiar with preferred habitats to assist you with proper techniques to ensure the best protection strategies are employed for your site. Keep the following guidelines in mind as you formulate a protection plan for this site.

For work that occurs between April 1- October 31:

- Exclusionary practices should be used to prevent any turtle access into disturbance areas. These measures will need to be installed based on local site characteristics with the assistance of a herpetologist, or at the limits of disturbance.
- Exclusionary fencing be at least 20 in tall and must be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through.
- All staging and storage areas, outside of previously paved locations, regardless of the duration of time they will be utilized, must be reviewed to remove individuals and exclude them from re-entry.
- All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species.
- The Contractor search the work area each morning prior to any work being done.
- Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and fencing should be inspected to identify and remove access point. This animal is protected by law and should not be relocated off-site.
- In areas where silt fence is used for exclusion, it shall be removed as soon as the area is stable and disturbance is finished to allow for reptile and amphibian passage to resume.
- Work conducted during early morning and evening hours should occur with special care not to harm basking individuals.
- Your project indicated use of timber mats. Timber mats have the potential to entrap wildlife (especially turtles) that may fall into the crevices and gaps, where they may be exposed to predation or dangerous temperatures on a sunny day. Take precautions to block or stop wildlife from trying to cross the mat. Especially in areas where sensitive turtles may occur, inspect swamp mats at the beginning and end of workday to ensure turtles have not become trapped. Additionally clean mats between use locations to avoid invasive species transfer.

Natural Diversity Database information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Bureau of Natural Resources and cooperating units of DEEP, independent conservation groups, and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the NDDB should not be substituted for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated in the NDDB as it becomes available.

Please contact me if you have any questions (shannon.kearney@ct.gov). Thank you for consulting with the Natural Diversity Database and continuing to work with us to protect State-listed species.

Sincerely,

/s/ Shannon B. Kearney
Wildlife Biologist



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

July 21, 2022

Ms. Michelle Ford
Eversource Energy Service Company, Inc.
107 Seldon Street
Berlin, CT 06037
Michelle.ford@eversource.com

Project: Eversource Energy Service Company, LLC Transmission Lines 1355, 1610, 1690, 1208
Structure and Copper Replacement in Meriden, Southington and Wallingford, Connecticut
NDDDB Determination No.: 202203858
Expiration Date: July 21, 2024

Dear Michelle Ford,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed Eversource Energy Service Company, LLC Transmission Lines 1355, 1610, 1690, 1208 Structure and Copper Replacement in Meriden, Southington and Wallingford, Connecticut.

According to our information there are State Special Concern *Terrapene carolina carolina* (eastern box turtle), *Clemmys guttata* (spotted turtle) and *Glyptemys insculpta* (wood turtle) within your entire project area.

Protection for State Special Concern Turtles

Best management practices to protect these turtles should be implemented throughout the entire work area. For all upland work, crushed stone should be avoided as much as possible and temporary mats should be used instead. I also recommend that no wood chips be placed along this right-of-way. Instead, these wood chips should be removed and used elsewhere (off site).

Protection for Turtles during Inactive Period (October 1st through March 30th):

- Keeping heavy equipment in the open ROW to the greatest extent possible and hand-felling trees to the greatest extent possible will minimize the potential for heavy machinery to crush hibernating turtles located in the forested edges along the ROW (a preferred habitat for box turtles to hibernate in).
- Overall, minimizing ground disturbance along the forest edges will minimize the potential for box turtle mortality during the winter months.
- Avoid and limit any equipment use within 100 feet of streams and brooks
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species, and instructed to notify the appropriate authorities to relocate any observed turtle.

- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

Protection for Turtles during Active Period (April 1st through September 30th):

- Hiring a qualified herpetologist to be on site to ensure these protection guidelines remain in effect and prevent turtles from being run over when moving heavy equipment. This is especially important in the month of June when turtles are selecting nesting sites. All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species and instructed to relocate turtles found inside work areas or notify the appropriate authorities to relocate individuals. The Contractor and consulting herpetologist must search the work area each morning prior to any work being done. If a turtle is discovered later in the day after the initial search work should stop until the turtle can be relocated by the qualified herpetologist or educated construction worker. Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and any exclusionary fencing should be inspected to identify and remove access point. The goal is to keep turtles from being unintentionally killed during this project.
- Exclusionary practices will be required to prevent any turtle access into construction areas. These measures will need to be installed at the limits of disturbance.
- Exclusionary fencing must be at least 20 in tall and must be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through. Do not use plastic or netted silt-fence.
- All staging and storage areas, outside of previously paved locations, regardless of the duration of time they will be utilized, must be reviewed to remove individuals and exclude them from re-entry.
- In areas where silt fence is used for exclusion, it shall be removed as soon as the area is stable to allow for reptile and amphibian passage to resume.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- Special precautions must be taken to avoid degradation of wetland habitats including any wet meadows and seasonal pools.
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- Avoid and limit any equipment use within 100 feet of streams and brooks.
- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

Protection for State Listed Plant Species

According to our information, there is a record for the following state listed plant along East Street, Southington, in the vicinity of a portion of this project:

***Asclepias purpurascens* (Purple Milkweed)**

State Status: Special Concern

Habitat: Roadsides, old fields, former hayfields, borders of woods, floodplains, wet meadows, on moist,

dry, or hydric soil.

Blooms late Jun, Jul. Immature fruits by the end of July, mature fruits late Aug-Oct.

This plant potentially occurs in the portion of the project west of East Street where temporary matting will be used to create work pads and service road. In order to protect the *Asclepias purpurascens* plants that potentially occur there, there are two options:

Option 1. You may forego conducting surveys for the *Asclepias purpurascens* and place the matting down only outside of the growing season, between November 15 and March 15.

Option 2. If you want to use matting during the growing season, outside of the November 15 to April 15 period, the areas that you intend to mat must be surveyed for *Asclepias purpurascens* by a qualified botanist or plant ecologist at a time of year when this species is detectable and identifiable. The results of that survey must be provided to the NDDB and accepted/approved by NDDB before any matting is installed. Any plants discovered should be flagged and matting should not be placed in those areas. If it is not possible to avoid those areas with the matting, then matting may only be placed there outside of the growing season, between November 15 and March 15.

This determination is good for two years. Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by July 21, 2024.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov. Thank you for consulting the Natural Diversity Data Base. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEEP for the proposed site.

Sincerely,

A handwritten signature in blue ink that reads "William A. Moorhead". The signature is written in a cursive style with a horizontal line underneath the name.

Bill Moorhead
Botanist/Plant Community Ecologist



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

July 25, 2022

Ms. Michelle Ford
Eversource Energy Service Company
107 Seldon Street
Berlin, CT 06037
Michelle.ford@eversource.com

Project: Eversource Energy Service Company Eversource Transmission Structure (STR 4679A) Replacement along the 1208 Line ACR Project, Ball Street, Wallingford, Connecticut
NDDDB Final Determination No.: 202203860

Dear Michelle Ford,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map provided for the Eversource Energy Service Company Eversource Eversource Transmission Structure (STR 4679A) Replacement along the 1208 Line ACR Project, Ball Street, Wallingford, Connecticut.

According to our records there are known extant populations of State Endangered *Floerkea proserpinacoides* (False mermaid-weed) and State Special Concern *Terrapene c. carolina* (Eastern box turtle) that occur within the vicinity of this project.

Recommended Protection Strategies for State Listed Plants

I do not anticipate adverse impacts to State Endangered *Floerkea proserpinacoides* (False mermaid-weed) from this project and no further conservation action is required.

Recommended Protection Strategies for Special Concern Box Turtles:

Work normally should occur when these turtles are active (April 1st to October 30th). Conducting land clearing while the turtle is active will allow the animal to move out of harm's way and minimize mortality to hibernating individuals. A qualified herpetologist should be hired to work on site with your construction crew during the project construction period to be sure that turtles will not be unintentionally killed during the moving of heavy equipment and tree clearing. This is especially important in May, June and July when turtles are choosing nest sites.

I recommend the following protection strategies in order to protect these turtles:

- Exclusionary practices will be required to prevent any turtle access into construction areas. These measures will need to be installed at the limits of disturbance.
- Exclusionary fencing must be at least 20 in tall and must be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through. Do not use plastic netted or any netted silt-fence.
- All staging and storage areas, outside of previously paved locations, regardless of the duration of time they will be utilized, must be reviewed to remove individuals and exclude them from re-entry.
- All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species and instructed to relocate turtles found inside work areas or notify the appropriate authorities to relocate individuals.
- Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and fencing should be inspected to identify and remove access point.

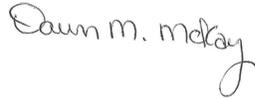
- In areas where non-netted silt fence is used for exclusion, it shall be removed as soon as the area is stable to allow for reptile and amphibian passage to resume.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- Special precautions must be taken to avoid degradation of wetland habitats including any wet meadows and seasonal pools.
- The Contractor must search the work area each morning prior to any work being done.
- Avoid and limit any equipment use within 50 feet of streams and brooks. If trees must be removed cut them to fall away from the waterway and do not drag trees across the waterway or remove any stumps.
- Any confirmed sighting of box, wood or spotted turtles will be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

This determination is good for two years. Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by July 25, 2024.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available. The result of this review does not preclude the possibility that listed species may be encountered on site and that additional action may be necessary to remain in compliance with certain state permits.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov . Thank you for consulting the Natural Diversity Data Base.

Sincerely,



Dawn M. McKay
Environmental Analyst 3



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

August 11, 2022

Ms. Michelle Ford
Eversource Energy Service Company, Inc.
107 Seldon Street
Berlin, CT 06037
Michelle.ford@eversource.com

Project: Eversource Energy Service Company, LLC Transmission Lines 1355, 1610, 1208 Structure Replacement (Structures 4069-1 on the 1355/1610 Line and 3666-1 on the 1208 Line) on New Cheshire Road in Meriden, Connecticut
NDDB Determination No.: 202207534
Expiration Date: August 11, 2024

Dear Michelle Ford,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed Eversource Energy Service Company, LLC Transmission Lines 1355, 1610, 1208 Structure (Structures 4069-1 on the 1355/1610 Line and 3666-1 on the 1208 Line) on New Cheshire Road in Meriden, Connecticut.

According to our information there are State Special Concern *Terrapene carolina carolina* (eastern box turtle) within your project area.

Protection for State Special Concern Turtles

Best management practices to protect these turtles should be implemented throughout the entire work area.

For all upland work, crushed stone should be avoided as much as possible and temporary mats should be used instead. I also recommend that no wood chips be placed along this right-of-way. Instead, these wood chips should be removed and used elsewhere (off site).

Protection for Turtles during Inactive Period (October 1st through March 30th):

- Keeping heavy equipment in the open ROW to the greatest extent possible and hand-felling trees to the greatest extent possible will minimize the potential for heavy machinery to crush hibernating turtles located in the forested edges along the ROW (a preferred habitat for box turtles to hibernate in).
- Overall, minimizing ground disturbance along the forest edges will minimize the potential for box turtle mortality during the winter months.
- Avoid and limit any equipment use within 100 feet of streams and brooks
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species and instructed to notify the appropriate authorities to relocate any observed turtle.
- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

Protection for Turtles during Active Period (April 1st through September 30th):

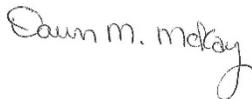
- Hiring a qualified herpetologist to be on site to ensure these protection guidelines remain in effect and prevent turtles from being run over when moving heavy equipment. This is especially important in the month of June when turtles are selecting nesting sites. All construction personnel working within the turtle habitat must be apprised of the species description and the possible presence of a listed species and instructed to relocate turtles found inside work areas or notify the appropriate authorities to relocate individuals. The Contractor and consulting herpetologist must search the work area each morning prior to any work being done. If a turtle is discovered later in the day after the initial search work should stop until the turtle can be relocated by the qualified herpetologist or educated construction worker. Any turtles encountered within the immediate work area shall be carefully moved to an adjacent area outside of the excluded area and any exclusionary fencing should be inspected to identify and remove access point. The goal is to keep turtles from being unintentionally killed during this project.
- Exclusionary practices will be required to prevent any turtle access into construction areas. These measures will need to be installed at the limits of disturbance.
- Exclusionary fencing must be at least 20 in tall and must be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through. Do not use plastic or netted silt-fence.
- All staging and storage areas, outside of previously paved locations, regardless of the duration of time they will be utilized, must be reviewed to remove individuals and exclude them from re-entry.
- In areas where silt fence is used for exclusion, it shall be removed as soon as the area is stable to allow for reptile and amphibian passage to resume.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- Special precautions must be taken to avoid degradation of wetland habitats including any wet meadows and seasonal pools.
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- Avoid and limit any equipment use within 100 feet of streams and brooks.
- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

This determination is good for two years. Please re-submit an NDDDB Request for Review if the scope of work changes or if work has not begun on this project by August 11, 2024.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov. Thank you for consulting the Natural Diversity Data Base. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEEP for the proposed site.

Sincerely,



Dawn M McKay
Environmental Analyst 3