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Deborah Denfeld
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July 20, 2023

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

Re: Petition No. 1577 Frost Bridge to Noera Rebuild Project

Dear Ms. Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy submits the enclosed original and 15 copies of the response to the request for information listed below:

Response to CSC-01 Interrogatory dated July 3, 2023
CSC Set 01 - Questions 1 -32

Sincerely,

A handwritten signature in cursive script that reads "Deborah Denfeld".

Deborah Denfeld
Team Lead – Transmission Siting

Encl

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 1

Referencing Petition p. 29, were any comments received from the Towns of Watertown, Thomaston and Plymouth, the City of Waterbury or abutting property owners since the filing of the Petition? If so, what were their concerns, and how were these concerns addressed?

Response:

Since the filing of the Petition, no comments have been submitted or issues raised by the municipal officials of Watertown, Thomaston, Plymouth, or Waterbury or by abutting property owners.

Date Filed: July 20, 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 completed a series of outreach efforts to connect with abutting property owners to inform them of the proposed Project.

In January 2023 abutting property owners were mailed a notice introducing the proposed Project, scope, schedule, and other planned pre-construction activities. Eversource also connects with abutting property owners in person by executing “door to door” outreach. If no one is home, a door hanger is left containing Project information including how to contact Eversource to discuss the project in more detail. All outreach materials include a dedicated hotline phone number and email address for interested stakeholders to connect with Project representatives. The hotline is monitored throughout the day, and most inquiries are acknowledged within one business day. In addition to the hotline, the phone number and email address is also provided for a dedicated outreach representative on the Project.

Eversource readily meets with property owners when requested to further help answer any questions or concerns that they may have, oftentimes walking through the property to review the limits of the easement and site-specific impacts prior to construction. Eversource discusses right-of-way restoration measures with property owners during public outreach and any additional questions or restoration requests are documented and followed up upon as appropriate.

Of note, Eversource has also reviewed project details with several businesses, community leaders and property management for abutting condo complexes. One property owner expressed site-specific concerns about proposed structure locations, including direct property impacts and perceived visual impact due to the location of a structure. Eversource met with this property owner onsite to discuss the design limitations, engineering standards, best practices for restoration, and potential visual mitigation measures. Eversource committed to the property owner that the team will evaluate work pad limits with the contractor prior to construction to determine if any further reduction of impacts to the area would be feasible. Eversource will continue to coordinate potential mitigation and restoration measures with each individual property owner, as requested.

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 and e-mail address 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 one business day.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 3

Referencing Petition pp. 25-26, has an application been filed with the Federal Aviation Administration (FAA) for review of the specified overhead spans? If yes, when was such application filed? Provide any response from FAA including any required marking/lighting plans if applicable.

Response:

Yes. The Form 7460-1 Notice of Proposed Construction or Alteration application was filed on July 7, 2023, for structures and spans between Structures 6/6A and 7/7A. The application is in review with the FAA and the Project will adhere to and implement any required marking/lightning requirements.

Date Filed: July 20, 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:

In general, the easements along the existing ROW grant Eversource a perpetual easement, privilege and right of way for electric lines for the transmission of electric currents of any character necessary and the right at any time and from time to time to erect, inspect, operate, use, patrol and permanently maintain the electric lines, upon over and across the easement land. The electric lines may consist of poles, towers, other supporting structures (which may be substituted one for the other at any time), circuits, cables, wires, crossarms, guy wires, anchors, guys stubs and other overhead and underground appurtenances and fixtures, any or all of which constitute, parts of electric lines may be erected, relocated, replaced, repaired or changed in number, size or type from time to time. Together also with the right to enter upon, pass and transport materials, along and over said right of way to and from adjoining land of others or highways.

Also, these easements generally include the right to trim, cut, take down and remove at any and all times trees, parts of trees, limbs, branches, underbrush and structures within or projecting into the right of way as in the judgment of Eversource may interfere with or endanger any of said electric lines or their operation, whenever they are erected.

Date Filed: July 20, 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 "work pads at structure and wire pulling sites", "Project work sites" and the Project construction staging area.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 6

Referencing Petition p. 8, when was the most recent vegetation management conducted in the ROW? What work was performed?

Response:

Eversource completed vegetation maintenance work in May through December of 2020 including right-of-way maintenance clearing, side trimming and hazard tree removal. In 2021, Eversource completed vegetation management herbicide application from August through October.

Most recently, brush clearing from Noera Tap to Noera Substation was completed in Spring 2023 to facilitate on-foot inspection of the Project area.

Date Filed: July 20, 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 Frost Bridge to Noera 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 number 259) as well as a future Eversource Local System Plan project.

Date Filed: July 20, 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:

The purpose of the Frost Bridge to Noera Rebuild Project (the "Project") is to improve system reliability by addressing asset condition concerns. The Project scope is not attributable to support a generator interconnection.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 9

How would any interruptions to existing generation facilities proximate and/or interconnected to the transmission lines be avoided/mitigated?

Response:

No interruptions are expected to existing generation facilities proximate and/or interconnected to the transmission lines due to this project.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 10

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 \$46.3 million. Of the total, \$12.5 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: 40.0%
- Other Connecticut customers: 5.4%
- Other New England customers: 54.6%

The estimated allocations are based on 2022 actual loads.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 11

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 20, 2023

Request from: Connecticut Siting Council

Question: 12

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 is performing 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 within the easement area by implementing edge to edge maintenance, which is consistent with the recommendations in the referenced FERC and NERC report.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 13

Identify all other permits required to perform the proposed work.

Response:

United States Army Corps of Engineers

- Self-Verification Notification under Connecticut General Permits 6 and 21

Connecticut Department of Energy and Environmental Protection

- General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities
- Natural Diversity Data Base Determination
- State Historic Preservation Office Notification
- Special Use License

The Public Utilities Regulatory Authority

- Approval for Method and Manner of Construction

Connecticut Department of Transportation

- Crossing Encroachment Permit Route 262

Railroad Crossing Permits

- Naugatuck Railroad Company
- Genesee and Wyoming (formerly, CSX Transportation)

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 14

Referencing Petition p. 6, do the existing conductors of the 1163 and 1550 Lines consist of 4/0 copper for 1.5 miles and 795 kcmil aluminum conductor steel reinforced (ACSR) conductors for 3.5 miles of the Project route?

Response:

Yes. From Frost Bridge Substation to Noera Junction, the existing conductors are 795-kcmil ACSR for a distance of 3.5 miles. From Noera Junction to Noera Substation, the existing conductor is 4/0 AWG copper for a distance of 1.5 miles.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 15

How would conductor and OPGW installation avoid contact with water at crossings?

Response:

The new conductor and OPGW would be installed such that the wires 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. The existing conductor would be connected to a wire rope (“hardline”).
5. 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.
6. The new conductor will be connected to the hardline and then pulled into position.
7. 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 20, 2023

Request from: Connecticut Siting Council

Question: 16

Referencing Petition p. 4 and Map Sheet 6, Structure 691 is marked for replacement; however, this structure was rebuilt in 2014 via Council Sub-Petition No. 1000-WY-01. Why does this structure need to be replaced?

Response:

Structure 691 needs to be replaced due to the proposed reconfiguration of the Noera Junction structures, and the installation of the proposed 1272-kcmil Aluminum Conductor Steel Supported conductor. As stated in the Petition, the proposed conductor is larger than the existing conductor, installed at a higher tension. The existing structure cannot support the increased loading from the larger conductor and therefore needs to be replaced.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 17

Referencing Petition p. 5, bullet point 1, explain in further detail why the 18 existing double-circuit lattice structures would be replaced with 36 single-circuit monopoles instead of 18 double-circuit monopoles?

Response:

The proposed single-circuit monopoles are “dead-end” or “angle” structure configurations and, typically, their locations are characterized by angle points within the right-of-way and long spans between structures. The single-circuit configuration is designed to fully support the unbalanced loads from the wires without compromising the sag and tension characteristics of the wires. Eversource’s standard practice is to replace a double-circuit dead-end structure with two single-circuit dead-end structures, one structure for each circuit.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 18

Referencing Petition p. 6, bullet point 1, explain why and where the two new single-circuit weathering steel monopoles would be installed.

Response:

The two new single-circuit weathering steel monopoles (Structures 705 and 705A) are required to maintain the conductor vertical ground clearance and to ensure the conductor phase-to-phase clearance into the Noera Substation.

Please refer to page 5 of the Petition for explanation of why and where the two new single-circuit weathering steel monopoles would be installed.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 19

Referencing Petition p. 6, bullet point 5, explain why underground all-dielectric self-supporting (ADSS) fiber optic cable is required between two structures at Noera Junction. Identify the two structures.

Response:

The installation of an underground ADSS fiber optic cable on the 1163 Line between Structure 25 and Structure 690 at Noera Junction is necessary to facilitate a continuous fiber connection between Frost Bridge Substation and Noera Substation. Currently, there is not sufficient clearance at the junction to connect overhead OPGW between the two structures.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 20

Referencing Petition pp. 2 and 5, the existing lattice structure would be replaced in order to structurally support the new conductors and/or address asset condition issues. Why would the double-circuit wood H-frame structure and double-circuit steel pole structure need to be replaced for this Project?

Response:

The double-circuit H-frame Structure 26 and the double-circuit steel pole Structure 691 need to be replaced as part of this Project due to the proposed configuration change at Noera Junction and to support the proposed installation of the 1272 kcmil aluminum conductor steel-supported ("ACSS"). Structures 26 and 26A are required to be dead-end structures to act as the anchor points for the proposed reconducted wire loads and the existing wire loads towards Structure 27. The proposed 1272 kcmil ACSS conductor will terminate on Structures 26 and 26A and transition back to the existing ACSR conductor type.

The double-circuit steel pole Structure 691 replacement was addressed in the response to Question 16.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 21

Referencing Petition Map Sheet 4, why are Structures 19, 20 and 20A proposed to be moved to the southeast of their existing structure locations?

Response:

Structures 20 and 20A are proposed to be moved southeast of the existing location of Structure 20 to meet constructability needs, particularly regarding the pulling of the new conductor as there is not sufficient space for the required pull pad. The relocation of Structure 19 is a result of the positioning of Structures 20 and 20A.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 22

Referencing Petition p. 23 and Map Sheets 1 and 2, identify all proposed access road segments that would not be installed if Eversource is able to secure a DEEP Land Management Division Special Use License.

Response:

Referencing Map Sheet 1, the following in-ROW roads would not be installed should CTDEEP issue a Special Use License:

- The proposed switch back yellow access road from Spruce Brook Road, heading north to the work pad for Structures 6/6A.
- The proposed yellow access road between the work pads for Structures 6/6A and 5/5A
- The proposed yellow access road, and the matted portion within wetland #10, between the work pads for Structures 5/5A and 4/4A

Referencing Map Sheet 2, the following in-ROW road would not be installed should CTDEEP issue a Special Use License:

- The proposed yellow access road between the pull pads and the work pad for Structures 7/7A.

Date Filed: July 20, 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:

In addition to Eversource's Best Management Practices ("BMPs"), Eversource would comply with the recommendations detailed in the Connecticut Department of Energy and Environmental Protection ("CTDEEP") Natural Diversity Database ("NDDB") Determination Letter (received, 9/15/22), which includes time of year restrictions for work in certain species habitat areas.

Gravel work pad restoration measures would also be implemented to mitigate impacts within environmentally sensitive areas, which would include amendment of the work pad surface with stockpiled topsoil or fine process gravel, application of a native warm season grass mix, and installation of temporary erosion and sediment controls (e.g., straw mulch, compost filters, biodegradable erosion control blankets, etc.), which would be regularly inspected and maintained until final stabilization has been achieved.

Vernal pool habitat and species protection measures would be implemented during construction. These include, but are not limited to, avoiding civil construction near vernal pools to the maximum extent practicable during high sensitivity periods for the observed vernal pool indicator species, and protection of compatible vegetation within the vernal pool envelopes.

In addition to the monitoring requirement under the CTDEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities ("General Permit"), Eversource will hire an environmental inspector to conduct weekly inspections for the duration of the project activities, including restoration, and to perform post-restoration inspections on a monthly basis until all disturbed areas are stabilized and the Notice of Termination is filed per the General Permit requirements.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 24

Has Eversource developed a Protection Plan for wetlands, watercourses and vernal pools, including applicable pre-construction environmental resource field delineations and environmental inspections and duties, 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, stand-alone Protection Plan for wetlands, watercourses, and vernal pools for the Project. However, the Project Stormwater Pollution Control Plan ("SWPCP") will be submitted to the Connecticut Department of Energy and Environmental Protection, which will detail 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 will be obtained 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 Eversource's BMP Manual are comprehensive and meet the intent and spirit of a single Protection Plan.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 25

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 on the property where they were excavated would first be used for restoration of gravel work pads within the subject property and any Natural Diversity Database areas and/or Mattatuck State Forest, and then regraded into adjacent uplands and stabilized in accordance with Eversource's Best Management Practice ("BMP") manual and the Project Stormwater Pollution Control Plan. Any excavated soils that cannot be reused on the subject property from which they were excavated would be transported from the Project area and properly managed off-site in accordance with Eversource BMPs and any applicable local, state, or federal laws.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 26

Referencing Petition p. 5, one existing wood pole structure would be removed. If known, was the wooden pole chemically treated at the time of installation? Describe any best management practices associated with the disposal of the wooden pole.

Response:

Eversource does not have data as to whether the existing wood pole was chemically treated at the time of installation.

Eversource's 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.

Eversource's BMP Manual has been routinely included in submittals to environmental agencies.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 27

Referencing Petition p. 9, please describe low-impact methods for vegetation clearing that would be used and in what areas would the low-impact methods be used?

Response:

Low-impact methods for vegetation clearing incorporates a variety of approaches, techniques, and equipment to minimize site disturbance and to protect wetlands, watercourses, soils, and threatened and endangered species and their habitats. Eversource will require the tree clearing contractor to use some or all of the following low-impact tree clearing methods, depending on site-specific considerations:

- Hand cutting of non-compatible vegetation.
- Take into consideration soils and weather conditions when scheduling vegetation removal activities.
- Maximize the use of uplands for clearing access routes.
- Fell trees directionally (parallel to and within the ROW) to minimize impacts to residual vegetation, where practical.
- Use a variety of tree clearing methods/equipment (including manual cutting), as appropriate, to minimize impacts to sensitive areas to the extent practicable.
- Cut trees close to the ground, leaving root systems and stumps, where practical, to provide additional soil stability.
- Stockpile cut timber and brush only in uplands.

Refer to Petition Mapsheets 1, 2, and 3 for the areas of low-impact tree clearing that would be used within and adjacent to the Mattatuck State Forest.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 28

Referencing Petition p. 16, provide the DEEP Natural Diversity Data Base (NDDDB) Determination letter received on September 15, 2022. How are specific recommendations for each NDDDB species implemented prior to or during construction?

Response:

In the September 15, 2022, NDDDB Determination letter, the specific recommendation is a time of year restriction to mitigate impacts for the Eastern Whip-Poor-Will bird species. Specifically, Eversource will not authorize work that involves cutting, clearing, removal of trees or shrubs, or ground disturbance to occur between May 1 and July 30 of any given year.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 29

Referencing Petition p. 11, submit a copy of the November 22, 2022 correspondence from SHPO.

Response:

Please see the attached November 22, 2022 SHPO letter.

November 22, 2022

Mr. David George
Heritage Consultants, LLC
830 Berlin Turnpike
Berlin, CT 06057
(sent via email only to dgeorge@heritage-consultants.com)

Subject: Phase IA Cultural Resources Assessment Survey
Eversource Line 1550/1163 Structure Replacement Project
Watertown, Thomaston, Waterbury, and Wolcott, Connecticut

Dear Mr. George,

The State Historic Preservation Office (SHPO) has reviewed the following letter reports prepared by Heritage Consultants (Heritage) in response to your request for our comments regarding potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

Phase IA Cultural Resources Assessment Survey of the Line 1550/1163 Structure Replacement Project in Watertown, Thomaston, Waterbury, and Wolcott, Connecticut (dated September, 18 2020)

Line 1550/1163 Structure Replacement Project in Thomaston, Waterbury, and Wolcott, Connecticut (dated November, 9 2020)

SHPO notes that the proposed project encompasses 73 project items along the Eversource Line 1550/1163 right-of-way in the towns of Watertown, Thomaston, Waterbury, and Wolcott, Connecticut. SHPO understands that proposed undertaking includes 39 structure replacement locations and the installation of optical ground wire (OPGW) at 34 existing structure locations. Because the proposed project will require permitting issued by the United States Army Corps of Engineers, it is subject to review by this office pursuant to Section 106 of the National Historic Preservation Act. The submitted technical reports are comprehensive and meet the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

The desktop portion of the archaeological assessment survey of the project parcel was completed in September of 2020 and included a contextual overview of the project region, environmental characteristics, and a review of previously identified cultural resources. The literature review failed to identify any properties listed on the National Register of Historic Places or previously identified archaeological sites within 500 feet of the proposed project items. The results of the desktop review indicated that 61 of the 73 proposed project items were located in areas that contain steep slopes, poorly drained soils, or evidence of previous disturbance. The remaining 12 project items retained a moderate/high archaeological assessment. As a result, Heritage recommended Phase IB archaeological reconnaissance survey of Structures 5, 10, 14, 18, 22, 29, 32, 37, 39, 43, 50, and 52.

A subsequent pedestrian survey of the 12 referenced moderate/high archaeological sensitivity project items was completed in September of 2020. The results of the survey indicated that all 12 project items were located in areas containing poorly drained soils, moderate/steep slopes, and/or obvious signs of previous ground disturbances. As a result, Heritage recommended no further archaeological examination of the 73 project items associated with the Line 1550/1163 Structure replacement project. SHPO concurs with Heritage that the proposed project is not likely to impact significant archaeological resources and no additional investigations are warranted. Based on the information provided to our office, it is SHPO's opinion that no historic properties will be affected by the proposed activities.

This office appreciates the opportunity to review and comment upon this project. Do not hesitate to contact Cory Atkinson, Staff Archaeologist and Environmental Reviewer, for additional information at (860) 500-2458 or cory.atkinson@ct.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Kinney". The signature is fluid and cursive.

Jonathan Kinney
State Historic Preservation Officer

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 30

Referencing Petition p. 11, has Eversource received any comments from the Tribal Historic Preservation Offices (THPOs)?

Response:

No comments have been received from the THPO.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 31

How are invasive species within work areas identified prior to the commencement of construction?

Response:

Invasive species are identified by project environmental personnel during preconstruction survey work and constructability walkdowns.

Date Filed: July 20, 2023

Request from: Connecticut Siting Council

Question: 32

Could Eversource use net-less or other type of E&S controls to prevent wildlife entanglement?

Response:

Eversource's April 2022 Best Management Practices prohibits plastic and/or nylon netting from all projects. Biodegradable material (e.g. jute or cotton fiber) must be used instead.