



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL & CERTIFIED MAIL RETURN RECEIPT REQUESTED

October 13, 2023

Deborah Denfeld  
Team Lead – Transmission Siting  
Eversource Energy  
P.O. Box 270  
Hartford, CT 06141  
[deborah.denfeld@eversource.com](mailto:deborah.denfeld@eversource.com)

RE: **PETITION NO. 1582** - The Connecticut Light and Power Company d/b/a Eversource Energy petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed Pootatuck to West Devon Rebuild Project consisting of the replacement and reconductoring of electric transmission line structures along approximately 3.3 miles of its existing electric transmission line right-of-way shared by its existing 115-kilovolt (kV) 1580, 1241, 1483 and 1545 Lines between The United Illuminating Company's (UI) Pootatuck Substation in Shelton, UI's Trap Falls Substation in Shelton and Eversource's West Devon Junction in Stratford, traversing the municipalities of Shelton and Stratford, Connecticut, and related electric transmission line and substation improvements.

Dear Deborah Denfeld:

At a public meeting held on October 12, 2023, the Connecticut Siting Council (Council) considered and ruled that the above-referenced proposal would not have a substantial adverse environmental effect, and pursuant to Connecticut General Statutes § 16-50k, would not require a Certificate of Environmental Compatibility and Public Need with the following conditions:

1. Approval of any project changes be delegated to Council staff;
2. Submit a copy of the Department of Energy and Environmental Protection (DEEP) Stormwater Permit prior to commencement of construction;
3. Submit a copy of the Final DEEP Natural Diversity Database (NDDB) Determination Letter prior to commencement of construction;
4. Incorporate pollinator habitat in the restoration of disturbed areas consistent with CGS §16-50hh, where feasible;
5. An environmental monitor shall oversee construction activities in sensitive resource areas;
6. Implement the Vernal Pool Protection Plan;
7. Submit a Post-Construction Temporary Wetland Impact Restoration Report for project areas where temporary matting is utilized;
8. Unless otherwise approved by the Council, if the facility authorized herein is not fully constructed within three years from the date of the mailing of the Council's decision, this decision shall be void,

and the facility owner/operator shall dismantle the facility and remove all associated equipment or reapply for any continued or new use to the Council before any such use is made. The time between the filing and resolution of any appeals of the Council's decision shall not be counted in calculating this deadline. Authority to monitor and modify this schedule, as necessary, is delegated to the Executive Director. The facility owner/operator shall provide written notice to the Executive Director of any schedule changes as soon as is practicable;

9. The Council shall be notified in writing at least two weeks prior to the commencement of site construction activities;
10. Any request for extension of the time period to fully construct the facility shall be filed with the Council not later than 60 days prior to the expiration date of this decision and shall be served on all parties and intervenors, if applicable, and the City of Shelton and the Town of Stratford;
11. Within 45 days after completion of construction, the Council shall be notified in writing that construction has been completed **along with a representative photograph of the project**;
12. The facility owner/operator shall remit timely payments associated with annual assessments and invoices submitted by the Council for expenses attributable to the facility under Conn. Gen. Stat. §16-50v; and
13. This Declaratory Ruling may be transferred or partially transferred, provided both the facility owner/operator/transferor and the transferee are current with payments to the Council for their respective annual assessments and invoices under Conn. Gen. Stat. §16-50v. The Council shall be notified of such sale and/or transfer and of any change in contact information for the individual or representative responsible for management and operations of the facility within 30 days of the sale and/or transfer. Both the facility owner/operator/transferor and the transferee shall provide the Council with a written agreement as to the entity responsible for any quarterly assessment charges under Conn. Gen. Stat. §16-50v(b)(2) that may be associated with this facility, including contact information for the individual acting on behalf of the transferee.

This decision is under the exclusive jurisdiction of the Council and is not applicable to any other modification or construction. All work is to be implemented as specified in the petition dated July 3, 2023, and additional information dated August 17, 2023.

Enclosed for your information is a copy of the staff report on this project.

Sincerely,



Melanie A. Bachman  
Executive Director

MAB/MP/dll

Enclosure: Staff Report dated October 12, 2023

- c: The Honorable Mark A. Lauretti, Mayor, City of Shelton ([shelton01@cityofshelton.org](mailto:shelton01@cityofshelton.org))  
The Honorable Laura R. Hoydick, Mayor, Town of Stratford ([mayor@townofstratford.com](mailto:mayor@townofstratford.com))  
Kathleen Shanley, Eversource Energy ([Kathleen.shanley@eversource.com](mailto:Kathleen.shanley@eversource.com))

STATE OF CONNECTICUT )

: ss. Southington, Connecticut

October 13, 2023

COUNTY OF HARTFORD )

I hereby certify that the foregoing is a true and correct copy of the Decision and Staff Report in Petition No. 1582 issued by the Connecticut Siting Council, State of Connecticut.

ATTEST:



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Melanie A. Bachman  
Executive Director  
Connecticut Siting Council

STATE OF CONNECTICUT )

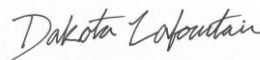
: ss. New Britain, Connecticut

October 13, 2023

COUNTY OF HARTFORD )

I certify that a copy of the Connecticut Siting Council Decision and Staff Report in Petition No. 1582 has been forwarded by Certified First Class Return Receipt Requested mail, on October 13, 2023, to each party and intervenor, or its authorized representative, as listed on the attached service list, dated July 3, 2023.

ATTEST:



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Dakota LaFountain  
Clerk Typist  
Connecticut Siting Council

**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

<b>Status Granted</b>	<b>Document Service</b>	<b>Status Holder (name, address &amp; phone number)</b>	<b>Representative (name, address &amp; phone number)</b>
<b>Petitioner</b>	<input checked="" type="checkbox"/> E-mail	The Connecticut Light and Power Company d/b/a Eversource Energy	Deborah Denfeld Team Lead – Transmission Siting Eversource Energy P.O. Box 270 Hartford, CT 06141 Phone: (860) 728-4654 <a href="mailto:deborah.denfeld@eversource.com">deborah.denfeld@eversource.com</a>



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**Petition No. 1582**

**The Connecticut Light and Power Company d/b/a Eversource Energy  
Pootatuck to West Devon Rebuild Project  
Shelton and Stratford**

**Staff Report  
October 12, 2023**

**Introduction**

On July 3, 2023, the Connecticut Siting Council (Council) received a petition from The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) for a declaratory ruling pursuant to Connecticut General Statutes (CGS) §4-176 and §16-50k, for the Pootatuck to West Devon Rebuild Project (Petition or Project) within existing Eversource electric transmission line right-of-way (ROW) in the Town of Stratford and the City of Shelton (municipalities).

The Project consists of the replacement of electric transmission line structures and conductors, and the replacement of shield wire with optical ground wire (OPGW)<sup>1</sup> on the 1580, 1241, 1483, and 1545 Lines along approximately 3.3 miles of existing ROW between The United Illuminating Company's (UI) Pootatuck Substation in Shelton, UI's Trap Falls Substation in Shelton; and Eversource's West Devon Junction in Stratford; and related electric transmission line and substation improvements.

On June 30, 2023, in compliance with Regulations of Connecticut State Agencies (RCSA) §16-50j-40, Eversource provided notice of the proposed Project to the municipalities and abutting property owners.

On July 5, 2023, the Council sent correspondence to the municipalities stating that the Council has received the Petition and invited the municipalities to contact the Council with any questions or comments by August 2, 2023. No comments were received from any of the municipalities.

Under RCSA §16-50j-40, neither Eversource nor the Council is required to provide notice to the state agencies listed in CGS §16-50j(g) when a petition for a declaratory ruling for modifications to an *existing facility* is submitted to the Council. On July 27, 2023, the Council on Environmental Quality submitted comments on the Project.<sup>2</sup>

Under CGS §16-50x, the Council retains exclusive jurisdiction over the existing electric transmission line and substation facility sites. Under 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. The Council cannot delegate its statutory authority to any other entity and it is not required to abide by comments from state agencies.<sup>3</sup>

The Council submitted interrogatories to Eversource on August 4, 2023. Eversource submitted responses to the interrogatories on August 17, 2023.

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<sup>1</sup> OPGW contains a conductor for lightning protection and fiber optics for communications between substations. It would be installed overhead.

<sup>2</sup> [https://portal.ct.gov/-/media/CSC/3\\_Petitions-medialibrary/Petitions\\_MediaLibrary/MediaPetitionNos1501-1600/PE1582/ProceduralCorrespondence/PE1582\\_CEOCommentsRecd\\_a.pdf](https://portal.ct.gov/-/media/CSC/3_Petitions-medialibrary/Petitions_MediaLibrary/MediaPetitionNos1501-1600/PE1582/ProceduralCorrespondence/PE1582_CEOCommentsRecd_a.pdf)

<sup>3</sup> *Corcoran v. Connecticut Siting Council*, 284 Conn. 455 (2007)

Pursuant to CGS §4-176(e) of the Uniform Administrative Procedure Act, an administrative agency is required to take action on a petition within 60 days of receipt. On August 17, 2023 pursuant to CGS §4-176(e), the Council voted to set the date by which to render a decision on the Petition as no later than December 30, 2023, which is the 180-day statutory deadline for a final decision under CGS §4-176(i).

### **Notice and Community Outreach**

Eversource initiated outreach to the municipalities in January 2023. Eversource did not receive comments from the Town of Stratford. The City of Shelton requested that Eversource include the municipal stormwater system on the contractor's map set for use in the field. Eversource would include this information.

Eversource initiated outreach to property owners along the Project route in fall 2022. All abutting property owners were notified of the Project and provided information on how to obtain additional information, as well as how to submit comments to the Council. During the construction phase of the Project, Eversource would maintain contact with the municipalities and abutting property owners to inform them of construction activities. Some property owners requested advance notification prior to work occurring on or near their property and expressed concern regarding site restoration.

### **Existing Facility Site**

The existing facility site includes approximately 3.3 miles of existing Eversource ROW that extends through commercial and residential areas, municipal conservation space, and Routes 8 and 15. It also crosses a gas line, several wetlands, Wells Brook, Farmill River, Black Brook, and Cranberry Pond. Approximately 0.6 mile of the ROW is between Pootatuck Substation and Trap Falls Substation, and 2.7 mile of the ROW is between Trap Falls Substation and West Devon Junction.

The ROW was established in 1923. Eversource's easements for the existing ROW grant Eversource rights to enter upon the right of way and to erect, repair, maintain, replace, inspect, operate and remove upon, infrastructure related to the conduction of electricity. The easements also grant rights to trim, cut, and remove vegetation within the ROW.

The Project ROW is approximately 110 feet wide. It is managed to its full width.<sup>4</sup> No expansion of the ROW is proposed.

Telecommunications antennas are collocated on Structures 1321 and 1340. Equipment would be relocated to the replacement structures by the telecommunications carriers.

Vegetation management was last performed in portions of the Project ROW in 2021.

### **Project Development**

The purpose of the proposed Project is to improve system reliability on 1580, 1241, 1483, and 1545 Lines by replacing aged conductors and shield wire and replacing electric transmission line structures to structurally support the new conductors and OPGW and to meet National Electrical Safety Code (NESC) standards.

From Pootatuck Substation to West Devon Junction, the 1580, 1241, 1483, and 1545 Lines are supported on a total of 53 structures. Once the Project is complete, 51 of these structures would have been replaced including

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<sup>4</sup> According to the Federal Energy Regulatory Commission, "full right-of-way" means the portion of land for which a utility has documented legal rights to build and maintain transmission facilities. Managing a narrower maintained right-of-way, rather than the full right-of-way, is a relatively common industry practice, though not a best practice.

all 49 existing double-circuit lattice structures. Structures 1341A and 1341B on the 1483 and 1241 Lines, respectively, were replaced under UI Petition 1228 and would be capable of supporting the proposed conductor.

The Project is identified in the 2023 Eversource Forecast of Loads and Resources Report and in the June 2023 Independent System Operator New England, Inc. (ISO-NE) Regional System Plan Asset Condition List.<sup>5</sup> There are no generation facilities listed on the ISO-NE interconnection queue associated with the proposed Project.

### *Cost*

The total estimated cost of the Project is approximately \$38.79M. All of the total Project cost would be eligible for regional cost allocation as it is associated with Pool Transmission Facilities.<sup>6</sup> Pending a final determination from ISO-NE, total costs are expected to be allocated<sup>7</sup> as follows:

Eversource Connecticut ratepayers <sup>8</sup>	19.2%	(\$7.45M)
Other Connecticut ratepayers <sup>9</sup>	6.0%	(\$2.33M)
<u>Other New England ratepayers<sup>10</sup></u>	<u>74.8%</u>	<u>(\$29.01M)</u>
Cost Total	100%	(\$38.79M)

### **Proposed Project**

The Project is proposed to address identified asset condition deficiencies by replacing aged conductors, replacing copper shield wire with OPGW, and replacing transmission structures necessary to structurally support the new conductors and OPGW. It includes the replacement of 14 double-circuit steel lattice structures with 14 double-circuit monopoles; replacement of 35 double-circuit steel lattice structures with 45 single-circuit monopoles; replacement of one double-circuit monopole with two single-circuit monopoles; and replacement of one single-circuit steel structure with one single-circuit monopole.

The Project requires taller structures to meet NESC standards, including, but not limited to, conductor clearance requirements. The NESC is the authoritative code for ensuring the continued practical safeguarding of persons and utility facilities during the installation, operation and maintenance of electric power and communications utility systems, including substations, overhead lines and underground lines.

NESC clearance requirements for conductor sway due to wind (blowout) are based on established horizontal clearance requirements during specific wind events to buildings (9.1 feet of clearance to the ROW edge for 115-kV conductors). Transmission lines are designed with the assumption that a building could be erected at any location along the ROW edge. To provide a buffer for construction tolerance, Eversource typically designs transmission corridors to have 11 feet of clearance to the ROW edge during specific wind events.<sup>11</sup>

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<sup>5</sup> Entry #372.

<sup>6</sup> ISO-NE defines Pool Transmission Facilities as facilities rated 69-kV or above owned by the participating transmission owners over which ISO-NE has operating authority in accordance with the terms set forth in the Transmission Operating Agreements.

<sup>7</sup> These allocations are estimates based on 2022 actual loads.

<sup>8</sup> Electrical service customers of Eversource and located within Connecticut.

<sup>9</sup> Electrical service customers located within Connecticut but outside of Eversource's service territory.

<sup>10</sup> Electrical service customers located within New England but outside of Connecticut.

<sup>11</sup> Petition 1527, response to Council interrogatory 19.

NESC clearance requirements for conductor uplift and insulator swing were factored into the transmission line design. Conductor uplift is a condition where wire on a structure pulls up on the hardware instead of hanging down vertically. It typically occurs in spans where structures are located at different ground levels or have different heights. The amount of insulator swing on a transmission line depends on conductor tension, temperature, wind velocity, insulator weight, ratio of weight span to wind span, and line angle. These issues can be mitigated by taller structures in certain locations to increase the load tension of the insulators and the span weight load of the conductors.

*1580 Line – Pootatuck Substation to West Devon Junction*

The 1580 Line is a 115-kV line supported by double-circuit lattice structures<sup>12</sup> installed beginning in 1923. The 1580 Line consists of 4/0 copper conductor between Pootatuck Substation and West Devon Junction.

Project work consists of the following:

- a) Replace 25 double-circuit steel lattice structures with 25 single-circuit weathering steel monopoles;
- b) Replace 4/0 copper conductor with 1590 kcmil ACSS conductor; and
- c) Replace 3/8-inch copperweld shield wire with OPGW.

*1241 and 1483 Lines – Pootatuck Substation to Trap Falls Substation*

The 1241 and 1483 Lines are 115-kV lines supported by double-circuit lattice structures, single-circuit steel monopoles and a double-circuit steel monopole installed beginning in 1923. The 1241 and 1483 Lines consist of 795 kcmil aluminum conductor steel reinforced (ACSR) conductor between Pootatuck Substation and Trap Falls Substation.

Project work consists of the following:

- a) Replace one double-circuit steel lattice structure with two single-circuit weathering steel monopoles;
- b) Replace three double-circuit steel lattice structures with three double-circuit weathering steel monopoles;
- c) Replace one double-circuit monopole structure with two single-circuit weathering steel monopoles;
- d) Replace 795 kcmil aluminum conductor steel reinforced (ACSR) conductor with 1590 kcmil ACSS conductor; and
- e) Replace 3/8-inch copperweld shield wire with OPGW.

*1545 and 1483 Lines – Trap Falls Substation to West Devon Junction*

The 1545 and 1483 Lines are 115-kV lines supported by mostly double-circuit lattice structures installed beginning in 1923. The 1545 and 1483 Lines consist of 795 kcmil ACSR conductor between Trap Falls Substation and West Devon Junction.

Project work consists of the following:

- a) Replace 9 double-circuit steel lattice structures with 18 single-circuit weathering steel monopoles;
- b) Replace 11 double-circuit steel lattice structures with 11 double-circuit weathering steel monopoles;
- c) Replace one single-circuit steel pole structure with one single-circuit weathering steel monopole;
- d) Replace 795 kcmil aluminum conductor steel reinforced (ACSR) conductor with 1590 kcmil ACSS conductor; and
- e) Replace 3/8-inch copperweld shield wire with OPGW.

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<sup>12</sup> The 1580 Line structures also supported the 1590 Line conductors before the 1590 Line was decommissioned. The 1590 Line would be removed and not replaced.



In addition to the structure replacements and OPGW installation, Project work includes installation of counterpoise and transfer of the existing lightning arrestors to the new structures, as needed.<sup>13</sup>

### **Project Construction**

Eversource would establish a temporary staging/laydown area for the Project at 61 Caswell Street in Milford. This staging/laydown area is approximately 0.8 acre. This staging/laydown area would contain Project equipment, office trailers, and vehicles. It would not be located within the existing ROW.

Eversource would utilize existing ROW access roads to the extent possible during construction. Where existing access roads are not present, new permanent gravel roads would be established. Multiple access roads are required so that equipment can access various construction zones along the ROW without relying on one point of access for long ROW segments. Construction matting would be utilized to install temporary access roads to protect sensitive areas (e.g. wetlands, NDDB areas, and lawns) to reach certain structure locations.

Eversource would obtain a Connecticut Department of Transportation (CDOT) Encroachment Permit to cross Routes 8 and 15 and a CDOT Entry Permit for Route 714.

Construction areas would be isolated by establishing erosion and sedimentation (E&S) controls in accordance with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control* and Eversource's April 2022 Best Management Practices Manual for Massachusetts and Connecticut (BMPs).<sup>14</sup> Typical E&S control measures include, but are not limited to, biodegradable blankets, hay bales, silt fencing, gravel anti-tracking pads, soil and slope protection, water bars, check dams, berms, swales, and plunge pools.

A project-specific Stormwater Pollution Control Plan (SWPCP) would be developed for registration under a DEEP Stormwater Permit. The Stormwater Permit requires the designing qualified professional to conduct the SWPCP Implementation Inspection that confirms compliance with the Stormwater Permit and the initial implementation of all SWPCP control measures for the initial phase of construction. The SWPCP also requires a qualified inspector to inspect the work areas at least once per week and within 24-hours after a rain event that meets certain permit criteria.

The Project is eligible for certification through the U.S. Army Corps of Engineers (USACE)/DEEP Self-Verification Notification process in regard to wetland impact. The self-verification notification forms would be submitted to the USACE - New England District and DEEP prior to the start of Project construction, as required by the SWPCP.

At each transmission line structure location, a work pad would be constructed, if necessary, to stage material for final on-site assembly and/or removal of structures, to pull conductors and to provide a safe, level work base for construction equipment. Work pad dimensions would vary based on site specific conditions such as terrain, proximity to the existing and replacement structures, and the type of construction activities.

Work pads for structure replacements would typically range from approximately 75 feet by 75 feet to 125 feet by 110 feet. Pull pads, necessary to accommodate machinery needed for pulling conductors and/or OPGW, would typically be 110 feet by 75 feet. Most of the work pads would be composed of gravel. Temporary work pads would be used in sensitive areas such as wetlands, NDDB areas, and lawns.

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<sup>13</sup> Petition 1566, Eversource Responses to Spaulding Interrogatory Nos. 65 and 66 - Counterpoise is typically installed at structure locations under the outside phase conductors at a depth of 18 inches.

<sup>14</sup> [2022 Eversource Best Management Practices MA, CT](#)

17 proposed structure foundations would be direct-embed foundations, and 45 proposed structure foundations would be drilled caisson foundations. Foundation installation work would require the use of equipment such as drill rigs, pneumatic hammers, augers, dump trucks, concrete trucks, grapple trucks, cranes, and light duty trucks. If groundwater is encountered, pumping trucks or other equipment would be utilized. The water would then be discharged in accordance with local, state and federal requirements. New structure sections, components and hardware would be delivered by flatbed truck to the structure locations for assembly using a crane, bucket trucks and excavator.

After the new structures are installed, OPGW and new conductor would be installed using conductor reels, pulling and tensioning rigs, guard trucks, and bucket trucks. During crossings of water bodies, new conductor and OPGW would be installed by maintaining appropriate tension and utilizing construction means and methods such as a series of pulleys and ropes to avoid contact with water beneath the span.

After the new structures/conductors/OPGW are installed and the existing structures are removed, ROW restoration activities would commence. Restoration work would include the removal of construction debris, signage, flagging, temporary fencing, and construction mats and work pads that are designated for removal or mitigation. Affected areas would be re-graded as practical and stabilized via revegetation or other measures before removing temporary E&S controls. ROW restoration would be performed in accordance with Eversource BMPs and in consultation with affected property owners.

Upon completion of the Project, gravel access roads and work pads would be left in place to facilitate future transmission line maintenance. If a property owner requests their removal, Eversource would discuss mitigation options with the landowner.

Except for concrete trucks, no construction equipment or vehicle washing would be allowed in the ROW. In accordance with Eversource's BMPs, concrete truck wash-out would occur only in upland areas of the ROW (a minimum of 50 feet from wetlands) to avoid or minimize the potential for impacts to water resources. All wash-out areas would include measures to control and contain wash-water and collect the cement wash-off for off-site disposal.

Project-related traffic would be expected to be temporary and highly localized in the vicinity of ROW access points and at the staging area. Due to the phasing of construction work, Project-related traffic is not expected to significantly affect transportation patterns or levels of service on public roads. Construction warning signs along public roads would be installed near work sites and flaggers or police personnel would be used to direct traffic, if necessary.

### **Environmental Effects and Mitigation Measures**

All work would occur within a maintained ROW. No tree clearing is required for the Project. Notwithstanding, mature vegetation removal, pruning of side vegetation and removal hazard trees along the ROW edges may be necessary.

Most vegetation removal would be accomplished manually using chainsaws. However, in some locations, the use of mechanical methods may be necessary. Vegetation removal activities would be performed in accordance with Eversource BMPs.

A total of 17 wetland areas and 6 watercourses occur along the ROW or in adjacent off-ROW areas. The Project would result in 600 square feet of permanent wetland impacts associated with the installation of 14 structures within wetlands areas. These structures are proposed within the wetlands in accordance with the overall Project design and structure alignment. They are located within wetlands that cannot be reasonably avoided.

Temporary wetland impacts related to Project construction matting would total approximately 2.88 acres. The Project would require one temporary watercourse crossing, using wood matting, for work pads and access roads. Construction activities within wetlands and across watercourses would be conducted in accordance with Eversource's BMPs.

A total of 2 vernal pools (VP) were identified in the Project ROW, but none of the VPs would be directly affected by construction activities. Work would occur within the VP envelope (100 feet from the VP edge) of the 2 VPs to facilitate access to the structures and/or new structures. Two proposed structures would be located within the VP envelope of VP1.

Eversource would conduct work in this area in accordance with Eversource's BMPs and Project specific VP protective measures, which include, but are not limited to, minimizing vegetative clearing and retaining stumps, establishment of E&S controls, use of temporary matting, and avoidance of permanent disturbance that could cause permanent habitat alteration or changes in local drainage patterns.

The DEEP-approved SWPCP would contain details regarding the E&S control measures that would be implemented to protect wetlands and vernal pools. E&S controls would also be inspected weekly by a qualified inspector, as required by the SWPCP. The Project would comply with the SWPCP, USACE self-verification procedures, and Eversource's BMPs. In addition, the qualified inspector would be on-site to monitor environmental resource protections as established in Eversource's BMP's and within the Final DEEP Natural Diversity Database (NDDDB) Determination letter.<sup>15</sup> An Environmental Monitor would conduct weekly inspections of resource areas for the duration of Project construction.

Invasive species mitigation measures would be conducted in accordance with Eversource's BMPs. Measures include the cleaning of temporary mats to prevent the introduction of invasive species into wetlands, the cleaning of vehicles, equipment, materials, gear, footwear or clothing of all visible soil and plant material on site known to contain invasives or as near as practical to the invasive area, prior to leaving the Project site.

The Project ROW extends across 100-year and 500-year Federal Emergency Management Agency-designated flood zones associated with the Farmill River. No proposed monopoles would be located within the 100-year or 500-year flood zones. A temporary pull pad would be located within the 500-year flood zone. There would be no permanent fill within FEMA flood zone of the Farmill River. Temporary matting, construction materials and equipment would be properly secured where placed within the flood zone and would be removed upon completion of construction.

The Project is not within a Public Drinking Water Supply Watershed. There are no DEEP-designated Aquifer Protection Areas within the Project ROW. Notwithstanding, to protect subsurface water quality, Eversource would conduct work in accordance with its BMPs which include provisions for the proper storage, secondary containment, and handling of diesel fuel, motor oil, grease, and other lubricants.

A preliminary DEEP NDDDB assessment was issued for the Project on May 23, 2023. Eversource would implement DEEP recommended species-specific protection measures during construction, which include, but are not limited to, time of year best management practices.

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<sup>15</sup> Eversource currently has a preliminary DEEP NDDDB Determination Letter, dated May 23, 2023.

Eversource also consulted with the U.S. Fish & Wildlife Service's (USFWS) Information, Planning and Consultation (IPaC) service regarding federally-listed species that may be present within the Project area. The IPaC report identified the northern long-eared bat (NLEB), a federally-listed and state-listed Endangered Species. Per USFWS NLEB guidance, Eversource performed an analysis using the USFWS NLEB planning tool which determined the Project would have no effect on the NLEB. There are no known NLEB maternity roost trees within 150 feet of the Project area, and no known NLEB hibernaculum is located within the municipalities; thus, no Project-related impact to NLEB are expected.

No properties/districts listed on the National Register of Historic Places are located within 500 feet of the Project ROW. A Phase 1A Cultural Resources Assessment (Phase 1A) of the Project area identified locations within the Project ROW possessing a moderate to high potential for archaeological sensitivity. A Phase 1B Survey (Phase 1B) was performed and these locations were reclassified as having no/low archaeological sensitivity. No further archaeological investigation was recommended. SHPO reviewed the results of the Phase 1B and concurred that no historic properties would be affected by the Project.

The nearest publicly accessible recreational areas are the James Farm Road Open Space and Roosevelt Forest in Stratford. The Project would not affect the recreational uses of these properties.

Disturbed areas would be stabilized using temporary E&S controls such as straw mulch, compost filters, and biodegradable erosion control blankets until final stabilization has been achieved. Appropriate seed mixes would be applied in uplands to revegetate disturbed areas, promote shrub land and other low-growth habitat along the ROW to benefit pollinators and other species.

In accordance with the SWPCP, monthly inspections would be conducted to monitor stabilization measures. A qualified inspector or a qualified professional engineer would inspect the areas and confirm compliance with the post-construction stormwater management requirements.

The Project would require increasing the height of many replacement structures to meet NESC clearance requirements within the existing ROW. Existing structures to be replaced on the lines range from 81 to 101 feet above ground level. The replacement structures on the lines would range from 85 feet to 115 feet above ground level, with an average height increase of 17.3 feet to meet NESC clearance requirements. Two structures would decrease in height by 1 to 11 feet. Three replacement structures would increase in height by 30 feet or more, and of those, two are adjacent to James Farm Road in Stratford (increase of 32 feet each); and one is adjacent to Route 8 in Shelton (increase of 37 feet).

Due to the increase in structure heights to comply with NESC clearance criteria, there would be indirect visual impacts to the surrounding area. The use of weathering steel replacement structures would blend in with the surrounding wooded landscape. Additionally, the replacement of lattice towers with monopoles would result in a more streamlined appearance.

### **Public Safety**

There would be no permanent changes to existing ROW sound levels after completion of the Project. Noise associated with construction activities is exempt from DEEP Noise Control Regulations. Notwithstanding, any construction-related noise would be short-term and localized in the vicinity of work sites.

Eversource received No Hazard Determinations from the Federal Aviation Administration (FAA) for the replacement structures, and no marking or lighting would be required.

Electric fields (EF) are produced whenever voltage is applied to electrical conductors and equipment. Electric fields are typically measured in units of kilovolts/meter (kV/m). As the weight of scientific evidence indicates that exposure to electric fields, beyond levels traditionally established for safety, does not cause adverse health effects, and as safety concerns for electric fields are sufficiently addressed by adherence to the NESC, as amended, health concerns regarding Electric and Magnetic Fields (EMF) focus on MF rather than EF. The International Commission on Non-Ionizing Radiation Protection (ICNIRP) has established a guideline of 4.2 kV/m.

The Project route contains an existing transmission line that emits magnetic fields (MF). In the United States, no state or federal exposure standards for 60-Hertz MF based on demonstrated health effects have been established, nor are there any such standards established worldwide. However, the ICNIRP has established a level of 2,000 milliGauss (mG), based on extrapolation from scientific experimentation, and the International Committee on Electromagnetic Safety (ICES) has calculated a guideline of 9,040 mG for exposure to workers and the general public, and recognized in the Council's *Electric and Magnetic Field Best Management Practices for the Construction of Electric Transmission Lines in Connecticut*.

MF at or beyond the edges of ROW are expected to decrease. The highest calculated MF level is 10.5 mG at the edge of the ROW, well below the ICNIRP and ICES recommended exposure standards.

### **Construction Schedule**

Construction is expected to begin in the fourth quarter of 2023 with anticipated completion by mid-2024. Normal work hours would be Monday through Saturday from 7:00 a.m. to 7:00 p.m. Sunday work hours or evening work (i.e. after 7:00 p.m.) may be necessary due to unforeseen circumstances, delays caused by inclement weather and/or outage constraints.

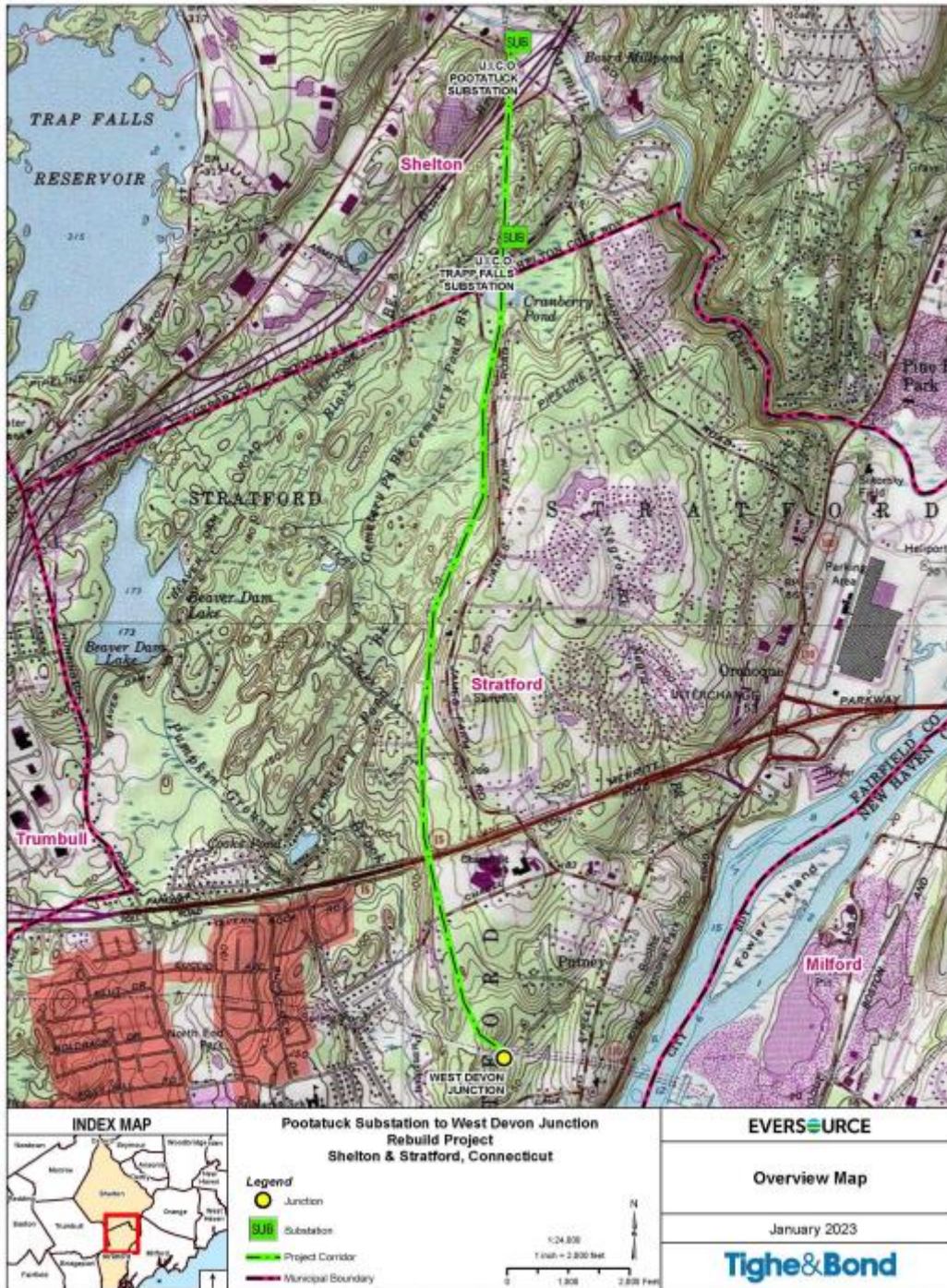
### **Conclusion**

If approved, staff recommends the following conditions:

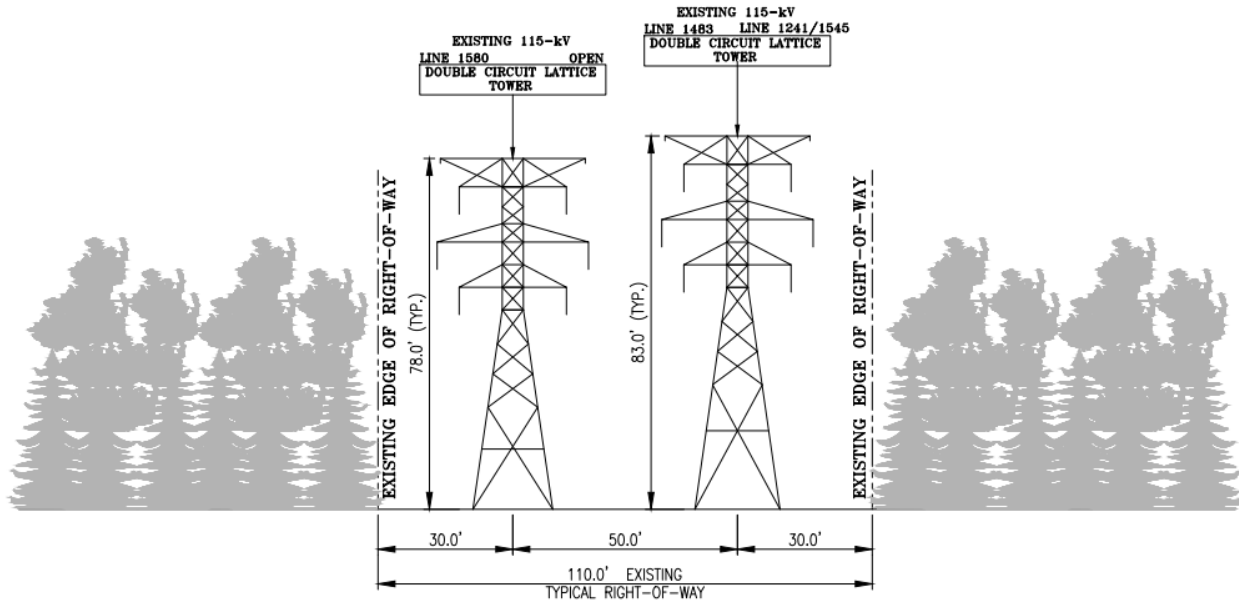
1. Approval of any project changes be delegated to Council staff;
2. Submit a copy of the DEEP Stormwater Permit prior to commencement of construction;
3. Submit a copy of the Final DEEP NDDB Determination Letter prior to commencement of construction;
4. Incorporate pollinator habitat in the restoration of disturbed areas consistent with CGS §16-50hh, where feasible; and
5. An environmental monitor shall oversee construction activities in sensitive resource areas.



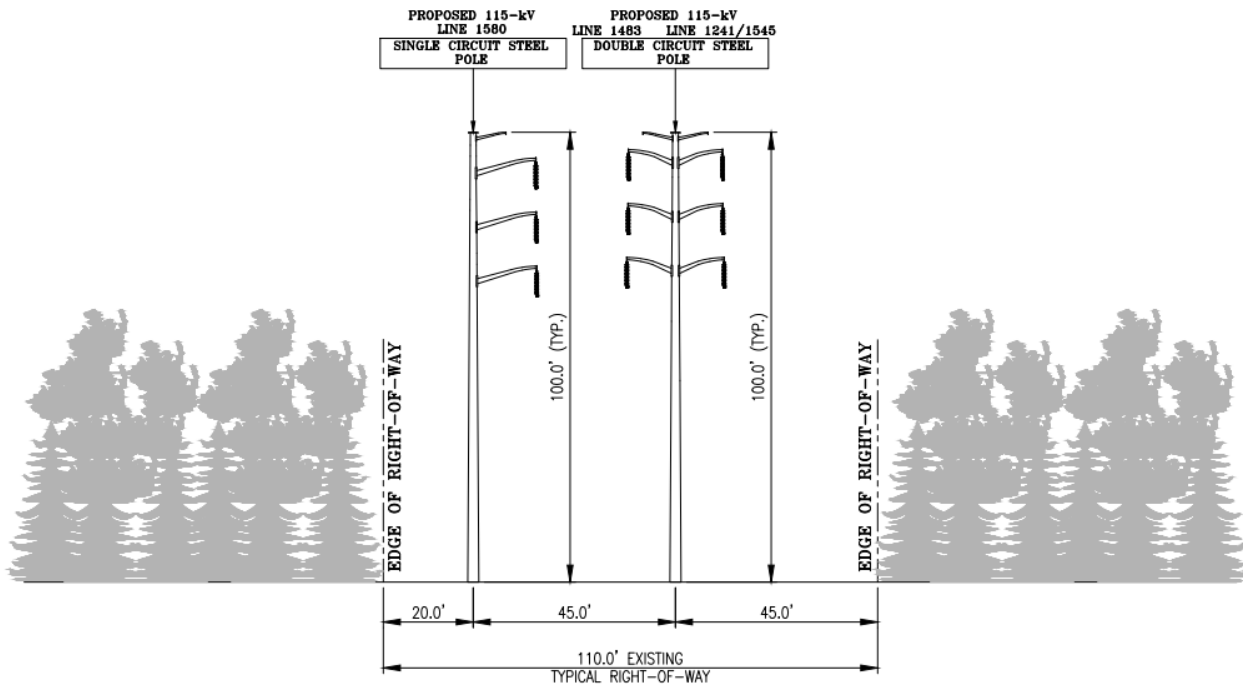
### Project Location



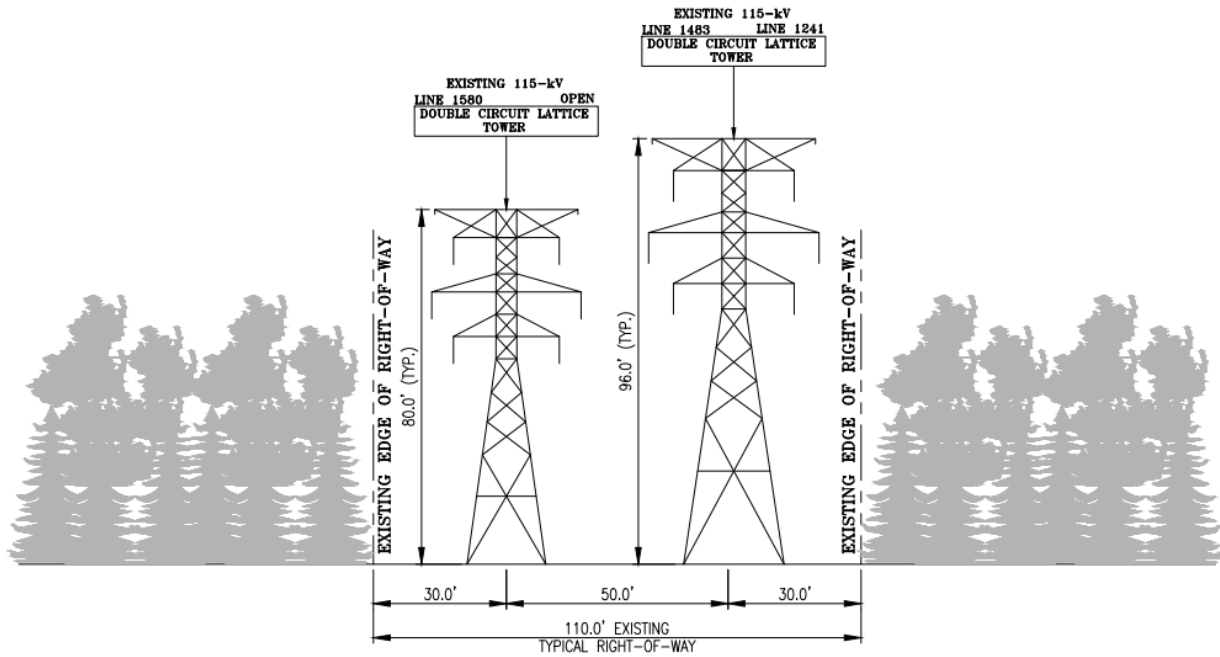
### Project ROW Profiles



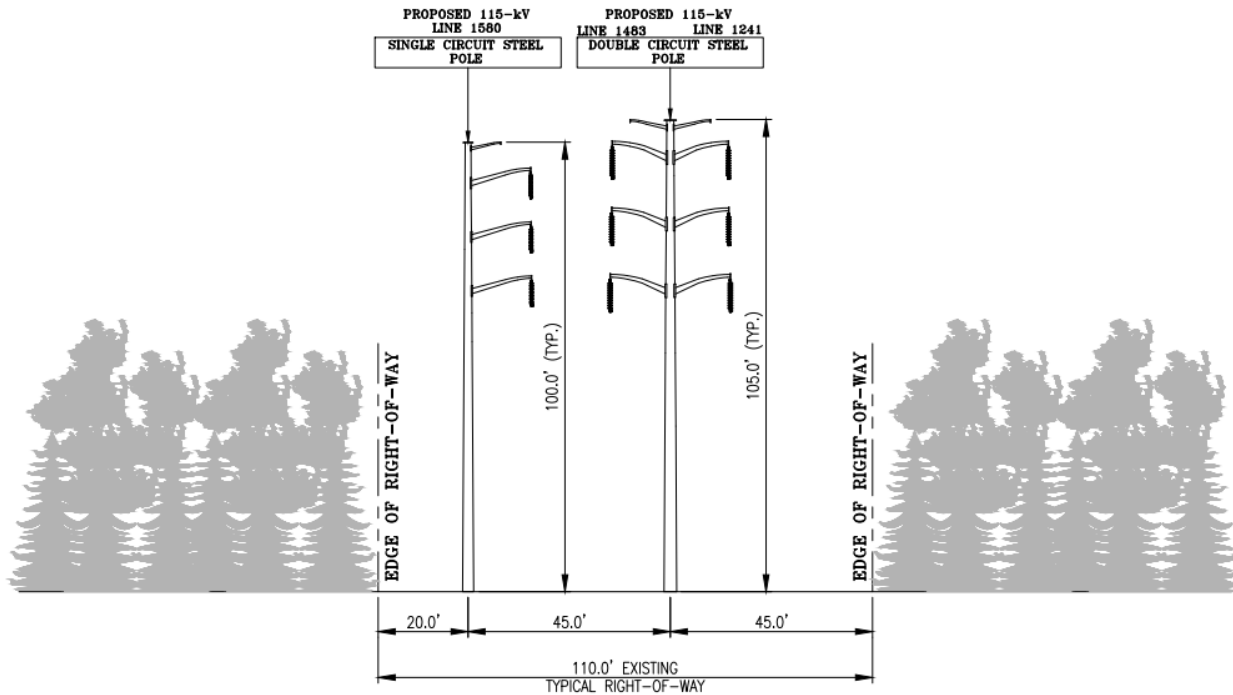
**EXISTING R.O.W. CONFIGURATION**  
**DOUBLE CIRCUIT STEEL LATTICE VERTICAL DESIGN**  
**LOOKING FROM W. DEVON JCT. TO POOTATUCK S/S**



**PROPOSED R.O.W. CONFIGURATION**  
**SINGLE CIRCUIT STEEL MONOPOLE/DOUBLE**  
**CIRCUIT STEEL VERTICAL DESIGN**  
**LOOKING FROM W. DEVON JCT. TO POOTATUCK S/S**

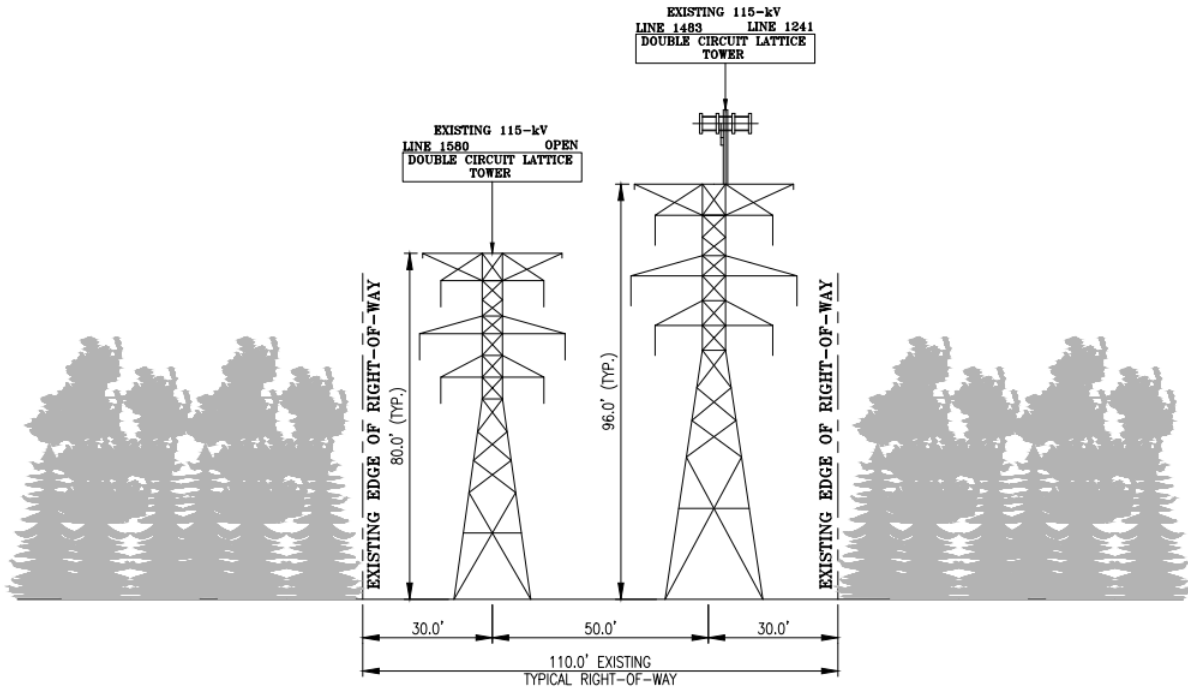


**EXISTING R.O.W. CONFIGURATION**  
**DOUBLE CIRCUIT STEEL LATTICE VERTICAL DESIGN**  
**LOOKING FROM TRAP FALLS S/S TO POOTATUCK S/S**

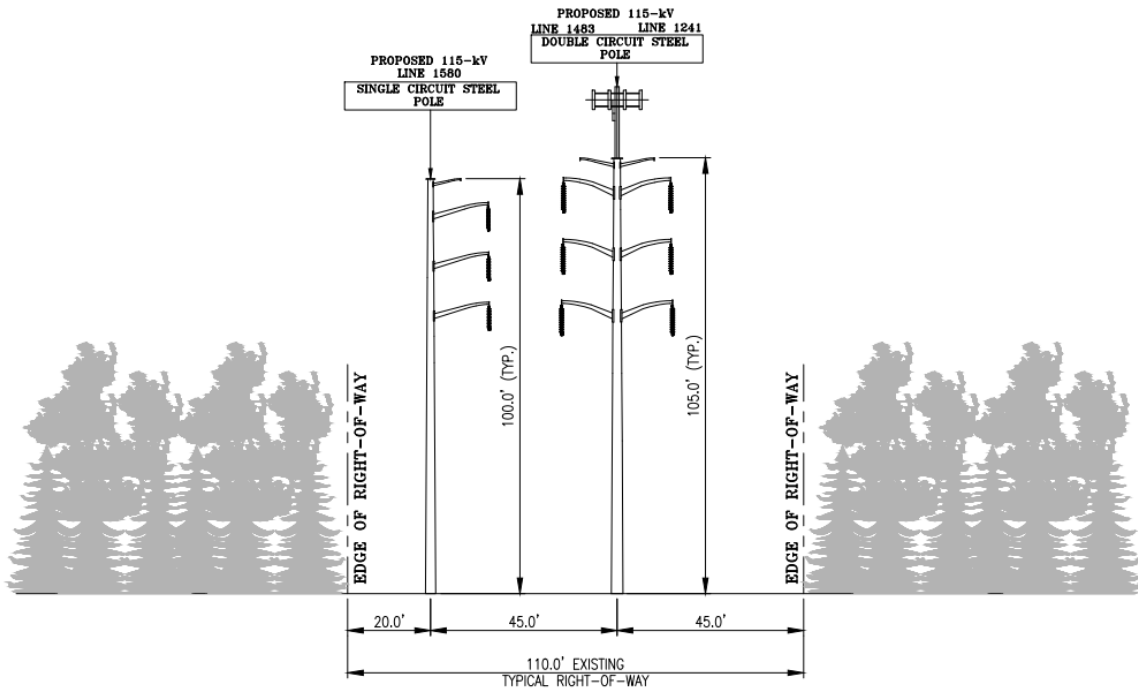


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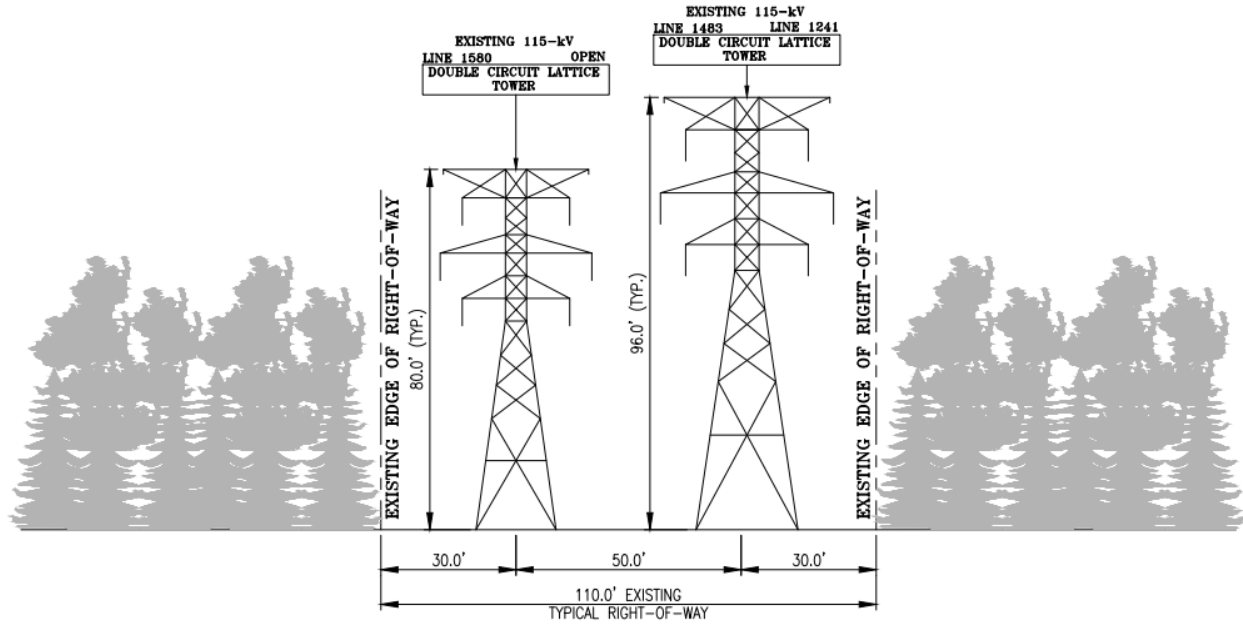




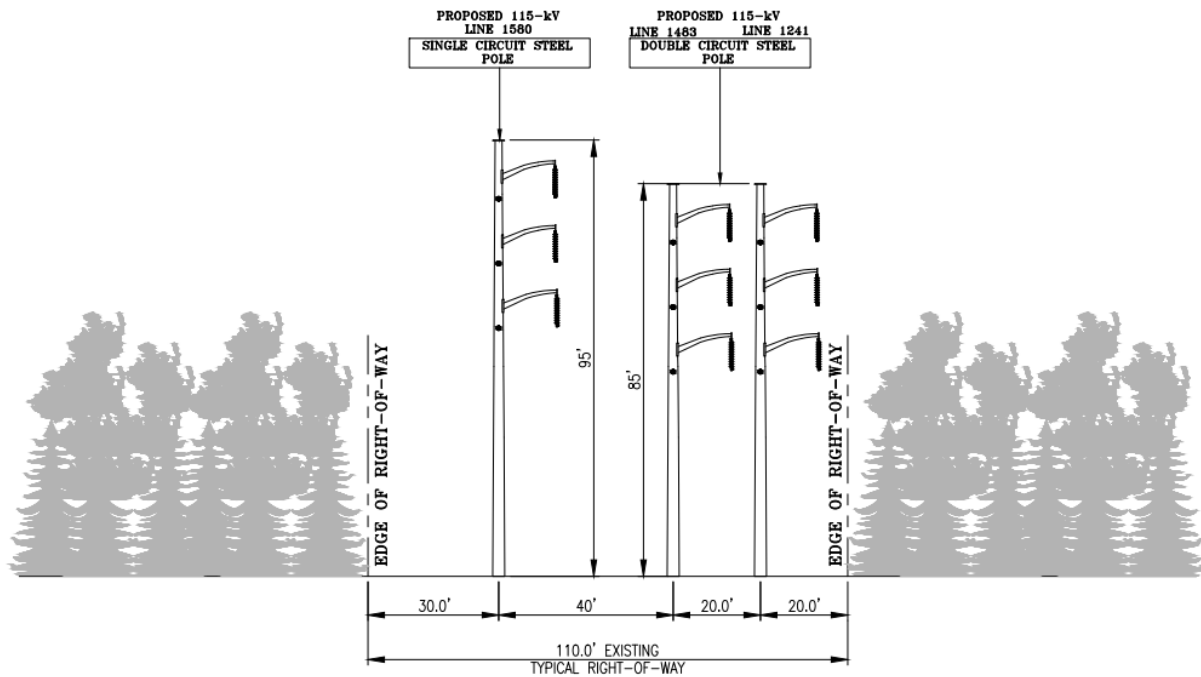
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