



56 Prospect Street
P.O. Box 270
Hartford, CT 06103

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

August 17, 2023

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

Re: Petition No 1582 Pootatuck to West Devon 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 August 4, 2023
CSC Set 01 - Questions 1 - 27

Sincerely,

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

Deborah Denfeld
Team Lead – Transmission Siting

Encl

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 1

Referencing Petition p. 28, were any comments received from the City of Shelton, the Town of Stratford 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 Town of Stratford since the filing of the Petition.

The City of Shelton requested that the Project Team include Shelton's municipal storm water system on the contractor's map set for use in the field. The Project Team has agreed to add this information to the contractor's map set.

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 properties, and Eversource agreed to provide such notification. Please see the response to Question 2 for a more complete description of Eversource's public engagement and outreach efforts.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 2

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

Response:

Eversource has a dedicated outreach team that communicates with affected and interested stakeholders throughout the phases of a Project, from development and inception through completion. For 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.

Eversource sent abutting property owners a letter of notice to introduce the Project and explain the proposed scope and 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 follow 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.

During on-site meetings, several property owners requested that topsoil and seed be applied over gravel access roads post construction. Eversource has agreed to these requests, where feasible. One property owner requested a temporary fence be installed as visual mitigation during construction on their property, which the Project Team will coordinate with the contractor.

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: August 17, 2023

Request from: Connecticut Siting Council

Question: 3

Referencing Petition p. 27, has a response been received from the Federal Aviation Administration (FAA) regarding the three replacement structures that might require marker balls or beacon lights? If yes, provide any response from FAA including any required marking/lighting plans if applicable.

Response:

Yes, a response has been received from the FAA; a determination of “No Hazard to Air Navigation” was received. Based on this evaluation, marking and lighting of the three structures are not necessary for aviation safety.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 4

Referencing Petition pp. 1 and 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 the right to enter upon the land and erect, inspect, operate, replace, remove, repair and patrol, and permanently maintain on the right of way, poles and towers, with necessary conductors, wires, cross arms, guys and other fixtures and appurtenances used or adapted for the transmission of electric current for light, heat, power or any other purpose, and used or adapted for telephone purposes.

The easements, in general, also grant Eversource the right to trim, cut and remove at any and all times trees, parts of trees, limbs, branches and underbrush within or projecting into the ROW as in the judgment of Eversource may interfere with or endanger poles, towers and wires, or their operation or with any of their appurtenances when erected.

Date Filed: August 17, 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: August 17, 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:

In 2021, an herbicide application was performed to control incompatible and woody invasive species in the ROW following the vegetation maintenance work done in 2020. The work performed in 2020 included the removal of incompatible species from the ROW and was performed utilizing mechanical mowing and hand cutting. Trees along the edge of the ROW were also pruned for side clearance between vegetation and the conductors.

Date Filed: August 17, 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 Pootatuck to West Devon 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 372).

Date Filed: August 17, 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 Pootatuck to West Devon Rebuild Project need is to improve system reliability driven by asset condition concerns and is not to support a generator interconnection.

Date Filed: August 17, 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 \$38.79 million. Eversource anticipates that the entire cost 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: 19.2%
- Other Connecticut customers: 6.0%
- Other New England customers: 74.8%

The estimated allocations are based on 2022 actual loads.

Date Filed: August 17, 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 weakened infrastructure, such as structures, conductors or shield wire.

Date Filed: August 17, 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 proposed project does not include tree work beyond what would be necessary for accessing and construction of the structures. The planned vegetation management was originally scheduled for 2023 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. To better coordinate the various project and vegetation management environmental regulatory requirements, the TRRP vegetation work was postponed until 2024.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 12

Identify all other permits required to perform the proposed work.

Response:

Connecticut Department of Energy and Environmental Protection (“CTDEEP”):

- General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities
- State Historic Preservation Office Notification – Section 106
- Natural Diversity Data Base Determination (“NDDB”)

United States Army Corps of Engineering/CTDEEP

- Self-Verification Notification (“SV”) under Connecticut General Permits 6 and 21

The Public Utilities Regulatory Authority

- Approval for Method and Manner of Construction

Connecticut Department of Transportation

- Entry Permit Route 714, Shelton
- Crossing Encroachment Permit Route 8, Shelton
- Crossing Encroachment Permit Route 15, Stratford

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 13

Referencing Petition pp. 5-6, what are the approximate ages and remaining useful life in years, if any, for the existing 4/0 copper conductor on the 1580 Line and the 795-kcmil aluminum conductor steel reinforced (ACSR) conductors on the 1241/1483 Lines and 1483/1545 Lines?

Response:

The 1580 Line 4/0 copper conductors are approximately 99 years old. Eversource proposes to replace this obsolete copper conductor due to its susceptibility to degradation from environmental factors such as wind, ice, and ambient temperature. As such, there is no remaining useful life.

The 1241/1483 and 1483/1545 ACSR conductors are approximately 61 years old. Eversource estimates the approximate life span of the ACSR conductors to be between 60 and 70 years. The useful life of ACSR conductor may be shorter or longer than this approximation depending on a variety of environmental factors. The conductor is routinely inspected for any wear or damage.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 14

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

Response:

The new conductor and OPGW would be installed using a puller/tensioner to maintain proper tension on the conductor and OPGW during removal and installation to eliminate the potential for excessive sag over the entire run. 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 and conductor will be clipped in.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 15

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, Eversource would comply with any recommendations detailed in the Connecticut Department of Energy and Environmental Protection ("CT DEEP") Natural Diversity Database Determination Letter for additional protection measures, which may include, but not be limited to, providing contractor training, time of year restrictions for work in certain species habitat areas, monitoring, and/or installation of exclusionary features (e.g., silt or snow fencing) as directed by qualified individuals.

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.). These erosion and sediment controls would be regularly inspected and maintained until final stabilization has been achieved.

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

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 16

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"), which will be submitted to the Connecticut Department of Energy and Environmental Protection pending receipt of a final NDDB determination, 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 and Eversource's Best Management Practices ("BMP") Manual, which focus 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 Company BMPs are comprehensive and meet the intent and spirit of a single Protection Plan.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 17

Referencing Petition p. 23, required inspections associated with the DEEP SWPCP are mentioned. In addition to the qualified inspector required by the General Permit, would there be other environmental inspectors assigned to the Project? If yes, identify specific inspection duties. If no, explain why not.

Response:

No environmental inspectors are required beyond the qualified SWPCP inspector.

A Final NDDB Determination has not yet been received for the Project. However, the Preliminary Determination has identified documented occurrences of listed species in the Project area that will require protection measures, including species-specific inspections. As such, a qualified individual will oversee implementation of the required listed species protection measures and conduct contractor training specific to these protections. Further, contractors also will be responsible for conducting pre-construction and construction inspections (“sweeps”) for the presence of the listed species. These inspections will occur prior to the start of work each day and periodically throughout the workday. Contractors are trained to follow established protocol for removing listed species from construction areas. Eversource construction representatives also will be onsite daily to help ensure that these inspections are performed by the contractors.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 18

Referencing Petition Map Sheet 7 of 7, what is the purpose of the square shaped temporary mat area southwest of VP-2? Could this matted area be relocated farther from VP-2?

Response:

Matting depicted through the vernal pool envelope, including the square shaped temporary mat area southwest of VP-2, was planned to reach a wire splice location and for construction efficiency. Since the Petition filing, an Eversource Project construction representative has determined that mat placement can be limited to avoid all temporary matting through the vernal pool envelope.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 19

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 in the vicinity of where they were excavated would be regraded into adjacent uplands and stabilized in accordance with Eversource's April 2022 *Construction & Maintenance Environmental Requirements, Best Management Practices Manual for Massachusetts, and Connecticut* ("BMPs") and the Stormwater Pollution Control Plan. Any excavated soils that cannot be reused in such a manner 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: August 17, 2023

Request from: Connecticut Siting Council

Question: 20

Referencing Petition p. 15, provide the DEEP Natural Diversity Data Base (NDDB) Determination letter received on May 23, 2023. How are specific recommendations for each NDDB species implemented prior to or during construction?

Response:

To date, the Project has received a preliminary assessment letter from NDDB (see attached May 23, 2023-PA No. 202210365 assessment letter), not a determination letter as stated in the Petition. Eversource has performed the plant survey required by the preliminary assessment and the survey results have been submitted to CTDEEP for review with a request for a final determination.

As needed, Eversource will utilize a qualified environmental resource to develop any species-specific protection plan.

Requirements for the protection of listed species are provided to the contractor prior to the start of construction. The qualified vendor will conduct on-site training with all contractors accessing the construction area and oversee installation of protective measures where recommended. Where needed, physical protection measures (e.g., exclusion fence) are inspected by the contractor and by the environmental inspector. The contractor's morning tailboards include a discussion of listed species documented in the portion of the Project area where the day's work will occur and any required protection measures. Eversource construction representatives, who are on-site daily, help to ensure that these tasks are appropriately executed. Weekly construction meetings between contractors and the Eversource Project team also will include a summary discussion of listed species that may be present, observations made during the week, and actions taken.



79 Elm Street • Hartford, CT 06106-5127

www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

May 23, 2023

Robert Deptula
Eversource Energy Service Company
107 Seldon Street
Berlin, CT 06037-1616
robert.deptula@eversource.com

Project: Eversource Energy Service Company, Transmission Line Removal and Replacement of Existing Structures on Transmission Lines 1241, 1483, 1580, 1545 as Part of the Pootatuck to West Devon Juncture Rebuild Project from Shelton to Stratford, Connecticut
NDDB Preliminary Assessment No.: 202210365
Expiration Date: May 23, 2024

Dear Robert Deptula,

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, Transmission Line Removal and Replacement of Existing Structures on Transmission Lines 1241, 1483, 1580, 1545 as Part of the Pootatuck to West Devon Juncture Rebuild Project from Shelton to Stratford, Connecticut. According to our information there are State Endangered *Ranunculus ambigens* (Water-plantain spearwort) and *Saururus cernuus* (Lizard's tail) along with State Special Concern *Clemmys gutatta* (Spotted turtle) and *Terrapene c. carolina* (Eastern box turtle) within the project areas.

Protection for State Listed Plants

According to our records there are known extant populations of two State Endangered plant species that occur within the vicinity of these project sites. The species are:

Ranunculus ambigens (Water-plantain spearwort)

State Status: Endangered

Habitat: Typically on muddy or mucky substrates that are seasonally inundated and then exposed by draw-down in later season, mostly but not always in open and semi-open habitats. Floodplain sloughs, creeks, brooks, ditches, open to (rarely) closed-canopy swamps, wet meadows, pot-hole ponds, shallow pools, lake shallows, swamps on traprock ridges.

Blooms Jun, Jul, Aug, Sep.

Saururus cernuus (Lizard's tail)

State Status: Endangered

Habitat: Shallow water of rivers, ponds, swamps, vernal pools, and marshes.

Blooms late Jul – early Aug.

To prevent impacts to State Threatened and Special Concern plant species, botanical field surveys of the site should be performed by a qualified botanist or plant ecologist with the appropriate scientific collecting permits at a time when these target species are identifiable. Please contact **The Native Plant Trust** to find a qualified botanist, familiar with these plants. A report summarizing the results of such surveys should include:

1. Survey date(s) and duration.
2. Site descriptions and photographs.
3. List of component vascular plant and animal species within the survey area (including scientific binomials).
4. Data regarding population numbers and/or area occupied by State-listed species. Include special plant and/or animal forms found at:
https://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&deepNav_GID=1628
5. Detailed maps of the area surveyed including the survey route and locations of State listed species.
6. Conservation strategies or protection plans that indicate how impacts may be avoided for all state listed plant species present on the site.
7. Statement/résumé indicating the botanist's qualifications. Please be sure when you hire a consulting qualified biologist to help conduct this site survey that they have the proper experience with target taxon.

The botanical site surveys report should be sent to our CT DEEP-NDDDB Program (deep.nddbrequest@ct.gov) for further review by our program biologists **along with an updated request** for another NDDDB review. Incomplete reports may not be accepted.

If you do not intend to do site surveys to determine the presence or absence of state-listed species, then you should presume species are present and let us know how you will protect the state-listed species from being impacted by this project. You may submit these best management practices or protection plans with your new request for an NDDDB review. Please be sure these protection plans are developed by qualified botanist or plant ecologist familiar with these state listed Connecticut plants. If you need help finding a qualified botanist or plant ecologist, please contact The Native Plant Trust.

After reviewing your new NDDDB request form and the documents describing how you will protect these species from project impacts we will make a final determination and provide you with a letter from our program to use with DEEP-Permits.

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 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

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

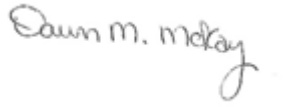
- Hiring a qualified herpetologist to be on site to ensure these protection guidelines remain in effect and prevent turtles from being run over when moving heavy equipment. This is especially important in the month of June when turtles are selecting nesting sites. All construction personnel working within 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)

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 Natural History Survey, cooperating units of DEEP, landowners, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the NDDDB should not be substitutes for onsite surveys necessary for a thorough environmental impact assessment. 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 deep.nddbrequest@ct.gov
Thank you for consulting the Natural Diversity Data Base.

Sincerely,



Dawn M McKay
Environmental Analyst 3

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 21

Referencing Petition p. 15, Eversource notes that, The IPaC report indicated one federally listed threatened species, Northern Long-eared Bat (NLEB) Would the re-classification of the NLEB from federally threatened to endangered affect the IPaC determination? Explain.

Response:

No, the re-classification of NLEB from federally threatened to endangered will not affect the IPaC determination. A “No Effect” determination was received following completion of the U.S. Fish and Wildlife Service Range-wide Determination Key for the Project.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 22

Referencing Petition p. 17, would the proposed weathering steel structures be expected to blend in with the wooded surrounding landscape? Explain.

Response:

Yes. In wooded areas, a darker colored weathered steel monopole would have less of a visual impact due to its ability to blend in more easily with the surrounding area's vegetation than the alternative, galvanized steel structures.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 23

Referencing Petition pp. 10 and 11, submit a copy of the correspondence from SHPO.

Response:

A copy of the November 29, 2022 correspondence from SHPO is attached.

November 29, 2022

Mr. David George
Heritage Consultants, LLC
830 Berlin Turnpike
Berlin, CT 06037
(sent via email only to dgeorge@heritage-consultants.com)

Subject: Archaeological Reconnaissance Survey
Eversource Energy Pootatuck to West Devon Rebuild Project
Shelton & Stratford, Connecticut

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the report titled, *Phase IB Cultural Resources Reconnaissance Survey of Sensitivity Areas Along Eversource Energy's Pootatuck to West Devon Junction Rebuild Project in Shelton and Stratford, Connecticut* prepared by Heritage Consultants, LLC (Heritage) and dated October 2022. The report indicates that the project proponent requested the Phase IB archaeological reconnaissance survey of six archaeological sensitivity areas along the Eversource Energy Pootatuck to West Devon Junction Rebuild project (Project) corridor in support of an application to the Connecticut Siting Council (CSC). SHPO notes the six archaeological sensitivity areas were identified during a Phase IA archaeological assessment survey previously completed by Heritage. Because the Project will require approval of the CSC, it is subject to review by our office pursuant to the Connecticut Environmental Policy Act. The submitted report is well-written, comprehensive, and meets the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

No previously recorded archaeological sites or properties listed on the National Register of Historic Places were identified within 500 feet of the six archaeological sensitivity areas. During survey, Heritage completed 104 of 125 (82 percent) planned shovel tests. The 21 planned but unexcavated shovel tests fell within areas of slope, bedrock, or previous disturbance. Subsurface testing failed to identify any cultural material. No cultural material was recovered as a result of the field effort. Therefore, based on the information provided to our office, SHPO concurs with the findings of the report that no additional archeological investigations of these six sensitivity areas are warranted and that no historic properties will be affected by the proposed project. This comment is conditional upon the submission of two bound copies of the final report to our office for permanent curation and public accessibility.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's archeological resources. 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,



Jonathan Kinney
State Historic Preservation Officer

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 24

Referencing Petition pp. 10 and 11, has Eversource received any comments from the Tribal Historic Preservation Offices (THPOs)?

Response:

Project cultural resource assessment documentation was submitted to applicable THPOs on December 1, 2022. No comments from any of the THPOs have been received to date.

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 25

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: August 17, 2023

Request from: Connecticut Siting Council

Question: 26

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

Response:

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

Date Filed: August 17, 2023

Request from: Connecticut Siting Council

Question: 27

Referencing Petition p. 19, post-construction magnetic field levels would decrease at the edges of the ROW as a result of the project. Would that be due to the generally taller structures? Explain.

Response:

No, the decrease at the edges of the ROW is not primarily due to the taller structures. The electric and magnetic fields at the ROW edges are expected to slightly decrease primarily because of the proposed relocation of the transmission lines away from the ROW edges and more toward the center of the ROW.