56 Prospect Street
P.O. Box 270
Hartford, CT 06141-0270

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

July 14, 2025

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

RE: West Devon Junction to Devon Substation Rebuild Project

Dear Attorney Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") is requesting a Declaratory Ruling from the Connecticut Siting Council ("Council") that no Certificate of Environmental Compatibility and Public Need is required for the West Devon Junction to Devon Substation Rebuild Project ("Project"), which proposes modifications to the existing 1483, 1545, 1580, 1590 (decommissioned), 1710, and 1730 transmission lines in the Town of Stratford and City of Milford Connecticut ("Petition").

Prior to submitting this Petition, Eversource representatives briefed municipal officials about the Project and provided written notice to all abutters of the proposed work and also of the filing of this Petition with the Council. Maps and line lists identifying the notified property owners are provided in the Petition in *Attachment A – Map Sheets* – West Devon Junction to Devon Substation Rebuild Project.

Eversource is submitting this filing electronically and is providing one copy and 15 additional copies to the Council, along with the requisite $625 filing fee.

Sincerely,

Deborah Denfeld

Deborah Denfeld
Team Lead – Transmission Siting
deborah.denfeld@eversource.com

Enclosure

cc: Laura Hoydick, Mayor, Town of Stratford
Anthony S. Giannattasio, Mayor, City of Milford

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THE CONNECTICUT LIGHT AND POWER COMPANY

doing business as

EVERSOURCE ENERGY

PETITION TO THE CONNECTICUT SITING COUNCIL
FOR A DECLARATORY RULING OF
NO SUBSTANTIAL ADVERSE ENVIRONMENTAL EFFECT
FOR THE PROPOSED MODIFICATIONS TO THE EXISTING
1483, 1545, 1580, 1590, 1710, and 1730 LINES
IN THE TOWN OF STRATFORD AND CITY OF MILFORD CONNECTICUT

1. Introduction

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource" or the "Company") hereby petitions the Connecticut Siting Council ("Council") for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required pursuant to Section 16-50g et seq. of the Connecticut General Statutes for proposed modifications to sections of the 1483, 1545, 1580, 1590, 1710 and 1730 115-kilovolt ("kV") transmission lines that are located within Eversource owned property or within Eversource transmission line rights-of-way ("ROW") that extend from West Devon Junction (Town of Stratford) to Devon Substation (City of Milford), in Connecticut as described herein (the "Project"). Eversource respectfully submits that a Certificate is not required because the proposed modifications would not have a substantial adverse environmental effect.

2. Purpose of the Project

The purpose of the Project is to rebuild 115-kilovolt ("kV") transmission lines that extend between West Devon Junction, located in Stratford east of River Valley Road, over the Housatonic River to East Devon Junction located in Milford south of Bic Drive and to Devon Substation located at 700 Naugatuck Avenue, Milford, a distance of 2.17 miles. The 1545/1483 and 1580/1590[1] transmission lines would be modified over this entire corridor length, whereas the 1710/1730 transmission lines would be modified over approximately a 0.17-mile length at the Housatonic River crossing. The area encompassed by these lines collectively comprise the "Project Area."[2,3]

[1] The 1590 Line is carried on double-circuit lattice tower structures with the 1580 Line; the 1590 line, however, has been decommissioned and would be removed and not replaced as part of this Project.

[2] As referenced in the Petition, the "Project Area " is synonymous with the existing facility "Site" described in RCSA §16-50j-2a (29); "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.

[3] The Project was not identified by an ISO-New England Inc. needs and solution analysis. The Project is associated with the ISO-NE Asset Condition List No. 373. There are no generation facilities in the ISO-NE interconnection queue associated with the proposed Project.

The Project scope consists of conductor, shield wire, and structure replacements, along with the addition of two structures near Devon Substation, and the removal of two structures near East Devon Junction, all within the Project Area. The proposed transmission line rebuild work would be located entirely within Eversource's existing ROWs or on Eversource fee-owned property.

The Project scope includes replacing the existing 795-kcmil aluminum conductor steel reinforced ("ACSR") conductor on the 1545/1483 lines and the 4/0 copper conductor on the 1580 line with the installation of 1590-kcmil aluminum conductor steel support ("ACSS") 54/19 "Falcon" conductor, resulting in completion and consistency with the recent conductor upgrades on these same lines in the Devon-Towantic South Naugatuck transmission line corridor to their termination structures at Devon Substation.[4]

The Project scope also includes replacing the existing Copperweld and Alumoweld shield wire on the 1545/1483 lines and the Aluminum shield wire on the 1580 line with 96-fiber optical ground wire ("OPGW"). The installation of 96-fiber OPGW would provide improved communication and reliability as part of the Eversource fiber optic network build out.

At the Housatonic River crossing on the 1710/1730 lines, the existing 795-kcmil ACSS conductor would be replaced with 1590-kcmil 54/19 "Falcon" conductor, similar to the other lines in this transmission corridor. The conductor at this crossing needs to be replaced due to the position of the replacement structures which will add more than 200 feet to the crossing span length. The longer span will necessitate the need for splicing on both sides of the river. The National Electrical Safety Code ("NESC") cautions that utilities should avoid conductor splicing over crossing spans; therefore, the existing conductor would be replaced. Similarly, due to the extended span length, the existing OPGW will be replaced with new OPGW.

In addition to the Project scope above, the work includes replacing 34 double-circuit lattice tower ("DCLT") structures with 44 structures (10 double-circuit steel pole ["DCSP"] structures and 34 single-circuit steel pole ["SCSP"] structures). Most of the proposed structure replacements are due to either asset condition[5], overstress due to the heavier new conductor and/or OPGW, and/or meeting vertical clearance requirements due to heavier (additional sag) new conductor lines.

Several structures need to be replaced for other conditions:

- The 1710/1730 lines in the Project Area were rebuilt in 2018[6]; however, two 101-year-old DCLT structures (Structures 814 and 813) were left on either side of the Housatonic River crossing to be replaced at a future date. These two DCLT structures would be replaced with DCSP structures to capitalize on the permitting and construction access already

[4] This Project is similar in scope to the transmission line rebuild projects presented in Petition Nos. 1527, 1582, 1614,1640 and pending Petition No.1656, which are also located in the Devon-Towantic-South Naugatuck corridor.

[5] Existing structures exhibiting bent and rusted members or show signs of section loss due to rust and/or foundation degradation.

[6] Towantic Lines Upgrade Project (Petition No. 1291)

needed to remove and replace adjacent riverside structures on the 1580/1590 lines and 1545/1483 lines.

- Two other structure replacements would realign the existing line angle locations, as they turn to the Devon Substation's line termination structures, crossing the Connecticut Department of Transportation ("CTDOT") railroad in Milford. Replacement of Structure 299, a DCLT, with an SCSP structure to support the 1580 line, and replacement of Structure 1301, a DCLT, with two SCSP structures to support the 1545 and 1483 lines, along with the addition of two new SCSP structures west of the railroad, would accommodate this reconfiguration and provide adequate horizontal clearances between the transmission lines as they enter Devon Substation.

The proposed replacement and new structures would have a galvanized steel finish to match other monopole structure finishes within the Project Area.

Figure 1 illustrates the location of the proposed Project.

Figure 1: Project Overview Map

3. Project Area Description and Existing Transmission Facilities

3.1 Project Area Description

The Project Area includes Eversource owned property, Eversource ROWs with easement agreements, and off-ROW access for installation, maintenance, and improvement of transmission lines. In general, the easements grant Eversource the right to enter upon the land and erect, inspect, operate, replace, remove, repair, patrol, and permanently maintain on the ROW poles, towers, 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.[7]

The transmission line corridor and major features of the Project Area traversed by the three sets of transmission lines (1545/1483, 1580/1590 and 1710/1730 lines) are described below.

Town of Stratford

Within Stratford, the Project Area extends from West Devon Junction to the east side of Route 110 (River Road) before the Housatonic River, over a distance of approximately 0.5 mile. Most of the three sets of transmission lines in Stratford are located in a 250 feet wide corridor beginning at West Devon Junction to the west side of the Housatonic River, on Eversource owned property, with a short section of ROW traversing two private residential properties between Main Street and River Road. West of West Devon Junction, the two 110 feet wide ROWs (where the 1710/1730 lines split from the corridor of the 1545/1483 and 1580/1590 lines) span residential properties.

Features crossed by the lines include residential properties, local roads, overhead distribution lines, and State Route 110 (River Road).

Housatonic River Crossing

At the Housatonic River crossing, the structures on each side of the river are located on Eversource owned property. The river crossing span is approximately 0.17 mile between structures.

City of Milford

In Milford, east of the river crossing, the Project lines continue in a general southeast direction over approximately 1.5 miles to Devon Substation. At the east side of the river the transmission line corridor is located on either Eversource property or within 250 feet wide easements up to Caswell Street including crossing the Charles E. Wheeler Wildlife Management Area, the City of

[7] The easements also grant Eversource the right to trim, cut and remove trees, parts of trees, limbs, branches, and underbrush within or projecting into the ROW/on adjoining land of Grantor, as in the judgment of the Grantee may interfere with or endanger poles, towers and wires, and their operation or with any of the appurtenances.

Milford's Housatonic Wastewater Treatment Plant parcel, and Caswell Cove Condominiums. East of Caswell Street/Bic Drive, the lines cross over the CTDOT railroad and the Iroquois Gas transmission line before entering East Devon Junction. At East Devon Junction, the Project lines are joined by several other overhead lines (the 1776 line on the west side of the corridor and the 1497, 1640 and 1685 lines on the east side). South of East Devon Junction, two Eversource 345-kV underground transmission lines (the 3165 and 3619 lines), encased in a concrete duct bank approximately three feet below grade, traverse the transmission corridor, aligned between existing Structures 1304 and 296, to Naugatuck Avenue. The Project lines continue south in an easement spanning the Devon Power LLC's capped coal ash landfill, then turn westerly, crossing the CTDOT railroad for a second time and tie into the line's terminal structures at Devon Substation, located in an easement on the Devon Power LLC parcel.[8]

3.2 Vegetation Management

In Stratford, within that portion of the Project Area on Eversource owned property and within the 250 feet wide easement area between Main Street and River Road, low growth vegetation is maintained across a 200 feet width on the northern side of the transmission line corridor.

In Milford, within that portion of the Project Area on Eversource owned property and within the 250 feet wide (and up to 500 feet wide) easement areas, vegetation is maintained to various widths. The maintained widths meet clearance requirements from the outside conductors in the transmission line corridor.

Vegetation work was last performed in the Project Area in 2020 with 'cut floor work' [9], and pruning of side vegetation and tree branches, with selective application of herbicide treatment in 2021.

3.3 Existing Transmission Line Facilities Description

The Project's existing transmission line features are described in further detail below:

1545/483 Lines

The 1545 and 1483 lines were initially constructed in 1962. The 1545 Line spans approximately 4.69 miles between United Illuminating's ("UI") Trap Falls Substation (Shelton) and Devon Substation. The 1483 Line spans approximately 5.52 miles between UI's Pootatuck Substation (Shelton) and Devon Substation. Both lines have seen prior modifications outside of the Project Area with the most recent in 2024.[10]

Within the Project Area, the 1545/1483 lines are carried on sixteen DCLT structures and one DCSP structure. The 795-kcmil ACSR conductor is approximately 63 years old. The Copperweld

[8] Eversource has retained easement rights for Devon Substation within the Devon Power LLC parcel.

[9] Cut floor work entails the removal of incompatible vegetation, regardless of present height, and floor cutting of lower growth vegetation to the edge of the vegetation-maintained width in the ROW. Incompatible vegetation is any tree or shrub that matures at a height taller than 15 feet.

[10] Pootatuck to West Devon Junction Rebuild Project (Petition No. 1582) replaced structures and conductor over 3.3 miles for the 1580, 1241, 1483 and 1545 lines in Shelton and Stratford, Connecticut.

shield wire on the 1545 Line is approximately 63 years old, and the Alumoweld shield wire on the 1483 Line is approximately 25 years old.

1580/1590 Lines

The 1580/1590 lines span approximately 23.8 miles between South Naugatuck Substation (Naugatuck) and Devon Substation and were first constructed in 1923, with subsequent modifications (structure, conductor, and/or shield wire replacements) in 1954, 1962, 1972, 2014, 2018, 2022, 2024, and 2025.

Within the Project Area, the 1580/1590 lines are carried on sixteen DCLT structures and one DCSP structure. The 4/0 copper conductor is approximately 72 years old, with a 250 feet section of conductor replaced in 2018. The 19#10 Aluminum shield wire is seven years old.

1710/1730 Lines

The 1710 and 1730 lines were constructed in 1924. The 1710 Line spans approximately 7.07 miles between UI's Old Town Substation (Bridgeport) and Devon Substation with subsequent upgrades of structure, conductor, and/or shield wire in 1987 and 2018. The 1730 Line spans approximately 4.13 miles between UI's Trumbull Substation (Trumbull) and Devon Substation with subsequent modifications of structure, conductor, and/or shield wire in 1972 and 2018.

At the Housatonic River crossing, the 1710/1730 lines are carried on two DCLT structures (Structures 814 and 813). The structures support 795-kcmil ACSS conductor and 24 fiber OPGW, both seven years old.

Federal Aviation Administration ("FAA") required marker balls are currently installed on the 1710 and 1730 transmission lines crossing the Housatonic River. FAA structure lighting is provided on Structures 814 and 813. Two low-voltage (120/240 volts AC) electric service lines supply power to the lighting systems. These electric service lines originate from a distribution line along Route 110 (River Road), supported by cross-arms between Structures 814 and 287, and span the Housatonic River to cross-arms between Structures 813 and 288.

4. Proposed Project Modifications

The proposed transmission line Project work includes conductor, shield wire, and structure replacements in Stratford and Milford.

Within the Project area, two structures will be added, and two structures will be removed without replacement.

Details of the proposed modification work on the 1545/1483, 1580, and 1710/1730 lines are described below:

Conductor Modifications

- Replace the existing conductor for the 1545/1483 and 1580 lines with 1590-kcmil ACSS 54/19 “Falcon” conductor. The conductor needs to be replaced to complete the recent conductor upgrades on these same lines to their termination structures at Devon Substation. The decommissioned 1590 Line conductor will be removed and not be replaced.
- Replace the existing conductor for the 1710/1730 lines at the Housatonic River crossing with 1590-kcmil 54/19 “Falcon” conductor. The conductor needs to be replaced due to the position of the replacement structures which will add more than 200 feet to the crossing span. A longer span would require splicing on both sides of the river, but NESC cautions that utilities should avoid conductor splicing over crossing spans.

Shield Wire/Fiber Modifications

- Replace the existing Copperweld and Alumoweld shield wire on the 1545/1483 lines, and the Aluminum shield wire on the 1580 line with 96-fiber OPGW to provide improved communication and reliability as part of the Eversource fiber optic network build out. The decommissioned 1590 Line shield wire will be removed and not be replaced.
- Replace the existing 24-fiber OPGW on the 1710/1730 lines with 96-fiber OPGW at the Housatonic River crossing. Similar to the reason for replacing the 1710/1730 conductor at this location, the existing OPGW will be replaced due to the increased span length over the river.

Structure Modifications

1545/1483 Lines

- Replace six DCLT structures due to asset condition with three DCSP structures and six SCSP structures (three sets of paired single circuit structures).
- Replace five DCLT structures because of overstress due to the proposed conductor and/or shield wire replacement with two DCSP structures and six SCSP structures (three sets of paired single circuit structures).
- Replace two DCLT structures (Structures 1312 and 1313) at the Housatonic River crossing with two DCSP structures because the proposed replacement conductor would result in increased sag on the existing structures and therefore would not meet the U.S. Army Corps of Engineers (“USACE”) vertical clearance height requirements over the river.
- Replace two DCLT structures (Structures 1314 and 1307) with two SCSP structures (one set of paired single circuit structures) and one DCSP structure, respectively, in order for the replacement conductor to meet current NESC vertical clearance standards at road crossings (Main Street in Stratford and Bic Drive in Milford) and from existing overhead distribution lines.

- Replace DCLT Structure 1301 supporting the 1545/1483 lines with two SCSP structures to accommodate an angle in the line and a modified line alignment to the Devon Substation termination structures.

1580 Line

- Replace ten (10) DCLT structures due to asset condition with ten (10) SCSP structures to carry the 1580 Line.
- Replace five DCLT structures currently supporting the 1580/1590 lines, including two 102-year-old river crossing structures, with five SCSP structures to support the 1580 line because of overstress due to the proposed conductor and/or shield wire replacement.
- Replace DCLT Structure 299 with one SCSP structure to maintain adequate horizontal clearance from the 1545/1483 line conductors which will shift as a result of the proposed replacement of adjacent Structure 1301.

1710/1730 Lines

- Replace two 101-year-old DCLT structures (Structures 814 and 813) at the Housatonic River crossing with two DCSP structures. Replacing these structures avoids one or more future mobilizations and capitalizes on the permitting and construction access already needed to remove and replace adjacent Structures 287 and 288 on the 1580/1590 line and Structures 1312 and 1313 on the 1545/1483 lines.

Structure Additions and Removals

- Add two new SCSP structures (Structures 19499/19499A) on the 1545/1483 lines east of Devon Substation and to the west of the CTDOT railroad to accommodate the new line angle to the termination structures within the Substation and to maintain adequate NESC vertical clearance over the railroad.
- Remove two DCSP structures (Structures 294A and 1306A) near East Devon Junction that support the 1580/1590 lines and 1545/1483 lines, respectively, as they would no longer be needed due to the locations of proposed adjacent replacement structures.

Structures will be accessed in the transmission line corridor of the Project Area using existing and proposed access roads from the Town of Stratford and City of Milford, and State Route 110 (River Road). No additional ROW is required for the Project.

Additional Modifications

- Permanently remove the two low-voltage electric service wires spanning the Housatonic River, as future FAA structure lighting will be powered by distribution lines located on both sides of the river.
- At Devon Substation, the three new conductor lines will be tied into the existing termination structures and all-dielectric self-supporting (“ADSS”) fiber optic cable would be spliced to the three new OPGW lines and tied into the Substation control building.

- Lighting arrestors will be installed on the new conductor with arrestors placed on approximately every fifth structure upon completion of the Project.

Proposed Project modification reference documents are included in attachments, as follows:

- *Attachment A*: Map Sheets – Aerial view base maps, which depict the locations of existing and proposed structures, as well as the approximate location and configuration of work pads and pull pads, access roads, and other Project elements.

- *Attachment B*: Structure Tables – A list of specific structure information on the types and the heights of the existing and proposed structures.

- *Attachment C*: Typical Cross Sections – Drawings that depict typical views along the transmission line corridor of the existing and proposed structures.

4.2 Structure Heights

The heights of the existing structures range from 76 feet to 209 feet. The proposed replacement structures will range in height from 95 feet to 195 feet. The two new proposed structures outside of Devon Substation (Structures 19499 and 19499A) will both be 65 feet in height. All proposed replacement structures are required to meet current NESC vertical clearance requirements over ground-based features, adjusting for changes in ground elevations at the replacement structure locations, and with consideration of forward and backward structure heights to avoid uplift conditions.[11]

Regarding structure height changes:

- Four proposed replacement structures at the Housatonic River crossing on the 1580 line and 1710/1730 lines would have height decreases between 12 feet and 40 feet below the corresponding existing structure's height, which range between 195 feet and 209 feet. The replacement structure locations are being shifted to upland locations, therefore allowing shorter structure heights.
- The remaining proposed replacement structures will have height increases between 3 feet and 69 feet above their corresponding existing structure's height, with an average height increase of 30.6 feet.

Replacement structures with the greatest height increases are described below:

In Stratford, one structure on the 1545/1483 lines (Structure 19114) and one structure on the 1580 Line (Structure 19115), would have height increases of 48 feet and 52 feet respectively, to maintain clearance when crossing the overhead electric distribution service line at Forest Road.

[11] To minimize uplift conditions and minimize insulator swing under extreme weather conditions, a gradual vertical descending (or ascending) wire height is managed with designed structure heights.

In Milford, two structures on the 1545/1483 lines (Structures 1312 and 1311) would be replaced by three structures (Structures 19511 and 19510/19510A) having height increases of 50 feet and 59 feet/59 feet, respectively. Two proposed structures on the 1580 Line (Structure 19111 and Structure 19110), would have height increases of 69 feet and 49 feet, respectively. These structure height increases are required to maintain appropriate clearances due to increased sag. Sag increases result because of the reconfiguration of the river crossing which increases the span length more than 200 feet.

Also in Milford, south of Bic Drive and near East Devon Junction, four taller structures are required to meet clearance requirements for crossing an overhead 115-kV transmission line (1776 Line) and the CTDOT railroad. Three structures on the 1545/1483 lines (Structure 19506 and Structures 19505/19505A) would have height increases of 53 feet and 38 feet/38 feet, respectively, and two other adjacent structures on the 1580 line (Structure 19107 and Structure 19106) would have height increases of 45 feet and 41 feet, respectively.

5. Existing Environment, Environmental Effects and Mitigation

The Project would not have a substantial adverse environmental effect for the reasons explained more fully below.

5.1 Land Use

The Project Area traverses through residential and commercial/industrial properties (including landscaped areas and driveways), wetlands, the Housatonic River including an intertidal marsh and the coastal boundary, the Charles E. Wheeler Wildlife Management Area, the Iroquois Gas transmission line, the City of Milford's Wastewater Treatment Plant, and a capped coal ash landfill. The Project Area also crosses Route 110 (River Road), local town roads (River Valley Road, Forest Road, Main Street, Caswell Street, Bic Drive, Popes Island Road, and Oronoque Road), overhead electrical distribution lines, other overhead transmission lines, and two crossings of the CTDOT railroad ROW that carries the Metro North Waterbury Line. The Project terminates at Devon Substation.

The capped coal ash landfill is located northeast of Devon Substation on the east side of the CTDOT railroad and is regulated by the Connecticut Department of Energy and Environmental Protection ("DEEP") Remediation Division. Matting for a 16-feet wide access road is proposed to be applied over the cap of the closed landfill to access structures outside the cap limits.[12] Although no subsurface work is proposed within the landfill capped limits, soil and groundwater pre-characterization sampling will be conducted for select proposed structure foundation locations in proximity to the landfill. If structure foundation locations are found to be impacted, Eversource would prepare a project-specific Soil and Groundwater Management Plan to manage materials

[12] The proposed single layer matted access over the capped landfill follows the location of a previously used/established access way and avoids grading and tree removal if a perimeter access road around the west side of the capped area were to be used instead.

during structure replacement work efforts. No excavation is proposed within the identified limits of the capped area, and the matting will be placed to protect the landfill surface.

All Project work would occur within Eversource's property and/or existing ROW, which is dedicated to long-term use as an electric transmission line corridor. As such, the Project will not result in adverse impacts to existing land uses.

5.2 Scenic, Recreational, and Cultural Resources

The Project will not have a substantial adverse impact to scenic, recreational, or cultural resources for the reasons explained below.

Scenic Resources

The Project will not cross or impact any designated scenic roads.[13] There are no state-designated visual or scenic resources along or in the immediate vicinity of the ROW.

Recreational Resources

Designated open space parcels, recreational use areas, and hiking trails within the Project Area were reviewed and identified through a desktop review of GIS ("Geographic Information System") data available from DEEP[14], Connecticut Forest and Park Association ("CFPA")[15], the Town of Stratford's Parks website[16], the City of Milford's Parks website[17], and verified through field reconnaissance.

Recreational opportunities within and adjacent to the Project Area include hiking, biking, bird watching, boating, and fishing. The Project Area traverses through an open space parcel of the Charles E. Wheeler Wildlife Management Area in Milford. Further south, Caswell Cove includes a marina and a public park along the Housatonic River.

Construction within the Project Area ROW at the Charles E. Wheeler Wildlife Management Area will result in the permanent wetland impact from the proposed installation of replacement Structures 19509 and 19510. A state land notification ("SLN") will be submitted to DEEP for work associated with proposed temporary access and structure placement within the wildlife management area. Eversource will coordinate directly with DEEP prior to starting construction activities and will comply with the terms and conditions of the SLN.

Specific protection measures would be developed and implemented to maintain public safety during Project construction, while also avoiding or minimizing short-term impacts to recreational users on land or within the Housatonic River.

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[13] Connecticut Department of Transportation, July 3, 2024 Connecticut State Scenic Roads. Available URL: https://portal.ct.gov/DOT/Programs/Connecticut-Scenic-Roads

[14] Connecticut Department of Energy and Environmental Protection, GIS Data URL: https://portal.ct.gov/DEEP/GIS-and-Maps/Data/GIS-DATA

[15] Connecticut Forest & Park Association URL: https://www.ctwoodlands.org

[16] Town of Stratford, Parks and Recreation URL: https://www.townofstratford.com/page/parks

[17] City of Milford Parks and Recreation URL: https://milfordct.myrec.com/info/

Eversource will continue to engage with representatives of these public recreational areas with pre-construction notifications and coordination of public safety with additional community outreach and/or posting of advisory signage where needed.

Cultural Resources

A Phase 1A Cultural (archaeological and historical) Resource Assessment of the proposed Project Area was conducted by Heritage Consultants, LLC ("Heritage") in September 2022. The review consisted of an initial desktop resource review and pedestrian survey ("Phase 1A Cultural Resource Assessment" or "Phase 1A"). The Phase 1A assessment results are detailed in its report dated September 8, 2022.

The Phase 1A desktop evaluation determined that there is one previously identified archaeological site located within 500 feet of the Project Area. No National/State Register of Historic Places properties/districts or inventoried historic structures were identified within 500 feet of the Project Area.

However, based upon the presence of qualifying criteria (i.e., identification of areas that are likely to contain and/or retain archaeological deposits), the Phase 1A assessment identified four locations within the Project Area as having a moderate to high potential for archaeological sensitivity, thus prompting further investigation via the execution of a Phase 1B survey (archeological sensitivity analysis to define the potential for the ROW to yield as yet undiscovered archaeological sites).

The Phase 1B survey consisted of shovel testing and was completed by Heritage in September 2022. Results of the Phase 1B survey are detailed in Heritage's report dated November 2022 which determined that no additional investigation was warranted.

The Phase IB report was provided to the State Historic Preservation Office ("SHPO") and the Tribal Historic Preservation Offices ("THPO") of the Connecticut Tribe of Mohegan Indians, the Mashantucket Pequot Tribal Nation, the Narragansett Indian Tribe, and the Wampanoag Tribe of Gay Head for their review.

A written response to Eversource from the SHPO, dated November 29, 2022 (*Attachment D – SHPO Review Letter*), concluded that no historic properties will be affected by the Project and no additional archaeological examination of the Project Area is needed prior to start of construction. A written response from any of the THPOs would be provided to the Council by Eversource upon receipt.

5.3 Tree Clearing and Vegetation Removal

Eversource Vegetation Management will be implementing the Transmission Rights of Way Reliability Program ("TRRP") concurrently with this Project. Consistent with the TRRP requirements, trees within the non-maintained portion of the ROW will be cleared beyond the previously maintained corridor to the edge of the Eversource ROW, or in the case of Eversource property, 100 feet from the outside overhead conductor.

Tree clearing is specifically proposed along the remaining non-maintained 50-foot-wide southerly section of the 250-foot-wide ROW in the Town of Stratford in three areas; between West Devon Junction and Main Street on Eversource owned property, west of Route 110 (River Road) in an Eversource ROW, and east of Route 110 on Eversource owned property, for a total of 1.66 acres. Tree clearing will be performed across approximately 10,244 square feet (0.24 acre) of wetlands in Stratford.

Due to the presence of lawns and low-growth vegetation within the majority of the ROW, it is anticipated the removal of mature vegetation and pruning of side vegetation would be limited in most other areas of the ROW. However, there would be some select tree removal to the east of the 1685 Line in Milford, which under the TRRP would be cleared to 100 feet from the outside overhead conductor or to the edge of easement or fee owned property, whichever is less. Vegetation removal may be required for access roads, structure work pads, and pull pad areas prior to an application of gravel in upland areas.

To minimize impacts, the tree clearing contractor would comply with relevant specifications for access, vegetation removal methods, listed species protection, and use of temporary matting in sensitive resource areas to the extent practicable. All vegetation work would be conducted in accordance with Eversource's *April 2022 Construction & Maintenance Environmental Requirements, Best Management Practices Manual for Massachusetts and Connecticut* ("BMPs" or "BMP Manual"), and comply with the Project permits and approvals.

Eversource would provide oversight of the work, monitor compliance with the BMPs, and aid the contractor when planning work in environmentally sensitive resource areas and determining options for wood products disposal. (Refer to Section 7.2 for Tree Clearing and Vegetation Management Methods)

The resulting increase in shrubland and early successional habitat (and the preservation of such habitat) along the ROW is beneficial for many species of wildlife as shrubland habitat is otherwise declining in New England.[18]

5.4 Water Resources

The Project Area is located within the Housatonic River drainage basin and includes inland and tidal wetlands, freshwater watercourses (perennial and intermittent streams), the tidally influenced

[18] Connecticut's Wildlife Action Plan has identified 47 wildlife Species of Greatest Conservation Need (SGCN) associated with shrubland habitat and require active management.

Housatonic River, a vernal pool, and Federal Emergency Management Agency ("FEMA") flood zones.

Eversource conducted field delineations of wetlands and water resources in the Project Area in the fall of 2020, spring of 2021, and summer of 2022. Wetland boundaries were reinspected and modified on Project mapping as needed in the spring of 2023 (*Attachment E - Wetland and Watercourse Delineations – Technical Memorandum).*

Project work activities would result in both permanent and temporary impacts to water resource areas. All Project work in or near these water resource areas would be conducted in accordance with Eversource's BMPs and with the Project specific Stormwater Pollution Control Plan ("SWPCP") that Eversource would develop for the Project under the DEEP General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities ("General Permit").

The Project would require a Pre-Construction Notification ("PCN") to the USACE for work in tidal wetlands and for the Housatonic River crossing. Project components in freshwater wetlands would be eligible for the Self-Verification Notification ("SVN") through the USACE. Required forms and accompanying materials would be submitted to the USACE New England District and DEEP in advance of construction. Work activities would meet all applicable terms and special conditions of the USACE General Permit for the State of Connecticut and the State of Connecticut 401 Water Quality Certification. Additional details on each of these water resource areas are provided below.

Collectively, these protection measures defined in the SWPCP, USACE PCN, and SVN authorization conditions, and Eversource's BMP Manual, are comprehensive and meet the intent and spirit of a single protection plan for watercourses, wetlands, and vernal pools.

5.4.1 Watercourses and Waterbodies

Three watercourses have been identified and delineated within or proximate to the Project Area. The one named perennial watercourse is the Housatonic River. The other two perennial and unnamed watercourses (S1 and S2) would require crossing for temporary construction access. These features would be spanned with temporary matting where needed, which would be removed during restoration. The temporary crossings would not result in permanent impacts to the watercourses. No waterbodies were identified within or proximate to the Project Area.

Existing stormwater culverts and drainage swales would be crossed along access roads at various locations throughout the Project Area. Existing stormwater management features would be protected and/or stabilized in accordance with the Project's SWPCP and Eversource's BMPs. If impacted by construction vehicles, these features would be repaired or replaced.

5.4.2 Wetlands

Wetlands located within the Project Area were identified and delineated in accordance with industry standard methodology. A total of six wetlands are located within or proximate to the Project Area.

Proposed Project activities would occur within an intertidal marsh (wetland W4) associated with the Housatonic River complex and the Charles E. Wheeler Wildlife Management Area. The intertidal marsh is brackish and is dominated by invasive common reed (*Phragmites australis*). Other vegetation in this intertidal marsh includes saltmarsh cordgrass (*Spartina alterniflora*), Jesuit's bark (*Iva frutescens*), and narrow-leaf cattail (*Typha angustifolia*). Permanent impacts to this wetland would be associated with the installation of eight proposed structures. These installations would impact approximately 350 square feet (0.008 acre) of wetlands.

The Project work would also temporarily impact approximately 107,635 square feet (2.47 acres) of wetlands associated with the use of temporary construction matting utilized for access roads, pull pads, and work pads and for access associated with necessary vegetation removal. All matting would be promptly removed upon Project completion and wetland areas would be restored in accordance with Eversource's BMPs. A summary of Project effects to wetlands and watercourses is provided in Table 1.

Table 1
Summary of Project Effects to Wetlands and Watercourses

Wetland / Watercourse ID	Attachment A - Map Sheet	Wetland/Watercourse Effects (square feet / acres)		
		Temporary Matting	Permanent (Structure Installations)	Tree Clearing
W1/S1	1	2,849 / 0.07		
W2/S2	1	2,594 / 0.06		3,614 / 0.08
W3	1	1,136 / 0.03		6,630 / 0.15
W4	2	97,582 / 2.24	350 / 0.008	
W6	4	3,474 / 0.08		
Total		***107,635 / 2.47***	***350 / 0.008***	***10,244 / 0.24***

5.4.3 Vernal Pools

The Project Area was initially surveyed for potential vernal pools during the wetland delineation in the fall of 2020. Potential vernal pools were identified based on the presence of suitable hydrology (i.e., evidence of seasonally to permanently flooded wetlands) and the presence of other indicators such as concave and unvegetated surfaces. Vernal pool habitat was assessed in the spring of 2021 and re-assessed in the spring of 2022. The spring assessment methods included visual surveys to identify adults, larvae and egg masses, audial surveys of amphibian chorusing, and dip-net surveys to identify vernal pool species larvae.

One cryptic vernal pool (VP1) was identified within wetland W1 extending beyond the northeastern edge of the ROW (*Attachment A – Map Sheet 1*). This vernal pool was dominated by forested and scattered scrub-shrub vegetation. Spotted salamander egg masses were

observed in multiple years and wood frog egg masses were observed in one year in this vernal pool. Detailed results of the vernal pool surveys are found in *Attachment F – Vernal Pool Report.*

The Project would not result in any impacts to VP1. A temporary pull pad would be installed within the 100-foot vernal pool envelope ("VPE") for VP1. The pull pad within the VPE for VP1 would consist of temporary matting to minimize disturbance. The Project would comply with the vernal pool avoidance and minimization measures recommended for the Project, which are further detailed in *Attachment F – Vernal Pool Report*.

5.4.4 FEMA Flood Zones

The Project crosses FEMA-designated flood zones associated with the unnamed stream S2 and the Housatonic River, and the regulatory floodway for the Housatonic River. Proposed Structures 19511, 19112, and 813 would be placed within the regulatory floodway. Proposed Structures 19510, 19510A, 19509, 19111, and 19110 would be placed within the 100-year flood zone of the Housatonic River and outside of the regulatory floodway. Due to design constraints, these proposed structures cannot be located outside of the regulatory floodway or 100-year flood zone.

The Project would remove three DCLT structures in the regulatory floodway and four DCLT structures beyond the regulatory floodway in the 100-year flood zone on the east side of the Housatonic River. Structure removal would include the removal of the existing concrete foundations to one foot below the ground surface. The Project would not include any grade changes in flood plains or floodways outside of the structure replacements. The removal and installation of structures within the floodway/100-year flood zone would have a negligible change to flood storage volume.

Proposed temporary fill would be limited to the placement of a temporary matted access road and work pad in the 100-year flood zone of stream S2, and temporary matted work pads, pull pads, and access roads within the regulatory floodway, 100-year flood zone, and 500-year flood zone of the Housatonic River.

Temporary mats, construction materials, and equipment would be properly secured where placed within the flood zones and the regulatory floodway and would be removed from the flood zones and floodway immediately upon completion of construction. The proposed activities would not adversely affect the flood storage capacity or hydraulic characteristics of the FEMA flood zones and regulatory floodway and are eligible for pre-construction notification under the USACE General Permit.

5.4.5 Coastal Area

To either side of the Housatonic River, Eversource's ROW crosses the coastal boundary associated with Long Island Sound, as defined by the 100-year frequency coastal flood zone, a 1,000-foot linear setback from the mean high-water mark, or a 1,000-foot linear setback measured from the inland boundary of tidal wetlands, whichever is the farthest inland. The coastal boundary

encompasses lands and coastal waters defined by Connecticut's Coastal Management Act and managed by DEEP's Coastal Management Program as within Connecticut's coastal area.

DEEP's coastal regulatory jurisdiction limit is defined by the coastal jurisdiction line ("CJL"). The CJL[19] identifies a specified topographic elevation for each municipality computed from the highest predicted tides found on Long Island Sound, and the Connecticut, Housatonic, and Thames River up to their respective heads of tide. The *Attachment A – Map Sheets* identify the portions of the Project Area corridor within the coastal boundary and the CJL.

Within the Project Area, the following structure work would occur within the coastal boundary:

Town of Stratford

- Remove Structure 286 and install Structure 19114
- Remove Structure 1314 and install Structures 19513 and 19513A
- Remove Structure 814 and install Structure 814
- Remove Structure 287 and install Structure 19113
- Remove Structure 1313 and install Structure 19512

There would be no structure removals or installations in the CJL in the Town of Stratford.

City of Milford

Within the Milford Project Area all proposed structure removals and installations would be within the coastal boundary.

The following structure removals and installations will occur in the CJL.

- Remove Structure 1312 and install Structure 19511
- Remove Structure 288 and install Structure19112
- Remove Structure 813 and install Structure 813
- Remove Structure 290 and install Structure 19110
- Install Structure 19509

Effects on coastal resources would be short term and limited to Project construction. Potential adverse effects to coastal resources would be avoided or minimized by using existing access roads and employing temporary mattings for work pads and access roads in these areas, implementing BMPs for erosion and sedimentation ("E&S") controls, and adhering to the provisions of the Project-specific SWPCP.

On June 24, 2025, Eversource submitted a Certificate of Permission (COP) Application Form to the DEEP Land and Water Resources Division regarding the proposed line rebuild activities

[19] The CJL for the Housatonic River in Stratford is 5.0 ft NAVD88 and in Milford is 5.1 ft NAVD88. Using the protocol developed by DEEP for determining the coastal jurisdiction line at an individual location, the CJL for where the Project Area crosses the Housatonic River is 4.9 ft NAVD88.

beneath the coastal jurisdiction line. Eversource would construct the Project in accordance with conditions of the Project-specific COP.

5.4.6 Water Supply

Based on Aquifer Protection Area ("APA") mapping maintained by DEEP, no APAs extend into the Project Area. The Project Area is not within a public water supply watershed and does not cross any public water supply reservoirs or public water supply wells.

5.5 Habitat and Wildlife

The Project Area extends through a variety of habitats that support vegetation and wildlife common in maintained transmission line corridors and adjacent to forest lands. Habitat vegetation includes upland and wetland shrubland, and meadow and riparian corridors.

DEEP Natural Diversity Database ("NDDB") mapping depicts known or potential occurrences of state-listed endangered, threatened, or special concern species in the vicinity of the Project Area. Eversource submitted a NDDB state-listed Species Review Request to DEEP for the Project on November 8, 2022, and received a preliminary determination from DEEP which listed the following state-listed species occurring within the vicinity of the Project Area:

- Salt marsh bulrush (*Bolboschoenus novae-angliae*)
- Water sedge (*Carex aquatilis* ssp. *altior*)
- Woolly beach-heather (*Hudsonia tomentosa*)
- Lizard's tail (*Saururus cernuus*)
- Saltmarsh sparrow (*Ammodramus caudacutus*)
- Seaside sparrow (*Ammodramus maritimus*)
- Pied-billed grebe (*Podilymbus podiceps*)
- Northern diamondback terrapin (*Malaclemys terrapin terrapin*)
- Saltmarsh tiger beetle (*Cicindela marginata)*
- Great Egret (*Ardea alba*)
- Snowy Egret (*Egretta thula*)
- Little blue heron (*Egretta caerulea*)
- Eastern Box Turtle (*Terrapene carolina carolina*)
- Spotted Turtle (*Clemmys guttata*)
- Peregrine falcon (*Falco peregrinus*)

NDDB requested biological surveys for additional listed species in its preliminary determination. Eversource completed the requested surveys and submitted the results to DEEP for a final determination which was received from NDDB on June 12, 2023. In March 2025, Eversource submitted a request to NDDB for an extension of NDDB's determination and proposed conservation measures to allow work to occur outside of the time of year restriction, as required by the initial NDDB determination. A favorable response from NDDB was received June 2, 2025

(*Attachment G – NDDB Determination Letter*). Eversource would comply with the supplemental protection measures NDDB required for listed species.

In addition to coordinating with the NDDB for the protection of state-listed species, Eversource consulted with the U.S. Fish & Wildlife Service's ("USFWS") Information, Planning, and Consultation ("IPaC") service regarding federal-listed species that may be present within the Project Area. IPaC indicated the proposed endangered tricolored bat and the candidate species monarch butterfly may be found in proximity to the Project Area.

Tricolored bats roost in trees in the warmer months, spend the colder months in hibernacula, and are a state-listed endangered species in Connecticut. The tricolored bat was not listed in the preliminary determination received from NDDB, and therefore, no impacts to this species are anticipated.

Utility corridors provide linear habitat for monarch butterflies and other pollinators. While the monarch butterfly is currently identified as a federal candidate species, it is not yet federally listed or proposed for listing. As detailed in the USFWS Environmental Conservation Online System[20], consultation with USFWS under Section 7 of the Endangered Species Act is not required for a candidate species. Gravel work pad restoration in sensitive areas (e.g., NDDB areas) would be seeded with a DEEP approved seed mix that includes pollinator-friendly native vegetation, ("native seed mix"). No adverse impact to this species is anticipated.

Due to the limited work in the Housatonic River, Eversource consulted the National Oceanic and Atmospheric Administration (NOAA) Fisheries Endangered Species Act Section 7 Mapper. According to the NOAA Section 7 Species List, the area of the Housatonic River crossed by the Project provides migration and foraging habitat for the endangered Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) and an endangered shortnose sturgeon (*Acipenser brevirostrum*). Critical habitat for Atlantic sturgeon is in or near this area of the Housatonic River. According to the NOAA Essential Fish Habitat (EFH) Mapper, the Housatonic River crossing is mapped as EFH for multiple fish species.

In-water work would be limited to the controlled lowering of wires into the Housatonic River and subsequent wire removal. A buoy would be attached to each wire (a total of six wires over a two-day period) to help keep the wires from dragging across the bottom of the river. (Refer to Section 7.7)

A qualified individual[21] would oversee implementation of listed species protection measures and conduct contractor training as required by the Project determination letter received from NDDB. In addition, contractors would be responsible for conducting pre-construction and periodic construction sweeps for the presence of certain listed species. These sweeps would occur prior

[20] USFWS, Environmental Conservation Online System URL: https://ecos.fws.gov/ecp/species/9743

[21] The qualified individual, who will provide environmental monitoring for implementation of NDDB required listed species protection measures during construction, will have a demonstrated proficiency as a wildlife biologist with applicable field experience for training and guiding the Contractor during the work.

to the start of work each day and periodically throughout the workday. Contractors would follow established protocol for the removal of listed species from construction areas, as directed. Eversource construction representatives would also be on-site daily to help ensure that these sweeps inspections are performed by contractors, as required.

5.6 Invasive Species

Invasive species within the Project Area were identified by Project environmental personnel during pre-construction survey work and constructability walkdowns. The Project would adhere to Eversource's BMPs to minimize the disturbance and spread of soil and/or plant matter, including the following to limit or prevent the potential spread of invasive species:

- Clean vehicles, equipment, materials (including matting), gear, footwear or clothing of all visible soil and plant material on site in the infested area, or as near as practical to the infested area, prior to leaving the Project site.
- Cleaning may be accomplished using a brush, broom, or hand tools, by shaking or dropping mats in a controlled manner to dislodge attached soil and debris, or compressed air.

The contractor training would also include a review of measures to be implemented to limit/prevent the potential spread of invasive species.

5.7 Visual Effects

The Project would result in some change to the visual character of the transmission lines, primarily because the lattice structures would be replaced with a monopole design. Though the height of the proposed replacement structures would generally increase, the replacement/new structures would result in a more streamlined appearance. All replacement/new monopole structures are proposed to have a galvanized steel finish that generally matches the finish of the existing lattice structures as well as match the finish on other structures within the same ROW beyond the Project Area. Additionally, the FAA required structure lighting at the Housatonic River sides and the FAA marker balls on the conductor over the river span would be similar to existing conditions, and therefore would not create any new visual impacts.

Based on the foregoing, the Project would not have an adverse effect on visual resources.

5.8 Air Quality

The Project may have a short-term, localized effect on air quality associated primarily with fugitive dust and equipment emissions. To minimize the amount of dust generated by construction activities, the extent of exposed/disturbed areas at any one time would be minimized. Temporary gravel tracking pads would be installed at points of construction vehicle ingress/egress to minimize the potential for equipment to track dirt onto local roads. To further minimize dust, water may be used to wet down disturbed soils or work areas with heavy tracking, as needed.

Vehicle emissions would be limited by requiring contractors to properly maintain construction equipment and vehicles, and by minimizing the idling time of equipment and vehicles, including diesel construction equipment, in accordance with Connecticut regulatory requirements.[22]

5.9 Noise

Short-term and localized noise from construction activities, such as the operation of standard types of construction equipment (e.g., backhoe, bulldozer, drill rig, excavator mounted rock hammer, crane, trucks, etc.) would temporarily increase ambient sound levels immediately surrounding the work areas.[23] Upon completion of construction and during operation of the lines, the proposed Project would not result in increased ambient noise levels.

5.10 Electric and Magnetic Fields

Eversource prepared calculations of the existing and post-Project electric and magnetic fields ("EMF"). The calculations were based on average annual loading conditions, as these are most representative of typical operating conditions. The calculations are made relative to the centerline of the proposed, modified transmission lines.

Table 2 and Table 3 summarize the modeled magnetic and electric fields at the ROW edges before and after the proposed Project modifications.

[22] Regulations of Connecticut State Agencies (RCSA) Section 22a-174-18(b)(3)(C) prohibits the idling of motor vehicles for more than three consecutive minutes when not in motion.

[23] Construction noise is exempted under the Connecticut regulations for the control of noise, RCSA §22a-69-1.8(g).

Table 2 Summary of Calculated Magnetic Fields (at 1 meter above ground) Average Annual Loads in milligauss (mG)				
ROW Section:		North Edge of ROW	Max in ROW	South Edge of ROW
West Devon Junction to Housatonic River (250 feet wide)	Existing	30.7	75.6	11.6
	Proposed	30.7	76.0	12.6
Housatonic River Crossing	Existing	13.4	77.1	12.3
	Proposed	23.3	80.4	12.5
ROW Section:		West Edge of ROW	Max in ROW	East Edge of ROW
Housatonic River to East Devon Junction (300-350 feet wide)	Existing	15.9	75.2	5.6
	Proposed	15.9	75.8	6.1
East Devon Junction to Devon Substation (width varies)	Existing	61.1	159.0	0.7
	Proposed	60.7	157.2	0.7

Table 3 Summary of Calculated Electric Fields (at 1 meter above ground) Average Annual Loads in kilovolt per meter (kV/m)				
ROW Section:		North Edge of ROW	Max in ROW	South Edge of ROW
West Devon Junction to Housatonic River (250 feet wide)	Existing	0.10	1.77	0.15
	Proposed	0.11	1.97	0.15
Housatonic River Crossing	Existing	0.17	1.83	0.05
	Proposed	0.17	2.05	0.13
ROW Section:		West Edge of ROW	Max in ROW	East Edge of ROW
Housatonic River to East Devon Junction (300-350 feet wide)	Existing	0.17	1.82	0.16
	Proposed	0.18	1.93	0.19
East Devon Junction to Devon Substation (width varies)	Existing	2.07	2.61	0.08
	Proposed	2.17	3.01	0.09

The results of the calculations provided in the tables above and the *Attachment H*: *EMF Graphs* show that the proposed modifications would have similar EMF results at the edge of the ROW and generally slightly higher results in the maximum in-ROW values.

The anticipated field strength for both electric and magnetic fields from the proposed modifications are well below the internationally established exposure limits for 60-Hz electric and magnetic fields, specifically, the limits identified by the International Council on Electromagnetic Safety ("ICES") and the International Council on Non-Ionizing Radiation Protection ("ICNIRP"). These thresholds are summarized in Table 4 below.

Table 4
International Guidelines for EMF Exposure

	EF (kV/m)	MF (mG)
ICES	5	9,040
ICNIRP	4.2	2,000

5.11 Federal Aviation Administration (FAA)

Eversource filed Notices of Proposed Construction or Alteration ("Notice") with the FAA for the Project. Based on the FAA responses received, three FAA determinations issued on September 6, 2024, require lighting and marking on two riverside structures (Structures 814 and 813) and placement of marker balls on the 1710/1730 lines across the river span, consistent with existing conditions. Power for the FAA-required lighting would be supplied from nearby local distribution lines.

6. Construction Traffic Management

Construction-related vehicular and equipment movements would utilize public roads to access the Project Area. On and off-ROW access roads would provide direct ingress/egress to construction work sites, as illustrated on the *Attachment A – Map Sheets.* However, Project-related traffic would be temporary and is generally expected to be more localized in the vicinity of the ROW access points and at the staging areas (described in Section 7.1), with the exception of work in Route 110 (River Road) where a detour would be needed.

To safely move construction vehicles and equipment onto and off the ROW while minimizing disruptions to vehicular traffic along public roads, Eversource or its Project contractor would work with the affected towns and CTDOT to develop and implement access and traffic control measures, as needed, and described below.

The traffic management procedures would be the responsibility of the construction contractor, including posting and maintaining construction warning signs along public roads near work sites, for coordinating the use of flaggers or police personnel to direct traffic, as required, and for informing the public of construction work zones.

Construction vehicles and equipment associated with the Project work would include, but would not be limited to, pickup trucks, bucket trucks, flat-bed trucks, excavator, concrete trucks, drill rigs, front loaders, reel trailers, bulldozers, forklifts, side booms, dump trucks and cranes. Pullers and tensioners would be used for the line work.

Access to Structures in Stratford and Temporary Detour

Access to upland structures in Stratford would be from River Valley Road and Main Street. Access from State Route 110 (River Road) would be used for structures closest to the Housatonic River.

Route 110 – Temporary Detour and Alternating Traffic

In advance of removing the existing adjacent DCLT structures (Structure 814 of the 1710/1730 lines, Structure 287 of the 1580/1590 lines and Structure 312 for the 1545/1483 lines) on the east side of the two-lane Route 110 (River Road) and installing the proposed monopole replacement structures on the west side, Eversource has coordinated with the Town of Stratford and CTDOT to develop a Traffic Management Plan ("TMP") to accommodate construction over a 30-week period in this area. The first five weeks and the last 10 weeks would allow for intermittent one-lane alternating traffic. The interim 15 weeks would result in the closure of Route 110 in the Project Area, limiting through-traffic to accommodate a large crane setup for structure removals and installation, and for wire pull activities. The detour would route traffic around the closure onto a section of Stratford's Main Street.

Before implementing the detour, neighborhood outreach would be conducted, and signage would be posted alerting residents and service providers of the activities. During the detour, assigned spotter/flagger(s) would be on-site during active construction. During the intermittent one-lane alternating traffic operations, local traffic may be infrequently stopped/delayed while equipment and material deliveries take place on Route 110.

Eversource continues on-going communications with the Town of Stratford and CTDOT regarding the Project details and proposed TMP and will be submitting a formal Encroachment Permit to CTDOT for approval.[24]

[24] Eversource met with CTDOT on February 4, 2025, and presented details of the proposed work in Route 110 (River Road), including temporary improvements for access to existing and proposed structures, use of periodic one-lane closures in the work area, and an approximate 15-week detour routing traffic to Main Street with

Access to Structures in Milford

On the east side of the Housatonic River, access to the more northerly structures would primarily be from Caswell Street, utilizing existing access roads in the transmission line corridor, as well as temporary matted access roads in this sensitive resource area.

Access to more southerly structures in Milford would utilize access from Bic Drive and Naugatuck Avenue, primarily using existing access roads.

Access to Devon Substation

Access to Devon Substation is provided at two locations from Naugatuck Avenue. The more northerly access is on a gravel road which crosses over the Iroquois Gas transmission line before crossing the CTDOT railroad at grade and then continuing onto an existing access road along the west side of the railroad to the Substation. The more southerly access from Naugatuck Avenue crosses over the railroad on a bridge to reach the Substation.

7. Construction Activities and Sequence

Eversource would direct the contractor to conduct daily pre-construction meetings prior to the start of work where all compliance conditions, including those in applicable environmental permit or approvals conditions, would be reviewed with the work crews prior to the start of work in the field. Protection measures for sensitive resources would also be part of the contractor training and education, including but not limited to time of year best management practices, monitoring, E&S controls, and installation of exclusionary features such as silt fences.

Project construction would include the following activities:

7.1 Establishing Staging Area/Laydown Yard

Eversource proposes to use a previously established staging area/laydown yard on approximately 3.45 acres located at 12 North Division Street in Derby (Figure 2), approximately 9 to 10 miles from the Project Area.

Eversource would also use an Eversource owned staging area/laydown yard located on 1.7 acres at 591 Bic Drive in Milford (Figure 3), located adjacent to the Project Area in Milford.

These staging area/laydown yards would be used to store construction equipment and materials, (including tools and supplies), conductor, insulators, hardware, structure components, and construction mats for the Project. Office trailers may also be located at the staging area/laydown areas. Transmission line components removed during the work (structure steel, conductor, shield

implementation of temporary traffic signal modifications and other improvements at the north and south ends of the detour. A similar presentation of proposed work in Route 110 was made at a January 29, 2025, meeting with representatives of the Town of Stratford, who later approved the temporary Route 110 road closure and detour of traffic at a meeting of the Stratford Traffic Authority on March 20, 2025.

wire, hardware, and insulators) also may be temporarily stored at these yards prior to removal off-site for salvage and/or disposal. The staging area/laydown yards may also be used by construction crew members for parking personal vehicles and construction vehicles, and for performing minor maintenance, when needed, on construction equipment.

E&S controls would be installed and maintained at the staging area/laydown yards until completion of the work in accordance with Project permits and Eversource's BMPs.

Figure 2: Staging Area/Laydown Yard (Derby)

Figure 3: Staging Area/Laydown Yard (Milford)

7.2 Tree Clearing and Vegetation Management Methods

The majority of vegetation work is located within an Eversource owned parcel located in Stratford. Two discrete locations in proximity to State Route 110 (River Road) and the western bank of the Housatonic River would also require tree clearing. All vegetation work would comply with Eversource's BMP Manual. Examples of BMPs contractors would employ include but are not limited to:

- Consider soil and weather conditions when scheduling vegetation removal activities such as during periods of heavy rainfall.
- Where practical, cut brush close to the ground, leaving root systems and stumps, to retain soil stability, especially in proximity to the Housatonic River.
- Temporary construction mats would also be used to provide a stable base for equipment to cross watercourses or wetlands.
- Woody debris, including logs and branches, will be removed from the ROW.

Tree clearing and vegetation removal would be accomplished using mechanical methods or by hand. Mechanical methods would typically require use of flat-bed trucks, mowers, brush hogs, or other types of mowing equipment, skidders, forwarders, bucket trucks for canopy trimming, and chippers.

Pruning and select tree removal would be primarily completed on foot by ground and climbing crews with chainsaws as needed. In some locations, mechanical equipment may be used to complete the work safely.

Trees designated to be removed would be cut parallel to and close to the ground. Limited, if any, stump removal may be conducted but will be in consultation with an affected property owner, as applicable.

7.3 Soil Erosion and Sediment Controls

Project construction activities would conform to Eversource BMPs for E&S controls, including those provided in the Connecticut Guidelines for Soil E&S Control ("Connecticut Guidelines") effective March 30, 2024, the 2024 Connecticut Stormwater Quality Manual, and the Project specific SWPCP. Temporary E&S control measures would be installed prior to beginning site work and would be maintained and inspected for the duration of the Project until final site stabilization has been achieved to ensure their integrity and effectiveness. SWPCP inspections would be performed in accordance with the DEEP General Permit and would be performed by a qualified inspector in accordance with the SWPCP and for compliance with the General Permit.[25]

[25] A qualified inspector would have a demonstrable and focused experience in erosion and sediment control, as defined in the DEEP General Permit for Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. E&S Controls will be inspected weekly and within 24 hours of the end of a storm that generates a discharge that equals or exceeds 0.5 inches. For storms of less than 0.5 inches, an inspection shall occur immediately upon the start of the subsequent normal working hours.

Typical E&S control measures include, but are not limited to, straw blankets, straw bales, silt fencing, rock construction entrances, soil and slope protection, water bars, check dams, berms, swales, and plunge pools.[26] Silt fences would be installed as needed to intercept and retain sediment and/or construction materials from disturbed areas and minimize the potential for sedimentation outside of the Project and staging areas.

Following construction, seeding and/or mulching or hydroseeding would be completed to permanently stabilize the areas disturbed by construction activities.

7.4 Access Roads and Work Pads

The Project would utilize existing access roads to the extent possible; however, some new access roads would be required in the Eversource ROWs as permitted under existing easement agreements. Prior to establishing new or improving existing access roads, work pads or pull pads, the limits of watercourses, wetlands, and vernal pools are marked in the field prior to construction.

Temporary construction matting would be utilized in wetlands, including the VP1 envelope, for access road construction as well as in other sensitive areas, such as NDDB areas, across residential lawns, and private driveways as needed to reach structure locations.

Existing in-ROW access roads may need to be improved (graded, widened, and/or reinforced) with additional material to accommodate the safe passage of construction vehicles and equipment.

New permanent access roads within the Eversource ROW would be limited to upland areas. Typically, the maximum width of an access road is approximately 16 feet wide (additional width may be needed at turning or passing locations). E&S controls would be installed as necessary before the commencement of improvements to or development of access roads.

Gates, pole barriers, and signage are currently used to discourage all-terrain vehicles from accessing the transmission line corridor. It is Eversource's standard work practice for work crews to close and lock all gates at the end of the workday. For any new access points that do not have gates or pole barriers, Eversource would install these upon request by the property owner during and/or after construction.

A work pad is required at each transmission line structure location to create a safe, level work base for construction and to stage material and equipment for final on-site structure assembly and/or removal, and to install new conductor and OPGW. The proposed work pads have been minimized to the greatest extent practicable but vary in size, from approximately 120 to 140 feet wide, to 140 to 180 feet long, to support activities needed for installation of new structures and removal of existing structures as shown on *Attachment A – Map Sheets*. The work pads would be

[26] Eversource prohibits non-biodegradable plastic netting in erosion control products specifically to avoid wildlife entanglement. Eversource is not aware of wildlife entanglement instances with other forms of E&S controls, such as silt fencing, straw wattles, etc. that are commonly used. Eversource has not utilized 100 percent natural fiber E&S controls as it is unclear whether this change in practice would provide an environmental benefit compared to current methods.

constructed with a gravel surface, though temporary matting would be utilized to protect sensitive areas (e.g., wetlands and watercourses, lawn areas, and vernal pool envelopes).

Pull pads are temporarily placed to accommodate wire pulling activities across structures and would be placed at specific locations within the transmission line corridor. Pull pads would have dimensions of approximately 80 feet wide by 120 feet long but may also vary due to terrain and would be constructed with temporary matting.

The approximate locations and configuration of the work pads and pull pads, are shown on *Attachment A – Map Sheets*.

To facilitate future transmission line maintenance, gravel access roads and work pads would be left in place. Gravel work pads within NDDB areas would be restored with stockpiled soil and/or processed stone, a DEEP approved native seed mix and straw mulch. During restoration activities, work areas would be monitored weekly to ensure compliance with E&S measures and then monitored monthly after restoration until the sites are stabilized.

Mitigation options would be discussed with individual property owners following the removal of temporary construction matting across lawn or private drive areas. If existing fencing on private property needs to be relocated to execute the work, the fence would be restored at the time of site restoration.

Per Eversource policy, stone walls located in open space or property owner-maintained areas that are located within proposed access roads or work pad locations will be breached only enough to permit passage of heavy equipment or to the limits of the work pad with the remainder of the stonewall left intact. If the stone wall needs to be dismantled, the stones will be placed within the ROW outside of active work zones, and the wall later restored to original condition during restoration, unless otherwise directed by the property owner. Rubble stone walls located outside of property owner-maintained areas will be dismantled and stones will either be utilized as part of restoration or placed within the ROW in a location that would not obstruct access unless otherwise directed by the property owner.

7.5 Foundation Installation

Structures would have either direct-embed or drilled caisson foundations. Installation of foundations would require the use of equipment such as mechanical excavators, drill rigs, pneumatic hammers, augers, drill rigs, dump trucks, concrete trucks, grapple trucks, cranes, and light duty trucks.

If groundwater was found to be impacted during pre-characterization sampling from proposed structure foundations (Refer to Section 5.1), then water generated from de-watering operations at those locations would be containerized in a fractionation tank, tested, and discharged or disposed off-site in accordance with applicable local, state, and federal requirements. Otherwise, if non-impacted groundwater is encountered, pumping (vacuum) trucks or other suitable equipment would be used to pump water from the excavated areas. The water would then be

discharged in accordance with applicable local, state, and federal requirements, the General Permit, and Eversource's BMPs.

Excavated soils that are generated during construction activities would not be temporarily stored or stockpiled in wetlands, floodways, or watercourses. The removal of temporarily stored or stockpiled soils would be managed during restoration activities. (Refer to Section 7.9)

7.6 Structure Installation

Structure sections and hardware would be delivered to the individual structure locations using flat-bed trucks and assembled on-site using a crane and bucket trucks.

Depending on site-specific soil conductivity, supplemental grounding such as counterpoise would be installed. A quad “ditch-witch” plow-cable trencher, or equivalent/similar type of equipment, would be used to install the counterpoise after the proposed structures are constructed to a depth of 18 to 24 inches.

7.7 Conductor/ Shield Wire Removal and Conductor/OPGW Installation

The Project would include two approaches to wire removal. First, the wire removal and installation for the 1545/1483, 1710/1730 and 1580 lines in the Project Area, including the Housatonic River crossing, would occur through an overhead wire pulling method after the proposed replacement structures have been installed. Second, the removal of the 1590 decommissioned line in the Project Area, and the two low voltage wires over the river crossing, would be managed with a “controlled let down.” Each approach is described below:

Wire Removal and Replacement – Overhead Wire Pulling Method

The removal of the existing conductor and shield wire for the 1545/1483, 1710/1730 and 1580 lines would take place during the active installation of the new conductor and OPGW as the existing conductor and shield wire would be used as pulling lines, if possible. The equipment required for these activities would include wire reels, compressors, conductor pulling and tensioning rigs, guard trucks or structures, and bucket trucks.

The typical replacement conductor and OPGW installation process is as follows:

1. The existing shield wire and existing conductor would be unclipped from the existing structures and transferred to the new structures and placed in blocks.
2. “Traveler blocks” (a series of pulleys) would be installed at each replacement structure and to the existing structures that are not going to be replaced (at the outer limits of the wire replacement lengths) so that the wire can be pulled.
3. The existing shield wire would be connected to a rope and pulled out while pulling in a hardline or rope at the same time. The new OPGW would be connected to the hardline or rope and pulled into position with the use of a tensioner to keep the OPGW from sagging while pulling.

4. The existing conductor would be connected to a rope and pulled out while pulling in a hardline or rope at the same time. The new conductor would be connected to the hardline and then pulled into position with the use of a tensioner to keep the conductor from sagging while pulling.
5. After the OPGW and new conductor are pulled into position, the traveler blocks would be removed and the OPGW will be clipped in.

When wire pulling activities occur over the Housatonic River, precautions would be taken when installing the replacement conductor and OPGW to avoid contact with water (and adjacent ground surfaces), and Eversource would coordinate with the Town of Stratford, City of Milford, and DEEP to notify the public, and specific recreational boat launch areas. The closest public boat launch site is the Caswell Cove Marina in Milford, located south of the transmission lines river crossing area, and therefore would not be directly affected by the construction zone during any wire pulling activities. In addition, Eversource proposes to post "CAUTION: ACTIVE CONSTRUCTION ZONE OVER RIVER" signs along the Housatonic River in the vicinity of the overhead wire crossing. Eversource also plans to provide advance notice to the abutting property owners.

Helicopters may also be used for the replacement line work where equipment access is limited or to avoid impacts to sensitive resources. In the event helicopters are utilized, advanced notification to the affected municipality and property owners would be provided.

Wire Removal - Controlled Let Down

The removal of the 1590 decommissioned line in areas outside of the Housatonic River crossing would involve a "controlled let down" whereby in areas where the line crosses over a road or railroad tracks, the line would be lowered under relaxed tension control before being cut and immediately removed to the sides of the ground features using pre-arranged standby crews and equipment. Appropriate traffic control measures as well as precautions around the railroad tracks (as coordinated with CTDOT and MNR) would be instituted during the controlled let downs.

At the Housatonic River crossing, the removal of the 1590 line (three conductor lines and shield wire) and the two low voltage wires would also require a controlled let down onto the river surface. A buoy would be attached to each wire (a total of six wires) to help keep them from dragging across the bottom of the river. These wires would be lowered individually under relaxed tension onto the river surface before being cut and immediately pulled out to the sides of the river with pre-arranged standby crews and equipment. Because of their length, removal of these wires by helicopter is not a viable option.

Precautions to river traffic would be similar to that described above for the wire pulling activities over the river. During the wire letdown and removal, river traffic would be managed for public safety in accordance with requirements established as a result of coordination and review with the DEEP Boating Division, DEEP Wildlife Management Area, the Caswell Cove Marina, the Town of Stratford, the City of Milford, and the U.S. Coast Guard. This work would also be

conducted in accordance with USACE permit conditions. A Preconstruction Notification is being prepared and submitted to both USACE and DEEP. A preapplication meeting was held with these agencies in March 2025. A complete list of anticipated permits is provided in Section 8.

7.8 Structure Removal

After the new conductor and OPGW installation is complete, the existing structures would be removed from the ROW and recycled or otherwise disposed of properly.

7.9 Restoration

After construction is complete, Eversource would perform ROW restoration in accordance with the protocols specified in the Project permits, Eversource's BMPs, and in consultation with any property owners affected by the Project.

Post-construction restoration of the ROW would include the removal of construction debris, signage, flagging, temporary fencing, and temporary construction mats. Disturbed areas would be restored as practical and stabilized with vegetation or other measures before removing temporary E&S controls. Surface restoration of lawn, driveway surfaces, or public road (e.g., widened road turning radius at Main Street Putney/River Road) intersection locations would be implemented, if necessary.

Excavated soils from the Project that Eversource has no reason to believe may be impacted based on a desktop analysis of publicly known impacted locations, land uses and/or olfactory/visual indicators, etc., that cannot be used as backfill in the immediate vicinity of where they were excavated, would be regraded into adjacent uplands and stabilized in accordance with Eversource's BMPs and the SWPCP. Excavated soils to be used for restoration will not change the grades in any flood plains or floodways.

Excavated soils that cannot be reused in adjacent uplands or were found to be impacted during pre-characterization sampling (Refer to Section 5.1) would be transported from the work location and properly managed off-site in accordance with Eversource's BMPs, applicable local, state, or federal laws, and with the project specific Soil and Groundwater Management Plan for impacted soils, if necessary.

Work pad restoration includes layering the work pad surface with stockpiled topsoil or fine processed gravel (utilizing topsoil as a priority when it is present), application of a native seed mix, and installation of temporary erosion and sediment controls (e.g., straw mulch, and environmental controls with no plastic netting to limit wildlife entanglement, compost filters, biodegradable erosion control blankets), which would be regularly inspected and maintained until final stabilization has been achieved.

7.10 Waste Management

Waste materials, such as structure components (i.e., steel from the removed structures, conductor, shield wire, associated hardware, etc.) and other construction debris would be reclaimed through the Eversource Investment Recovery System and/or disposed of in accordance with Eversource's BMPs, applicable regulations, or recycled consistent with applicable rules and regulations and Eversource policies.

8. Project Permits / Notification

The following permits and notifications required for this Project are listed by agency as follows:

- USACE/DEEP Self Verification Notification (SVN) – for work in freshwater wetlands
- USACE/DEEP Pre-Construction Notification (PCN) – for work in tidal wetlands and Housatonic River crossing
- NOAA Fisheries Section 7/Essential Fish Habitat Consultation
- Federal Aviation Administration (FAA) - Notice of Proposed Construction or Alteration
- Connecticut Department of Energy and Environmental Protection
    - General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities
    - Natural Diversity Data Base (NDDB) Determination – state-listed endangered, threatened, or special concern species
    - State Land Notification (SLN) - for work in the Charles E. Wheeler Wildlife Management Area
    - State Historic Preservation Office (SHPO) Notification
    - Certificate of Permission (COP) – for rebuild work within the coastal jurisdiction line
    - Fisheries Consultation
    - Department of Agricultural, Bureau of Aquaculture Consultation
- The Public Utilities Regulatory Authority (PURA) – Approval for Method and Manner of Construction and Lines Energization
- CTDOT (District 3) - Encroachment Permit and Traffic Management Plan
- CTDOT Office of Rail / Metro North Railroad - Right of Entry Permit
- Stratford Shellfish Commission Consultation
- Stratford and Milford Harbor Management Notifications

The in-water work is included as part of the PCN to be filed with the USACE. Eversource would also conduct consultations with NOAA fisheries, Stratford Shellfish Commission, and local harbor management agencies in the Project Area related to the in-water work activities and their coordination.

9. Construction Schedule and Work Hours

Construction activities are planned to commence in Q1 2026; however, the start of construction is permit dependent. The planned in-service date for the Project is December 2026.

Construction work hours would typically be between 7:00 AM and 7:00 PM, six days per week (Monday through Saturday).[27] However, E&S controls and other work area inspections may occur outside these standard hours, as necessary, to comply with BMP and permit requirements. At the staging/laydown areas, construction workers may arrive for and leave work outside of these times but would not engage in noise generating construction activities before or after the designated work hours. In addition, during winter, snow plowing and de-icing activities would typically commence, when necessary, prior to 7:00 AM to ensure a safe environment for construction personnel prior to the start of the workday.

During outage switching to de-energize a line and/or re-energize another line, access to substations may be required outside of typical work hours, specifically after 7:00 pm and before 7:00 am and often on weekends. The line switching activities are not noise producing and would occur inside the control enclosures in each of the substations associated with a particular outage, however, ingress and egress at the substations may require gate openings for truck access and safety lights may be triggered during the short duration switchover event. The currently identified switchovers[28] during the Project's duration involves substations both within and outside[29] the Project Area. Eversource would notify the municipalities of the proposed modified work hours as the actual planned event date approaches and would continue to work with the municipalities and nearby abutters of these substations to apprise them of the work and to resolve potential concerns.

On occasion, Sunday work hours might be required to meet scheduling Project needs other than outage switching. In those instances where work during non-typical house is required, notice would be provided in advance to the Council, the affected municipalities, and abutters.

10. Municipal and Property Owner Outreach

Eversource has a dedicated outreach team that communicates with affected and interested stakeholders throughout the phases of a Project, from planning and development through completion. For the Project, Eversource completed a series of outreach activities to municipal

[27] Wire pulling activities over the CTDOT railroad ROW that carries the Metro North Waterbury Line would be subject to Metro North requirements that may entail work outside of standard work hours.

[28] Eversource requests transmission outage to support Project work from The Connecticut Valley Electric Exchange (CONVEX) via their database which is utilized by all utilities in Connecticut. After CONVEX review, it submits the request to ISO-NE for final approval. The actual number of switchovers have not yet been determined and will depend on the actual sequence of work activities to be coordinated with the Project contractor.

[29] Substations within and outside the Project Area, which will be entered outside of typical construction work hours for outage switching, include Eversource's Devon Substation, East Devon Substation, and South Naugatuck Substation; as well as United Illuminating's owned Old Town Substation, Pequonnock Substation, Pootatuck Substation, Trap Falls Substation, and Trumbull Substation. Eversource will coordinate with United Illuminating as required to support switching activities.

officials and abutting property owners to inform them of the proposed Project, discuss impacts, restoration, and potential mitigation, if necessary. Eversource would continue to engage with municipal officials, community groups, property owners, and other interested stakeholders throughout the duration of the Project.

Eversource consulted with the Town of Stratford and the City of Milford in April of 2025 to provide an initial briefing on the proposed Project.

- A meeting was held with the Mayor of Stratford and local officials on April 16, 2025. Discussion focused on the Route 110 (River Road) temporary detour and alternating traffic plan. Eversource commits to ongoing communication with the town to coordinate efforts during construction.
- A meeting was held with Milford local officials on April 14, 2025. There were no concerns.

Outreach to abutting property owners also began in April 2025 when Eversource sent abutting property owners a notice to introduce the Project and explain the proposed scope and its schedule. These introduction letters included a Hotline for Connecticut Projects - # 1-800-793-2202 - and email address - ProjectInfo@eversource.com - so that property owners can reach out to a Project representative at their convenience. Municipal officials were also provided with a copy of the letter.

Following these introduction letters, 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 discussing potential site-specific impacts from the work. Any follow up topics or specific restoration requests are noted and appropriate follow up is completed. To date, Eversource has not received any specific requests or received any concerns regarding the proposed work.

In conjunction with the submission of this Petition, all abutting propertycro owners were notified of the filing and provided information on how to obtain additional information on the Project, as well as how to submit comments to the Council (*Attachment I*: *Letter to the Abutters and Affidavit*).

Eversource is committed to continuing these conversations with property owners and other stakeholders. Eversource representatives will continue to conduct mailings as well as in-person door-to-door outreach contact with abutting property owners to provide advance notification as to the start of construction activities and updates throughout the phases of construction and restoration.

11. Conclusion

Based on the foregoing, Eversource respectfully submits that the proposed modifications would not result in a substantial adverse effect on the environment, nor would they damage existing scenic, historical, or recreational values. Accordingly, Eversource requests that the Council issue

a declaratory ruling that the proposed modifications would not require a Certificate of Environmental Compatibility and Public Need.

Communications regarding this Petition for a Declaratory Ruling should be directed to:

Deborah Denfeld
Team Lead – Transmission Siting
Eversource Energy
PO Box 270
Hartford, CT 06141-0270
Telephone: (860) 728-4654

By: 

Deborah Denfeld
Team Lead – Transmission Siting
deborah.denfeld@eversource.com

List of Attachments:

A: Map Sheets
B: Structure Table
C: Typical Cross Sections
D: SHPO Review Letter
E: Wetland and Watercourse Delineations – Technical Memorandum
F. Vernal Pool Report
G. NDDB Determination Letter
H. EMF Graphs
I: Letter to Abutters and Affidavit

Attachment A

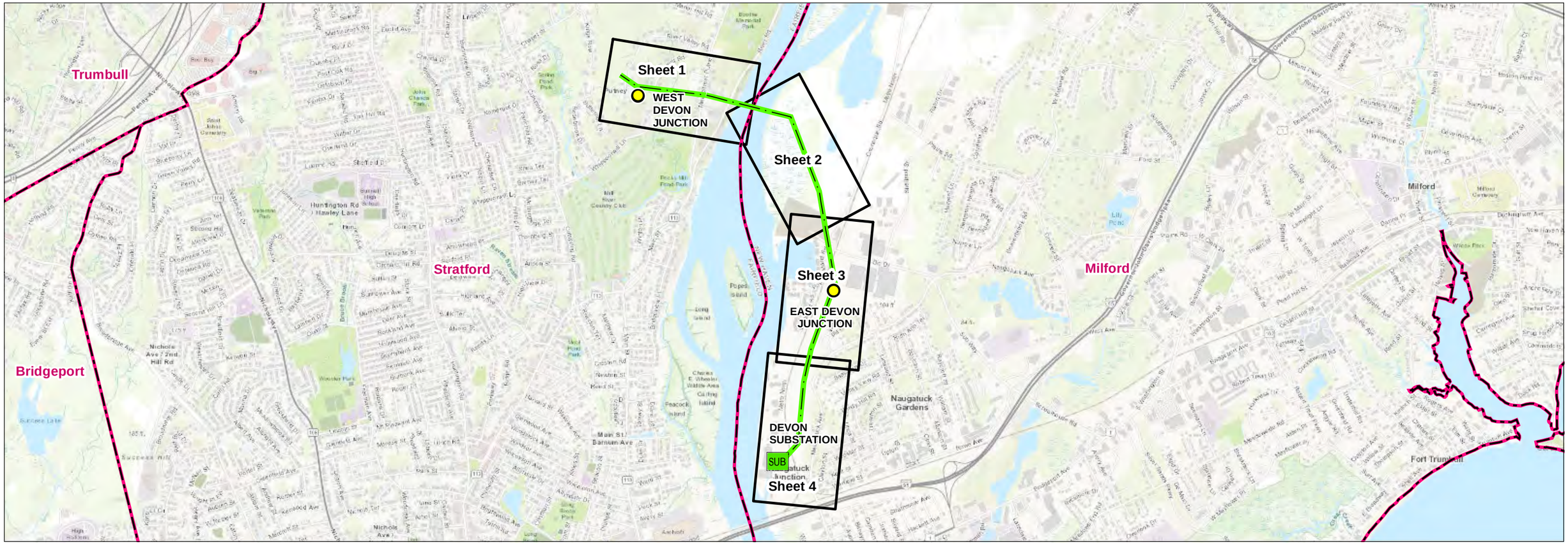
Map Sheets

West Devon Junction to Devon Substation Rebuild Project

Stratford & Milford, Connecticut

Petition Map Set

Date: July 07, 2025



Legend

Junction | SUB Substation | Project ROW | Municipal Boundary | Map Sheet

N

0 0.25 0.5 Miles

NO.	DATE	REVISIONS

PREPARED FOR:

EVERSOURCE

PREPARED BY:

Tighe&Bond

INDEX OF FIGURES

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Mapsheet 1 of 4
West Devon Junction to Devon Substation Rebuild Project
Town of Stratford, Connecticut

AREA DESCRIPTION

Existing Land Use & Resource Areas

- Natural Diversity Database Area
- Eversource Owned Property
- West Devon Junction
- FEMA 100-Year Flood Zone
- FEMA 500-Year Flood Zone
- FEMA Floodway
- Open Water (Housatonic River)
- Coastal Boundary
- Coastal Jurisdiction Line

RIGHT-OF-WAY DESCRIPTION

- ± 110 Feet and ± 250 Feet
- Maintained to Meet Existing Clearance Requirements
- Gravel Access Roads
- Gravel Work Pads

Water Resources

- Wetland – W1, W2, W3
- Watercourses – S1, S2, S3 (Housatonic River)
- Vernal Pools – VP1

Wetland and Watercourse Crossings

- W1, W2, W3
- S1, S2

Right-of-Way Vegetation

- Scrub-Shrub Wetland
- Emergent Wetland
- Residential, Maintained Grass Upland
- Trees
- Scrub-Shrub Upland

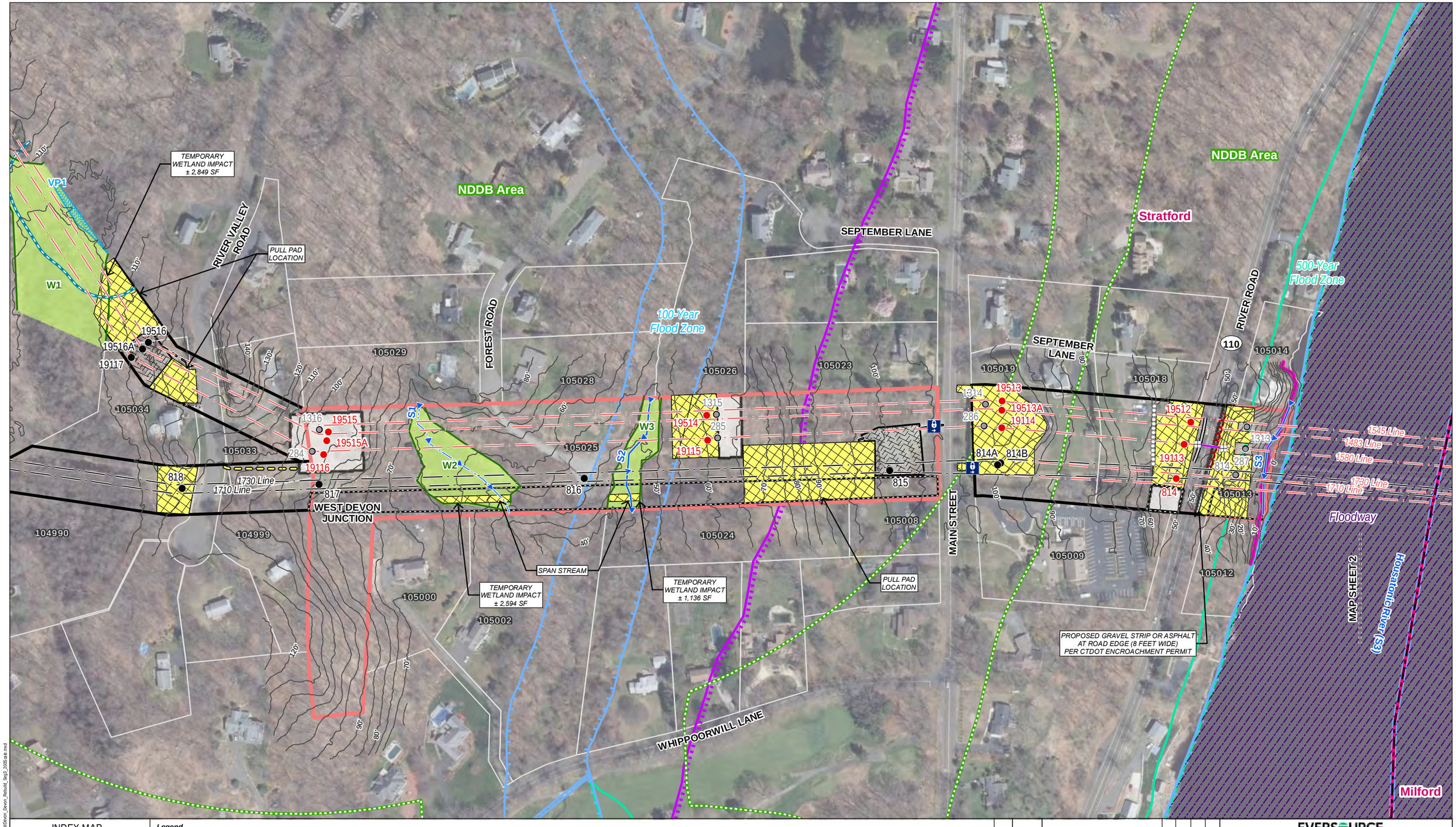
Access

- From River Valley Road
- From Main Street
- From River Road (Route 110)

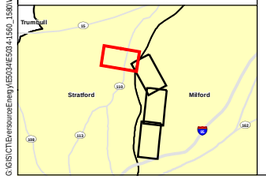
Road Crossings

- River Valley Road
- Main Street
- River Road (Route 110)

Line List	Parcel Address	City	State	Owner Name
104990	60 BUTTERNUT LN	STRATFORD	CT	SAAD PHILIP & PATRICIA LIVING TRUST
104999	545 RIVER VALLEY RD	STRATFORD	CT	MAHAR JAMES A & MAHAR CAROL D (SV)
105000	190 WHIPPOORWILL LN	STRATFORD	CT	MEADY CHRISTINE K & JOSEPH M (SV
105002	170 WHIPPOORWILL LN	STRATFORD	CT	BARAN ALFRED P & BARAN JOYCE I (SV)
105008	5375 MAIN ST	STRATFORD	CT	GOODPASTER PAMELA L & HREBIN MARY PATRICIA
105009	5344 MAIN ST	STRATFORD	CT	WHITE OAK BAPTIST CHURCH
105012	RIVER RD	STRATFORD	CT	TOWN OF STRATFORD OPEN SPACE RIVER FRONT
105013	RIVER RD	STRATFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY ATTN PROPERTY TAX DEPT
105014	450 RIVER RD	STRATFORD	CT	SALCEDO VIELKA J PENA
105018	5400 MAIN ST	STRATFORD	CT	CHIMSUNUM CHUKWUWINKE & ESTHER (SV)
105019	5370 MAIN ST	STRATFORD	CT	MAYERS SHANE B & SIFISO H (SV)
105023	5395 MAIN ST	STRATFORD	CT	CRUZ STEPHANIE & MULHEARN MICHAEL JS (SV)
105024	MAIN ST	STRATFORD	CT	GOODPASTER PAMELA L & HREBIN MARY PATRICIA
105025	MAIN ST	STRATFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
105026	75 SEPTEMBER LN	STRATFORD	CT	DIXON JACINTH M & DIXON MICHAEL P (SV)
105028	240 FOREST RD	STRATFORD	CT	AUTEN JAMES W & EILEEN L (SV)
105029	245 FOREST RD	STRATFORD	CT	DEMEZZO AMY LYNN
105033	525 RIVER VALLEY RD	STRATFORD	CT	GLOSS STANLEY M & KATHLEEN B (SV
105034	520 RIVER VALLEY RD	STRATFORD	CT	JULIAN DONALD F & ROBIN C (SV)



INDEX MAP



Legend

- Proposed Structure
- Existing Structure
- Existing Structure to be Removed
- Culvert
- Gate
- Catch Basin
- Culvert Pipe
- Sewer Manhole
- Sewer Main
- Map Sheet Match Line
- Fence
- Stonewall
- Rubble Wall
- Guardrail Limits
- Underground 345kV Line
- Overhead Eversource Line
- Proposed Overhead Eversource Line
- Existing Right-of-Way (ROW)
- Approximate Gas Line
- 5' Contours
- Railroad
- Existing Access
- Proposed Access
- 100' Vernal Pool Envelope
- Confirmed Vernal Pool Extent
- Delineated Intermittent Watercourse
- Delineated Perennial Watercourse
- Field Delineated Wetland Boundary Outline
- Field Delineated Wetland
- Temporary Construction Matting
- Existing Gravel
- Proposed Stone Work Pad
- Tree Clearing
- Natural Diversity Database Area (Nov 2024)
- Critical Habitat
- FEMA 100-Year Flood Zone
- FEMA 500-Year Flood Zone
- FEMA Floodway
- Coastal Boundary
- Coastal Jurisdiction Line (5' - actual CJL is 4.9')
- Capped Ash Landfill
- State-Owned Property (CTDEEP)
- Parcel Boundary
- Eversource Owned Property
- Municipal Boundary
- Easement Area

N

1 inch = 200 feet

0 50 100 200 Feet

NO.	DATE	REVISIONS	BY	CHK	APP	APP

EVERSOURCE

West Devon Junction to Devon Substation Rebuild Project

Stratford & Milford, CT | Map Sheet 1 of 4

Date: July 07, 2025

Tighe&Bond

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Mapsheet 2 of 4
West Devon Junction to Devon Substation Rebuild Project
City of Milford, Connecticut

AREA DESCRIPTION

Existing Land Use & Resource Areas

- Critical Habitat (Intertidal Marsh)
- Coastal Boundary
- Eversource Owned Property
- Commercial
- Undeveloped Forest
- Railroad
- Charles E. Wheeler Wildlife Management Area
- Open Water (Housatonic River)
- FEMA 100-Year Flood Zone
- FEMA Floodway
- Natural Diversity Database Area
- Coastal Jurisdiction Line

RIGHT-OF-WAY DESCRIPTION

- ± 250 Feet
- Maintained to Meet Existing Clearance Requirements
- Gravel Access Roads
- Gravel Work Pads

Water Resources

- Wetland – W4
- Watercourses – S3 (Housatonic River)

Wetland and Watercourse Crossings

- W4
- S3

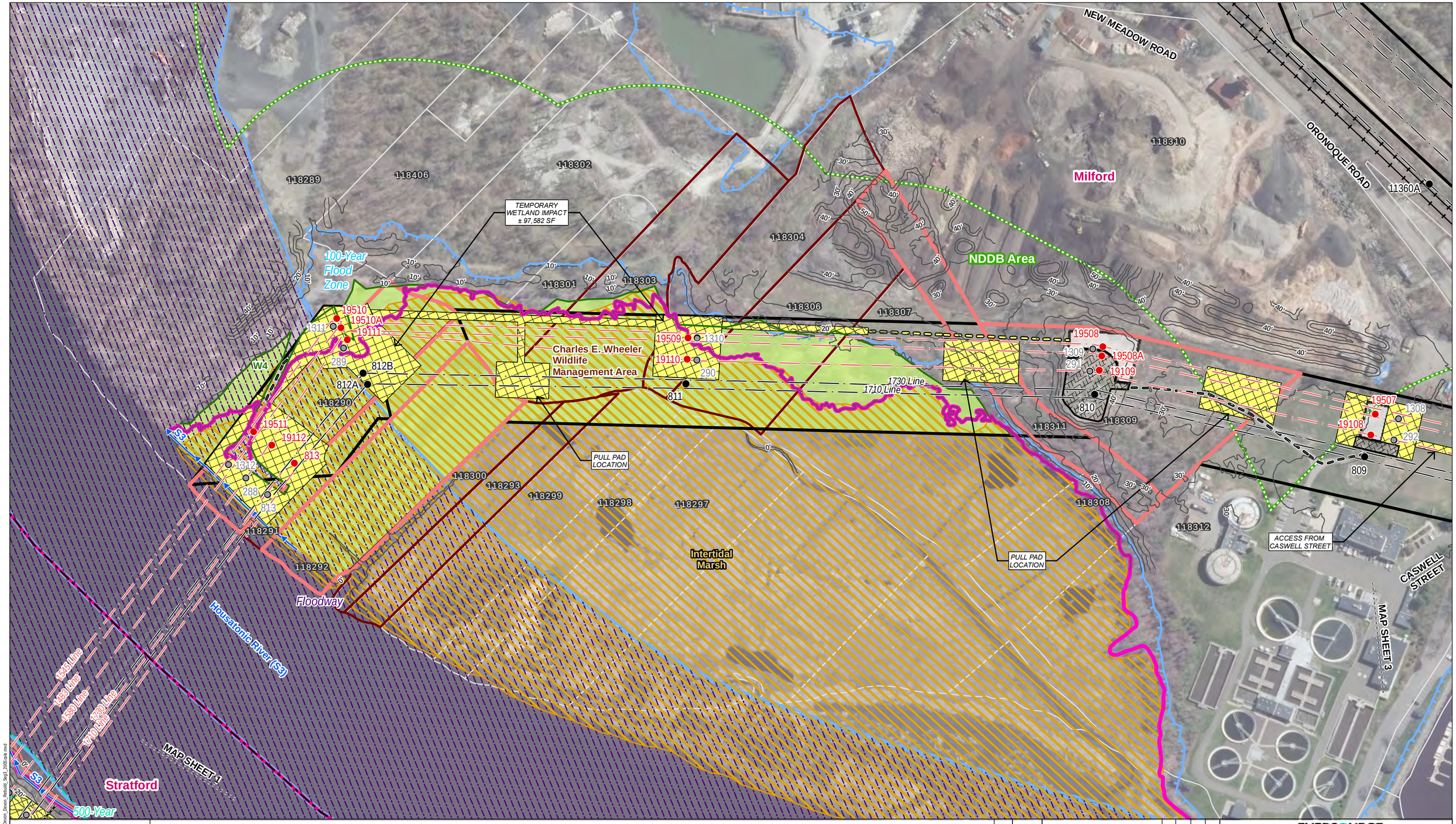
Right-of-Way Vegetation

- Scrub-Shrub Wetland
- Intertidal Marsh Habitat Wetland
- Scrub-Shrub Upland

Access

- From Caswell Street

Line List	Parcel Address	City	State	Owner Name
118289	0 CASWELL ST	MILFORD	CT	DAVIS HOLDING COMPANY
118290	0 CASWELL ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
118291	0 CASWELL ST	MILFORD	CT	STATE OF CONNECTICUT
118292	0 CASWELL ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
118293	0 CASWELL ST	MILFORD	CT	STATE OF CONNECTICUT
118297	0 CASWELL ST	MILFORD	CT	DAVIS HOLDING COMPANY
118298	0 CASWELL ST	MILFORD	CT	DAVIS HOLDING COMPANY
118299	0 CASWELL ST	MILFORD	CT	DAVIS HOLDING COMPANY
118300	0 CASWELL ST	MILFORD	CT	STATE OF CONNECTICUT
118301	0 CASWELL ST	MILFORD	CT	DAVIS HOLDING COMPANY
118302	0 CASWELL ST	MILFORD	CT	DAVIS HOLDING COMPANY
118303	0 CASWELL ST	MILFORD	CT	STATE OF CONNECTICUT
118304	0 CASWELL ST	MILFORD	CT	STATE OF CONNECTICUT
118306	0 CASWELL ST	MILFORD	CT	STATE OF CONNECTICUT
118307	0 CASWELL ST	MILFORD	CT	DAVIS HOLDING COMPANY
118308	0 CASWELL ST	MILFORD	CT	STATE OF CONNECTICUT
118309	0 CASWELL ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
118310	1183 ORONOQUE RD	MILFORD	CT	RASUN PROPERTIES ALPHA LLC C/O PALUMBO & DELAURA LLC
118311	0 CASWELL ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
118312	0 ORONOQUE RD	MILFORD	CT	CITY OF MILFORD
118406	0 CASWELL ST	MILFORD	CT	DAVIS HOLDING COMPANY



INDEX MAP

Legend

- Proposed Structure
- Existing Structure
- Existing Structure to be Removed
- Culvert
- Gate
- Catch Basin
- Culvert Pipe
- Sewer Manhole
- Sewer Main
- Map Sheet Match Line
- Fence
- Stonewall
- Rubble Wall
- Guardrail Limits
- Underground 345kV Line
- Overhead Eversource Line
- Proposed Overhead Eversource Line
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- Eversource Owned Property
- Municipal Boundary
- Easement Area

1 inch = 200 feet
0 50 100 200 Feet

NO.	DATE	REVISIONS	BY	CHK	APP	APP

EVERSOURCE

West Devon Junction to Devon Substation Rebuild Project

Stratford & Milford, CT | Map Sheet 2 of 4

Date: July 07, 2025

Tighe&Bond

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Mapsheet 3 of 4
West Devon Junction to Devon Substation Rebuild Project
City of Milford, Connecticut

AREA DESCRIPTION

Existing Land Use & Resource Areas

- Residential
- Commercial
- Railroad
- Eversource Owned Property
- Natural Diversity Database Area
- Coastal Jurisdiction Line
- Coastal Boundary
- FEMA 100-Year Flood Zone
- Open Water (Housatonic River)
- Underground 345kV Lines
- Transmission Gas Line (Iroquois Gas)

RIGHT-OF-WAY DESCRIPTION

- ± 250 Feet and ± 500 Feet
- Maintained to Meet Existing Clearance Requirements
- Gravel Access Roads
- Gravel Work Pads

Right-of-Way Vegetation

- Scrub-Shrub Upland

Access

- From Caswell Street
- From Bic Drive
- From Naugatuck Avenue

Road Crossings

- Caswell Street
- Bic Drive

Line List	Parcel Address	City	State	Owner Name
118286	565 BIC DR	MILFORD	CT	BIC CONSUMER PRODUCTS MANUFACTURING CO., INC
118287	0 CASWELL AV	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
118310	1183 ORONOQUE RD	MILFORD	CT	RASUN PROPERTIES ALPHA LLC C/O PALUMBO & DELAURA LLC
118312	0 ORONOQUE RD	MILFORD	CT	CITY OF MILFORD
118314	0 CASWELL ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
118315	1240 ORONOUQUE RD	MILFORD	CT	SZAREK PIOTR
118316	500 BIC DR	MILFORD	CT	MDC MILFORD ASSOCIATES LLC C/O MOUNTAIN DEVELOPMENT CORP
118317	1-66 GREENVIEW LN	MILFORD	CT	GLENWOOD COMPLEX
118318	0 CASWELL AVE	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
118321	1-66 GREENVIEW LN	MILFORD	CT	CASWELL COVE COMPLEX
118328	948 NAUGATUCK AVE	MILFORD	CT	ALBRITTON THOMAS & MAUREEN
118329	956 NAUGATUCK AVE	MILFORD	CT	SERVIDEO LOUIS A & ANN C & SURV
118330	964 NAUGATUCK AVE	MILFORD	CT	MILLER CYNTHIA
118331	0 NAUGATUCK AVE	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
118333	0 NAUGATUCK AVE	MILFORD	CT	NAUGATUCK AVE LLC
118334	990 NAUGATUCK AVE	MILFORD	CT	NAUGATUCK AVE LLC
132651	0 BIRKS ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132652	0 BIRKS ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132653	0 BIRKS ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132654	0 NORMAN ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132655	0 FISHER AVE	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132656	0 FISHER AVE	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132657	0 FISHER AVE	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132658	0 FISHER AVE	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132659	0 HOWARD AVE	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132660	0 HOWARD CT	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132661	0 CAMPBELL AVE	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132662	0 CASWELL ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132663	0 CAMPBELL AVE	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
132665	0 BIRKS ST	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY

EXISTING STAGING AREA / LAYDOWN YARD

BIC DRIVE

CROWLEY AVENUE

SASSACUS DRIVE

MAP SHEET 4

Milford

WOODHILL ROAD

NAUGATUCK AVENUE

3165 & 3619 Lines

EAST DEVON JUNCTION

1640 Line
1685 Line
1497 Line
1483 Line
1545 Line
1580 Line
1730 Line
1710 Line
1776 Line

Iroquois Gas Transmission Line

GREENVIEW LANE

ORONOQUE ROAD

POPES ISLAND ROAD

CASWELL STREET

WINDWARD ROAD

NDDB Area

100-Year Flood Zone

Housatonic River

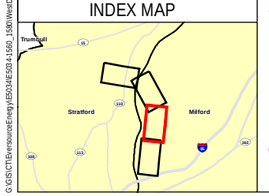
Floodway

ACCESS FROM NAUGATUCK AVENUE

MAP SHEET 2

132654 132655 132656 132658 118286 3809 132657 132659 132660 132661 132663 132662 132665 24488 132653 132652 132651 118287 118316 3808 24487 11359 118315 11358 11357 118310 19506 1307 293 19107 807 118314 118317 808 19507 1308 292 19108 809 118312 3807 24486 1306 19505 19505A 19106 1306A 294A 294 806 11356 805 3806 24485 19504 19105 1305 295 804 11355 118317 118321 118318 118330 118328 118329 3805 24484 19503 19503A 1304 19104 296 803 11354 118331 802 11353 118317 118333 118334

INDEX MAP



Legend

- Proposed Structure
- Existing Structure
- Existing Structure to be Removed
- Culvert
- Gate
- Catch Basin
- Culvert Pipe
- Sewer Manhole
- Sewer Main
- Map Sheet Match Line
- Fence
- Stonewall
- Rubble Wall
- Guardrail Limits
- Underground 345kV Line
- Overhead Eversource Line
- Proposed Overhead Eversource Line
- Existing Right-of-Way (ROW)
- Approximate Gas Line
- 5' Contours
- Railroad
- Existing Access
- Proposed Access
- 100' Vernal Pool Envelope
- Confirmed Vernal Pool Extent
- Delineated Intermittent Watercourse
- Delineated Perennial Watercourse
- Field Delineated Wetland Boundary Outline
- Field Delineated Wetland
- Temporary Construction Matting
- Existing Gravel
- Proposed Stone Work Pad
- Tree Clearing
- Natural Diversity Database Area (Nov 2024)
- Critical Habitat
- FEMA 100-Year Flood Zone
- FEMA 500-Year Flood Zone
- FEMA Floodway
- Coastal Boundary
- Coastal Jurisdiction Line (5' - actual CJL is 4.9')
- Capped Ash Landfill
- State-Owned Property (CTDEEP)
- Parcel Boundary
- Eversource Owned Property
- Municipal Boundary
- Easement Area

1 inch = 200 feet
0 50 100 200 Feet

NO.	DATE	REVISIONS	BY	CHK	APP	APP

EVERSOURCE

West Devon Junction to Devon Substation Rebuild Project

Milford, CT | Map Sheet 3 of 4

Date: July 07, 2025

Tighe&Bond

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Mapsheet 4 of 4
West Devon Junction to Devon Substation Rebuild Project
City of Milford, Connecticut

AREA DESCRIPTION

Existing Land Use & Resource Areas

- Residential
- Industrial
- Railroad
- Eversource Owned Property
- Natural Diversity Database Area
- Coastal Boundary
- Coastal Jurisdiction Line
- FEMA 100-Year Flood Zone
- Open Water (Housatonic River)
- Underground 345kV Lines
- Iroquois Gas Transmission Line
- Capped Ash Landfill
- Devon Substation
- Devon Railroad Substation

RIGHT-OF-WAY DESCRIPTION

- ± 500 Feet
- Maintained to Meet Existing Clearance Requirements
- Gravel Access Roads
- Gravel Work Pads

Water Resources

- Wetland – W5, W6

Wetland and Watercourse Crossings

- W6

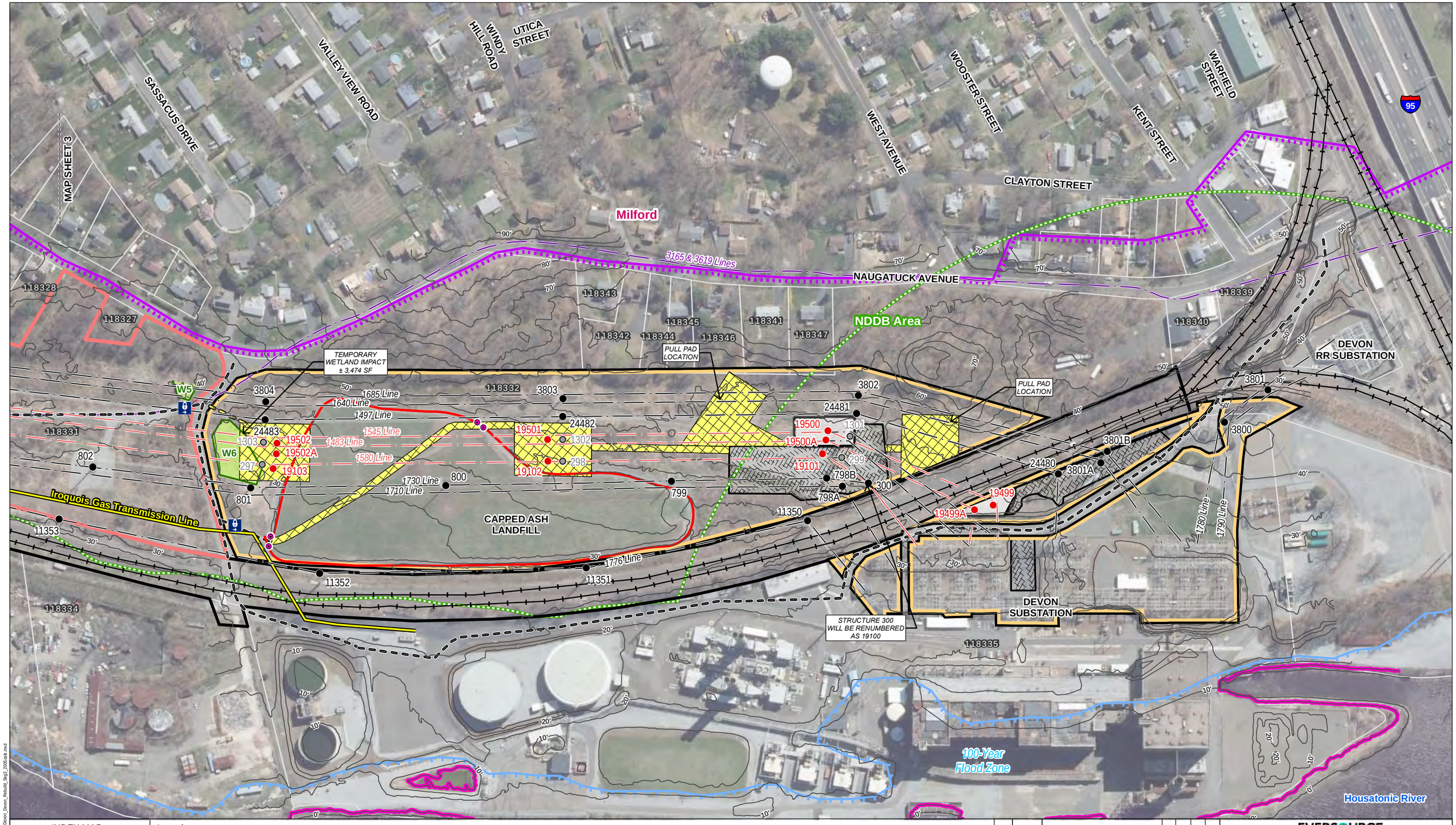
Right-of-Way Vegetation

- Scrub-Shrub Upland
- Herbaceous Wetland
- Residential, Maintained Grass Upland

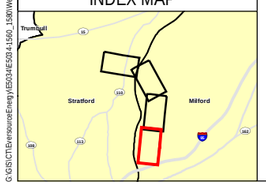
Access

- From Naugatuck Avenue

Line List	Parcel Address	City	State	Owner Name
118327	0 NAUGATUCK AVE	MILFORD	CT	CITY OF MILFORD
118328	948 NAUGATUCK AVE	MILFORD	CT	ALBRITTON THOMAS & MAUREEN
118329	956 NAUGATUCK AVE	MILFORD	CT	SERVIDEO LOUIS A & ANN C & SURV
118331	0 NAUGATUCK AVE	MILFORD	CT	CONNECTICUT LIGHT AND POWER COMPANY
118332	0 NAUGATUCK AVE	MILFORD	CT	DEVON POWER LLC ATTN TAX DEPT
118333	0 NAUGATUCK AVE	MILFORD	CT	NAUGATUCK AVE LLC
118334	990 NAUGATUCK AVE	MILFORD	CT	NAUGATUCK AVE LLC
118335	734 NAUGATUCK AVE	MILFORD	CT	DEVON POWER LLC ATTN TAX DEPT
118339	744 NAUGATUCK AVE	MILFORD	CT	CASEY BROTHERS LLC
118340	735 NAUGATUCK AVE	MILFORD	CT	CASEY BROTHERS LLC
118341	814 NAUGATUCK AVE	MILFORD	CT	KAYALIOGLU ZERRIN & KAYALIOGLU NAIL KORKUT JT TNTS
118342	852 NAUGATUCK AVE	MILFORD	CT	GLOECKNER MARC A
118343	856 NAUGATUCK AVE	MILFORD	CT	PISELLI CARLO A & PISELLI ALICIA & SURV
118344	846 NAUGATUCK AVE	MILFORD	CT	HOWAROAD REBEKAH L
118345	844 NAUGATUCK AVE	MILFORD	CT	CIMBAK JEROME JR & GINA & SURV
118346	834 NAUGATUCK AVE	MILFORD	CT	834 NAUGATUCK REALTY LLC
118347	806 NAUGATUCK AVE	MILFORD	CT	NOVAK JANET A



INDEX MAP



Legend

- Proposed Structure
- Existing Structure
- Existing Structure to be Removed
- Culvert
- Gate
- Catch Basin
- Culvert Pipe
- Sewer Manhole
- Sewer Main
- Map Sheet Match Line
- Fence
- Stonewall
- Rubble Wall
- Guardrail Limits
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- Proposed Overhead Eversource Line
- Existing Right-of-Way (ROW)
- Approximate Gas Line
- 5' Contours
- Railroad
- Existing Access
- Proposed Access
- 100' Vernal Pool Envelope
- Confirmed Vernal Pool Extent
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- Delineated Perennial Watercourse
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- Field Delineated Wetland
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- Existing Gravel
- Proposed Stone Work Pad
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- FEMA 100-Year Flood Zone
- FEMA 500-Year Flood Zone
- FEMA Floodway
- Coastal Boundary
- Coastal Jurisdiction Line (5' - actual CJL is 4.9')
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- State-Owned Property (CTDEEP)
- Parcel Boundary
- Eversource Owned Property
- Municipal Boundary
- Easement Area

1 inch = 200 feet

0 50 100 200 Feet

NO.	DATE	REVISIONS	BY	CHK	APP	APP

EVERSOURCE

West Devon Junction to Devon Substation Rebuild Project

Milford, CT

Map Sheet 4 of 4

Date: July 07, 2025

Tighe&Bond

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Attachment B

Structure Tables

Structure Table
West Devon Junction to Devon Substation
1545/1483 Lines
July 2025

Line(s)	Existing Structure No.	Existing Structure Description	Existing Structure Height (feet)	Proposed Structure No.	Proposed Structure Description	Proposed Structure Height (feet)	Change in Structure Height (feet)	Justification for Structure Replacement
	West Devon Junction							
1483	**1316**	DCLT	103	**19515A**	SCSP	115	**12**	Asset Condition - Degradation
1545				**19515**	SCSP	115		
1545/1483	**1315**	DCLT	87	**19114**	DCSP	135	**48**	Asset Condition - Degradation
1483	**1314**	DCLT	82	**19513A**	SCSP	105	**23**	NESC Vertical Clearances
1545				**19513**	SCSP	105		
1545/1483	**1313**	DCLT	140	**19512**	DCSP	165	**25**	NESC Vertical Clearances
	Housatonic River							
1545/1483	**1312**	DCLT	140	**19511**	DCSP	190	**50**	NESC Vertical Clearances
1483	**1311**	DCLT	81	**19510A**	SCSP	140	**59**	Asset Condition - Degradation
1545				**19510**	SCSP	140		
1545/1483	**1310**	DCLT	87	**19509**	DCSP	125	**38**	Asset Condition - Degradation
1483	**1309**	DCLT	92	**19508A**	SCSP	95	**3**	Asset Condition - Degradation
1545				**19508**	SCSP	95		
1545/1483	**1308**	DCLT	92	**19507**	DCSP	110	**18**	Asset Condition - Degradation
1545/1483	**1307**	DCLT	92	**19506**	DCSP	145	**53**	NESC Vertical Clearances
1545/1483	**1306A (1)**	DCSP	100	**NA**	**NA**	**NA**	**NA**	NA
1483	**1306**	DCLT	92	**19505A**	SCSP	130	**38**	Overloaded - Stressed Conditions
1545				**19505**	SCSP	130		
1545/1483	**1305**	DCLT	82	**19504**	DCSP	110	**28**	Overloaded - Stressed Conditions
1483	**1304**	DCLT	82	**19503A**	SCSP	100	**18**	Overloaded - Stressed Conditions
1545				**19503**	SCSP	100		
1483	**1303**	DCLT	92	**19502A**	SCSP	105	**13**	Overloaded - Stressed Conditions
1545				**19502**	SCSP	105		
1545/1483	**1302**	DCLT	83	**19501**	DCSP	95	**12**	Overloaded - Stressed Conditions
1483	**1301**	DCLT	82	**19500A**	SCSP	100	**18**	Line Realignment & Horizontal Clearances
1545				**19500**	SCSP	100		
1545	**-**	-	-	**19499**	SCSP	65	**New**	Line Realignment & NESC Vertical Clearances
1483	**-**	-	-	**19499A**	SCSP	65	**New**	Line Realignment & NESC Vertical Clearances
	Devon Substation							

NESC - National Electrical Safety Code

Existing Structures Legend:	
DCLT	Double Circuit Lattice Tower (steel)
DCSP	Double Circuit Steel Pole

Proposed Structures Legend: (Galvanized Steel)	
SCSP	Single Circuit Steel Pole
DCSP	Double Circuit Steel Pole

(1) Structure to be removed without replacement. Structure is no longer needed for vertical clearance with replacement line geometry

Structure Table
West Devon Junction to Devon Substation
1580 Line (and 1590 Decomissioned Line)
July 2025

Line(s)	Existing Structure No.	Existing Structure Description (1)	Existing Structure Height (feet)	Proposed Structure No.	Proposed Structure Description	Proposed Structure Height (feet)	Change in Structure Height (feet)	Justification for Structure Replacement
	West Devon Junction							
1580	**284**	DCLT	88	**19116**	SCSP	115	**27**	Asset Condition - Degradation
1580	**285**	DCLT	88	**19115**	SCSP	140	**52**	Asset Condition - Degradation
1580	**286**	DCLT	87	**19114**	SCSP	100	**13**	Asset Condition - Degradation
1580	**287**	DCLT w/Connection (2)	205	**19113**	SCSP	165	**-40**	Overloaded - Stressed Conditions
	Housatonic River							
1580	**288**	DCLT w/Connection (3)	209	**19112**	SCSP	190	**-19**	Overloaded - Stressed Conditions
1580	**289**	DCLT	76	**19111**	SCSP	145	**69**	Overloaded - Stressed Conditions
1580	**290**	DCLT	81	**19110**	SCSP	130	**49**	Asset Condition - Degradation
1580	**291**	DCLT	78	**19109**	SCSP	95	**17**	Asset Condition - Degradation
1580	**292**	DCLT	78	**19108**	SCSP	107.5	**29.5**	Asset Condition - Degradation
1580	**293**	DCLT	90	**19107**	SCSP	135	**45**	Overloaded - Stressed Conditions
1580	**294A**	DCSP	104	**NA**	**NA**	**NA**	**NA**	NA
1580	**294**	DCLT	89	**19106**	SCSP	130	**41**	Overloaded - Stressed Conditions
1580	**295**	DCLT	78	**19105**	SCSP	103	**25**	Asset Condition - Degradation
1580	**296**	DCLT	78	**19104**	SCSP	100	**22**	Asset Condition - Degradation
1580	**297**	DCLT	82	**19103**	SCSP	110	**28**	Asset Condition - Degradation
1580	**298**	DCLT	79	**19102**	SCSP	95	**16**	Asset Condition - Degradation
1580	**299**	DCLT	81	**19101**	SCSP	110	**29**	Adjust for 1545/1483 Line Realignment (From Structure 1301 Replacement) & Horizontal Clearances
	Devon Substation							

NESC - National Electrical Safety Code

Existing Structures Legend:	
DCLT	Double Circuit Lattice Tower (steel)
DCSP	Double Circuit Steel Pole

Proposed Structures Legend: (Galvanized Steel)	
SCSP	Single Circuit Steel Pole

(1) The existing DCLT structures carry the 1580 line and the 1590 decommsionned line. The 1590 line will be removed and not be replaced

(2) Steel cross-arm connection to adjacent structure 814 on the 1710/1730 lines

(3) Steel cross-arm connection to adjacent structure 814 on the 1710/1730 line

(4) Structure to be removed without replacement. Structure is no longer needed for vertical clearance with replacement line geometry

Structure Table
West Devon Junction to Devon Substation
1710/1730 Lines
July 2025

Line(s)	Existing Structure No.	Existing Structure Description	Existing Structure Height (feet)	Proposed Structure No.	Proposed Structure Description	Proposed Structure Height (feet)	Change in Structure Height (feet)	Justification for Structure Replacement
	West Devon Junction							
1710/1730	**814**	DCLT w/Connection (1)	195	**814**	DCSP	180	**-15**	Aged (101 year old) lattice tower steel structure at riverside crossing
	Housatonic River							
1710/1730	**813**	DCLT w/Connection (2)	207	**813**	DCSP	195	**-12**	Aged (101 year old) lattice tower steel structure at riverside crossing
	Devon Substation							

Existing Structures Legend:	
DCLT	Double Circuit Lattice Tower (steel)

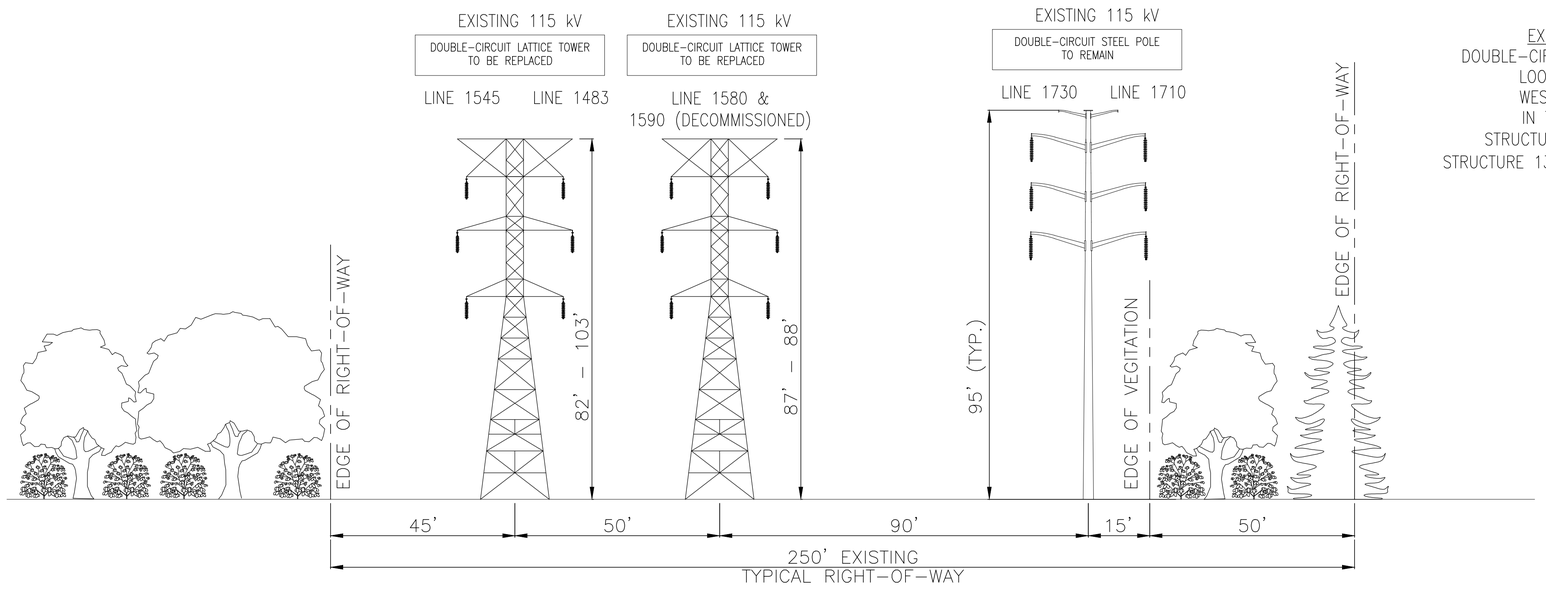
Proposed Structures Legend: (Galvanized Steel)	
DCSP	Double Circuit Steel Pole

(1) Steel cross-arm connection to adjacent structure 287 on the 1580/1590 Line to support electric services lines for FAA required lighting.

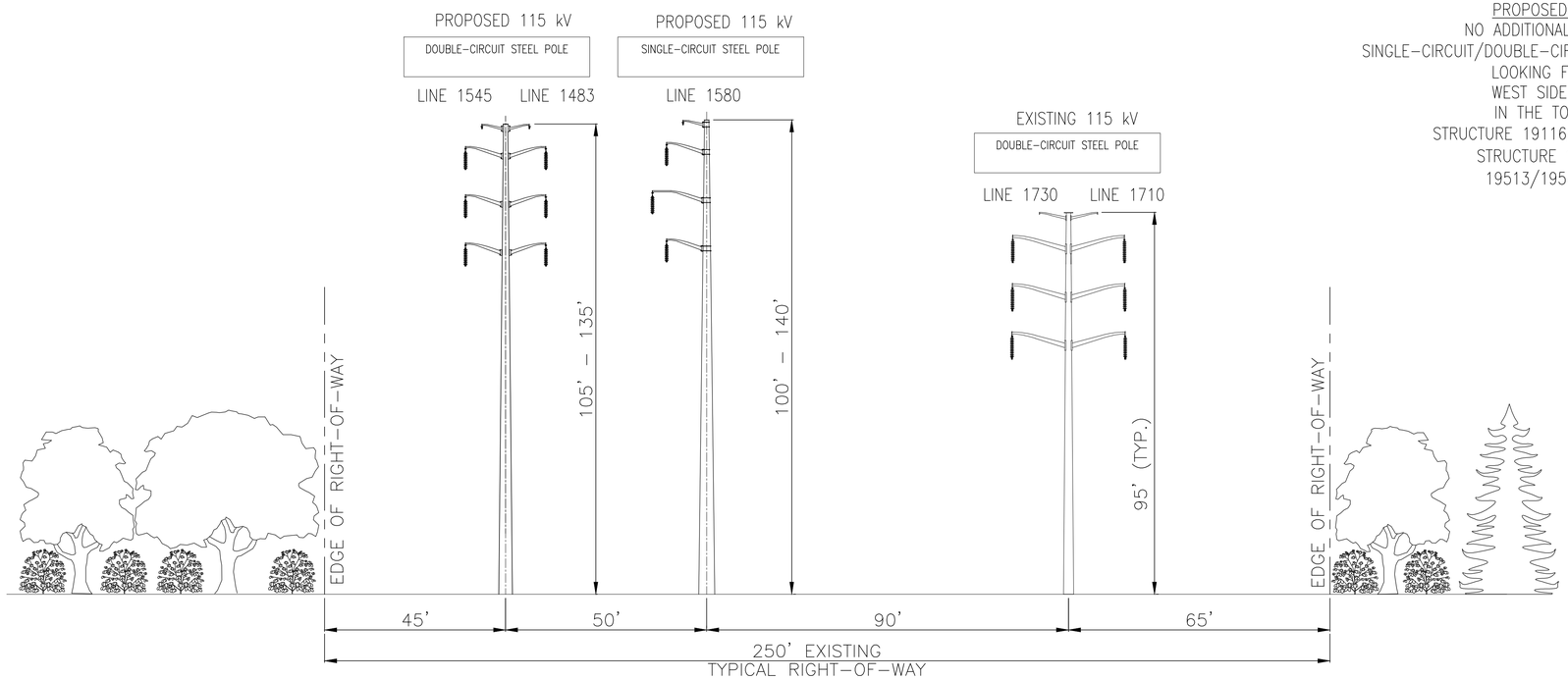
(2) Steel cross-arm connection to adjacent structure 288 on the 1580/1590 Line to support electric services lines for FAA required lighting.

Attachment C

Typical Cross Sections



EXISTING R.O.W. CONFIGURATION
DOUBLE-CIRCUIT STEEL LATTICE VERTICAL DESIGN
LOOKING FROM W. DEVON JCT TO
WEST SIDE OF HOUSATONIC RIVER
IN THE TOWN OF STRATFORD, CT
STRUCTURE 284, 285, & 286 (1580 LINE)
STRUCTURE 1316, 1315, & 1314 (1545/1483 LINES)



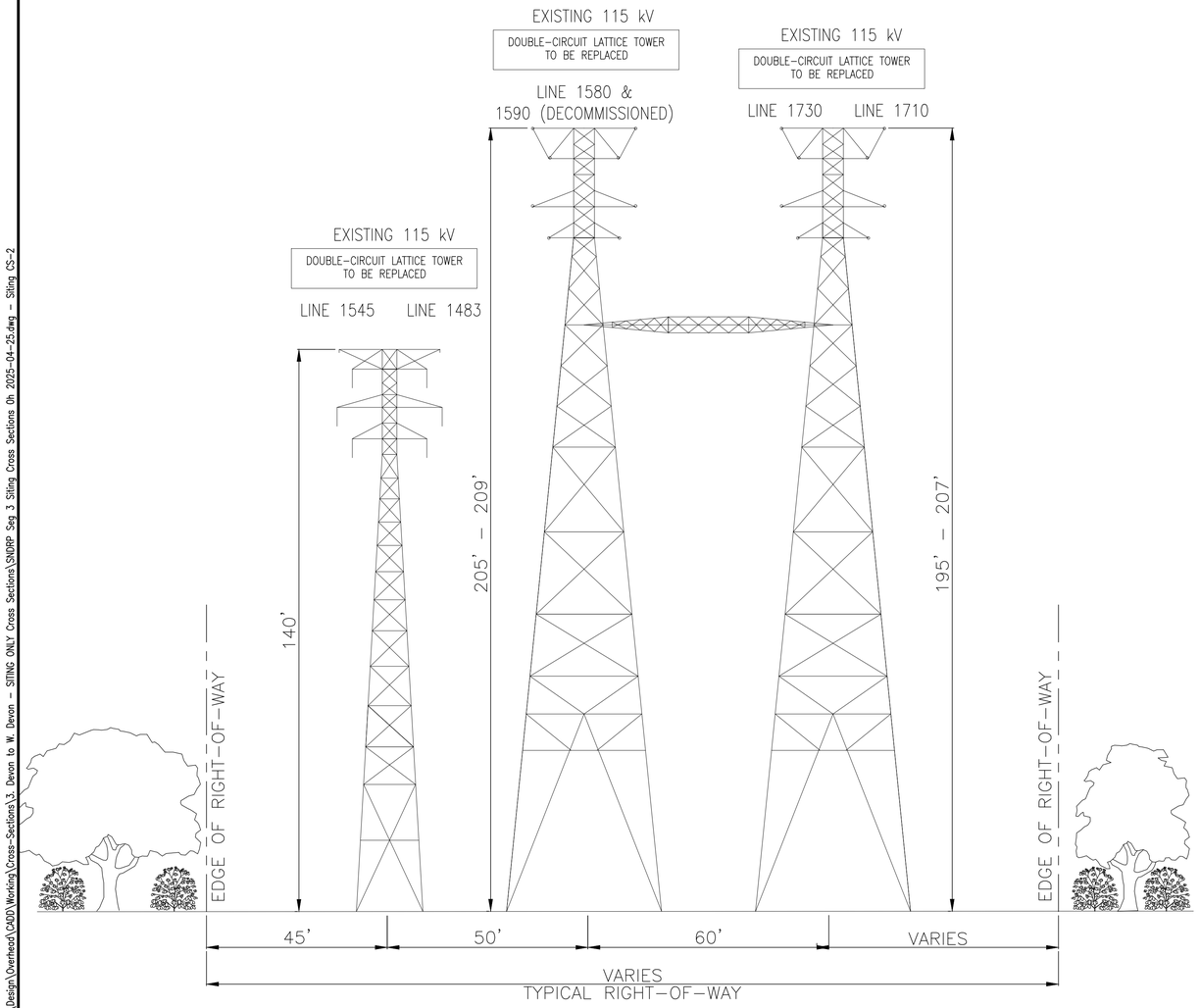
PROPOSED R.O.W. CONFIGURATION
NO ADDITIONAL RIGHT-OF-WAY REQUIRED
SINGLE-CIRCUIT/DOUBLE-CIRCUIT STEEL MONOPOLE VERTICAL DESIGN
LOOKING FROM W. DEVON JCT TO
WEST SIDE OF HOUSATONIC RIVER
IN THE TOWN OF STRATFORD, CT
STRUCTURE 19116, 19115 & 19114 (1580 LINE)
STRUCTURE 19515/19515A, 19514 &
19513/19513A (1545/1483 LINES)

XS-1

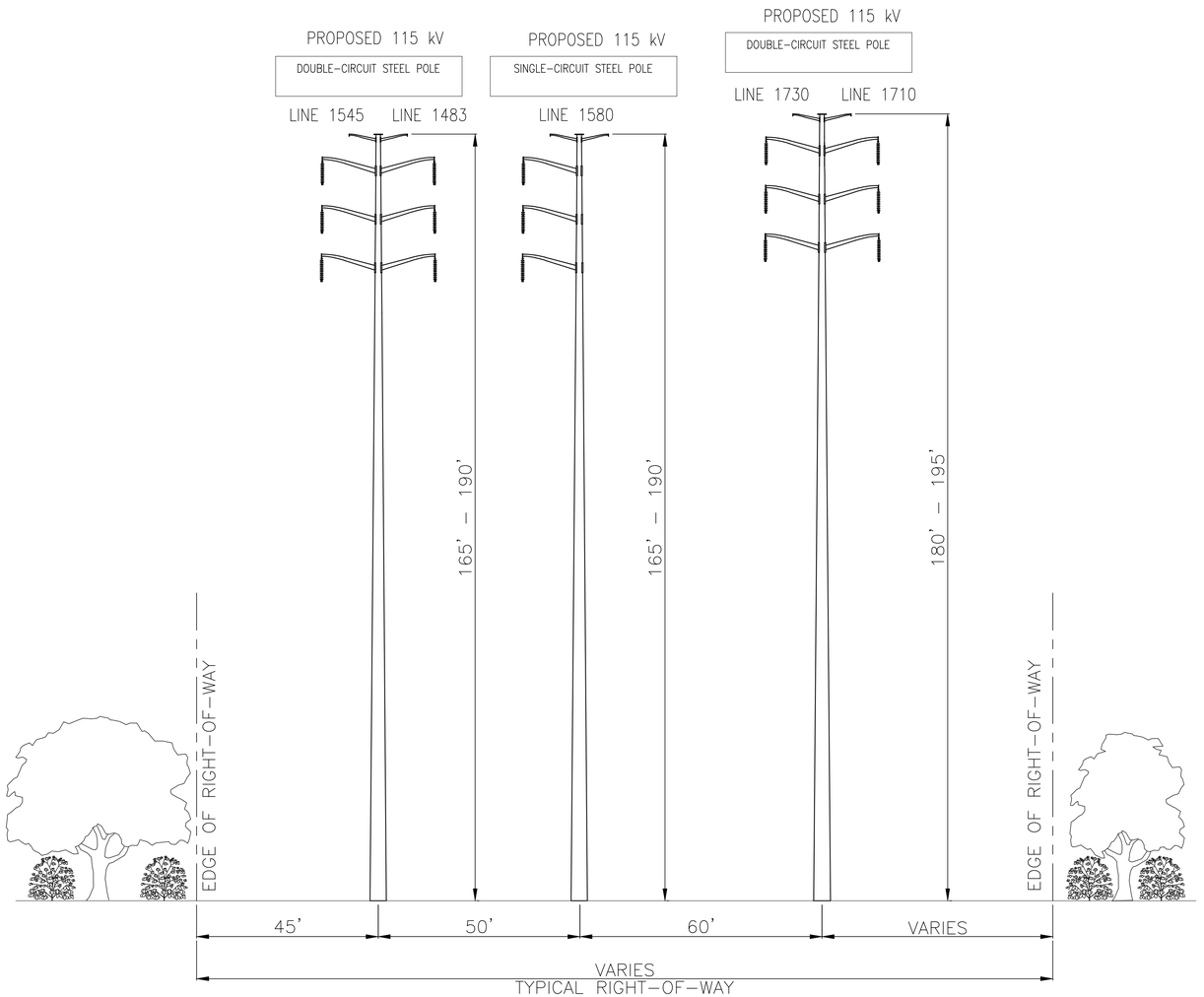
EVERSOURCE ENERGY

TITLE
WEST DEVON JCT - DEVON S/S
115-kV TRANSMISSION LINE
RIGHT OF WAY CROSS SECTION
STRATFORD & MILFORD, CONNECTICUT

BY	ND/ BMcD	CHKD	ACR/BMcD	APP	TGJ/ES	APP	JM/ES
DATE	04/25/25	DATE	04/25/25	DATE	04/25/25	DATE	04/25/25
H-SCALE	N.T.S.	SIZE	D	FIELD BOOK & PAGES			
V-SCALE	N.T.S.	V.S.		R.E. DWG			
R.E. PROJ. NUMBER	80047509 / 80119463			DWG NO.	01250-85000p001		



EXISTING R.O.W. CONFIGURATION
DOUBLE-CIRCUIT STEEL LATTICE VERTICAL DESIGN
LOOKING FROM WEST SIDE OF HOUSATONIC RIVER
TO EAST SIDE OF HOUSATONIC RIVER
IN THE TOWN OF STRATFORD & CITY OF MILFORD, CT
STRUCTURE 287 & 288 (1580 LINE)
STRUCTURE 1313 & 1312 (1545/1483 LINES)
STRUCTURE 814 & 813 (1710/1730 LINES)



PROPOSED R.O.W. CONFIGURATION
NO ADDITIONAL RIGHT-OF-WAY REQUIRED
SINGLE-CIRCUIT/DOUBLE-CIRCUIT STEEL MONOPOLE VERTICAL DESIGN
LOOKING FROM WEST SIDE OF HOUSATONIC RIVER
TO EAST SIDE OF HOUSATONIC RIVER
IN THE TOWN OF STRATFORD & CITY OF MILFORD, CT
STRUCTURE 19113 & 19112 (1580 LINE)
STRUCTURE 19512 & 19511 (1545/1483 LINES)
STRUCTURE 814 & 813 (1710/1730 LINES)

XS-2

EVERSOURCE ENERGY

TITLE
WEST DEVON JCT - DEVON S/S
115-kV TRANSMISSION LINE
RIGHT OF WAY CROSS SECTION
STRATFORD & MILFORD, CONNECTICUT

BY ND/ BMcD	CHKD ACR/BMcD	APP TGJ/ES	APP JM/ES
DATE 04/25/25	DATE 04/25/25	DATE 04/25/25	DATE 04/25/25
H-SCALE N.T.S.	SIZE D	FIELD BOOK & PAGES	
V-SCALE N.T.S.	V.S.	R.E. DWG	
R.E. PROJ. NUMBER 80047509 / 80119463		DWG NO. 01250-85000p002	

ES VER. 05/2015

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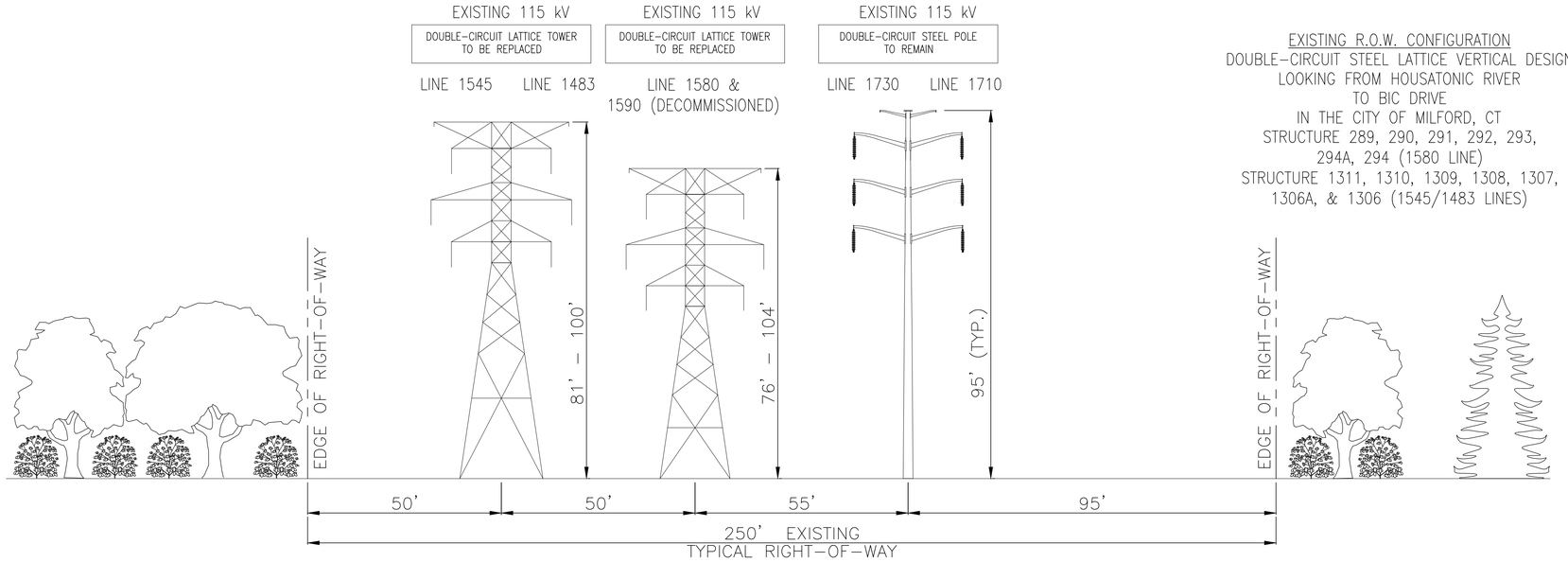
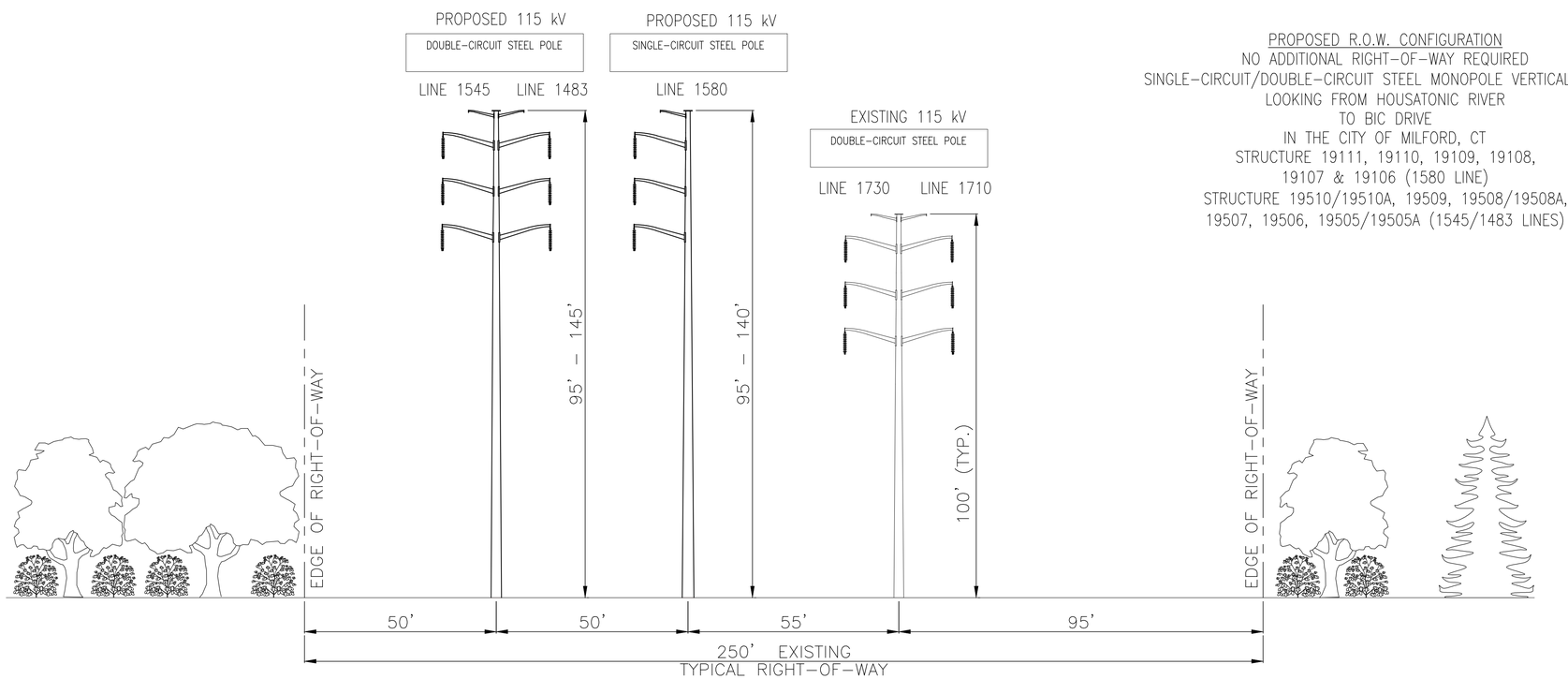


EXISTING R.O.W. CONFIGURATION
DOUBLE-CIRCUIT STEEL LATTICE VERTICAL DESIGN
LOOKING FROM HOUSATONIC RIVER
TO BIC DRIVE
IN THE CITY OF MILFORD, CT
STRUCTURE 289, 290, 291, 292, 293,
294A, 294 (1580 LINE)
STRUCTURE 1311, 1310, 1309, 1308, 1307,
1306A, & 1306 (1545/1483 LINES)



PROPOSED R.O.W. CONFIGURATION
NO ADDITIONAL RIGHT-OF-WAY REQUIRED
SINGLE-CIRCUIT/DOUBLE-CIRCUIT STEEL MONOPOLE VERTICAL DESIGN
LOOKING FROM HOUSATONIC RIVER
TO BIC DRIVE
IN THE CITY OF MILFORD, CT
STRUCTURE 19111, 19110, 19109, 19108,
19107 & 19106 (1580 LINE)
STRUCTURE 19510/19510A, 19509, 19508/19508A,
19507, 19506, 19505/19505A (1545/1483 LINES)

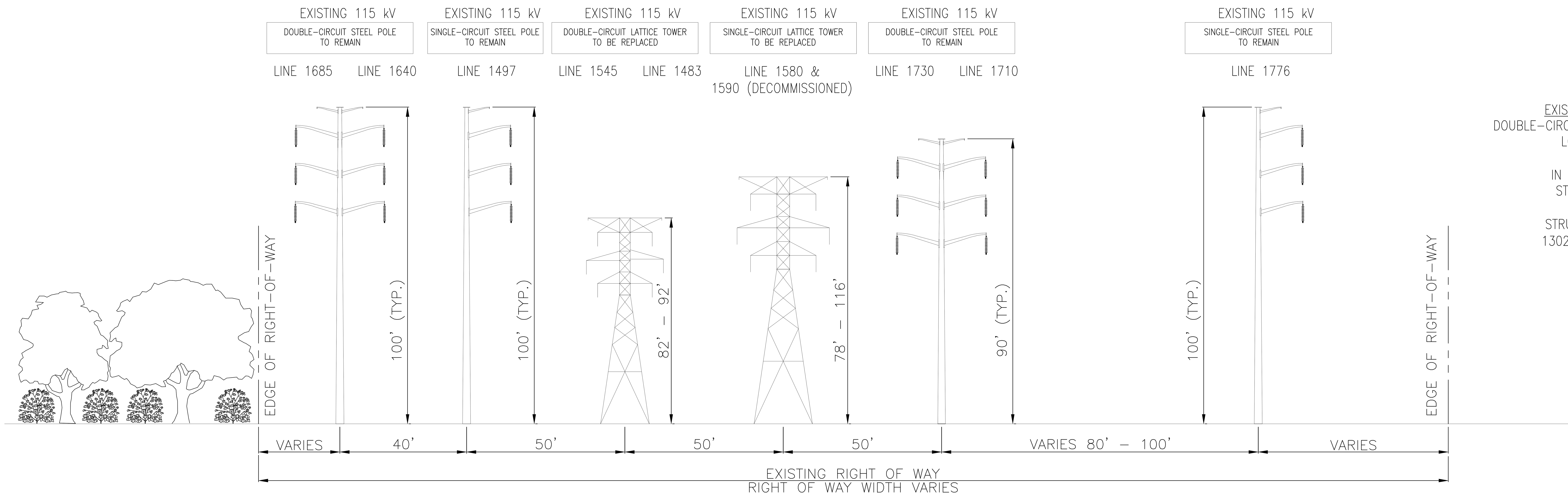
XS-3

EVERSOURCE ENERGY

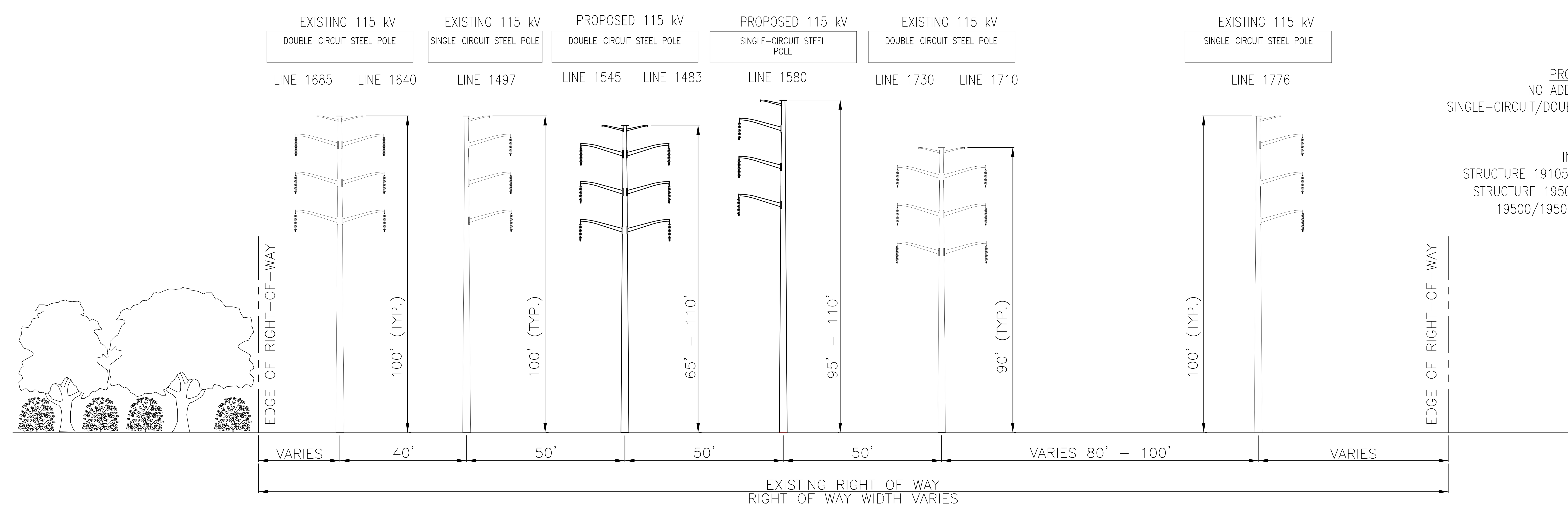
TITLE
WEST DEVON JCT - DEVON S/S
115-kV TRANSMISSION LINE
RIGHT OF WAY CROSS SECTION
STRATFORD & MILFORD, CONNECTICUT

BY	ND/ BMcD	CHKD	ACR/BMcD	APP	TGJ/ES	APP	JM/ES
DATE	04/23/25	DATE	04/25/25	DATE	04/25/25	DATE	04/25/25
H-SCALE	N.T.S.	SIZE	D	FIELD BOOK & PAGES			
V-SCALE	04/25/25	V.S.		R.E. DWG			
R.E. PROJ. NUMBER	80047509 / 80119463			DWG NO.	01250-85000p003		

ES VER: 05/2015



EXISTING R.O.W. CONFIGURATION
DOUBLE–CIRCUIT STEEL LATTICE VERTICAL DESIGN
LOOKING FROM BIC DRIVE
TO DEVON S/S
IN THE CITY OF MILFORD, CT
STRUCTURE 295, 296, 297,
298, 299 (1580 LINE)
STRUCTURE 1305, 1304, 1303,
1302, 1301 (1545/1483 LINES)



PROPOSED R.O.W. CONFIGURATION
NO ADDITIONAL RIGHT–OF–WAY REQUIRED
SINGLE–CIRCUIT/DOUBLE–CIRCUIT STEEL MONOPOLE VERTICAL DESIGN
LOOKING FROM BIC DRIVE
TO DEVON S/S
IN THE CITY OF MILFORD, CT
STRUCTURE 19105, 19104, 19103, 19102, 19101 (1580 LINE)
STRUCTURE 19504, 19503/19503A, 19502/19502A, 19501,
19500/19500A, 19499/19499A (1545/1483 LINES)

XS-4

EVERSOURCE ENERGY

TITLE
WEST DEVON JCT - DEVON S/S
115–kV TRANSMISSION LINE
RIGHT OF WAY CROSS SECTION
STRATFORD & MILFORD, CONNECTICUT

BY ND/ BMcD	CHKD ACR/BMcD	APP TGJ/ES	APP JM/ES
DATE 04/25/25	DATE 04/25/25	DATE 04/25/25	DATE 04/25/25
H–SCALE N.T.S.	SIZE D	FIELD BOOK & PAGES	
V–SCALE N.T.S.	V.S.	R.E. DWG	
R.E. PROJ. NUMBER 80047509 / 80119463		DWG NO. 01250-85000p004	

Attachment D

SHPO Review Letter

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 West Devon Junction to Devon Rebuild Project
Stratford & Milford, Connecticut

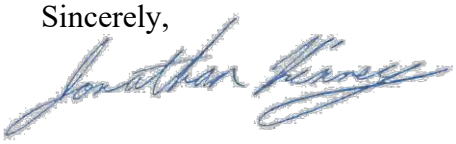
Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the report titled, *Phase IB Cultural Resources Reconnaissance Survey of Sensitivity Areas Along Eversource Energy's West Devon Junction to Devon Rebuild Project in Stratford and Milford, 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 four archaeological sensitivity areas (SA-196 through SA-199) along the Eversource Energy West Devon Junction to Devon Rebuild project (Project) corridor in support of an application to the Connecticut Siting Council (CSC). SHPO notes the four 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 (NRHP) were identified within 500 feet of the four archaeological sensitivity areas. During survey, Heritage completed 51 of 78 (65 percent) planned shovel tests. The 27 planned but unexcavated shovel tests fell within areas of slope, bedrock, or previous disturbance. Subsurface testing resulted in six shovel tests positive for cultural material. Recovered artifacts included historic ceramic sherds, a ceramic marble, and a single quartz bifacial reduction flake. The recovered historic materials were identified as typical historic field scatter not eligible for inclusion on the NRHP. Delineation shovel testing around the lone precontact artifact failed to produce additional evidence of cultural material. As a result, the single bifacial reduction flake was determined to be an isolated find not eligible for listing on the NRHP. Finally, Phase IB archaeological survey of SA-199 revealed a historical period brick and aggregate concrete foundation. Subsequent research revealed no significant historical importance or associations related to the structural remains. Further, the foundation remains were determined by Heritage to be not architecturally significant. Therefore, Heritage concluded that the foundation within SA-199 was not eligible for inclusion on the NRHP and warranted no further preservation efforts.

Based on the information provided to our office, SHPO concurs with the findings of the report that no additional archeological investigations of these four 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

Attachment E

Wetlands and Watercourse Delineations Technical Memorandum

Wetland Report:

West Devon Junction to Devon Rebuild Project

TO: Antonio Federici, PWS, CPESC, Eversource Energy

FROM: Matthew Regan, PWS, Tighe & Bond

DATE: April 16, 2025

Tighe & Bond performed wetland and watercourse delineations in support of the West Devon Junction to Devon Rebuild Project. Initial delineations occurred in October 2020, March 2021, and June 2022. In spring of 2023, wetland limits were reviewed to ensure older delineations remained accurate.

Wetland and Watercourse Delineation Methodology

Wetlands and watercourses were delineated in accordance with the requirements of the Connecticut Inland Wetlands and Watercourses Act (CGS §22a-36 to 22a-45), the Connecticut Tidal Wetlands Act (CGS §22a-30-1 to 22a-30-17), and the U. S. Army Corps of Engineers Wetlands Delineation Manual (1987) *Regional Supplement to the Corps of Engineers Wetland Delineation Manual Northcentral and Northeast Region* (Version 2.0) (January 2012). The limits of the wetlands and watercourses were identified in the field by consecutively numbered flags. Pink "Wetland Delineation" flagging was used for delineating wetlands and blue flagging was used for delineating watercourses. Flag locations were surveyed at the time of the investigation using Global Positioning System (GPS) units capable of submeter accuracy. Wetlands were classified using the Cowardin System.

Delineated wetlands and watercourses within the Project Area are summarized in Table 1, and Army Corps of Engineers Wetland Determination Data Forms are attached.

TABLE 1
Delineated Wetlands and Watercourses within the West Devon Junction to Devon Substation Rebuild Project

Map Sheet No.	Wetland No. [1]	Determination Data Sheet Wetland No.[2]	Dominant NWI Class [3]	Other NWI Classes	Dominant Water Regime	Associated Watercourse[4]	Associated Vernal Pool[5]
1	W1	282 W82	PSS	PEM	Seasonally Flooded/Saturated		VP1
1	W2	284 W83	PSS	-	Seasonally Flooded/Saturated	S1	
1	W3	284 W84	PEM	PSS	Seasonally Flooded/Saturated	S2	
1, 2	-	-	R1UB3		Tidal River	S3 (Housatonic River)	
2	W4	Wetland 5	E2EM	-	Irregularly Flooded (Tidal)	S3	
4	W5	Wetland 6	PEM	-	Seasonally Flooded/Saturated		
4	W6	Wetland 7	PEM	-	Seasonally Flooded/Saturated		

[1] Wetland No. refers to the number on the Map Set for the West Devon Junction to Devon Rebuild Project

[2] Data Sheet Wetland No. refers to the code assigned during delineation and referenced on the delineation data form

[3] Wetlands classified according to Cowardin et al 1979; PEM= Palustrine Emergent Wetland; PSS= Palustrine Scrub-Shrub Wetland; PFO= Palustrine Forested Wetland; POW= Palustrine Open Water, E2EM = Estuarine Intertidal Emergent Wetland, R1UB3 = Riverine Tidal Unconsolidated Bottom Mud

[4] Associated Watercourse refers to the identification number in the project map set

[5] Vernal Pools were identified in 2020 and surveyed in 2021 and 2022 by Tighe & Bond.

WETLAND DETERMINATION DATA FORM – Northcentral and Northeast Region

Project/Site: Line 1580 City/County: Milford Sampling Date: 2021-03-05

Applicant/Owner: Eversource State: Connecticut Sampling Point: 282 W82

Investigator(s): MHZ, RKV Section, Township, Range:

Landform (hillslope, terrace, etc.): Hillslope Local relief (concave, convex, none): Concave Slope (%): 5

Subregion (LRR or MLRA): R 144A Lat: 41.2328186 Long: -73.1216606 Datum: WGS 84

Soil Map Unit Name: 73C - Charlton-Chatfield complex, 0 to 15 percent slopes, very rocky NWI classification: PSS1, PEM5

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✔ No ____ (If no, explain in Remarks.)

Are Vegetation ✔, Soil ____, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ____ No ✔

Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ✔	No ____	**Is the Sampled Area within a Wetland?** Yes ✔ No ____
Hydric Soil Present?	Yes ✔	No ____	
Wetland Hydrology Present?	Yes ✔	No ____	If yes, optional Wetland Site ID: 282

Remarks: (Explain alternative procedures here or in a separate report.)

Vegetation management within ROW

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ✔ Surface Water (A1)
- ✔ High Water Table (A2)
- ✔ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ✔ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ✔ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ✔ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Vis ble on Aerial Imagery (C9)
- ✔ Stunted or Stressed Plants (D1)
- ✔ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ✔ Microtopographic Relief (D4)
- ✔ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes ✔	No ____	Depth (inches): 3
Water Table Present?	Yes ✔	No ____	Depth (inches): 0
Saturation Present? (includes capillary fringe)	Yes ✔	No ____	Depth (inches): 0

Wetland Hydrology Present? Yes ✔ No ____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

Surface water present in some depression areas

VEGETATION – Use scientific names of plants. Sampling Point: 282 W82

Tree Stratum (Plot size: 30 ft r)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	= Total Cover		
Sapling/Shrub Stratum (Plot size: 15 ft r)			
1. Cornus amomum	40	✔	FACW
2. Frangula alnus	20	✔	FAC
3. Betula populifolia	10		FAC
4.			
5.			
6.			
7.			
	70% = Total Cover		
Herb Stratum (Plot size: 5 ft r)			
1. Phalaris arundinacea	40	✔	FACW
2. Solidago rugosa	40	✔	FAC
3. Thelypteris palustris	10		FACW
4. Juncus effusus	5		OBL
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
	95% = Total Cover		
Woody Vine Stratum (Plot size: 30 ft r)			
1.			
2.			
3.			
4.			
	= Total Cover		

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 4 (A)

Total Number of Dominant Species Across All Strata: 4 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	5	x 1 =	5
FACW species	90	x 2 =	180
FAC species	70	x 3 =	210
FACU species	0	x 4 =	0
UPL species	0	x 5 =	0
Column Totals:	165 (A)		395 (B)

Prevalence Index = B/A = 2.39

Hydrophytic Vegetation Indicators:

___ 1 - Rapid Test for Hydrophytic Vegetation

✔ 2 - Dominance Test is >50%

___ 3 - Prevalence Index is ≤3.0[1]

___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Vegetation Strata:

Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub – Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? **Yes** ✔ **No** ___

Remarks: (Include photo numbers here or on a separate sheet.)

SOIL

Sampling Point: 282 W82

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 - 8	10YR 2/1	100					Sandy Loam	
8 - 12	10YR 3/1		10YR 5/1	5	C	PL	Loam	
12 - 16	10YR 6/1	85	10YR 7/1	15	D	M	Sandy Loam	Depleted horizon texture coarser then surface
-								
-								
-								
-								
-								
-								
-								
-								
-								

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

[2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ✔ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7) (**LRR R, MLRA 149B**)
- ___ Polyvalue Below Surface (S8) (**LRR R, MLRA 149B**)
- ___ Thin Dark Surface (S9) (**LRR R, MLRA 149B**)
- ___ Loamy Mucky Mineral (F1) (**LRR K, L**)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) (**LRR K, L, MLRA 149B**)
- ___ Coast Prairie Redox (A16) (**LRR K, L, R**)
- ___ 5 cm Mucky Peat or Peat (S3) (**LRR K, L, R**)
- ___ Dark Surface (S7) (**LRR K, L**)
- ___ Polyvalue Below Surface (S8) (**LRR K, L**)
- ___ Thin Dark Surface (S9) (**LRR K, L**)
- ___ Iron-Manganese Masses (F12) (**LRR K, L, R**)
- ___ Piedmont Floodplain Soils (F19) (**MLRA 149B**)
- ___ Mesic Spodic (TA6) (**MLRA 144A, 145, 149B**)
- ___ Red Parent Material (F21)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? **Yes** ✔ **No** _____

Remarks:

WETLAND DETERMINATION DATA FORM – Northcentral and Northeast Region

Project/Site: Line 1580 City/County: Stratford Sampling Date: 2021-03-11

Applicant/Owner: Eversource State: Connecticut Sampling Point: 284 W83

Investigator(s): MHZ, RKV Section, Township, Range:

Landform (hillslope, terrace, etc.): Hillslope Local relief (concave, convex, none): Slope (%): 5-10

Subregion (LRR or MLRA): R 144A Lat: 41.2310791 Long: -73.1177822 Datum: WGS 84

Soil Map Unit Name: 3 - Ridgebury, Leicester, and Whitman soils, 0 to 8 percent slopes, extremely stony NWI classification: PSS1

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✔ No ____ (If no, explain in Remarks.)

Are Vegetation ✔, Soil ____, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✔ No ____

Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ✔	No ____	**Is the Sampled Area within a Wetland?** Yes ✔ No ____
Hydric Soil Present?	Yes ✔	No ____	
Wetland Hydrology Present?	Yes ✔	No ____	If yes, optional Wetland Site ID: 284

Remarks: (Explain alternative procedures here or in a separate report.)

Vegetation management in ROW

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ✔ Surface Water (A1)
- ✔ High Water Table (A2)
- ✔ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ✔ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ✔ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ✔ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ✔ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ✔ Saturation Vis ble on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ✔ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ✔ Microtopographic Relief (D4)
- ✔ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes ✔	No ____	Depth (inches): 3
Water Table Present?	Yes ✔	No ____	Depth (inches): 0
Saturation Present? (includes capillary fringe)	Yes ✔	No ____	Depth (inches): 0

Wetland Hydrology Present? Yes ✔ No ____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Wetland includes a stream

Remarks:

VEGETATION – Use scientific names of plants. Sampling Point: 284 W83

Tree Stratum (Plot size: 30 ft r)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	= Total Cover		
Sapling/Shrub Stratum (Plot size: 15 ft r)			
1. Cornus amomum	30	✔	FACW
2.			
3.			
4.			
5.			
6.			
7.			
	30% = Total Cover		
Herb Stratum (Plot size: 5 ft r)			
1. Microstegium vimineum	20	✔	FAC
2. Smilax rotundifolia	20	✔	FAC
3. Symplocarpus foetidus	20	✔	OBL
4. Onoclea sensibilis	15	✔	FACW
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
	75% = Total Cover		
Woody Vine Stratum (Plot size: 30 ft r)			
1.			
2.			
3.			
4.			
	= Total Cover		

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 5 (A)

Total Number of Dominant Species Across All Strata: 5 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	20	x 1 =	20
FACW species	45	x 2 =	90
FAC species	40	x 3 =	120
FACU species	0	x 4 =	0
UPL species	0	x 5 =	0
Column Totals:	105 (A)		230 (B)

Prevalence Index = B/A = 2.19

Hydrophytic Vegetation Indicators:

___ 1 - Rapid Test for Hydrophytic Vegetation

✔ 2 - Dominance Test is >50%

✔ 3 - Prevalence Index is ≤3.0[1]

___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Vegetation Strata:

Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub – Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? **Yes** ✔ **No** ___

Remarks: (Include photo numbers here or on a separate sheet.)

ROW veg maintenance

SOIL

Sampling Point: 284 W83

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0 - 6	10YR 2/2	100					Silt Loam	
6 - 12	10YR 3/1	98	10YR 4/6	2	C	M	Sand	
-								
-								
-								
-								
-								
-								
-								
-								
-								
-								

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

[2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ✔ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7) (**LRR R, MLRA 149B**)
- ___ Polyvalue Below Surface (S8) (**LRR R, MLRA 149B**)
- ___ Thin Dark Surface (S9) (**LRR R, MLRA 149B**)
- ___ Loamy Mucky Mineral (F1) (**LRR K, L**)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) (**LRR K, L, MLRA 149B**)
- ___ Coast Prairie Redox (A16) (**LRR K, L, R**)
- ___ 5 cm Mucky Peat or Peat (S3) (**LRR K, L, R**)
- ___ Dark Surface (S7) (**LRR K, L**)
- ___ Polyvalue Below Surface (S8) (**LRR K, L**)
- ___ Thin Dark Surface (S9) (**LRR K, L**)
- ___ Iron-Manganese Masses (F12) (**LRR K, L, R**)
- ___ Piedmont Floodplain Soils (F19) (**MLRA 149B**)
- ___ Mesic Spodic (TA6) (**MLRA 144A, 145, 149B**)
- ___ Red Parent Material (F21)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: Rock

Depth (inches): 12

Hydric Soil Present? Yes ✔ No ___

Remarks:

WETLAND DETERMINATION DATA FORM – Northcentral and Northeast Region

Project/Site: Line 1580 City/County: Shelton Sampling Date: 2021-03-11

Applicant/Owner: Eversource State: Connecticut Sampling Point: 284 W84

Investigator(s): MHZ, RKV Section, Township, Range:

Landform (hillslope, terrace, etc.): Hillslope Local relief (concave, convex, none): Concave Slope (%): 5-10

Subregion (LRR or MLRA): R 144A Lat: 41.2307434 Long: -73.1173829 Datum: WGS 84

Soil Map Unit Name: 3 - Ridgebury, Leicester, and Whitman soils, 0 to 8 percent slopes, extremely stony NWI classification: PEM PSS

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✔ No ____ (If no, explain in Remarks.)

Are Vegetation ✔, Soil ____, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✔ No ____

Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ✔	No ____	**Is the Sampled Area within a Wetland?** Yes ✔ No ____
Hydric Soil Present?	Yes ✔	No ____	
Wetland Hydrology Present?	Yes ✔	No ____	If yes, optional Wetland Site ID: 284 W84

Remarks: (Explain alternative procedures here or in a separate report.)

Vegetation management in ROW

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ✔ Surface Water (A1)
- ✔ High Water Table (A2)
- ✔ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ✔ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ✔ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ✔ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ✔ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ✔ Saturation Vis ble on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ✔ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ✔ Microtopographic Relief (D4)
- ✔ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes ✔	No ____	Depth (inches): 3
Water Table Present?	Yes ✔	No ____	Depth (inches): 0
Saturation Present? (includes capillary fringe)	Yes ✔	No ____	Depth (inches): 0

Wetland Hydrology Present? Yes ✔ No ____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Wetland includes a stream

Remarks:

VEGETATION – Use scientific names of plants. Sampling Point: 284 W84

Tree Stratum (Plot size: 30 ft r)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	= Total Cover		
Sapling/Shrub Stratum (Plot size: 15 ft r)			
1. Cornus amomum	30	✔	FACW
2.			
3.			
4.			
5.			
6.			
7.			
	30% = Total Cover		
Herb Stratum (Plot size: 5 ft r)			
1. Persicaria arifolia	30	✔	OBL
2. Symplocarpus foetidus	30	✔	OBL
3. Microstegium vimineum	20	✔	FAC
4. Onoclea sensibilis	10		FACW
5. Lythrum salicaria	5		OBL
6.			
7.			
8.			
9.			
10.			
11.			
12.			
	95% = Total Cover		
Woody Vine Stratum (Plot size: 30 ft r)			
1. Vitis riparia	30	✔	FAC
2.			
3.			
4.			
	30% = Total Cover		

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 5 (A)

Total Number of Dominant Species Across All Strata: 5 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	65	x 1 =	65
FACW species	40	x 2 =	80
FAC species	50	x 3 =	150
FACU species	0	x 4 =	0
UPL species	0	x 5 =	0
Column Totals:	155 (A)		295 (B)

Prevalence Index = B/A = 1.90

Hydrophytic Vegetation Indicators:

___ 1 - Rapid Test for Hydrophytic Vegetation

✔ 2 - Dominance Test is >50%

✔ 3 - Prevalence Index is ≤3.0[1]

___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Vegetation Strata:

Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub – Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes ✔ No ___

Remarks: (Include photo numbers here or on a separate sheet.)

vegetation disturbance from ROW vegetation management, invasive plants

SOIL

Sampling Point: 284 W84

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0 - 8	10YR 2/1	100					Loamy Sand	
6 - 16	7.5YR 3/1	90	10YR 6/6	10	C	M	Sand	
-								
-								
-								
-								
-								
-								
-								
-								
-								
-								

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

[2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ✔ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ✔ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7) (**LRR R, MLRA 149B**)
- ___ Polyvalue Below Surface (S8) (**LRR R, MLRA 149B**)
- ___ Thin Dark Surface (S9) (**LRR R, MLRA 149B**)
- ___ Loamy Mucky Mineral (F1) (**LRR K, L**)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) (**LRR K, L, MLRA 149B**)
- ___ Coast Prairie Redox (A16) (**LRR K, L, R**)
- ___ 5 cm Mucky Peat or Peat (S3) (**LRR K, L, R**)
- ___ Dark Surface (S7) (**LRR K, L**)
- ___ Polyvalue Below Surface (S8) (**LRR K, L**)
- ___ Thin Dark Surface (S9) (**LRR K, L**)
- ___ Iron-Manganese Masses (F12) (**LRR K, L, R**)
- ___ Piedmont Floodplain Soils (F19) (**MLRA 149B**)
- ___ Mesic Spodic (TA6) (**MLRA 144A, 145, 149B**)
- ___ Red Parent Material (F21)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: Rock

Depth (inches): 16

Hydric Soil Present? Yes ✔ No ___

Remarks:

WETLAND DETERMINATION DATA FORM – Northcentral and Northeast Region

Project/Site: 1580 Segment 3 City/County: Milford, New Haven Sampling Date: 2023-05-17

Applicant/Owner: Eversource State: Connecticut Sampling Point: Wetland 5

Investigator(s): Matthew Regan Section, Township, Range: _____

Landform (hillslope, terrace, etc.): Marsh Local relief (concave, convex, none): Concave Slope (%): 1

Subregion (LRR or MLRA): R 144A Lat: 41.22566458 Long: -73.10525340 Datum: WGS 84

Soil Map Unit Name: Westbrook mucky peat, 0 to 2 percent slopes, very frequently flooded NWI classification: _____

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✔ No _____ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes ✔ No _____

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ✔	No _____	**Is the Sampled Area within a Wetland?** **Yes ✔** **No _____**
Hydric Soil Present?	Yes ✔	No _____	If yes, optional Wetland Site ID: _____
Wetland Hydrology Present?	Yes ✔	No _____	

Remarks: (Explain alternative procedures here or in a separate report.)

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ✔ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Vis ble on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ✔ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes _____	No ✔	Depth (inches): _____
Water Table Present?	Yes ✔	No _____	Depth (inches): 18
Saturation Present? (includes capillary fringe)	Yes ✔	No _____	Depth (inches): 8

Wetland Hydrology Present? Yes ✔ No _____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

VEGETATION – Use scientific names of plants. Sampling Point: Wetland 5

Tree Stratum (Plot size: 30 ft r)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	= Total Cover		
Sapling/Shrub Stratum (Plot size: 15 ft r)			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	= Total Cover		
Herb Stratum (Plot size: 5 ft r)			
1. Phragmites australis	95	✔	FACW
2. Solanum dulcamara	5		FAC
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
	100% = Total Cover		
Woody Vine Stratum (Plot size: 30 ft r)			
1.			
2.			
3.			
4.			
	= Total Cover		

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	95	x 2 =	190
FAC species	5	x 3 =	15
FACU species	0	x 4 =	0
UPL species	0	x 5 =	0
Column Totals:	100 (A)		205 (B)

Prevalence Index = B/A = 2.1

Hydrophytic Vegetation Indicators:

✔ 1 - Rapid Test for Hydrophytic Vegetation

✔ 2 - Dominance Test is >50%

✔ 3 - Prevalence Index is ≤3.0[1]

___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Vegetation Strata:

Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub – Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes ✔ No ___

Remarks: (Include photo numbers here or on a separate sheet.)

SOIL

Sampling Point: Wetland 5

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0 - 3	10YR 3/1	100					Sandy Clay Loam	
3 - 20	2.5Y 4/1	95	10R 3/6	5	C	M	Sandy Clay Loam	
-								
-								
-								
-								
-								
-								
-								
-								
-								
-								

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

[2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7) (**LRR R, MLRA 149B**)
- ___ Polyvalue Below Surface (S8) (**LRR R, MLRA 149B**)
- ___ Thin Dark Surface (S9) (**LRR R, MLRA 149B**)
- ___ Loamy Mucky Mineral (F1) (**LRR K, L**)
- ___ Loamy Gleyed Matrix (F2)
- ✔ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) (**LRR K, L, MLRA 149B**)
- ___ Coast Prairie Redox (A16) (**LRR K, L, R**)
- ___ 5 cm Mucky Peat or Peat (S3) (**LRR K, L, R**)
- ___ Dark Surface (S7) (**LRR K, L**)
- ___ Polyvalue Below Surface (S8) (**LRR K, L**)
- ___ Thin Dark Surface (S9) (**LRR K, L**)
- ___ Iron-Manganese Masses (F12) (**LRR K, L, R**)
- ___ Piedmont Floodplain Soils (F19) (**MLRA 149B**)
- ___ Mesic Spodic (TA6) (**MLRA 144A, 145, 149B**)
- ___ Red Parent Material (F21)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? **Yes** ✔ **No** _____

Remarks:

WETLAND DETERMINATION DATA FORM – Northcentral and Northeast Region

Project/Site: 1580 SEGMENT 3 City/County: Milford, New Haven Sampling Date: 2023-05-16

Applicant/Owner: Eversource State: Connecticut Sampling Point: Wetland 6

Investigator(s): Matthew Regan Section, Township, Range: _____

Landform (hillslope, terrace, etc.): Flat Local relief (concave, convex, none): Concave Slope (%): 1

Subregion (LRR or MLRA): R 144A Lat: 41.2140513 Long: -73.1049267 Datum: WGS 84

Soil Map Unit Name: Udorthents, smoothed NWI classification: _____

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✔ No _____ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes ✔ No _____

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ✔	No _____	**Is the Sampled Area within a Wetland?** **Yes ✔** **No _____**
Hydric Soil Present?	Yes ✔	No _____	
Wetland Hydrology Present?	Yes ✔	No _____	If yes, optional Wetland Site ID: _____

Remarks: (Explain alternative procedures here or in a separate report.)

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ___ Surface Water (A1)
- ✔ High Water Table (A2)
- ✔ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Vis ble on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes _____	No ✔	Depth (inches): _____
Water Table Present?	Yes ✔	No _____	Depth (inches): 6
Saturation Present? (includes capillary fringe)	Yes ✔	No _____	Depth (inches): 4

Wetland Hydrology Present? Yes ✔ No _____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

VEGETATION – Use scientific names of plants. Sampling Point: Wetland 6

Tree Stratum (Plot size: 30 ft r)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	= Total Cover		
Sapling/Shrub Stratum (Plot size: 15)			
1. Rosa multiflora	10	✔	FACU
2.			
3.			
4.			
5.			
6.			
7.			
	10% = Total Cover		
Herb Stratum (Plot size: 5 ft r)			
1. Phragmites australis	85	✔	FACW
2. Smilax rotundifolia	15		FAC
3. Lonicera sempervirens	10		FACU
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
	110% = Total Cover		
Woody Vine Stratum (Plot size: 30 ft r)			
1.			
2.			
3.			
4.			
	= Total Cover		

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 50 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	85	x 2 =	170
FAC species	15	x 3 =	45
FACU species	20	x 4 =	80
UPL species	0	x 5 =	0
Column Totals:	120 (A)		295 (B)

Prevalence Index = B/A = 2.5

Hydrophytic Vegetation Indicators:

___ 1 - Rapid Test for Hydrophytic Vegetation

___ 2 - Dominance Test is >50%

✔ 3 - Prevalence Index is ≤3.0[1]

___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Vegetation Strata:

Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub – Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? **Yes** ✔ **No** _____

Remarks: (Include photo numbers here or on a separate sheet.)

SOIL

Sampling Point: Wetland 6

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0 - 20	10YR 3/1	95	10YR 5/6	5	C	M	Silty Clay Loam	
-								
-								
-								
-								
-								
-								
-								
-								
-								
-								
-								

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

[2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ Depleted Below Dark Surface (A11)
- ✔ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7) (**LRR R, MLRA 149B**)
- ___ Polyvalue Below Surface (S8) (**LRR R, MLRA 149B**)
- ___ Thin Dark Surface (S9) (**LRR R, MLRA 149B**)
- ___ Loamy Mucky Mineral (F1) (**LRR K, L**)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) (**LRR K, L, MLRA 149B**)
- ___ Coast Prairie Redox (A16) (**LRR K, L, R**)
- ___ 5 cm Mucky Peat or Peat (S3) (**LRR K, L, R**)
- ___ Dark Surface (S7) (**LRR K, L**)
- ___ Polyvalue Below Surface (S8) (**LRR K, L**)
- ___ Thin Dark Surface (S9) (**LRR K, L**)
- ___ Iron-Manganese Masses (F12) (**LRR K, L, R**)
- ___ Piedmont Floodplain Soils (F19) (**MLRA 149B**)
- ___ Mesic Spodic (TA6) (**MLRA 144A, 145, 149B**)
- ___ Red Parent Material (F21)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? **Yes** ✔ **No** ___

Remarks:

WETLAND DETERMINATION DATA FORM – Northcentral and Northeast Region

Project/Site: 1580 SEGMENT 3 City/County: Milford, New Haven Sampling Date: 2023-05-16

Applicant/Owner: Eversource State: Connecticut Sampling Point: Wetland 7

Investigator(s): Matthew Regan Section, Township, Range: _____

Landform (hillslope, terrace, etc.): Marsh Local relief (concave, convex, none): _____ Slope (%): 1

Subregion (LRR or MLRA): R 144A Lat: 41.2139348 Long: -73.1056745 Datum: WGS 84

Soil Map Unit Name: Udorthents, smoothed NWI classification: _____

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✔ No _____ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes ✔ No _____

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ✔	No _____	**Is the Sampled Area within a Wetland?** **Yes ✔** **No _____**
Hydric Soil Present?	Yes ✔	No _____	If yes, optional Wetland Site ID: _____
Wetland Hydrology Present?	Yes ✔	No _____	

Remarks: (Explain alternative procedures here or in a separate report.)

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ✔ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Vis ble on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ✔ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes _____	No ✔	Depth (inches): _____	
Water Table Present?	Yes ✔	No _____	Depth (inches): 18	
Saturation Present? (includes capillary fringe)	Yes ✔	No _____	Depth (inches): 8	**Wetland Hydrology Present? Yes ✔ No _____**

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

VEGETATION – Use scientific names of plants. Sampling Point: Wetland 7

Tree Stratum (Plot size: 30 ft r)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	= Total Cover		
Sapling/Shrub Stratum (Plot size: 15 ft r)			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	= Total Cover		
Herb Stratum (Plot size: 5 ft r)			
1. Phragmites australis	85	✔	FACW
2. Lonicera sempervirens	15		FACU
3. Boehmeria cylindrica	10		OBL
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
	110% = Total Cover		
Woody Vine Stratum (Plot size: 30 ft r)			
1.			
2.			
3.			
4.			
	= Total Cover		

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	10	x 1 =	10
FACW species	85	x 2 =	170
FAC species	0	x 3 =	0
FACU species	15	x 4 =	60
UPL species	0	x 5 =	0
Column Totals:	110 (A)		240 (B)

Prevalence Index = B/A = 2.2

Hydrophytic Vegetation Indicators:

✔ 1 - Rapid Test for Hydrophytic Vegetation

✔ 2 - Dominance Test is >50%

✔ 3 - Prevalence Index is ≤3.0[1]

___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Vegetation Strata:

Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub – Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes ✔ No ___

Remarks: (Include photo numbers here or on a separate sheet.)

SOIL

Sampling Point: Wetland 7

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0 - 3	10YR 3/2	95	10YR 5/4	5	C	M	Clay Loam	
3 - 20	10YR 4/2	90	10YR 5/8	10	C	M	Clay Loam	
-								
-								
-								
-								
-								
-								
-								
-								
-								
-								

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

[2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ✔ Depleted Below Dark Surface (A11)
- ✔ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7) (**LRR R, MLRA 149B**)
- ___ Polyvalue Below Surface (S8) (**LRR R, MLRA 149B**)
- ___ Thin Dark Surface (S9) (**LRR R, MLRA 149B**)
- ___ Loamy Mucky Mineral (F1) (**LRR K, L**)
- ___ Loamy Gleyed Matrix (F2)
- ✔ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) (**LRR K, L, MLRA 149B**)
- ___ Coast Prairie Redox (A16) (**LRR K, L, R**)
- ___ 5 cm Mucky Peat or Peat (S3) (**LRR K, L, R**)
- ___ Dark Surface (S7) (**LRR K, L**)
- ___ Polyvalue Below Surface (S8) (**LRR K, L**)
- ___ Thin Dark Surface (S9) (**LRR K, L**)
- ___ Iron-Manganese Masses (F12) (**LRR K, L, R**)
- ___ Piedmont Floodplain Soils (F19) (**MLRA 149B**)
- ___ Mesic Spodic (TA6) (**MLRA 144A, 145, 149B**)
- ___ Red Parent Material (F21)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

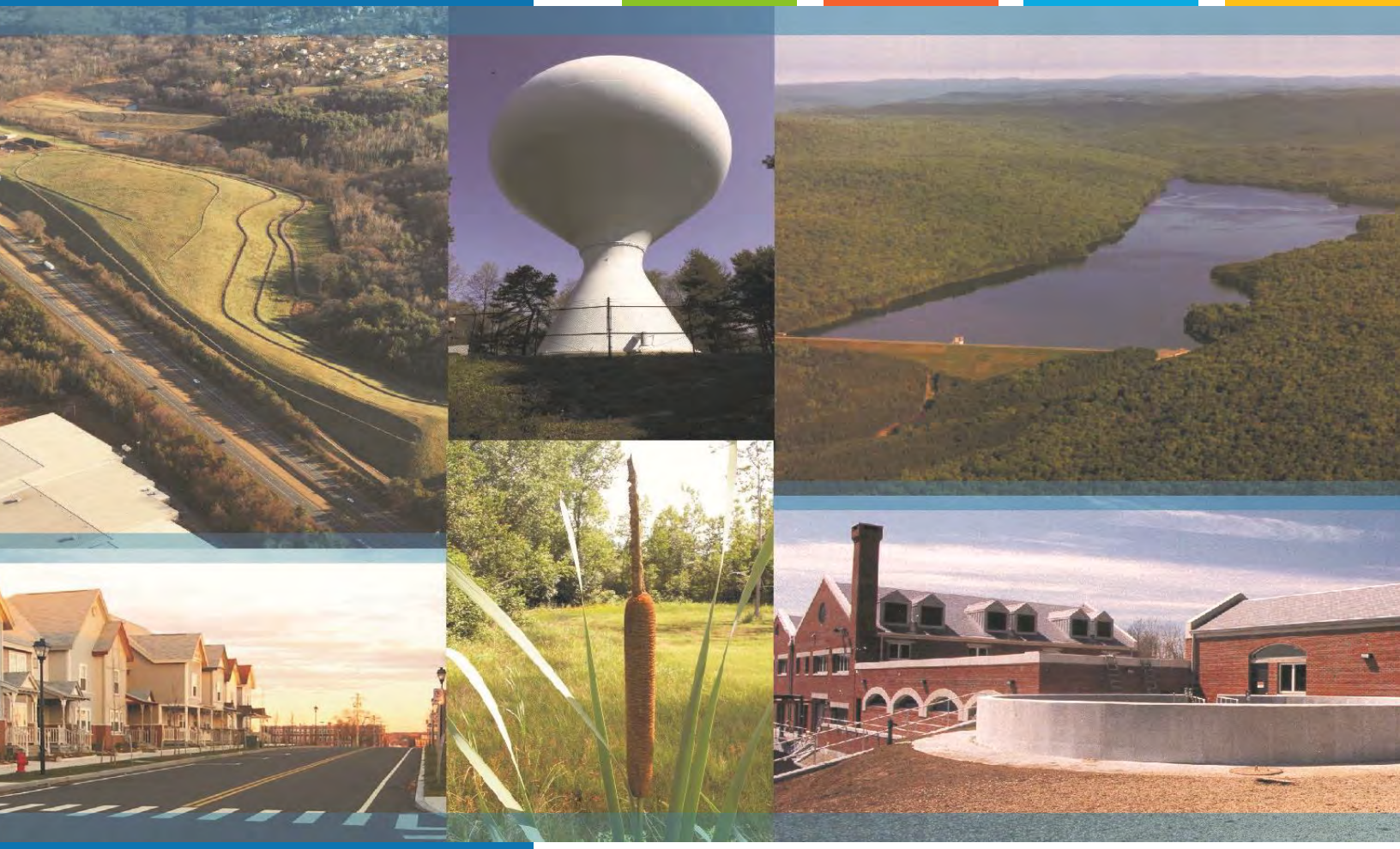
Depth (inches): _____

Hydric Soil Present? **Yes** ✔ **No** _____

Remarks:

Attachment F

Vernal Pool Report



West Devon Junction to Devon Rebuild Project
Stratford and Milford, Connecticut

Vernal Pool Report

Eversource Energy

May 2023

Tighe&Bond

100% Recyclable

Section 1 **Introduction**

The following report details the vernal pool habitat assessment conducted by Tighe & Bond in support of Eversource Energy Service Company's ("Eversource") Petition to the Connecticut Siting Council for the West Devon Junction to Devon Substation Rebuild Project ("Project"). The Project is planned within an approximate 2-mile section of an existing transmission line right-of-way ("ROW") in the towns of Stratford and Milford, Connecticut. The Project will require the construction of temporary and permanent access roads and work pads to facilitate rebuild activities, including removal and installation of new transmission structures and associated overhead transmission components. The Project will not require widening of the ROW or tree clearing that would result in a conversion of cover type. The Project will not result in any direct impacts to vernal pool depressions. Impacts to 100-foot vernal pool envelopes will be minimized to the greatest extent practicable through avoidance, minimization, and the use of Best Management Practices ("BMPs") as detailed within this report.

Section 2 **Vernal Pool Determination and Regulations**

The Connecticut Siting Council ("Council") published the *Electric and Fuel Transmission Line Facility* application guide ("Guidelines") in April 2010. Section VIII of the Guidelines provides an outline of the contents for an application to the Council. Specifically, Section VI.I.D requires the applicant to depict vernal pools in the existing conditions plans, along with a 100-foot buffer around each pool.

Projects subject to the Council's jurisdiction are not subject to local inland wetland commission regulations in Connecticut. Connecticut's Inland Wetlands and Watercourse Act ("Act"), enacted in 1972, did not originally address vernal pools. The regulation of vernal pools is provided through a later amendment, P.A. 95-313. This 1995 amendment expanded the definition of "watercourse" to include "*all other bodies of water, natural or artificial, vernal or intermittent*." Neither the Act nor its amendment provide a definition for vernal pool.

Under authority granted by Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers ("Corps") - New England District issued the *Department of the Army Regional General Permits for the State of Connecticut* ("GP", effective date December 15, 2021). Within the GP, vernal pools are included as one of six wetland habitats defined as "Special Wetlands" by the Connecticut Department of Energy and Environmental Protection's ("CTDEEP") associated Water Quality Certification program.

A number of vernal pool definitions have been developed by regulatory authorities and conservation organizations. The Corps GP defines vernal pools ("VPs") as "*depressional wetland basins that typically go dry in most years and may contain inlets or outlets, typically of intermittent flow. Vernal pools range in both size and depth depending upon landscape position and parent material(s). In most years, VPs support one or more of the following obligate indicator species: wood frog, spotted salamander, blue spotted salamander, marbled salamander, Jefferson's salamander and fairy shrimp. However, they should preclude sustainable populations of predatory fish.*"

Calhoun and Klemens (2002) *Best Development Practices: Conserving Pool-Breeding Amphibians in Residential and Commercial Developments in the Northeastern United States* ("BDP Manual") provides the following operational definition of vernal pools:

> *Vernal pools are seasonal bodies of water that attain maximum depths in the spring or fall and lack permanent surface water connections with other wetlands or water bodies. Pools fill with snowmelt or runoff in the spring, although some may be fed primarily by groundwater sources. The duration of surface flooding, known as hydroperiod, varies depending upon the pool and the year; vernal pool hydroperiods range along a continuum from less than 30 days to more than one year. Pools are generally small in size (<2 acres), with the extent of vegetation varying widely. They lack established fish populations, usually as a result of periodic drying, and support communities dominated by animals adapted to living in temporary, fishless pools. In the region, they provide essential breeding habitat for one or more wildlife species including Ambystomid salamanders (Ambystoma spp., called "mole salamanders"*

because they live in burrows), wood frogs (Rana sylvatica), and fairy shrimp (Eubranchipus spp.).

2.1 Vernal Pool Identification Methods

Vernal pool physical characteristics can vary widely while still providing habitat for indicator species. "Classic" vernal pools are natural depressions in a wooded upland with no hydrologic connection to other wetland systems. Anthropogenic depressions such as quarry holes, old farm ponds and borrow pits can also provide similar habitat. Often, vernal pools are depressions or impoundments embedded within larger wetland systems. These vernal pool habitats are commonly referred to as "cryptic" vernal pools.

Several species of amphibians depend on vernal pools for reproduction and development. These species are referred to as "indicator"[1] vernal pool species, and their presence in a temporary wetland during the breeding season helps to identify that area as a vernal pool. Indicator species present in Connecticut include the following:

- Blue-spotted salamander (*Ambystoma laterale*)
- Wood frog (*Rana sylvatica*)
- Spotted salamander (*Ambystoma maculatum*)
- Jefferson salamander (*Ambystoma jeffersonianum*)
- Eastern spadefoot toad (*Scaphiopus holbrookii*)
- Marbled salamander (*Ambystoma opacum*)
- Fairy shrimp (*Branchiopoda anostraca*)

Facultative vernal pool species are fauna that utilize but do not necessarily require vernal pools for reproductive success. Examples of facultative species include spotted turtle (*Clemmys guttata*), spring peeper (*Pseudacris crucifer*), and four-toed salamander (*Hemidactylium scutatum*). These species may breed or feed in vernal pools but are also capable of carrying out all phases of their lifecycle in other types of wetlands or water bodies. Evidence of breeding by facultative species alone is not sufficient for a vernal pool classification.

For this report, a vernal pool is defined as an area that meets the physical characteristics described above and contains evidence of breeding activity of any of the indicator species listed above, including the presence of egg masses and larvae. This vernal pool assessment also makes an important distinction between wetlands in which indicator species may breed and those wetlands where they breed and successfully develop.

Vernal pool species breeding can also occur in bodies of water such as road ruts or man-made basins where the development and metamorphosis of larvae is unsuccessful. These

[1] Calhoun and Klemens (2002) argue that "indicator" species is a better word than the commonly used "obligate" species, as they will occasionally breed in roadside ditches and small ponds that are not vernal pools.

are referred to as "decoy vernal pools". In the BDP Manual, Calhoun and Klemens note the negative impact associated with ruts:

> *Site clearing can cause water-filled ruts. These ruts intercept amphibians moving toward the vernal pool and may induce egg deposition. Often these ruts do not hold water long enough to allow development of amphibians and therefore acts as "sinks" that result in populations declines.*

Decoy vernal pools often lack vegetation for egg mass attachment and dry more rapidly than classic or cryptic vernal pools, limiting larval survivorship.

Section 3 **Means and Methods**

Potential vernal pools (PVPs) were identified during the wetland delineation in the fall of 2020. A Tighe & Bond Certified Wildlife Biologist (CWB) and Professional Wetland Scientist (PWS) conducted field surveys of the PVPs identified during the delineation on April 8, April 25, and May 13 of 2022. Previous field survey work by environmental scientists (including CWB and PWS certified staff) occurred on March 25 and 26, April 2, 8, and 9, May 27, and June 18 of 2021. Any observed areas of surface water in the Project ROW observed during Spring field work were assessed for vernal pool habitat conditions. Field surveys were conducted to observe and monitor each PVP habitat area. Survey methods included a visual search for adults, larvae and egg masses, audial surveys to listen for chorusing, and dip-net surveys to identify amphibian larvae. The follow-up field surveys were conducted to confirm that hydrology and hydroperiod remained adequate to support breeding and development. Photographs of each location are provided in Appendix A.

The methodology described in the BDP Manual was used to assess each pool qualitatively. This assessment methodology utilizes a three-tiered rating system, with the tier designation determined by examining the biological value of the pool in conjunction with the condition of the habitat surrounding the pool, which is the area used by vernal pool amphibians during the non-breeding season. The higher the species diversity and abundance, coupled with an undeveloped and forested landscape surrounding the pool, the higher the tier rating. Tier I pools are considered the highest quality pools, while Tier III are the lowest. Analysis of the landscape condition within 750 feet of the pools is required to complete the full BDP analysis; this was conducted as the sites permitted due to constraints related to property rights and boundaries. For areas outside of the ROW and access roads, land use assessment was based on aerial photograph assessment. The BDP Manual defines Tier I and II pools are those pools that meet at least one of the following *biological* criteria:

1. The presence of a breeding state-listed species (such as blue-spotted salamander, Jefferson salamander, spadefoot toad, wood turtle, or eastern box turtle); or
2. Two or more indicator species breeding; or
3. 25 or more total egg masses of any vernal pool indicator species.

The tier rating of a pool is based on which of the above *biological* criteria are met coupled with an analysis of the level of development within two landscape management zones surrounding the pools, the Vernal Pool Envelope (VPE, 0-100 feet from the pool) and the Critical Terrestrial Habitat (CTH, 100-750 feet from the pool).

A Tier I pool must meet one of the above *biological* criteria *and* have at least 75% undeveloped land within the Vernal Pool Envelope (VPE, 0-100 feet from the pool) and at least 50% undeveloped land within the Critical Terrestrial Habitat (CTH, 100-750 feet from the pool).

A Tier II pool must meet one of the above *biological* criteria along with one of the landscape criteria, either 75% undeveloped land within the VPE *or* 50% undeveloped land within the CTH.

A Tier III pool is a pool that either has high *biological* value coupled with a high percentage of developed land within the VPE and CTH *or* low biological value coupled with one of the landscape criteria being met (either 75% undeveloped land within the VPE *or* 50% undeveloped land within the CTH). Typical, Tier III pools exhibit low species diversity and abundance.

Section 4 **Results**

A total of one (1) PVP was identified during the initial wetland delineation and was confirmed to be a VP during the field assessment. Note that this VP is also identified as VP2 in the Pootatuck to West Devon Rebuild Project, which will occur ahead of this Project. The VP is located within a larger wetland system and is an isolated depression within the wetland that is seasonally inundated. This area includes scrub-shrub and emergent wetlands in the ROW and forested wetland outside of the ROW. The adjacent land use includes forested upland and wetland and residential areas. The VP is located almost entirely within a forested area with a minimum of 75% undisturbed Vernal Pool Envelope and 60% Critical Terrestrial Habitat.

No additional VPs or decoy vernal pools were found in the project area during the survey.

The study period was drier than typical, and the duration of standing water affected development of the tadpoles in the Spring of 2021 and 2022, as detailed below.

Table 4-1 provides a summary of the biological findings and Tier Rating for the pool using the BDP Methodology.

TABLE 4-1
Summary Vernal Pool Findings

Year	Maximum Egg Mass Totals		Facultative Species Observed	Cowardin Code(s)*	Tier Rating	Pool Type **	Petition Map Sheet No.
	Wood Frog	Spotted Salamander					
2022	2	7	None	PEM/PFO1C	I	CR	6
2021	-	4	Spotted Turtle				

**Cowardin code(s)*
PSS1 – Palustrine scrub-shrub
PFO1 - Palustrine forested wetland broad leaved deciduous
**Water Regime*
C - Seasonally flooded

***Pool Type*
CR - Cryptic

4.1 Vernal Pool 1

Vernal Pool 1 (VP1) is located at the eastern edge of the ROW, northwest of Structures 19117, 19516, and 19516A, which will be constructed ahead of this Project during the Pootatuck to West Devon Rebuild Project. The cryptic vernal pool depression lies recessed within the larger boundary of Wetland W1. It is largely forested with scattered scrub-shrub vegetation within. Dominant vegetation observed during the site visits included red maple (*Acer rubrum*), skunk cabbage (*Symplocarpus foetidus*), common reed (*Phragmites australis*), highbush blueberry (*Vaccinium corymbosum*), and a variety of sedge species (*Carex* sp.). Photographs of the VP are provided in Attachment A.

During the April 8 survey, two wood frog egg masses and seven spotted salamander egg masses were observed. On April 25, only one wood frog egg mass and one spotted salamander egg mass were counted. During the final May 13 monitoring event, no egg masses of any species were observed within the pool. The density of *Phragmites* in the VP

at the ROW may have limited the presence of tadpoles or larvae during the May 13th observation, where dense plant stems were present in the ponded area. These numbers are similar to those observed in 2021, where a maximum of four spotted salamander and no wood frog egg masses were observed in the month of April. However, hundreds of wood frog tadpoles were observed in May and June of the 2021 monitoring season; this was not observed to occur again at any point during the 2022 site visits. A spotted turtle (*Clemmys guttata*) was observed at VP1 during the May 27th monitoring in 2021.

The surface water area and depth varied over the course of the 2021 and 2022 survey seasons. In 2022, the water depth was recorded at an average of 10.6 inches during the first survey on April 8. This average pool depth dropped to 9.6 inches during the April 24 monitoring event and raised slightly to 10.3 inches during the final site visit on May 13.

VP1 was assigned a Tier I rating during the 2021 and 2022 monitoring seasons due to the presence of two indicator species (assumed from the presence of wood frog and spotted salamander egg masses) as well as the percentage of undeveloped land in the VPE and CTH.

4.2 Study Period Weather

The studied vernal pool appeared to be potentially limited in its ability to provide amphibian breeding habitat during the 2021 and 2022 survey seasons due to the loss of water volume in the spring, as rainfall conditions during the study period were drier than typical. Reported monthly rainfall for the period from March through May 2021 was below normal with Fairfield County at 85% and New Haven County at 92% of normal precipitation for that three-month period. This trend continued in 2022, with reported monthly rainfall for the period from March through July being below normal for Fairfield County at 82% and New Haven County at 77% of normal precipitation for that similar five-month period (ct.gov/water/drought/drought-home).

As such, conditions at the pool studied for this report are expected to vary from year to year in response to variable and changing weather conditions.

Section 5 **Discussion**

This section discusses potential impacts to vernal pools due to the Project construction and discusses avoidance and minimization measures incorporated into the Project design.

5.1 Potential Impacts to Vernal Pools

A total of one (1) vernal pool was identified within the Project Area. This vernal pool was found to support two vernal pool indicator species, wood frog and spotted salamander. This pool is classified as Tier I due to the observation of multiple indicator species, and 75% or greater undeveloped VPE and/or 50% or greater undeveloped CTH.

The Project does not propose any activities within vernal pool depressions and avoids direct impacts to vernal pools. The principal construction activities that could affect vernal pools include:

- The construction of new or improved access roads within VPEs (i.e., within 100 feet of the vernal pool)
- The construction of work pads within VPEs
- The demolition and construction of electric transmission structures in VPEs
- The movement of vehicles and equipment through amphibian migratory routes
- The potential for erosion and sedimentation into vernal pools
- The destruction of fossorial habitat through soil compaction and grading

5.1.1 Vernal Pool 1

The Project includes the placement of temporary timber matting for an access road and pull pad within the VPE of VP1. No existing or proposed structures are within the VPE of VP1.

5.2 Avoidance and Minimization Measures

The potential for adverse impacts on vernal pools may be minimized by implementing a variety of BMPs aimed at minimizing the effects of both permanent and temporary construction-related activities. The following types of measures may be considered to minimize potential impacts on vernal pools:

Construction Activities during Migration, Breeding & Larval Development Periods

Where feasible in areas proximate to vernal pools, avoid or minimize construction activities during periods of peak migration, breeding and larval development as described below for each indicator species:

Wood frog:

- Breeding and larval development period: from March through July.
- Migration period: migration into pools occurs predominantly between mid-March and mid-April.

Spotted salamander:

- Breeding and larval development period: from March through June.
- Migration period: migration from pools occurs predominantly between late summer and early fall.

For Project activities that must occur adjacent to vernal pools during amphibian migration periods, implement measures on a site-specific basis as necessary to facilitate unencumbered amphibian access to and from vernal pools, such as elevated construction matting. Mitigation measures will be identified after considering site-specific conditions, including the type of construction activity in proximity to a vernal pool, the amphibian species known to occur in the vernal pool, and seasonal conditions.

Vegetation Clearing:

- Minimize the removal of low-growing vegetation surrounding vernal pools. If low growing woody vegetation (shrubs) will be removed, the cut vegetation (slash) should be left in place to provide cover and promote the development of coarse woody debris and detritus.
- Where possible, the stumps of cut woody debris should be left in place to minimize soil disturbance.
- Woody shrub cover should remain intact to the maximum extent practicable.

Erosion and Sedimentation Controls

- Erosion control measures should be designed in a manner that allows unencumbered amphibian access to vernal pools and migratory pathways. Such measures may include but are not limited to syncopated silt fencing and/or straw wattles in the immediate vicinity of vernal pools, and aligning erosion and sedimentation controls to avoid bisecting vernal pool habitat.
- Install appropriate erosion and sediment controls around distinct work sites and access roads to minimize the potential for sediment deposition into vernal pools and remove such controls promptly after final site stabilization.
- Plastic netting used in a variety of erosion control products (i.e., erosion control blankets, fiber rolls [wattles], reinforced silt fence) has been found to entangle wildlife, including amphibians. No permanent erosion control products or reinforced silt fence should be used. Temporary erosion control products should be composed of processed fibers mechanically bound together to form a continuous matrix (netless) or netting composed of planar woven natural biodegradable fiber to avoid/minimize wildlife entanglement.

Access Roads and Work Pads

- Evaluate the use of temporary timber mat access roads in lieu of constructing gravel access roads to minimize the loss of vegetated areas within the VPE.
- Use bridging when installing timber mats to provide for access under timber mat roads.

- Minimize the removal of shrub cover associated with work pad and access road construction within 25 feet of vernal pools.
- Where feasible, remove new gravel fill associated with construction work pads and pull pads.

Prevention of Decoy Vernal Pools

- Permanent access road crossings should be constructed in a manner that wetland hydrology is maintained, and surface water impoundment does not occur.
- Access road grading or improvements necessary to accommodate project construction vehicles should eliminate any existing depressions or ruts that may be functioning as decoy vernal pools.
- Avoid siting temporary sediment traps near vernal pools as they may function as decoy pools.

Section 6 **References**

Calhoun, A.J.K. and M.W. Klemens. 2002. *Best Development Practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United States.* MCA Technical Paper No. 5 Metropolitan Conservation Alliance, Wildlife Conservation Society, Bronx, New York. 57 p.

Colburn, Elizabeth A. 2004. *Vernal Pools: Natural History and Conservation*. McDonald and Woodward Publishing Company, Blacksburg, VA., 426 p.

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Klemens, M.W. 1993. *Amphibians and Reptiles of Connecticut and Adjacent Regions*. State Geological and Natural History Survey of Connecticut, Bulletin No. 112, Connecticut Department of Environmental Protection, Hartford, CT.

Cowardin, L.M., V. Carter, F.C. Golet and E.T. LaRoe. 1979. *Classification of Wetlands and Deepwater Habitats of the United States*. U.S. Fish and Wildlife Service. FWS/OBS-79/31. Washington, D.C. 103 p.

Tighe&Bond

APPENDIX A

Photographic Log

Client: Eversource Energy **Job Number:** E5034-154

Site: West Devon Junction to Devon Rebuild Project, Stratford and Milford, Connecticut

Photograph No.: 1	**Date:** 04/08/2022	**Direction Taken:** North
Description: Overview of Vernal Pool 1 (PFO1C), taken during the first site visit on April 8, 2022.		

Photograph No.: 2	**Date:** 04/25/2022	**Direction Taken:** North
Description: Overview of Vernal Pool 1, taken during the second site visit on April 25, 2022.		

Photographic Log

Client: Eversource Energy **Job Number:** E5034-154

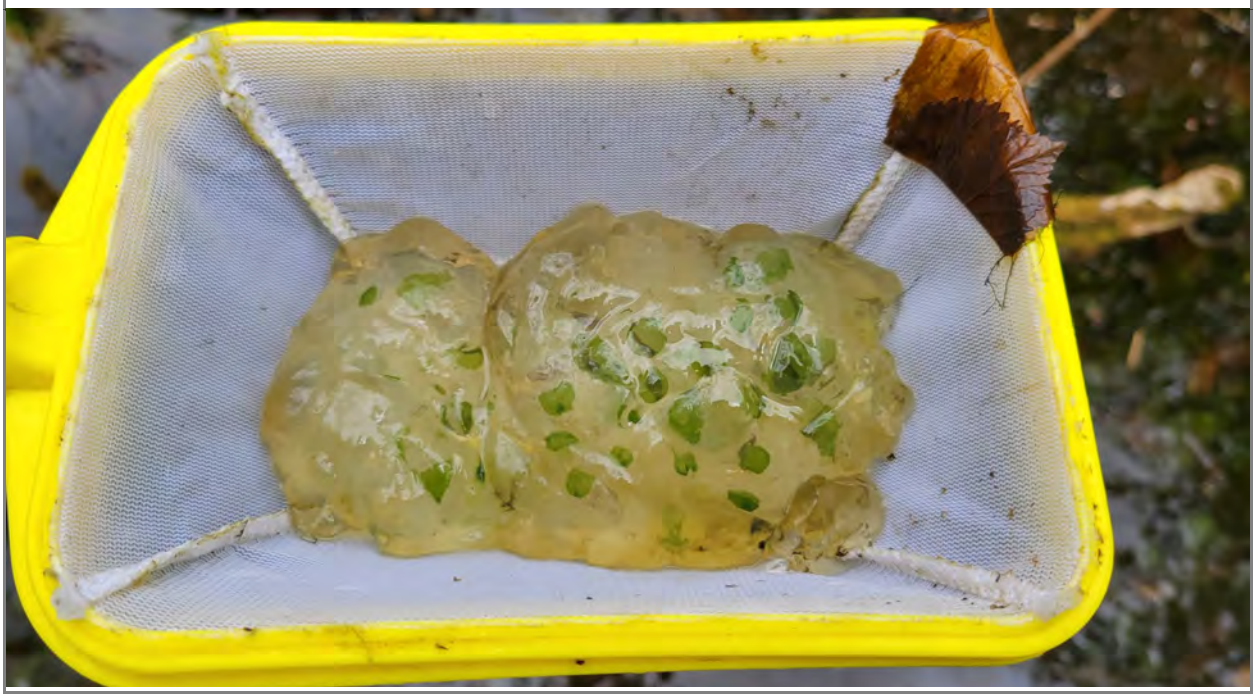
Site: West Devon Junction to Devon Rebuild Project, Stratford and Milford, Connecticut

Photograph No.: 3	**Date:** 05/13/2022	**Direction Taken:** North

Description: Overview of Vernal Pool 1, taken during the third site visit on May 13, 2022.

Photograph No.: 4	**Date:** 04/25/2022	**Direction Taken:** N/A

Description: Spotted salamander egg masses were observed within Vernal Pool 1 in 2022, at varying stages of maturity.



Photographic Log

Client: Eversource Energy **Job Number:** E5034-154

Site: West Devon Junction to Devon Rebuild Project, Stratford and Milford, Connecticut

Photograph No.: 5	**Date:** 04/08/2022	**Direction Taken:** N/A
Description: Wood frog egg masses and tadpoles were observed within Vernal Pool 1 in 2022, at varying stages of maturity.		

Tighe&Bond

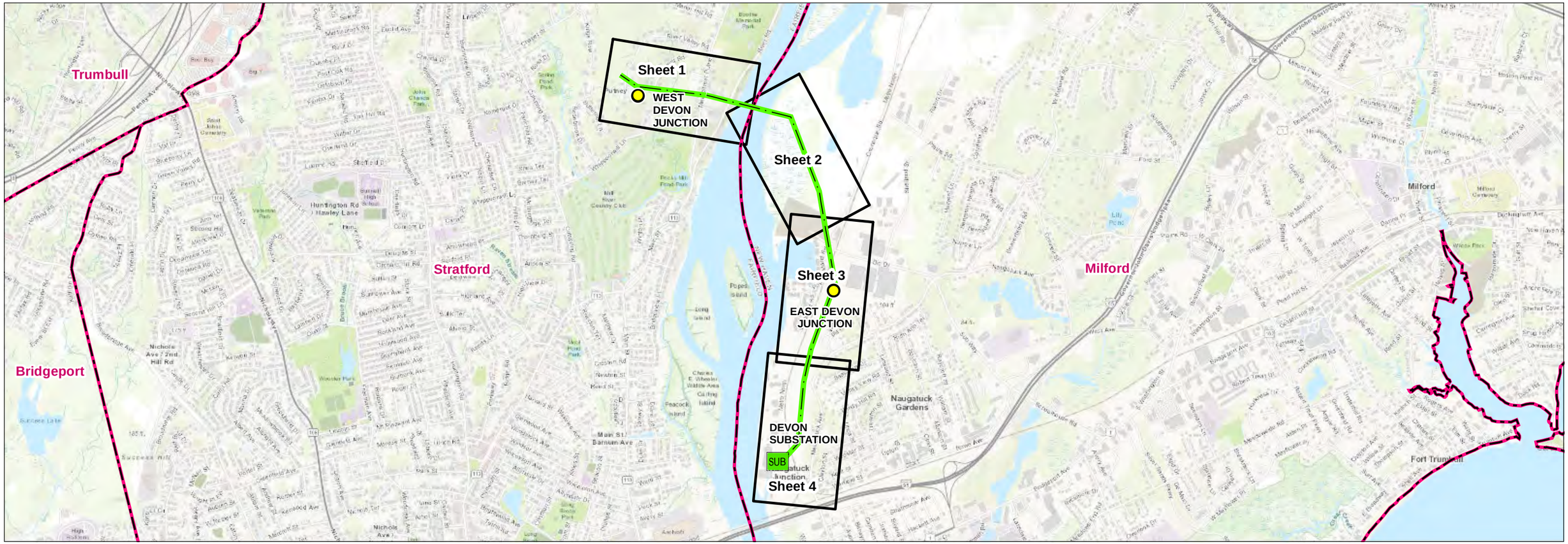
APPENDIX B

West Devon Junction to Devon Substation Rebuild Project

Stratford & Milford, Connecticut

Petition Map Set

Date: July 07, 2025



Legend

Junction | SUB Substation | Project ROW | Municipal Boundary | Map Sheet

N

0 0.25 0.5 Miles

NO.	DATE	REVISIONS

PREPARED FOR:

EVERSOURCE

PREPARED BY:

Tighe&Bond

INDEX OF FIGURES

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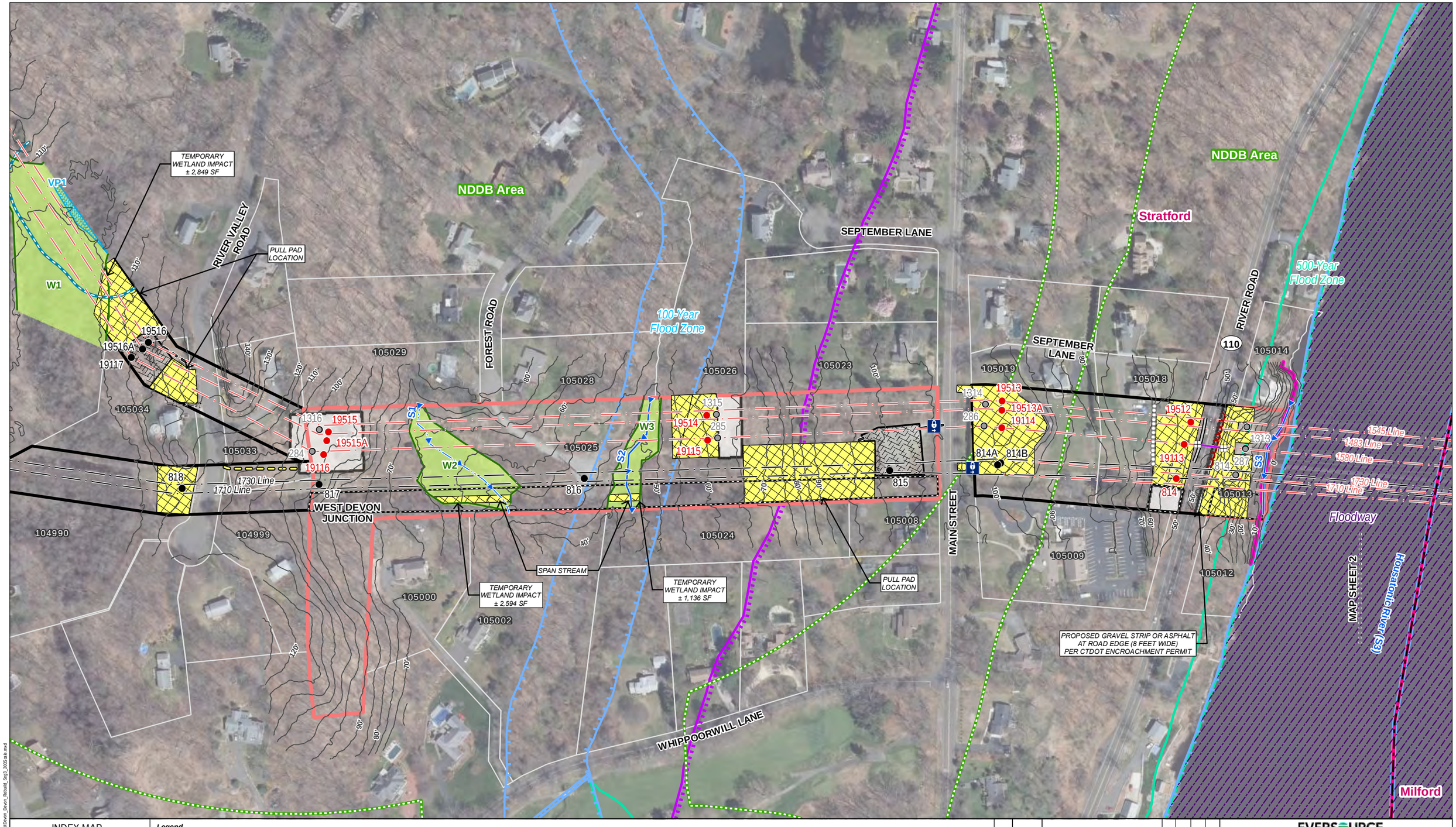
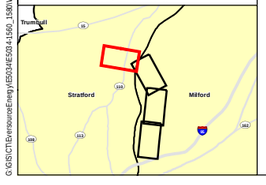


INDEX MAP



Legend

- Proposed Structure
- Existing Structure
- Existing Structure to be Removed
- Culvert
- Gate
- Catch Basin
- Culvert Pipe
- Sewer Manhole
- Sewer Main
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- Critical Habitat
- FEMA 100-Year Flood Zone
- FEMA 500-Year Flood Zone
- FEMA Floodway
- Coastal Boundary
- Coastal Jurisdiction Line (5' - actual CJL is 4.9')
- Capped Ash Landfill
- State-Owned Property (CTDEEP)
- Parcel Boundary
- Eversource Owned Property
- Municipal Boundary
- Easement Area

N

1 inch = 200 feet

0 50 100 200 Feet

NO.	DATE	REVISIONS	BY	CHK	APP	APP

EVERSOURCE

West Devon Junction to Devon Substation Rebuild Project

Stratford & Milford, CT | Map Sheet 1 of 4

Date: July 07, 2025

Tighe&Bond

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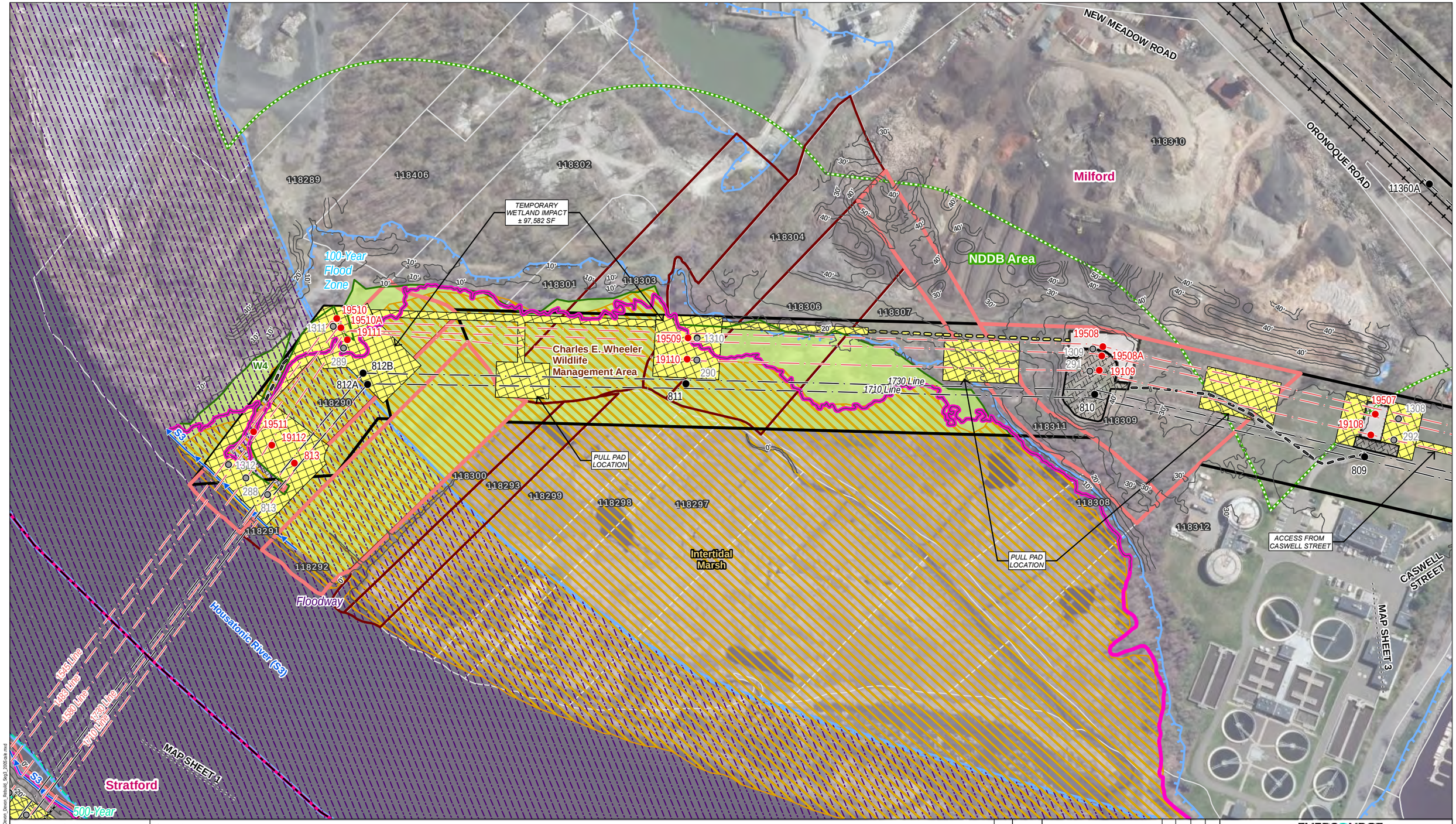

INDEX MAP

Legend

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1 inch = 200 feet
0 50 100 200 Feet

NO.	DATE	REVISIONS	BY	CHK	APP	APP

EVERSOURCE

West Devon Junction to Devon Substation Rebuild Project

Stratford & Milford, CT | Map Sheet 2 of 4

Date: July 07, 2025

Tighe&Bond

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EXISTING STAGING AREA / LAYDOWN YARD

BIC DRIVE

CROWLEY AVENUE

SASSACUS DRIVE

MAP SHEET 4

Milford

WOODHILL ROAD

NAUGATUCK AVENUE

3165 & 3619 Lines

EAST DEVON JUNCTION

1640 Line
1685 Line
1497 Line
1483 Line
1545 Line
1580 Line
1730 Line
1710 Line
1776 Line

Iroquois Gas Transmission Line

GREENVIEW LANE

ORONOQUE ROAD

POPES ISLAND ROAD

CASWELL STREET

WINDWARD ROAD

NDDB Area

100-Year Flood Zone

Housatonic River

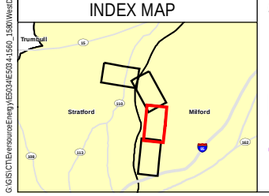
Floodway

ACCESS FROM NAUGATUCK AVENUE

MAP SHEET 2

132654 132655 132656 132658 118286 3809 132657 132659 132660 132661 132663 132662 132665 24488 132653 132652 132651 118287 118316 3808 24487 11359 118315 11358 11357 118310 19506 1307 293 19107 807 118314 118317 808 19507 1308 292 19108 809 118312 3807 24486 1306 19505 19505A 19106 1306A 294A 294 806 11356 805 3806 24485 19504 19105 1305 295 804 11355 118317 118321 118318 118330 118328 118329 3805 24484 19503 19503A 1304 19104 296 803 11354 118331 802 11353 118317 118333 118334

INDEX MAP



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1 inch = 200 feet
0 50 100 200 Feet

NO.	DATE	REVISIONS	BY	CHK	APP	APP

EVERSOURCE

West Devon Junction to Devon Substation Rebuild Project

Milford, CT | Map Sheet 3 of 4

Date: July 07, 2025

Tighe&Bond

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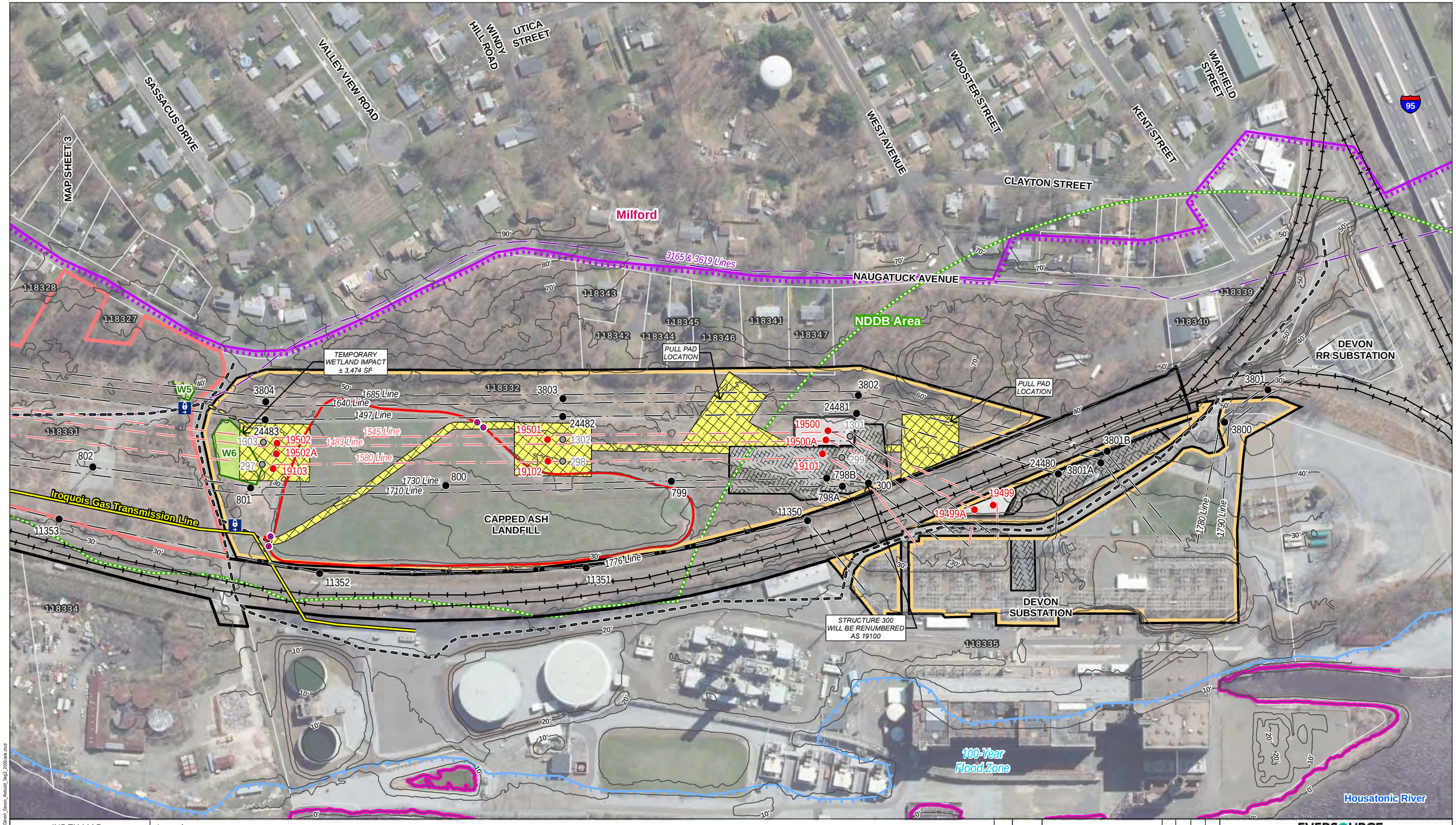

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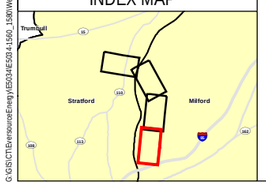

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NO.	DATE	REVISIONS	BY	CHK	APP	APP

EVERSOURCE

West Devon Junction to Devon Substation Rebuild Project

Milford, CT

Map Sheet 4 of 4

Date: July 07, 2025

Tighe&Bond

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Attachment G

NDDB Determination Letter

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

79 Elm Street • Hartford, CT 06106-5127 www.ct.gov/deep Affirmative Action/Equal Opportunity Employer

June 2, 2025

Robert Deptula
Eversource Energy Service Company
107 Selden Street
Berlin, CT 06037
Robert.deptula@eversource.com
Eversource.nddb@eversource.com

Project: Eversource Energy Company, LLC , Copper Conductor Retirement Program for the Complete Rebuild of the 1580 and 1545/1483 Transmission Lines from West Devon Junction to Devon Substation Project in Stratford and Milford, Connecticut
NDDB Final Determination No.: 202211219 (Extension of Determination and Updated Conservation Measures)
Expiration Date: June 2, 2027

Dear Robert Deptula,

I have re-reviewed NDDB maps and files regarding the proposed Eversource Energy Company, LLC, Copper Conductor Retirement Program for the Complete Rebuild of the 1580 and 1545/1483 Transmission Lines from West Devon Junction to Devon Substation Project in Stratford and Milford, Connecticut. We reviewed the new activities that have been added since the original review request that had been submitted on November 8, 2022, with a determination that expires June 12, 2025.

New project activities include:

- Updated Workspace: Eversource has updated the workspace since the original review request in the attached mapping and attached detailed shapefile (reviewed in **Attachment A and Attachment B**) in the email received by NDDB dated 3/18/2025. This includes additional and expansion of matting and new areas of gravel.
- In-water work: In water work will include the controlled lowering of six wires to be decommissioned/removed from the system into the Housatonic River and pulled across to the eastern shore in the Charles E. Wheeler WMA using a tensioner system.
- Vegetation management: activities are proposed on the west side of the Housatonic River between Structures 817 and 814. Trees will be cleared along the southern portion of the ROW (reviewed in email to NDDB dated 3/18/2025). Mechanical and chemical treatments will be used.

We concur with the additional conservation measures provided to the NDDB email dated 3/18/2025. If the additional conservation measures are implemented, we do not anticipate adverse impacts to state listed species.

The additional conservation measures to avoid adverse impacts to state listed species will include:

In-water work: A buoy will be attached to each wire (a total of six wires over a two-day period) to help keep the wires from dragging across the bottom of the river. A CTDEEP Fisheries consultation request was submitted separately on February 21, 2025.

Diamondback Terrapin: Eversource estimates that construction matting required for replacement of structures in the WMA and salt marshes would be in place for approximately 31 weeks and work would need to occur outside of the original window of August 1st – November 1st outlined in the NDDB determination. Eversource has consulted with herpetologist Eric Davison of Davison Environmental to minimize impacts to the Diamondback Terrapin. Eversource will follow the recommendations outlined in the attached Habitat Assessment and Protection Measures (**Attachment C**).

Saltmarsh birds: Matting will be in place prior to the start of the breeding season (April 1st) to minimize direct impacts to breeding birds.

Lizard's-tail: Lizard's-Tail (*Saururus cernuus)* will be avoided during construction of the Project. During the 2025 growing season, the Project Botanist will reflag the known occurrences (surveyed 2023) near Structure 1317 and flag any new occurrences that are observed between Structure 1317 and the Housatonic River. If new occurrences are found, Eversource would avoid the occurrence. If avoidance is not possible, Eversource will notify NDDB. A Special Plant Survey Form will be submitted for all new observations (if any) to NDDB.

Prior to construction, exclusionary fencing (e.g., orange construction fencing) will be placed between lizard's-tail plant areas and work areas to prevent accidental encroachment during construction. A field meeting will be held with the Contractor, the designated Environmental Monitor, and the Project Botanist to walk the plant areas and critical habitats to describe the required protection measures. The fencing as denoted in the field will be installed under the supervision of the Project Botanist or environmental monitor. The Contractor and the designated Environmental Monitor are together responsible for detecting and reporting any encroachment by vehicles, equipment, and materials into the fenced plant areas. Eversource will submit an email to NDDB notifying them of the impact within two days of the detection of the encroachment and/or other impact.

Protection for State Listed Plants

We are in receipt of a rare plant survey report State-listed Plant Species Survey Target Plants: Salt marsh bulrush (*Bolboschoenus novae-angliae*), Water sedge (*Carex aquatilis ssp. altior*), Woolly beach-heather (*Hudsonia tomentosa*) , Lizard's tail (*Saururus cernuus*) Eversource West Devon Junction to Devon Transmission Line Right-of-Way Charles E. Wheeler Wildlife Management Area in Milford, Connecticut prepared by Stantec Consulting Services, Inc. and dated August 31, 2022. This botanical report is accepted in full and no further conservation is required for *Bolboschoenus novae-angliae*, *Carex aquatilis ssp. altior*, or *Hudsonia tomentosa*.

However, because the surveyor was not provided with the exact location of State Endangered Lizard's tail (*Saururus cernuus*) before the botanical survey was completed, we require another site visit to document this occurrence of State Endangered Lizard's tail (*Saururus cernuus*). Our program botanist, William Moorhead, has spoken to Matt Arsenault of Stantec Consulting Services, Inc. and provided the exact locational information for a follow-up botanical survey to be done that will focus on *Saururus cernuus* (see attached map).

Prior to the commencement of any project activity in the vicinity of the mapped *Saururus* area, survey should be conducted by a qualified botanist or plant ecologist at a time when the *Saururus* plants are detectable and identifiable. If *Saururus* plants are detected within the footprint of the project activities/disturbance, the qualified botanist or plant ecologist must develop a protection/conservation plan for the *Saururus*, which describes how Eversource will avoid impacting the *Saururus* plants and/or appropriately mitigate or compensate for any unavoidable impacts.

This Saururus protection/conservation plan, together with the botanical survey report, including maps, field forms for the rare plant and photographs, should be submitted to NDDB (nddbrequestdep@ct.gov)

for review and approval prior to the commencement of work in this portion of the project area, as a condition of this this final determination.

Protection for State Endangered Peregrine Falcon at Devon Station
The peregrine falcon is a state threatened species which has adapted to life in urban settings. The peregrine falcon is associated with bridges for nesting and brood rearing purposes. Peregrines will actively and aggressively defend the nest, whether a nest box or natural nest, up to and sometimes past 75 yards. The peregrine will attack anyone or anything that comes within the area of its nest. Peregrine falcons are Connecticut's largest falcon and can measure up to 20 inches. Adults are slate gray above and pale underneath with fine bars and spots of black; they have long pointed wings with a narrow tail. Young falcons have the same composite but are darker underneath and browner all over. The peregrine falcon nesting season occurs between the months of April and June. For this reason, special conditions regarding the timing of work on the structure must be applied. In order to protect this species, the proposed construction activities should be completed during non-nesting season months (July – March). No construction activities should occur between April 1st and June 30th.

Protection Recommendation for Peregrine Falcon:
In order to protect this species, the proposed construction activities should be completed during non-nesting season months (July – March). No construction activities should occur between April 1st and June 30th. If work needs to be conducted during the breeding season (April 1st to June 30th) then I recommend hiring an ornithologist (bird expert) to evaluate and prepare a protection plan for the birds. All work on this project must maintain a minimum buffer of 600' from the nest. If a nest is identified by workers all work should stop immediately and this information should be reported to our program for further assistance and guidance to complete the work safely.

State Listed Species Protection within Wetlands and Especially at Charles Wheeler Marsh

Saltmarsh sparrow (*Ammodramus caudacutus*)- State Special Concern
Seaside sparrow (*Ammodramus maritimus*)- State Threatened
Pied-billed grebe (*Podilymbus podiceps*)- State Endangered
Northern diamondback terrapin (*Malaclemys terrapin terrapin*)- State Special Concern Saltmarsh tiger beetle (*Cicindela marginata*)- State Special Concern

Important Foraging Area for:
Great Egret (*Ardea alba*)- State Threatened
Snowy Egret (*Egretta thula*)- State Threatened
Little blue heron (*Egretta caerulea*)- State Special Concern

The Northern diamond-backed terrapin is a turtle that inhabits salt marshes and salt or brackish tidal waters. They can also be found on mud flats, shallow bays, coves, and tidal estuaries. Adjacent sandy dry upland areas are required for nesting. Nesting takes place in June-July on salt marshes and adjacent beach areas. The peaks of hatching occurrences are April – June and September – November. This species overwinters in depressions in the bottoms of estuaries, creeks, and salt marsh channels composed of muddy and fine grain sediments.

The Pied- billed grebe is a small, secretive wetland bird that requires quiet wetlands and ponds with abundant emergent vegetation for nesting. They require large (>12 acre) contiguous wetlands with roughly 50/50 interspersion of moderately shallow emergent vegetation and open water ("hemi-marsh"). Reducing wetland disturbance and restoring wetland function will benefit this bird.

Saltmarsh sparrow and Seaside Sparrow These tidal-marsh specialists breed in Connecticut tidal-marsh habitat from mid-May through early August. Connecticut possesses a globally significant proportion of the breeding population of saltmarsh sparrow. Connecticut populations of both species have

experienced a significant decline in nesting success due to increased rates of nest flooding. It is important to note that although saltmarsh sparrow nest in the middle of marshes, once fledged, the females and young preferentially use marsh margins including areas of bare ground interspersed with taller vegetation for foraging, cover from predation, and reduced flooding risk. This behavior makes it important to delineate proper long term protection buffers at the edges of their nesting habitat.

Foraging Egrets and Herons These are birds that nest and forage in colonies mixed with other species of wading birds. Foraging habitats preferred by this species include marshes, swamps, ponds, shores, and tide flats with a diet consisting of mainly fish and crustaceans. The foraging efficiency of the Snowy egret is affected most by disturbance.

See attached June 4, 2025 email from DEEP acknowledging edit needed (strike through dates below). The corrected version of this Final Determination was not received at the time of this PCN application submittal. Eversource 6/10/25.

Protection measures:

To protect hibernating Northern diamondback terrapin and minimize disturbance of sensitive saltmarsh birds~~, conduct your marsh disturbance between August 1st - November 1st . Additionally~~:

- Ensure construction activities will not create a barrier to turtle movements. No channels should be completely blocked to passage.
- The work crew must be made aware of the species description and possible presence.
- The immediate area where heavy equipment will be used each day should be searched for turtles before starting work using mechanical equipment.
- Any turtles found during the construction should be moved out of the way. This animal is protected by law and should never be taken off site.
- Work conducted during early morning and evening hours should occur with special care not to harm basking individuals.

Project Design

The overall footprint of the rebuild should be limited as much as feasibly possible. The project should use timber mats properly in all wetlands and remove the mats as soon as possible.

Protection for State Listed Turtles in Stratford Section of the Project

Eastern Box Turtle (*Terrapene c. carolina*): Eastern box turtles inhabit old fields and deciduous forests, which can include power lines and logged woodlands. They are often found near small streams and ponds. The adults are completely terrestrial but the young may be semiaquatic and hibernate on land by digging down in the soil from October to April. They have an extremely small home range and can usually be found in the same area year after year. Eastern box turtles have been negatively impacted by the loss of suitable habitat. Some turtles may be killed directly by construction activities, but many more are lost when important habitat areas for shelter, feeding, hibernation, or nesting are destroyed. As remaining habitat is fragmented into smaller pieces, turtle populations can become small and isolated. Reducing the frequency that motorized vehicles enter box turtle habitat is beneficial in minimizing direct mortality of adults.

Spotted Turtle (*Clemmys guttata*): Spotted turtles are semi-aquatic in nature, which means they live both on terrestrial land and water. This species lives in several types of habitats including bogs, swamps, fens, woodland streams, wet pastures and marshes. They sometimes also inhabit brackish streams influenced by tides. These reptiles always live in areas with slow moving water and soft soil. Spotted turtles are active hunters and they mainly hunt underwater they sometimes move onto terrestrial lands for hunting. Habitat destruction, degradation or alteration and fragmentation all threaten spotted turtle populations. Turtles are also particularly vulnerable to any activity that consistently reduces adult survivorship. The greatest concern during projects occurring in spotted turtle habitat are turtles being run over and crushed by mechanized equipment. Reducing the frequency that motorized vehicles enter spotted turtle habitat is beneficial in minimizing direct mortality of adults.

Protection for Turtles:
A herpetologist should be hired to help educate and keep turtles safe in the Right-of Way.

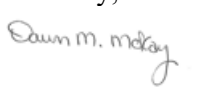
- Keep vehicle and heavy equipment on paved or hard surfaces.
- Overall, minimizing ground disturbance along the forest edges will minimize the potential for box turtle mortality during the winter months.
- Avoid and limit any equipment use within 100 feet of streams and brooks.
- All workers within the turtle habitat must be apprised of the species description and the possible presence of a listed species and instructed to notify the appropriate authorities to relocate any observed turtle.
- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

This determination is good for two years. Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by June 2, 2027.

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

Please contact me if you have further questions at deep.nddbrequest@ct.gov . Thank you for consulting the Natural Diversity Data Base. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEEP for the proposed site.

Sincerely,



Dawn McKay
Environmental Analyst 3/Biologist

From:	DEEP Nddbrequest
To:	Ehrlich, Evan M
Cc:	Bolton, Jeffrey; Deptula, Robert D; Federici, Antonio F; Matthew Regan; Eversource NDDB Tracking
Subject:	Re: Determination 202211219: Eversource 1580 and 1545/1483 Transmission Line Rebuild from West Devon Junction to Devon Substation in Stratford and Milford
Date:	Wednesday, June 4, 2025 2:16:29 PM
Attachments:	image001.png

Evan,

I can confirm those changes. I will make those changes in the letter and resend.

Dawn

Dawn M. McKay
Wildlife Division
Bureau of Natural Resources
Connecticut Department of Energy and Environmental Protection
79 Elm Street, Hartford, CT 06106-5127
P: 860.424.3592 | E: dawn.mckay@ct.gov

From: Ehrlich, Evan M <evan.ehrlich@eversource.com>
Sent: Wednesday, June 4, 2025 1:57 PM
To: DEEP Nddbrequest <DEEP.Nddbrequest@ct.gov>
Cc: Bolton, Jeffrey <jeffrey.bolton@eversource.com>; Deptula, Robert D <robert.deptula@eversource.com>; Federici, Antonio F <antonio.federici@eversource.com>; Matthew Regan <mregan@tighebond.com>; Eversource NDDB Tracking <eversource.nddb@eversource.com>
Subject: RE: Determination 202211219: Eversource 1580 and 1545/1483 Transmission Line Rebuild from West Devon Junction to Devon Substation in Stratford and Milford

Hi Dawn,

Thank you for providing the Determination 202211219.

Below is reflected in the current Revised Determination, however the original language is still included in the Revised Determination. We would just like a clarification on a few items:

Please confirm the following:

st

Work is approved to occur outside of the original window of August 1st – November 1 in the Charles E. Wheeler Wildlife Management Area and salt marsh with the protection measures outlined for the revised 2025 determination and the Diamondback terrapin Habitat Assessment. This would mean we can omit the statement on page 4 "conduct your marsh disturbance between August 1st – November 1st".

- No formal plant reporting is required other than A Special Plant Survey Form if a new occurrence is found.
    - The Project Botanist will reflag the known occurrences (surveyed 2023) near Structure 1317 (19117) and flag any new occurrences that are observed between Structure 1317 (19117) and the Housatonic River. If new occurrences are found, Eversource would avoid the occurrence. If avoidance is not possible, Eversource will notify NDDB. A Special Plant Survey Form will be submitted for all new observations (if any) to NDDB.

Thank you,
Evan

Evan Ehrlich
Licensing & Permitting – Wildlife and Protected Species
EVERSOURCE
107 Selden Street
Berlin, CT 06037
(860) 665-3183

From: DEEP Nddbrequest <DEEP.Nddbrequest@ct.gov>
Sent: Monday, June 2, 2025 12:04 PM
To: Ehrlich, Evan M <evan.ehrlich@eversource.com>
Cc: Bolton, Jeffrey <jeffrey.bolton@eversource.com>; Deptula, Robert D <robert.deptula@eversource.com>; Federici, Antonio F <antonio.federici@eversource.com>; Matthew Regan <mregan@tighebond.com>; Eversource NDDB Tracking <eversource.nddb@eversource.com>
Subject: Fw: Determination 202211219: Eversource 1580 and 1545/1483 Transmission Line Rebuild from West Devon Junction to Devon Substation in Stratford and Milford

Evan,

I have attached our updated NDDB letter with an additional 2-year expiration date. Let me know if there needs to be any additional clarification.

Take care,

Dawn

Dawn M. McKay
Wildlife Division
Bureau of Natural Resources
Connecticut Department of Energy and Environmental Protection
79 Elm Street, Hartford, CT 06106-5127
P: 860.424.3592 | E: dawn.mckay@ct.gov

From: Ehrlich, Evan M <evan.ehrlich@eversource.com>
Sent: Tuesday, March 18, 2025 4:37 PM
To: DEEP Nddbrequest <DEEP.Nddbrequest@ct.gov>
Cc: Bolton, Jeffrey <jeffrey.bolton@eversource.com>; Deptula, Robert D <robert.deptula@eversource.com>; Federici, Antonio F <antonio.federici@eversource.com>; Matthew Regan <mregan@tighebond.com>; Eversource NDDB Tracking <eversource.nddb@eversource.com>
Subject: Determination 202211219: Eversource 1580 and 1545/1483 Transmission Line Rebuild from West Devon Junction to Devon Substation in Stratford and Milford

Hi Dawn,

Eversource is requesting an extension and amendment on Determination 202211219 West Devon Junction to Devon Substation Rebuild Project in Milford and Stratford (Determination Expiration June 12, 2025). Eversource also requests the ability to conduct work in the Charles E. Wheeler Wildlife Management Area (WMA) and surrounding saltmarshes outside of the original window of August 1st – November 1st outlined in the NDDB determination with the conservation measures outlined below for diamondback terrapin and saltmarsh birds.

This Project will include the replacement of 34 transmission structures with 44 new structures and installation of new overhead wires and components. Activities subject to NDDB review include 28 structures to be removed, installation of 35 new structures; and temporary work pads, access roads, and pull pads within NDDB areas.

New Activities from the Original Review Request (Submitted November 8th, 2022, Expiration June 12, 2025):

- Updated Workspace: Eversource has updated the workspace since the original review request in the attached mapping and attached detailed shapefile (see **Attachment A and Attachment B**). This includes additional and expansion of matting and new areas of gravel.
- In-water work: In water work will include the controlled lowering of six wires to be

decommissioned/removed from the system into the Housatonic River and pulled across to the eastern shore in the Charles E. Wheeler WMA using a tensioner system.
- Vegetation management: activities are proposed on the west side of the Housatonic River between Structures 817 and 814. Trees will be cleared along the southern portion of the ROW (see mapping). Mechanical and chemical treatments will be used.

Conservation Measures:
In-water work: A buoy will be attached to each wire (a total of six wires over a two-day period) to help keep the wires from dragging across the bottom of the river. A CTDEEP Fisheries consultation request was submitted separately on February 21, 2025.

Diamondback Terrapin: Eversource estimates that construction matting required for replacement of structures in the WMA and salt marshes would be in place for approximately 31 weeks and work would need to occur outside of the original window of August 1st – November 1st outlined in the NDDB determination. Eversource has consulted with herpetologist Eric Davison of Davison Environmental to minimize impacts to the Diamondback Terrapin. Eversource will follow the recommendations outlined in the attached Habitat Assessment and Protection Measures (**Attachment C**).

Saltmarsh birds: Matting will be in place prior to the start of the breeding season (April 1st) to minimize direct impacts to breeding birds.

Lizard's-tail: Lizard's-Tail (*Saururus cernuus)* will be avoided during construction of the Project. During the 2025 growing season, the Project Botanist will reflag the known occurrences (surveyed 2023) near Structure 1317 and flag any new occurrences that are observed between Structure 1317 and the Housatonic River. If new occurrences are found, Eversource would avoid the occurrence. If avoidance is not possible, Eversource will notify NDDB. A Special Plant Survey Form will be submitted for all new observations (if any) to NDDB.
Prior to construction, exclusionary fencing (e.g., orange construction fencing) will be placed between lizard's-tail plant areas and work areas to prevent accidental encroachment during construction. A field meeting will be held with the Contractor, the designated Environmental Monitor, and the Project Botanist to walk the plant areas and critical habitats to describe the required protection measures. The fencing as denoted in the field will be installed under the supervision of the Project Botanist or environmental monitor. The Contractor and the designated Environmental Monitor are together responsible for detecting and reporting any encroachment by vehicles, equipment, and materials into the fenced plant areas. Eversource will submit an email to NDDB notifying them of the impact within two days of the detection of the encroachment and/or other impact.

Feel free to reach out if you have any questions or if you need additional information.

Thanks,
Evan

Evan Ehrlich
Licensing & Permitting – Wildlife and Protected Species

EVERSOURCE
107 Selden Street
Berlin, CT 06037
(860) 665-3183

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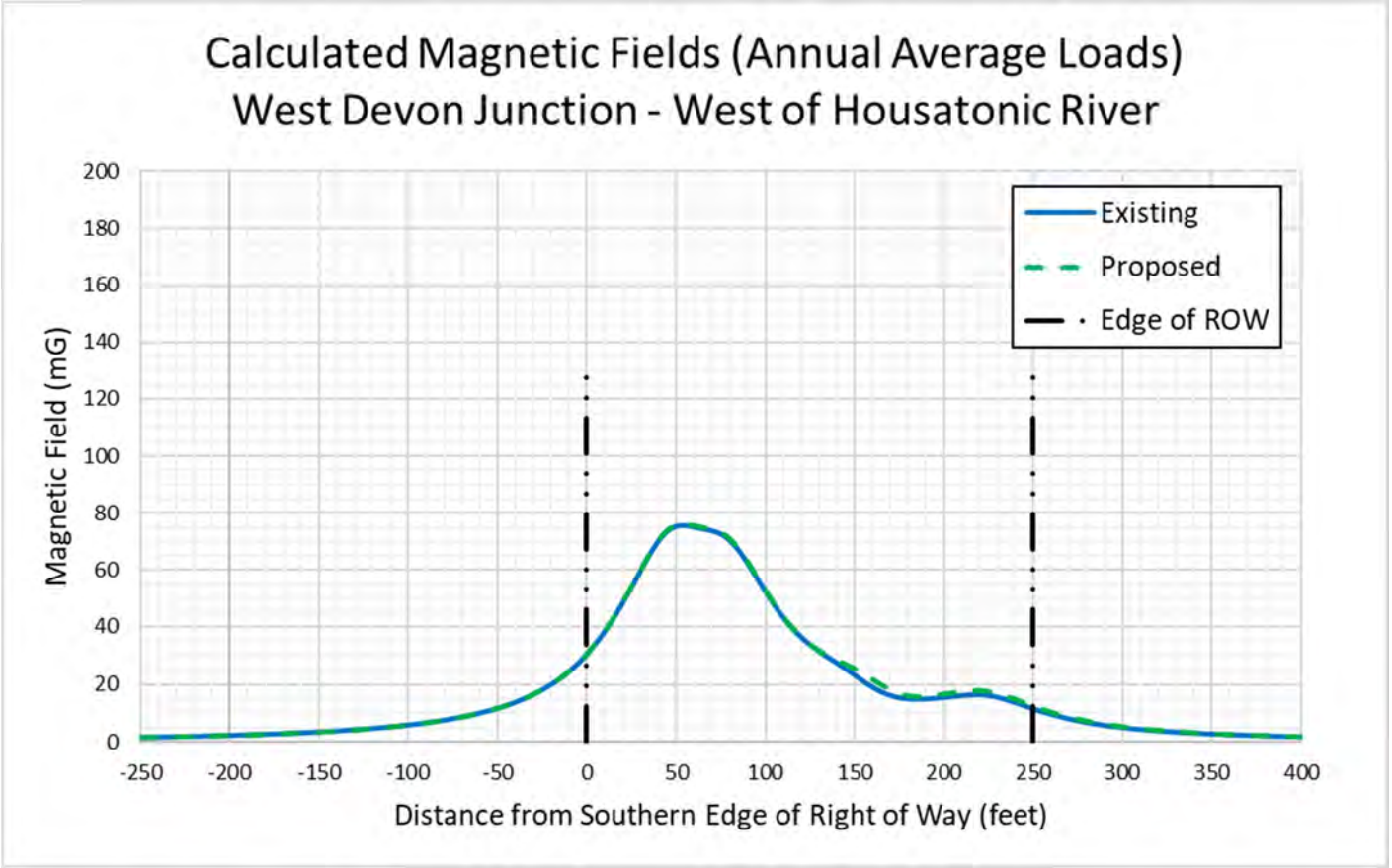
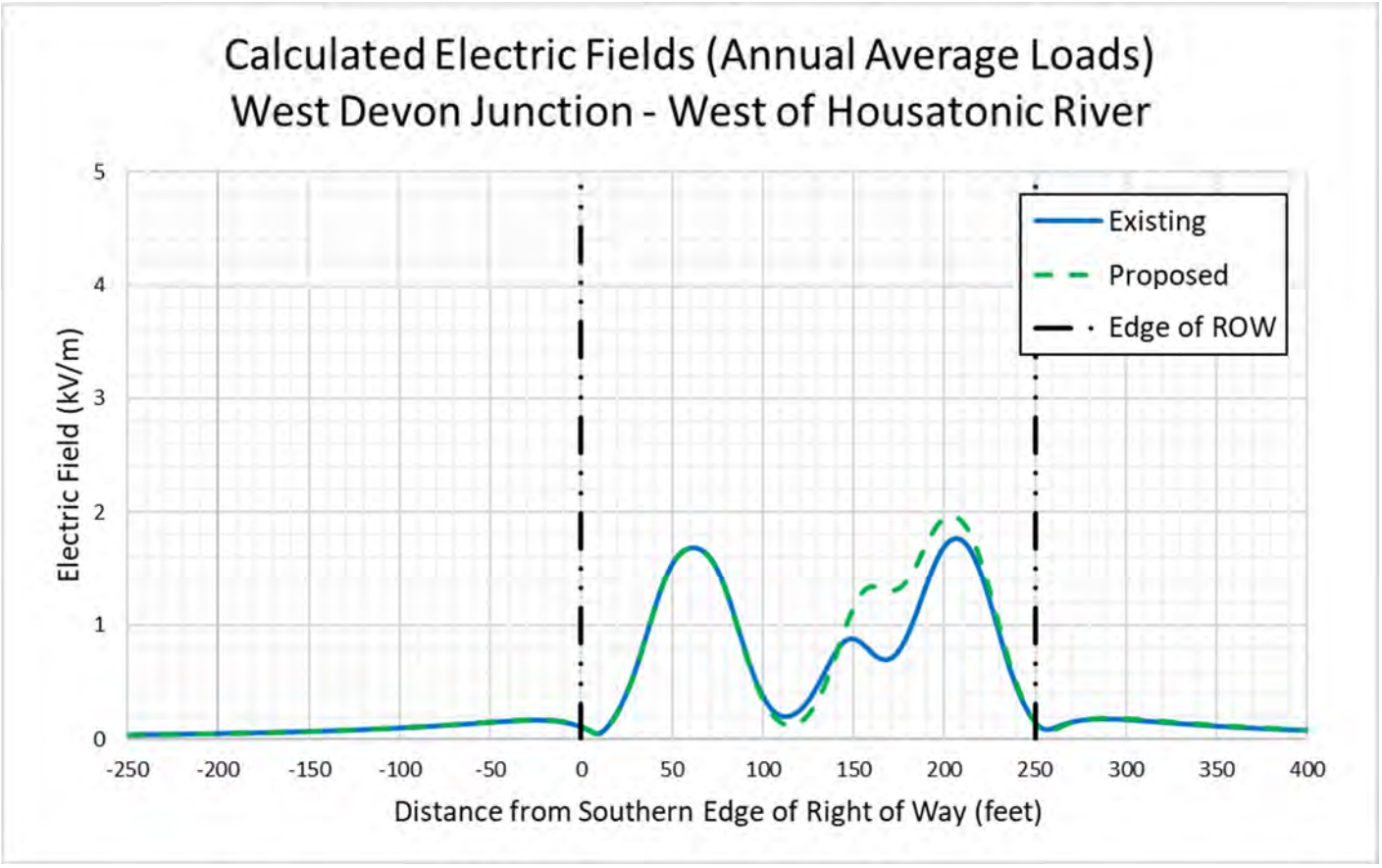
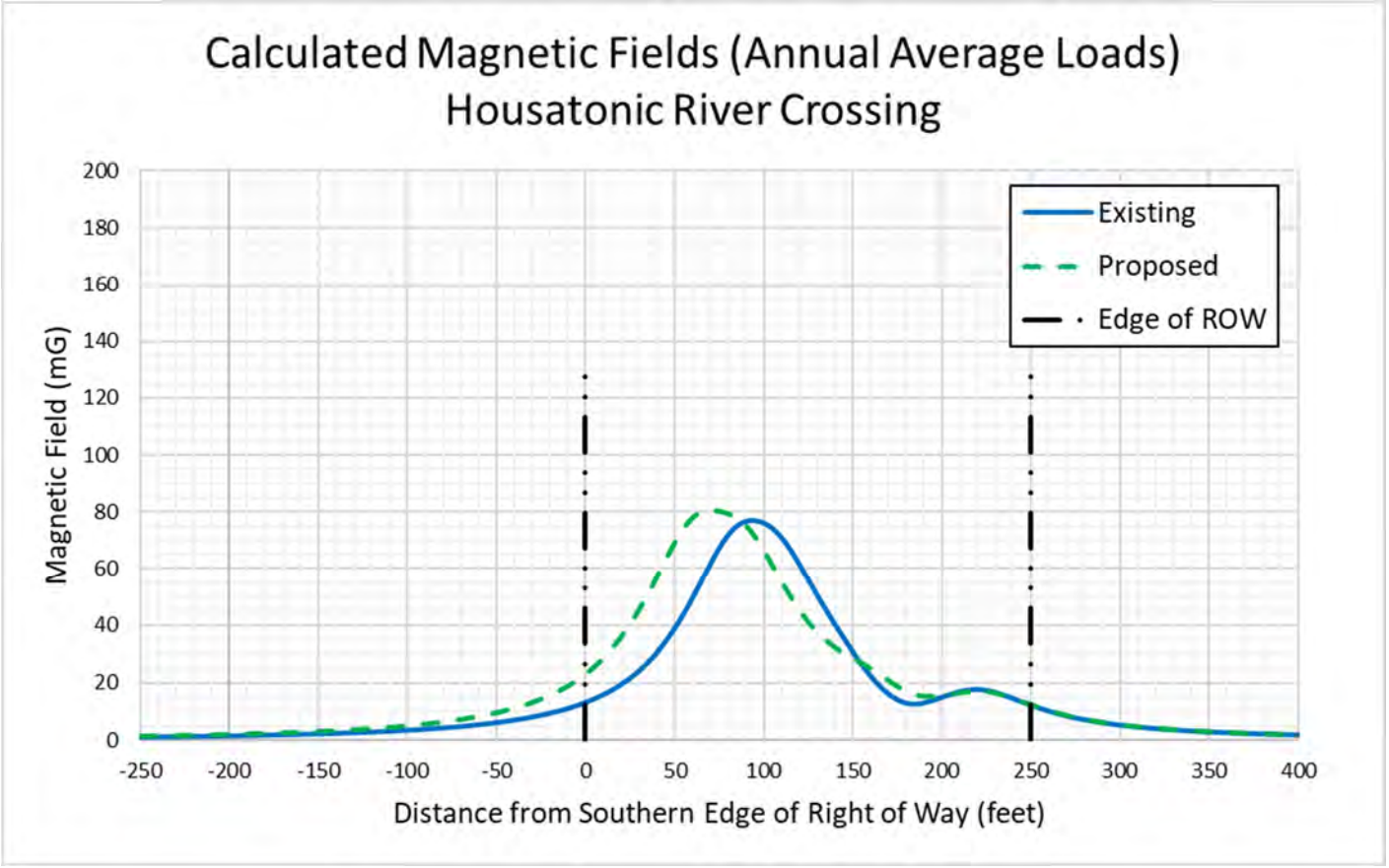
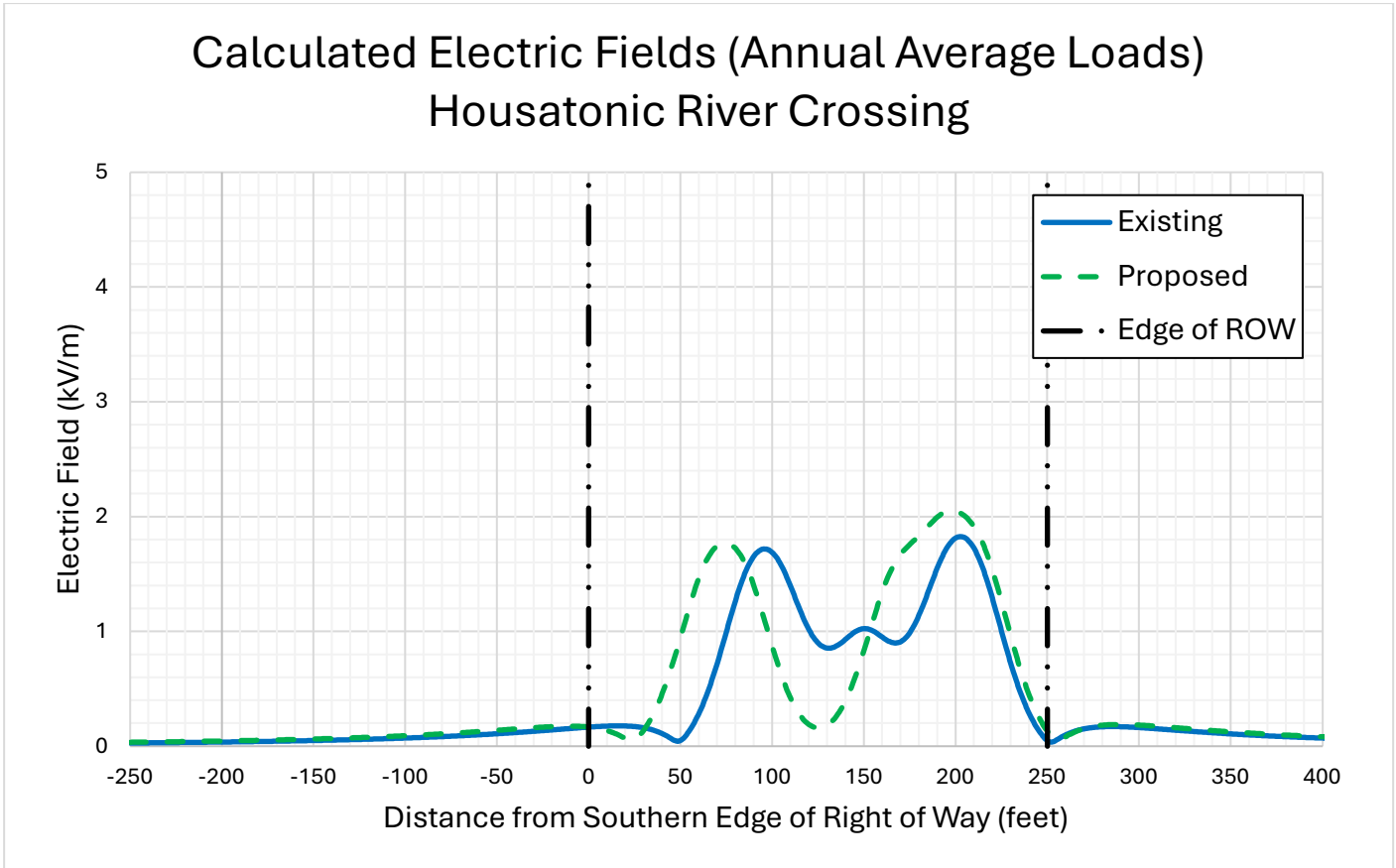
Attachment H

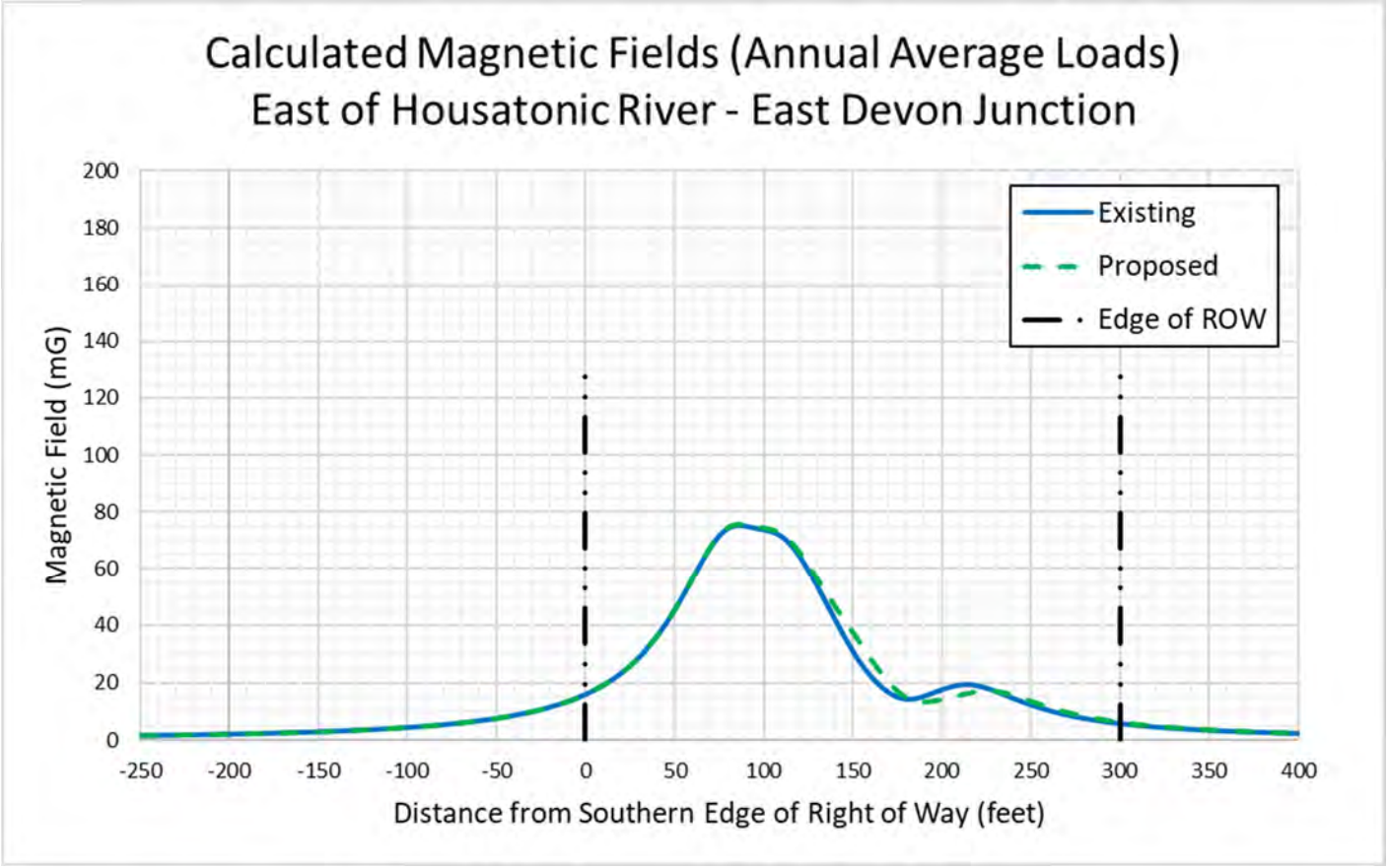
EMF Graphs

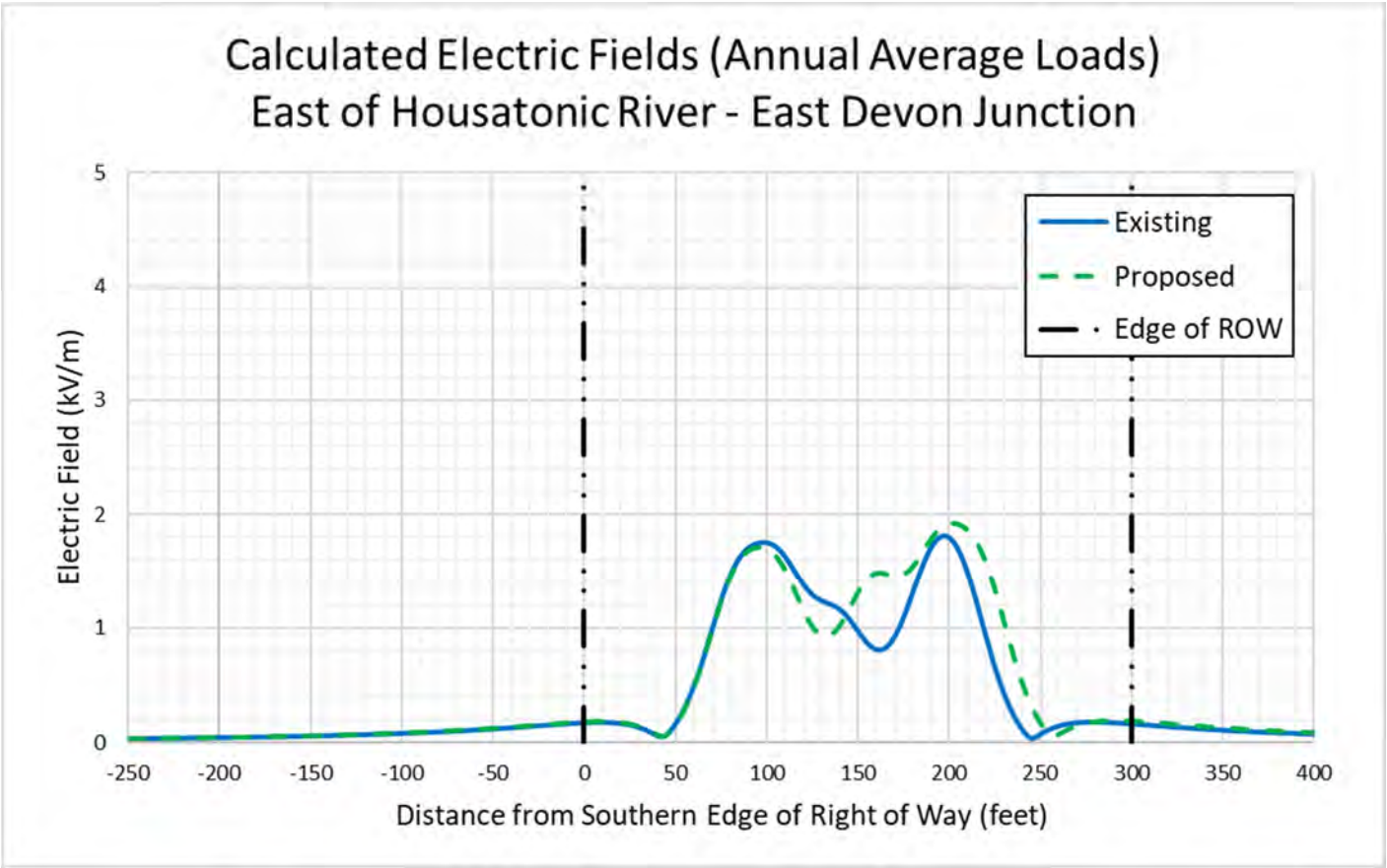

Calculated Magnetic Fields (Annual Average Loads)
West Devon Junction - West of Housatonic River
Magnetic Field (mG)
200
180
160
140
120
100
80
60
40
20
0
-250
-200
-150
-100
-50
0
50
100
150
200
250
300
350
400
Distance from Southern Edge of Right of Way (feet)
Existing
Proposed
Edge of ROW

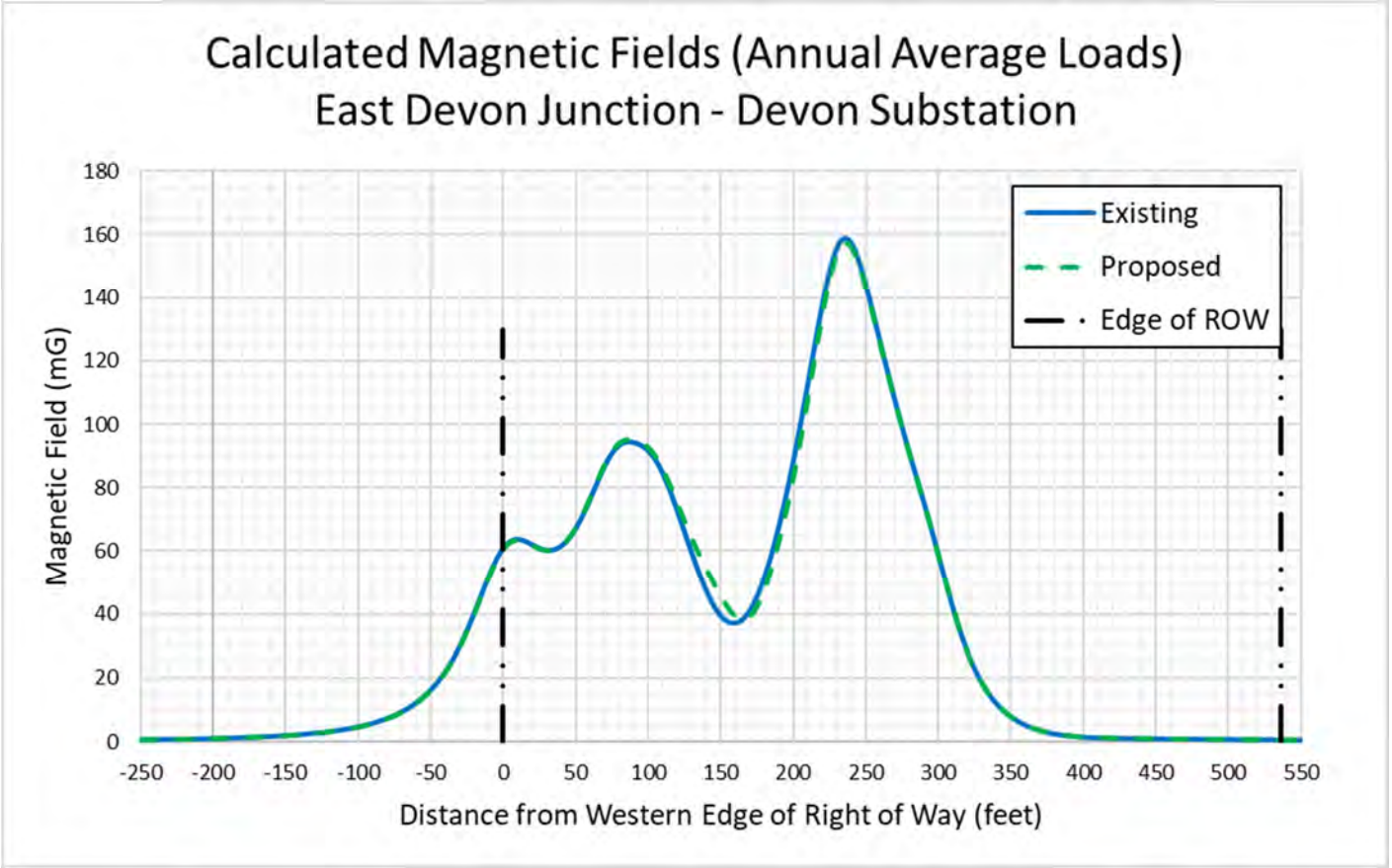

Calculated Electric Fields (Annual Average Loads)
West Devon Junction - West of Housatonic River
Electric Field (kV/m)
5
4
3
2
1
0
-250
-200
-150
-100
-50
0
50
100
150
200
250
300
350
400
Distance from Southern Edge of Right of Way (feet)
Existing
Proposed
Edge of ROW

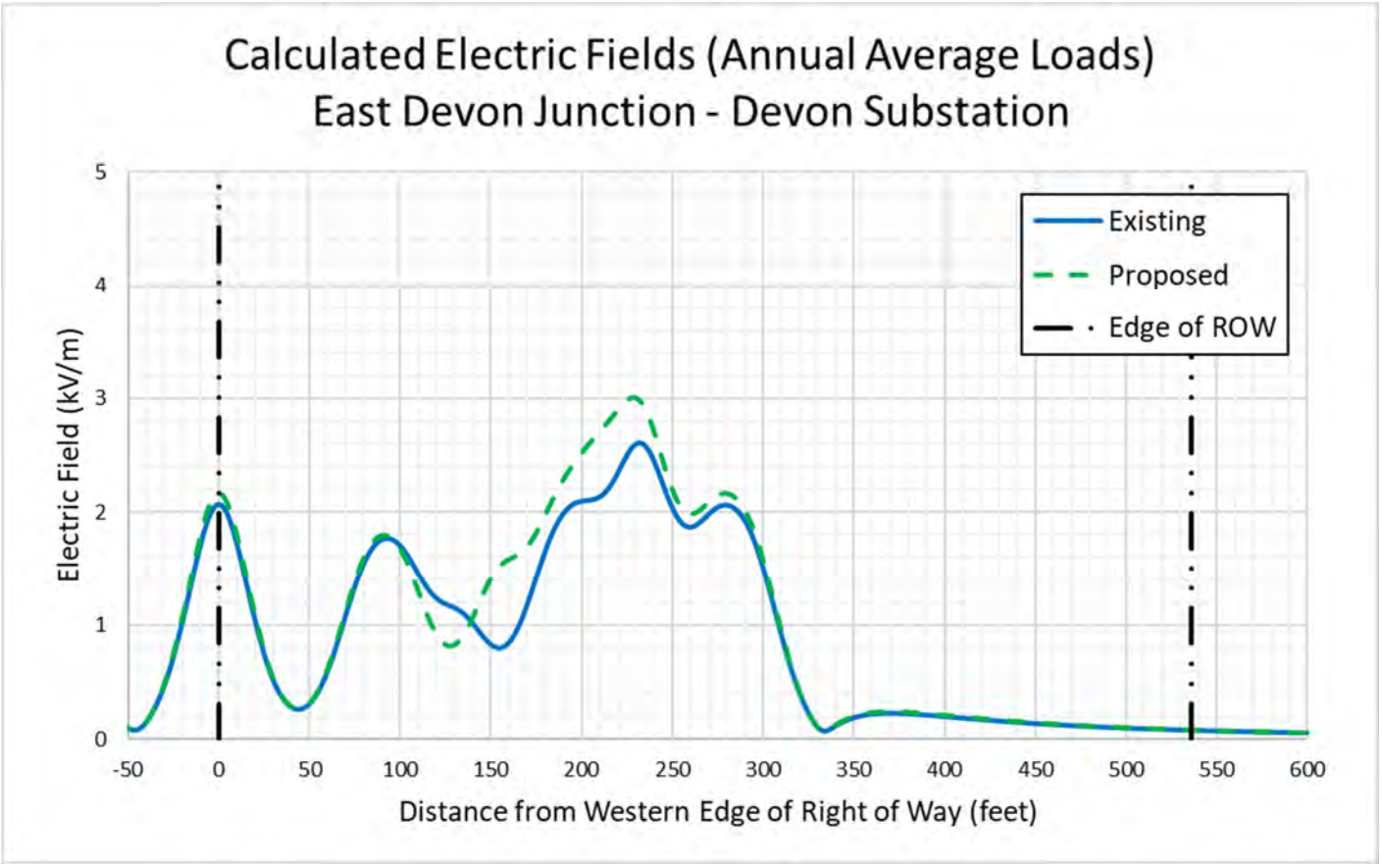

Calculated Magnetic Fields (Annual Average Loads)
Housatonic River Crossing
Magnetic Field (mG)
200
180
160
140
120
100
80
60
40
20
0
-250
-200
-150
-100
-50
0
50
100
150
200
250
300
350
400
Distance from Southern Edge of Right of Way (feet)
Existing
Proposed
Edge of ROW


Calculated Electric Fields (Annual Average Loads)
Housatonic River Crossing
Electric Field (kV/m)
5
4
3
2
1
0
-250
-200
-150
-100
-50
0
50
100
150
200
250
300
350
400
Distance from Southern Edge of Right of Way (feet)
Existing
Proposed
Edge of ROW


Calculated Magnetic Fields (Annual Average Loads)
East of Housatonic River - East Devon Junction
Magnetic Field (mG)
200
180
160
140
120
100
80
60
40
20
0
-250
-200
-150
-100
-50
0
50
100
150
200
250
300
350
400
Distance from Southern Edge of Right of Way (feet)
Existing
Proposed
Edge of ROW


Calculated Electric Fields (Annual Average Loads)
East of Housatonic River - East Devon Junction
Electric Field (kV/m)
5
4
3
2
1
0
-250
-200
-150
-100
-50
0
50
100
150
200
250
300
350
400
Distance from Southern Edge of Right of Way (feet)
Existing
Proposed
Edge of ROW


Calculated Magnetic Fields (Annual Average Loads)
East Devon Junction - Devon Substation
Magnetic Field (mG)
180
160
140
120
100
80
60
40
20
0
-250 -200 -150 -100 -50 0 50 100 150 200 250 300 350 400 450 500 550
Distance from Western Edge of Right of Way (feet)
Existing
Proposed
Edge of ROW


Calculated Electric Fields (Annual Average Loads)
East Devon Junction - Devon Substation
Electric Field (kV/m)
5
4
3
2
1
0
-50 0 50 100 150 200 250 300 350 400 450 500 550 600
Distance from Western Edge of Right of Way (feet)
Existing
Proposed
Edge of ROW

Attachment I

Letter to Abutters and Affidavit

EVERSOURCE

P.O. Box 270
Hartford, CT 06141-0270

July 2025

Dear Neighbor,

At Eversource, we're always working to serve you better. We are submitting a Petition to the Connecticut Siting Council (CSC) for a proposed electric reliability project in your area.

Proposed Project Information

The Project, called the West Devon Junction to Devon Substation Rebuild Project ("Project"), is one of several projects designed to support the continued reliability of the transmission system in your region. The Project work would be located within the existing Eversource right-of-way (powerline corridor) on or near your property in the Town of Stratford and the City of Milford.

The proposed project includes the replacement of existing transmission towers, conductor and shield wires along 2.17 miles between the West Devon Junction off River Valley Road in Stratford to the Devon Substation on 700 Naugatuck Ave in Milford.

This work includes:

- Replace existing towers with new galvanized steel monopole structures. The location and heights of the new structures will vary depending on location, topography, and other factors.
- Replace the existing conductor (energized wires) with new, upgraded conductor of the same voltage (115-kV).
- Replace the shield wire (top-most wire) with Optical Ground Wire (OPGW). The new wire will improve electric reliability by enabling communications between substations.
- Remove select trees and vegetation within the right-of-way as needed for construction, and conduct vegetation maintenance, which includes removing incompatible, tall-growing vegetation to comply with electric safety standards.
- Build or improve gravel roads and work pads to provide access to structure locations and to create a stable work area for equipment. Temporary construction matting will be used in and around environmentally sensitive areas (e.g., wetlands).

What You Can Expect

Pending receipt of the necessary approvals for this proposed work, construction is expected to begin in Quarter 1 of 2026.

Contact Information

Eversource is committed to being a good neighbor and doing our work with respect for you and your property. For more information, please call our Projects Hotline at 1-800-793-2202 or send an email to ProjectInfo@eversource.com. If you would like to send comments regarding Eversource's Petition to the CSC, please send them via email to siting.council@ct.gov or send a letter to the following address: Melanie Bachman, Executive Director, Connecticut Siting Council, Ten Franklin Square, New Britain, CT 06051.

Sincerely,

Taylor LaPierre
Project Manager – Eversource Energy

AFFIDAVIT OF SERVICE OF NOTICE

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

Sec. 16-50j-40 of the Regulations of Connecticut State Agencies ("RCSA") provides that proof of notice to the affected municipalities, property owners and abutters shall be submitted with a petition for declaratory ruling to the Connecticut Siting Council ("Council"). In accordance with that RCSA section, I hereby certify that I caused notice of the petition for a declaratory ruling of The Connecticut Light and Power Company doing business as Eversource Energy to be served by mail or courier upon the following municipal officials:

Honorable Laura R. Hoydick
Mayor
Town of Stratford
2725 Main Street
Stratford, CT 06615

Honorable Anthony S. Giannattasio Mayor
City of Milford
70 West River Street
Milford, CT 06460

I also certify that I caused notice of the proposed modifications to be served by mail or courier upon owners of abutting properties shown on the maps in Attachment A to the Petition.

Deborah Denfeld
Team Lead – Transmission Siting

On this the 14th day of July 2025, before me, the undersigned representative, personally appeared, Deborah Denfeld, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing instrument and acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

Notary Public/My Commission expires: _____

Officer of the Superior Court/ Juris No.: _____ 413393