Connecticut Department of Energy & Environmental Protection
Bureau of Water Protection & Land Reuse
Office of Long Island Sound Programs

Coastal Consistency Review Form

DEEP USE ONLY
Application No.: _____
Analyst Assigned: _____
Date Received (OLISP): _____

Please complete this form in accordance with the instructions (DEEP-INST-004). Print or type unless otherwise noted.

Part I: Project Information

1. Applicant Name: PSEG Power Connecticut LLC

Mailing Address: **1 Atlantic Street**

City/Town: **Bridgeport** State: **CT** Zip Code: **06604**

Business Phone: **203-551-6032** ext.: Fax:

Contact Person: **Robert Silvestri** Phone: **203-551-6032** ext.

E-mail: **Robert.Silvestri@pseg.com**

2. Preparer Name: AKRF, Inc.

Mailing Address: **307 Fellowship Road, Suite 214**

City/Town: **Mount Laurel** State: **NJ** Zip Code: **08054**

Business Phone: **856-797-9930** ext.: Fax: **856-797-9932**

Contact Person: **Jeffrey J. Pantazes** Phone: **856-359-7645** ext.

E-mail: **jpantazes@akrf.com**

3. Street Address or Description of Location of the Project Site:

1 Atlantic Street

City or Town: **Bridgeport**

4. Brief Project Description:

Construction of a combined cycle electric generating facility at an existing electric generating facility site (PSEG Bridgeport Generating Station)

5. Is the project located within the coastal boundary as defined in CGS section 22a-94(b)?

☒ Yes ☐ No

If you answered **Yes** to this question, complete the entire form.

If you answered **No** to this question, and your project is located in a coastal area, skip Parts II through V and complete Parts VI, VII and VIII.

Part I: Project Information (continued)

Has an endangered or threatened species review for this proposed activity been prepared or submitted as part of another DEEP license application? ☐ Yes ☒ No

If Yes, proceed to Part II; if No, complete the question below.

6. ENDANGERED OR THREATENED SPECIES: According to the most current "State and Federal Listed Species and Natural Communities Map", is the activity which is the subject of this application located within an area identified as a habitat for endangered, threatened or special concern species?

☒ Yes ☐ No Date of Map: **September 2015 Map. Note that a review was completed for this project on October 21, 2014 (NDDB 201408872); a new request was submitted in February 2016.**

If yes, complete and submit a *Request for NDDB State Listed Species Review Form* (DEEP-APP-007) to the address specified on the form, **prior** to submitting this application. **Please note NDDB review generally takes 4 to 6 weeks and may require additional documentation from the applicant.** A **copy** of the completed *Request for NDDB State Listed Species Review Form* **and** the CT NDDB response ***must*** be submitted with this completed application.

For more information visit the DEEP website at www.ct.gov/deep/nddbrequest or call the NDDB at 860-424-3011.

Part II: Identification of Applicable Coastal Use and Activity Policies and Standards

Identify all statutory goals and policies in or referenced by Section 22a-92 of the Coastal Management Act applicable to the proposed activities by checking the applicable boxes in the following table.

- ☒ General Development* - CGS Sections 22a-92(a)(1), 22a-92(a)(2), 22a-92(a)(9), 22a-92(a)(9)
- ☒ Water-Dependent Uses - CGS Sections 22a-92(a)(3), 22a-92(b)(1)(A)
- ☒ Ports and Harbors - CGS Section 22a-92(b)(1)(C)
- ☒ Coastal Structures and Filling - CGS Section 22a-92(b)(1)(D)
- ☒ Dredging and Navigation - CGS Sections 22a-92(c)(1)(C), 22a-92(c)(1)(D)
- ☐ Boating - CGS Section 22a-92(b)(1)(G)
- ☐ Fisheries - CGS Section 22a-92(c)(1)(I)
- ☐ Coastal Recreation And Access - CGS Sections 22a-92(a)(6), 22a-92(C)(1)(j), 22a-92(c)(1)(K)
- ☒ Sewer and Water Lines - CGS Section 22a-92(b)(1)(B)
- ☒ Fuel, Chemicals And Hazardous Materials - CGS Sections 22a-92(b)(1)(C), 22a-92(b)(1)(E), 22a-92(c)(1)(A)
- ☐ Transportation - CGS Sections 22a-92(b)(10)(F), 22a-92(c)(1)(F), 22a-92(c)(1)(G), 22a-92(c)(1)(H)
- ☒ Solid Waste - CGS Section 22a-92(a)(2)
- ☐ Dams, Dikes and Reservoirs - CGS Section 22a-92(a)(2)
- ☐ Cultural Resources - CGS Section 22a-92(b)(1)(J)
- ☐ Open Space and Agricultural Lands - CGS Section 22a-92(a)(2)

* applicable to all proposed activities

Part III: Consistency With Applicable Statutory Coastal Use and Activity Goals and Policies

Explain how the proposed activity is consistent with the applicable coastal activities goals and policies identified in Part II and describe any mitigation necessary to offset adverse impacts.

See Attached Compliance Statement

Part IV: Identification of Applicable Coastal Resources and Coastal Resource Policies

Identify the coastal resources and associated statutory policies that apply to your project by checking the applicable boxes in the following table.

Coastal Resources	on-site	adjacent to work site	off-site but potentially affected by the project
General Resources* - CGS Sections 22a-93(7), 22a-92(a)(2)	X	X	X
Beaches & Dunes - CGS Sections 22a-93(7)(C), 22a-92-(b)(2)(C), 22a-92(c)(1)(K)	☐	☐	☐
Bluffs & Escarpments - CGS Sections 22a-93(7)(A), 22a-92(b)(2)(A)	☐	☐	☐
Coastal Hazard Area - CGS Sections 22a-93(7)(H), 22a-92(a)(2), 22a-92(b)(2)(F), 22a-92(b)(2)(J), 22a-92(c)(2)(B), 22a-92(a)(5)	☒	☒	☐
Coastal Waters & Estuarine Embayments - CGS Sections 22a-93(5), 22a-93(7)(K), 22a-93(7)(L), 22a-93(7)(G), 22a-92(a)(2), 22a-92(c)(2)(A)	☒	☒	☐
Developed Shorefront - CGS Sections 22a-93(7)(I), 22a-92(b)(2)(G)	☒	☒	☐
Freshwater Wetlands and Watercourses - CGS Sections 22a-93(7)(F), 22a-92(a)(2)	☒	☒	☐
Intertidal Flats - CGS Sections 22a-93(7)(D), 22a-92(b)(2)(D), 22a-92(c)(1)(K)	☒	☒	☐
Islands - CGS Sections 22a-93(7)(J), 22a-92(b)(2)(H)	☐	☐	☐
Rocky Shorefront - CGS Sections 22a-93(7)(B), 22a-92(b)(2)(B)	☐	☐	☐
Shellfish Concentration Areas - CGS Sections 22a-93(7)(N), 22a-92(c)(1)(I)	☐	☒	☐
Shorelands - CGS Sections 22a-93(7)(M), 22a-92(b)(2)(I)	☐	☐	☐
Tidal Wetlands - CGS Sections 22a-93(7)(E), 22a-92(a)(2), 22a-92(b)(2)(E), 22a-92(c)(1)(B)	☒	☒	☐

* applicable to all proposed activities

Part V: Consistency with Applicable Statutory Coastal Resource Goals and Policies

Explain how the proposed activity is consistent with the applicable statutory coastal resource goals and policies identified in Part IV and describe any mitigation necessary to offset adverse impacts.

See Attached Compliance Statement

Part VI: Identification of Potential Adverse Impacts

Identify the adverse impact categories that apply to the proposed activity. Check the applicable box if the proposed activity has the potential to generate any adverse impacts defined in the Coastal Management Act and referred to in the following table. If the category is applicable to the proposed activity, you may describe in Part VII project design features which may eliminate or minimize the potential for identified adverse impacts.

Potential Resource Impacts	Applicable	Not Applicable
Characteristics & Functions of Resources - CGS Section 22a-93(15)(H)	☒	☐
Coastal Flooding - CGS Section 22a-93(15)(E)	☒	☐
Coastal Waters Circulation Patterns - CGS Section 22a-93(15)(B)	☐	☒
Drainage Patterns - CGS Section 22a-93(15)(D)	☒	☐
Patterns of Shoreline Erosion and Accretion - CGS Section 22a-93(15)(C)	☐	☒
Visual Quality - CGS Section 22a-93(15)(F)	☒	☐
Water Quality - CGS Section 22a-93(15)(A)	☒	☐
Wildlife, Finfish, Shellfish Habitat - CGS Section 22a-93(15)(G)	☒	☐

Potential Impacts on Water Dependent Uses	Applicable	Not Applicable
Locating a non-water-dependent use on a site suited to or planned for a water-dependent use - CGS Section 22a-93(17)	☐	☒
Replacing an existing water-dependent use with a non-water-dependent use - CGS Section 22a-93(17)	☐	☒
Siting a non-water-dependent use which reduces or eliminates public access to marine or tidal waters - CGS Section 22a-93(17)	☐	☒

Part VII: Consistency with Statutory Adverse Impact Policies

Explain how all potential adverse impacts identified, as applicable, in Part VI have been avoided, eliminated or minimized.

See Attached Compliance Statement

Part VIII: Remaining Adverse Impacts

Identify any adverse impacts which remain after incorporating all measures to eliminate or minimize such adverse impacts, and explain why no feasible and prudent alternatives exist that would further avoid or reduce such impacts.

See Attached Compliance Statement

If this completed form is required as part of another DEEP license application, submit this completed form as instructed on the relevant application.

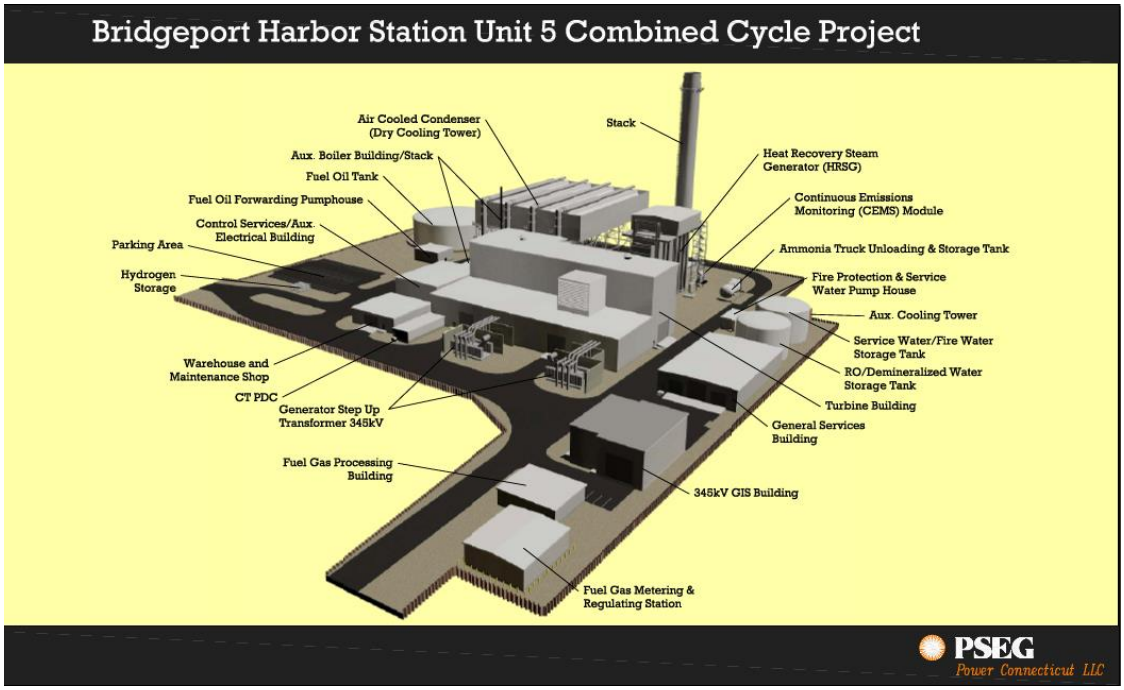
If this completed form is **not** required as part of another DEEP license application, submit this completed form to:

COASTAL PLANNING
DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
79 ELM STREET
HARTFORD, CT 06106-5127

State of Connecticut

Department of Energy & Environmental Protection

Coastal Consistency Compliance Statement



Bridgeport Harbor Station

Proposed Combined Cycle Facility

Bridgeport, Connecticut

PREPARED FOR:

PSEG Power Connecticut, LLC

February 2016

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1.0 INTRODUCTION

1.1 General Information

Project Information:
Bridgeport Harbor Unit No. 5
Combined Cycle Generating Facility

Site Information:
Bridgeport Harbor Generating Station
1 Atlantic Street
Bridgeport, CT 06604
Fairfield County

Consultant Information:
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Applicant Information:
Mr. Michael Stagliola – Plant Manager
PSEG Power Connecticut, LLC
1 Atlantic Street
Bridgeport, CT 06604

PSEG Power Connecticut LLC is proposing to install and operate a new, approximately 485 Megawatt ("MW"), combined cycle electric generating facility (the "Project" or "Facility") at its existing Bridgeport Harbor Station (BHS). BHS is located at 1 Atlantic Street in Bridgeport, Connecticut (Figure 1). This project requires a Coastal Site Plan application due to the project size and location within the delineated coastal boundary (Figure 2). A separate Land Use and Environmental Report (AKRF 2016) has been prepared that includes design plans for the combined cycle facility and dock repairs.

Need for the Facility

PSEG operates Bridgeport Harbor Station ("BHS") and other generating facilities at New Haven Harbor Station ("NHHS") in the wholesale capacity and energy markets established by Independent System Operator – New England (ISO-NE), which operates the regional electric transmission system throughout New England. PSEG is proposing to add power generating capacity in the region, as current market signals have indicated that new generating capacity is required to ensure electric system reliability and to replace recently retired system assets. ISO-NE operates annual forward capacity auctions ("FCAs") to solicit generating resources to meet its anticipated need. The latest FCA, known as FCA #10, was conducted on February 8, 2016. PSEG was notified on February 10, 2016 that the Project has been selected to provide both energy and capacity beginning June 1, 2019 consistent with the purchasing needs of ISO-NE. ISO-NE has therefore determined that there is a need for the Facility consistent with the design of the wholesale market which procures resources for reliability of the transmission system. PSEG has thus been awarded a capacity obligation of approximately 485 MW. This award requires PSEG to complete construction of the Facility and achieve commercial operation by June 1, 2019. PSEG is proceeding expeditiously to obtain all necessary regulatory permits and approvals to ensure that it can commence and complete construction in time to meet its obligations to ISO-NE as a capacity and energy resource interconnected to the transmission system.

Site and Project Description

The Site consists of approximately 58.8 acres on Bridgeport Harbor just south of Bridgeport's transportation center and ferry terminal. See Figures 1 and 3. Two existing generating units at the Site supply ISO-NE with about 400 MWs of power (current summer rating), or enough power to supply electric capacity and energy to approximately half a million residential customers. BHS's existing operating units include Unit 3, which runs primarily on coal and uses fuel oil for startup, and a jet-fueled combustion turbine peaking unit.

The Facility will be built on the southerly portion of the Site in an area currently occupied by four fuel oil storage tanks. As a separate project (the "Unit 3 Tank Project"), PSEG plans to remove the existing No. 6 fuel oil tanks at the tank farm and construct a replacement fuel oil storage tank to the north of the Facility, closer to Unit 3. The existing tank farm area will be remediated prior to construction of the Project. In a Notice of Exempt Modification filed on February 5, 2016, PSEG notified the Connecticut Siting Council of the Unit 3 Tank Project, a separate plan to remove the four existing No. 6 fuel oil storage tanks and three smaller underground fuel oil storage tanks, perform limited Site remediation in accordance with the Connecticut Department of Energy and Environmental Protection (CT DEEP) approved Revised Remedial Action Plan dated August 2004, and construct a replacement fuel oil tank for Unit 3.

The Facility will consist of a 485 MW dual fuel, single train combined cycle power plant. A combined-cycle power plant uses both a gas and steam turbine together to produce more electricity from the same fuel. The plant will include a combustion turbine (similar to a very large jet engine), a heat recovery steam generator (HRSG), and a steam turbine to generate electricity. The combustion turbine will use natural gas or ultralow-sulfur distillate (ULSD) fuel oil to generate electricity. Waste heat from the combustion turbine will be routed through the HRSG to create steam, powering the steam turbine and generating additional power. Using the waste heat from the combustion turbine to generate even more electricity makes a combined-cycle plant very efficient. The Facility will primarily run on natural gas, with provisions to use ULSD for up to 30 days per year as a back-up fuel, ensuring fuel diversity and dependability.

PSEG has selected a GE 7HA.02 gas turbine for the project. The GE turbine is an industry-leading, high-efficiency, air-cooled gas turbine, with more than 59% combined-cycle efficiency, enabling the most cost-effective conversion of fuel to electricity. Additionally, the Project design incorporates an air-cooled condenser to minimize the Facility's operational water requirements, and eliminate the need to use Bridgeport Harbor water for cooling thereby avoiding surface water requirements and impacts. Aquarion Water Company, the local water utility, will supply the Facility's water requirements. Wastewater will be discharged to the Bridgeport Water Pollution Control Authority facility.

The new Project's generating equipment will be installed on approximately 16 acres of previously disturbed land within the Site. As the Project is proposed to be built on the property of an existing generating station on a previously disturbed industrial site,

environmental impacts are minimized as compared to the development of a similar project on a “greenfield” site.

As an additional reliability measure, and to provide storm hardening for this critical waterfront energy infrastructure, the elevation of the Project Site will be raised by approximately 7 to 10 feet, to above the existing 500-year Federal Emergency Management Agency flood level. Grade changes will be accomplished through use of structural retaining walls and import of fill.

The Project also includes renovation to the existing fuel dock terminal facility at BHS that was damaged during Superstorm Sandy on October 29, 2012 to allow for future marine fuel oil deliveries. The existing oil dock was designed for oil tankers much larger than those necessary to support the new Facility, so the repairs to the existing dock will involve demolishing and removing portions of the existing timber walkways, repairing existing platforms, piers, and mooring dolphins, constructing new walkways and upgrading and replacing existing fender units and mooring hardware. No new piers are necessary and the final dock design will be approximately 40% shorter than the current dock configuration.

All construction will be in accordance with applicable local and state construction standards and conditions of the regulatory approvals to be obtained for the Project. The scope includes all Site preparation, installation of subsurface utilities and foundations, and installation of the new combined cycle Facility equipment and necessary ancillary equipment, including required electrical and municipal interconnections.

The Southern Connecticut Gas Company (“SCG”) operates an existing high pressure natural gas lateral pipeline connection adjacent to the Site which terminates at the Emera Bridgeport Energy power plant at 10 Atlantic Street. This gas pipeline was installed at the time the Emera Bridgeport Energy plant was constructed and has operated continuously since that time. This existing pipeline is capable of delivering natural gas for the Project through a new take-off connection using a 16” high-pressure natural gas service lateral line. PSEG is negotiating appropriate natural gas service arrangements with SCG. The Project has signed a Large Generator Interconnection Agreement (“LGIA”) with ISO-NE and United Illuminating Company’s (“UI”). Under the terms of this agreement, PSEG will construct, own and operate a single radial 345-kV underground transmission cable electrically interconnecting the Project with UI. The Project includes the installation of two 345-kV generator step-up transformers and a 345-kV collector bus with gas-insulated substation equipment prior to connection of the generator lead to UI’s facilities. The generator lead will run underground to UI’s substation, thereby eliminating any potential environmental impact of additional overhead lines in the area. Connecting to UI’s substation will require some limited construction to install the generator lead underground in the public right of way. PSEG expects to obtain the necessary street opening permits from the City of Bridgeport (the “City”) and has obtained consent through the LGIA with UI to allow the interconnection to its substation. See the submitted site plans for the general arrangement of these and other facilities.

1.2 Potential Environmental Impacts

Potential impacts from the proposed Facility will be minimized and made insignificant by good engineering practice and Facility design, installation of state-of-the-art air quality control technology for air emissions, best management practices for reducing potential impacts on water resources and water quality, minimizing truck traffic as much as possible through nearby residential neighborhoods, mitigation measures for noise, and use of natural gas as the primary fuel, with ULSD permitted for up to 30 days per year. The potential for environmental impacts and impacts on the nearby community will also be reduced by locating the Facility at the Site of an existing power generating station. The selected location for the Facility allows the Project to take advantage of existing infrastructure, thereby reducing potential construction emissions and impacts. The Facility is not expected to cause any health-related impacts because the Facility will be designed, permitted and operated to comply with ambient air quality and water quality standards promulgated to protect human health, including the sensitive subpopulations of children and the elderly.

The potential environmental impacts of the proposed Facility have been minimized by the following efforts and actions:

- Agreeing to retire the existing Unit 3 coal-fired power plant by July 1, 2021 as part of the Community Environmental Benefits Agreement (CEBA).
- Locating the Facility at the site of an existing power generating station that is zoned for industrial activity, which will allow the Facility to benefit from existing energy infrastructure thereby reducing potential construction impacts.
- Employing the advanced state-of-the-art and efficient electric generation technology, which will result in lower emissions per MWh produced than older, less efficient units;
- Relying primarily on natural gas as fuel, with up to 30 days of ULSD fuel use;
- Installing state-of-the-art air quality emission control technology including Dry Low NOx burners, water injection, and selective catalytic reduction with an oxidation catalyst to substantially reduce air emissions;
- Employing an exhaust stack design with reduced potential ground-level air quality impacts to comply with all applicable state and National Ambient Air Quality Standards (“NAAQS”);
- Using an air cooled condenser to completely eliminate the need for surface water withdrawals from Bridgeport Harbor, provide cooling for the steam turbine. In turn, this eliminates discharge of any heated cooling water to Bridgeport Harbor and eliminates the emission of particulate matter associated with evaporative condenser cooling systems;
- Aligning with the goals of the Connecticut Global Warming Solutions Act, C.G.S. § 22a-200d, by reducing carbon dioxide emissions at the site compared to the baseline specified in the Act (both 1990 and 2001 baselines) through the increased efficiency of the technology used, the

selection of natural gas as the primary fuel for the Facility and the retirement of Unit 3;
- Supplying barge delivery of materials during construction, where practicable, to reduce truck travel through nearby residential neighborhoods and delivery of ULSD by barge upon completion of the fuel oil dock repairs; and
- Designing and operating the Facility to meet applicable State of Connecticut (the "State") and City noise regulations.

Zoning

The industrial nature of the proposed Project is compatible with the zoning for the site. The northern portion of the proposed Project site is located within an Industrial-Heavy (I-H) Zone and with the southern portion of the site within an Industrial-Light (I-L) Zone (see Figure 4).

According to the City of Bridgeport Zoning and Subdivision Regulations, the I-H Zone is intended to reserve appropriate areas of the city for those industries which due to impacts in terms of dust, traffic, hazards, appearance or intensity of industrial development are not desirable in or adjacent to non-industrial areas. Development and performance standards are intended to recognize the operational needs of high impact industries while setting standards to promote safe, functional, efficient, and environmentally sound development and operation.

The I-L Zone is intended to promote industrial uses having minimal off-site impacts. The zone is intended to be an area where most industrial uses may be located, but where development and performance standards, which are stricter than those in the I-H Zone, promote uses which are compatible with non-industrial areas. West of the Bridgeport Harbor Generating Plant is a Mixed Use Waterfront (MU-W) Zone, an Office Retail (OR) Zone, Mixed Use Educational/Medical (MU-EM) Zone, as well as residential zones (from single family to residential high density zones). North of the plant are a Downtown Village District Waterfront (DVD-WF) Zone and a Downtown Village District Transit-Oriented Development (DVD-TOD) Zone.

Current Uses of Adjoining Properties

Bridgeport Harbor Station is bordered to the east and south by Bridgeport Harbor, which connects to the Pequonnock River north of the site. At the north end of the site is the United Illuminating Co. Pequonnock Substation. Industrial uses, including the adjacent Bridgeport Energy Center, owned and operated by Emera Energy, Inc., and United Illuminating Co.'s Singer electrical substation are immediately west of the existing Bridgeport Generating Station site . Also west of the site is the former (now vacant) Remington Shaver plant. Southwest of the vacant Remington Shaver plant is the eastern extent of Seaside Park. Directly west of the Bridgeport Energy Center facility and the Remington site are residential properties located along Main Street.

Located at 354 and 360 Main Street are the Mary and Eliza Freeman Houses respectively. These wood-framed, clapboard-covered, two-family houses were built in 1848 in what became known as Little Liberia, a neighborhood settled by free blacks

starting in the early nineteenth century. As the last surviving houses of this neighborhood, these were added to the National Register of Historic Places in February 1999. These houses are the oldest remaining in Connecticut built by free blacks before the state completed its gradual abolition of slavery in 1848. The houses and nearby Walter's Memorial A.M.E. Zion Church are also listed sites on the Connecticut Freedom Trail. West of Main Street is the University of Bridgeport Campus.

North of the station site is the Amtrak/Metro-North railroad corridor and the "Harbor Yard" development area, which includes a minor league ballpark (Ballpark at Harbor Yard) and the Webster Bank Arena and a ferry terminal operated by the Bridgeport and Port Jefferson Steamboat Company. Further north is Interstate I-95, north of which is Bridgeport's downtown core area.

Northeast of the site, across Bridgeport Harbor and south of Stratford Avenue (State Route 130), is Steel Point, which currently comprises vacant land and former marina facilities, including the Pequonnock Yacht Club and the Move Yacht Club. This "Steel Point" area is currently being redeveloped as the "Steelpointe Harbor Project". The Steelpointe Harbor development is a 2.8 million square-foot mixed-use, urban-oriented waterfront development project that will consist of retail shops, hotels, a public waterfront and residential uses. Recently constructed uses at this development site include Bass Pro Shops, Starbucks, and Chipotle, with planned additional uses including a hotel, luxury movie theater, and potentially office space and housing, surrounded by a ribbon park along the harbor.

Across the harbor directly east of the Bridgeport Harbor Generating Station site, west of Seaview Avenue, is industrial land that includes the Port of Bridgeport shipyards and the wastewater treatment facilities operated by the City of Bridgeport Water Pollution Control Authority. Private marinas are located south of the wastewater treatment facilities, including Dolphins Cove Marina and Lou's Boat Basin. At the end of Seaview Avenue there is the Miamogue Yacht Club and north of that is the East End Yacht Club located on Bay Street.

Residential areas most proximate to the Bridgeport Harbor Generating Station site are located within the South End neighborhood, west of the site along Main Street. The majority of the residential properties in the neighborhood are located further west, in the vicinity of Atlantic Street and Park Avenue, north of the University of Bridgeport properties. The closest park and playing fields are located at Seaside Park, south-west of the site.

Figure 5 shows the locations of adjacent land uses.

Summary of Community Outreach and Municipal Agreement

PSEG has undertaken comprehensive community and municipal outreach in the City over the last eighteen months, including complying fully with C.G.S. § 22a-20a, the Connecticut Environmental Justice Act (the "EJ Act"). As a result of PSEG's consultations with City officials and community groups, PSEG entered into the CEBA with the City and the Connecticut Coalition of Environmental Justice ("CCEJ"). The

CEBA contains substantial commitments and benefits PSEG is providing to the City and community.

Among other things, PSEG agreed to:

> (i) Contribute $2 million to create a community environmental benefits fund for public health and environmental benefits for the community to be administered at the direction of the community's environmental task force ("ETF");
>
> (ii) end commercial operations of the coal-fired BHS Unit 3 by July 1, 2021;
>
> (iii) initiate a program for the purpose of investing $5 million in renewable energy investment projects located in Bridgeport that satisfy certain conditions;
>
> (iv) participate jointly with the City in a Site planning study to explore potential redevelopment or reuse of the portion of the BHS Site not occupied by the Project or other BHS facilities; and
>
> (v) work cooperatively with local building trades unions, the City, ETF, CCEJ, and the University of Bridgeport ("UB") to identify and qualify subcontractors and laborers, including minorities, woman and veterans, with a preference for Bridgeport residents and businesses.

As a result of the cooperative communications and negotiations that resulted in the CEBA, the City, CCEJ and UB confirmed that they do not oppose the Project. Significantly, as the CEBA shows, the City agreed to express its support for the Project to the Council and CT DEEP.

In addition to the consultations and negotiations that took place pursuant to the EJ Act, PSEG also prepared and sent a technical report (the "Technical Report") to the City. The Technical Report addresses the need, site selection process and potential environmental effects of the Project in the manner provided by C.G.S. § 16-50*l*(e) and was sent to the mayor and City on November 13, 2015.

Visual Impact Environmental Compatibility

The design of the proposed Facility has been developed to meet the public need for electric generation capacity and energy supplies for the wholesale power markets while minimizing any potential adverse environmental impacts. PSEG selected the proposed location to minimize any potential visual impacts and designed the equipment layout to further reduce the potential environmental impacts. As an example of such design considerations, while the proposed stack height will be no taller than approximately 300 feet above the Site design grade, the Facility's new stack will be significantly lower than the existing 498-foot stack height of BHS Unit 3.

Primary Facility structures, including the proposed turbine building, HRSG building, and air-cooled condenser are anticipated to have heights of approximately 97, 125, and 125 feet above the proposed site design grade, respectively. The new exhaust stack will be the most prominently visible new structure.

A total of four exhaust stacks are currently located at the Site, the tallest of which is 498 feet above grade. Therefore, the proposed combined cycle Facility and related improvements will be located on a developed property that is already the location of existing generating units, including all visible appurtenances such as the existing exhaust stacks, boilers, coal conveying equipment, oil tanks, and barge docks.

In light of this existing industrial development, the proposed addition of the equipment required to support the combined cycle Facility, including the proposed 300-foot exhaust stack, will result in an incremental but not material change in the appearance of the BHS. The proposed 300-foot stack will be lower than the existing 498-foot stack at the Site, and the remaining Facility structures will be generally consistent with the height of the other structures at the BHS Site.

To illustrate this, viewshed photographs were taken from five vantage points, shown in Figure 6A through 6F. Figure 6A depicts the vantage point locations. The existing view and photosimulation from Soundview Drive are shown in Figure 6B. The existing view and photosimulation from Broad Street and University Avenue are shown in Figure 6C. The view and photosimulation from Newfield Avenue boat ramp are shown in Figure 6D. The view and simulation from the new ferry site are shown in Figure 6E. The view and simulation from the corner of Soundview Drive and Cove Road are shown in Figure 6F.

As shown in the photosimulations, the new Project, where visible, will not be substantially different from the existing BHS, nor would it be in sharp contrast with the area surrounding the Site. Thus, the proposed Project will not significantly impair the visual landscape from any of the area resources of potential concern, nor will the Project interfere with or reduce the general public's or area residents' enjoyment and/or appreciation of any open space or other scenic resources. In addition, residents and visitors to the area will not experience a significant change in the visual character of the area. Overall, the new Project will be visible, but will not be out of character with or out of proportion to the views of the existing BHS or other energy infrastructure in the immediate area. Thus, there will be no significant adverse visual impacts as a result of the Project. In response to the community's concerns raised during the EJ process about the existing Site's visual impacts, PSEG also agreed in the CEBA to collaborate with the City and jointly participate in a Site planning study of PSEG's redevelopment or reuse of the remainder of the BHS Facility. PSEG expects that retirement of Unit 3 and potential dismantling of some discontinued equipment and structures may further improve the future viewshed impact of the Site over time.

Air Emissions Impacts

In a combined cycle facility, hot gasses from the Combustion Turbine Generator ("CTG") are exhausted through ductwork to the HRSG, where energy is extracted and used to generate high pressure steam. The HRSG also contains a duct burner (natural gas-fired) which can be used to provide additional heat energy to the HRSG to increase steam production under certain operating conditions. Exhaust gas flow from the HRSG is discharged to the atmosphere through the approximately 300-foot tall stack. The CTG

produces electricity directly and the exhaust heat from the CTG produces steam in the HRSG, which drives a steam turbine generator to produce additional electricity.

The proposed unit will be equipped with state-of-the-art air emissions control technology, including:

- Dry Low NO_x combustors, a selective catalytic reduction system, and water injection when firing liquid fuel which all serve to reduce NO_x emissions;
- An oxidation catalyst to reduce CO and VOC emissions; and
- An air-cooled condenser which avoids particulate emissions associated with evaporative (i.e. "wet") cooling systems.

An initial air quality impact study has been completed and was submitted to CT DEEP on April 7, 2015 (see Exhibit E). This study is currently being updated. The study uses the EPA-developed and preferred dispersion model, known as AERMOD, to evaluate the ground-level impact of Unit 5 stack emissions. Various operating conditions are studied including different ambient temperatures (which affect CTG performance), various CTG loads, firing on both fuels (natural gas and ULSD), and both steady-state CTG operation and transient CTG operation.

Steady-state operation involves "normal" operation and is the usual state of the unit. Transient operating conditions involve start-up and shutdown activities. With the exception of nitrogen dioxide ("NO_2"), the study concludes that the impacts from the Unit 5 emissions, as proposed and after inclusion of a representative monitored background concentration to account for emissions of other sources in the region, do not exceed the NAAQS, the State ambient standards or the PSD Class II increments. The impact study did predict potential SIL exceedances for NO_2. The prediction of an SIL exceedance means only that further analysis is required for NO_2 to establish that the short-term NO_2 NAAQS will not be exceeded. The required studies are underway and will be submitted to CT DEEP.

The Project's potential air quality impacts are minimized both through its state-of-the-art design including the addition of highly efficient pollution control equipment and through the use of the proposed fuels, pipeline quality natural gas and ULSD, which are the cleanest available fossil fuels in the market today. The Project will meet EPA and CT DEEP requirements to employ "Best Available Control Technology" ("BACT") and/or Lowest Achievable Emission Rate ("LAER") technology for the various pollutants. The application of BACT or LAER is determined on a pollutant-specific basis by the projected annual quantity of emissions and the attainment status of the Bridgeport area. BACT will be employed to control emissions of NOx, CO, PM, $PM_{2.5}$, PM_{10}, H_2SO_4 and Greenhouse Gases. LAER will be employed to control emissions of the ozone precursors NOx and VOC. The final LAER and BACT determinations are made by CT DEEP during the formal technical review process as part of the air permitting package review.

Employed together, the selected fuels, state-of-the-art turbine design and air emission controls ensure that the Project combines high energy efficiency with very low emission rates.

Other Potential Impacts

PSEG engaged the services of technical consultants with substantial experience in planning and permitting power plant facilities, including AKRF, Inc. ("AKRF"). AKRF has prepared a Land Use and Environmental Information Report (AKRF 2016), which reviews all of the potential environmental impacts and efforts by PSEG to mitigate such impacts.

- Noise Impacts

Existing ambient background noise levels in the direct vicinity of the Site are typical for industrial areas with significant industrial activity including a large amount of heavy truck activity throughout the day and substantial background traffic noise from Interstate 95. Within the nearby residential neighborhoods, ambient background noise levels are typical of city areas. Noise sources identified in the area include industrial activity, vehicle traffic along I-95 and local roadways, rail traffic along the adjacent Northeast Corridor / Metro North rail line, and Bridgeport-Port Jefferson Ferry operations at the waterfront, among other marine activities.

Chapter 6 of the AKRF Land Use and Environmental Report (AKRF 2016) describes the various noise sources proposed for the Facility. As discussed by AKRF in its report, the preliminary noise analysis confirms that the surrounding area is characterized by high background noise in part due to heavy industrial activities in the area, among other sources. The noise analysis predicts that the noise level from the proposed Facility will be in compliance with existing State and City noise standards.

- Visual Impacts

AKRF conducted a visual impact analysis, as discussed in the Land Use and Environmental Report (AKRF 2016), and shown on Figures 6A through 6F. As described by AKRF, the proposed Facility would be visible, but the visual impacts are expected to be minor, especially given the current prominent visibility of the existing stacks and structures that comprise the existing BHS.

- Traffic Impacts

Access to the Site is limited for security reasons with routine traffic entering through the gate at Atlantic Street. Vehicle traffic (including heavy trucks and employee commuters) accessing the Site will most likely use Interstate 95 at Interchanges 26 or 27. Traffic accessing the Site from I-95 northbound will exit the Interstate and enter the industrial area by heading south on either Lafayette Street or Broad Street. Traffic traveling on I-95 southbound to the Site will exit at Interchanges 26 or 27 and head south on Broad Street before entering the industrial area. During the construction phase of the Project, truck traffic could potentially increase along Broad Street, Lafayette Street and Atlantic Street depending on which direction vehicles will travel to and from the Site. During construction, certain trucks requiring high clearance would access the site via I-95 Exit 26 onto Pine Street, to Admiral Street, Iranistan Avenue, and to the Site entrance on Atlantic Street. Trucks leaving the Site would take Atlantic Street to Main Street, Broad Street, Gregory Street, Iranistan Avenue, and Washburn Street, to I-95 at Wordin Avenue.

AKRF considered the potential effect of the proposed Project on traffic during Project construction and during Project operation. Traffic impacts are expected to be limited to the construction time frame for the Project. Temporary increases in traffic levels from construction vehicles may be experienced in the nearby neighborhoods. Where practicable, barges will be used to deliver materials and equipment to the Site, including large equipment and bulk deliveries of materials such as backfill and aggregates. These potential impacts will be temporary in nature. After construction is completed, the number of additional vehicle trips for delivery of supplies and worker commutes will be comparable to or less than those of the existing BHS Site. During Project operations, AKRF anticipates that vehicle trips will not result in excessive traffic near the Site.

- Historic and Archaeological Resources

AKRF evaluated potential effects of the proposed combined cycle Project on historic and archaeological resources. The proposed generating equipment will be installed on approximately 16 acres of previously disturbed land at the existing BHS. The new combined cycle Project will be sited in an area where four above-ground fuel oil storage tanks are currently located. These existing oil storage tanks, which were installed in 1968, will be removed in advance of the proposed Project pursuant to the Unit 3 Tank Project described above. As the Project development will occur within a previously disturbed industrial site, environmental impacts to historical or archaeological resources are minimized as compared with the development of a similar project on a "greenfield" site. As indicated in Appendix A, the State Historic Preservation Office determined on February 5, 2015 that no historic properties will be affected this project and no further review is requested.

- Natural Resources

The analyses conducted by AKRF on various geological, ecological and biological resources in the area confirmed that the Site and surrounding vicinity is characterized by important natural resources, including Long Island Sound, but that the Project, especially as designed, is not expected to have adverse environmental impacts on these resources. During construction, appropriate soil erosion and sediment control measures (e.g., silt fence, turbidity curtains, etc.) will be installed to prevent loose sediment from entering the onsite wetland area. Prior to construction, PSEG will consult with CT DEEP to avoid or minimize impacts to any nesting osprey near the Site.

Wetlands

Both freshwater and tidal wetlands are present at the BHS site, located east of the proposed Project site. The boundaries of these wetlands were determined by a field delineation conducted on April 9, 2014 by GEI Consultants, Inc. The construction of the proposed Project will not result in the disturbance of any wetland area. During construction, appropriate soil erosion and sediment control measures (e.g., silt fence, etc.) will be installed to prevent loose sediment from entering the wetland.

Endangered or Threatened Species

The proposed approximately 16-acre combined cycle area of development is located within PSEG's existing Bridgeport Harbor Generating Station. The existing station is located within an industrial area located on the western shore of Bridgeport Harbor. The Bridgeport Harbor Station has operated at this location since 1957. The area surrounding the existing station site is characterized by a mix of Industrial, commercial, and residential uses. As illustrated by the site aerials provided as Figures 2 and 3, aside from grassed areas interspersed with limited woody vegetation, the proposed development site contains little vegetative cover. As a consequence, the Project site is not anticipated to provide quality wildlife habitat and significant impacts to vegetation and wildlife will not occur.

The installation of the new Combined Cycle Facility will be within the fenced perimeter of the existing BHS and the modification does not introduce a significant change in site infrastructure. PSEG has determined that there will be no impact to any state or federal-listed endangered, threatened or species of special concern by either the construction or the operation of the proposed modification. PSEG solicited CT DEEP inputs on potential impacts to any state or federal-listed endangered, threatened or species of special concern for another proposed project at the site. The response from the CT DEEP, dated October 21, 2014 is included in Appendix A. CT DEEP determined that based on “the location and siting of this facility” (i.e. the other proposed project)…”it is unlikely that construction activities and subsequent operations of the facility will negatively impact state-listed species”. An update request was filed with CT DEEP in February 2016.

- Water Resources

The Project engineers have designed the proposed Facility to have a minimal impact on water resources, including minimizing the need for potable water and the wastewater process. The Project will not involve water intake from or discharges to Bridgeport Harbor. The water use analysis (water balance), shows the Facility’s water inputs and outputs and indicates minimal water outputs, with discharges to be limited to the existing City sanitary sewer system. In addition, engineers have prepared Site plans that feature a grading and drainage plan designed to manage and reduce stormwater runoff.

Stormwater

The proposed structural stormwater management system combines use of cover stabilization practices, a subsurface gravity collection and conveyance system, manufactured treatment devices (MTD) and discharge control practices (i.e., outfall headwall and rip-rap outlet protection). Stormwater from the site discharges to Bridgeport Harbor (i.e., tidal waters). Therefore, peak flow attenuation criteria for the 2, 10, and 100-year storm events do not apply.

A new stormwater outfall structure will be constructed at the existing NPDES outfall DSN 014. The MTD (Contech "Vortechs 11000"), have been designed to treat one (1)

inch of runoff from the site using an off-line configuration, and divert excess flows directly to the outfall.

The MTD will be used to satisfy the total suspended solids (TSS) removal goal for the Connecticut water quality design storm. The MTD will be installed in an off-line configuration, with excess flows diverted directly to the outfall. MTDs are frequently selected as a preferred stormwater management option for brownfield sites and sites having limited space for installation of conventional stormwater management structures. When properly designed, MTDs require significantly less space than conventional stormwater management practices.

The proposed system was evaluated for adequacy against the design and performance standards stated in the 2004 Connecticut Stormwater Quality Manual, and the City of Bridgeport, CT, Dept. of Public Facilities, Stormwater Management Manual, May 2008. The targeted reduction rate for TSS is eighty (80) percent of the anticipated load from the developed site assuming a 1 inch rainfall event.

2.0 Consistency with Applicable Statutory Coastal Resource Goals and Policies

In order for projects proposed in the coastal boundary to be consistent with the Connecticut Coastal Management Act (CCMA) and the City of Bridgeport's zoning regulations, they must be designed to avoid to the maximum extent practicable, and if unavoidable, be designed to minimize adverse impacts to coastal resources and future water dependent opportunities and activities. The following sections of this support document summarize the coastal resources and indicate whether or not they are located on and/or adjacent to the site and how the proposed project avoids or minimizes impact to the resources.

2.1 General Resources

Policy #1

To preserve and enhance coastal resources in accordance with the policies established by chapters 439 (Environmental Protection Department and State Policy), 440 (Wetlands and Watercourses), 446i (Water Resources), 446k (Water Pollution Control), 447 (State Parks and Forests), 474 (Pollution), and 477 (Flood Control and Beach Erosion). [CGS Section 22a-92(a)(2)]

Policy #2

The general assembly hereby declares that the policy of the state of Connecticut is to conserve, improve and protect its natural resources and environment and to control air, land and water pollution in order to enhance the health, safety and welfare of the people of the state. [CGS Section 22a-1 as referenced by CGS Section 22a-92(a)(2)]

Policy #3

It is hereby found and declared that there is a public trust in the air, water and other natural resources of the state of Connecticut and that each person is entitled to the protection, preservation and enhancement of the same. [CGS Section 22a-15 as referenced by CGS Section 22a-92(a)(2)]

Policy #4

The commissioner shall carry out the environmental policies of the state and shall have all powers necessary and convenient to faithfully discharge this duty. In addition to, and consistent with the environment policy of the state, the commissioner shall (a) promote and coordinate management of water, land and air resources to assure their protection, enhancement and proper allocation and utilization; (b) provide for the protection and management of plants, trees, fish, shellfish, wildlife and other animal life of all types, including the preservation of endangered species; (c) provide for the protection, enhancement and management of the public forests, parks, open spaces and natural area preserves; (d) provide for the protection, enhancement and management of inland, marine and coastal water resources, including, but not limited to, wetlands, rivers, estuaries and shorelines; (e) provide for the prevention and abatement of all water, land and air pollution including, but not limited to, that related to particulate, gases, dust, vapors, noise, radiation, odors, nutrients and cooled or heated liquids, gases and solids; (f) provide for control of pests and regulate the use, storage and disposal of pesticides and other chemicals which may be harmful to man, sea life, animals, plant life or natural resources; (g) regulate the disposal of solid waste and liquid waste, including but not limited to, domestic and industrial refuse, junk motor vehicles, litter and debris, which methods shall be consistent with sound health, scenic environmental quality and land use practices; (h) regulate the storage, handling and transportation of solids, liquids and gases which may cause or contribute to pollution; and (i) provide for minimum state-wide standards for the mining, extraction or removal of earth materials of all types. [CGS Section 22a-5, referenced by CGS Section 22a-92(a)(2)]

COMPLIANCE

The proposed combined cycle development will occur within a previously disturbed industrial site, and as a consequence, potential environmental impacts to coastal resources are avoided to the maximum extent practicable as compared to the development of a similar project on a “greenfield” site within the coastal zone. The proposed development will apply for and obtain all permits required under the various applicable CT DEEP permit programs designed to protect water, land, and air resources, plant and animal life, and to regulate the use, storage and disposal of chemicals and waste consistent with sound health, scenic environmental quality and land use practices, and operate in conformance with the conditions of the future permits. As a consequence, the proposed Project is protective of existing coastal resources and is in compliance with this policy.

2.2 Beaches & Dunes

Beaches and dunes are beach systems including barrier beach spits and tombolos, barrier beaches, pocket beaches, land contact beaches and related dunes and sandflats. In general, beaches are dynamic areas abutting coastal waters that are characterized by sand, gravel or cobbles.

Policy #5

To preserve the dynamic form and integrity of natural beach systems in order to provide critical wildlife habitats, a reservoir for sand supply, a buffer for coastal flooding and erosion, and valuable recreational opportunities. [CGS Section 22a-92(b)(2)(C)]

Policy #6

To insure that coastal uses are compatible with the capabilities of the system and do not unreasonably interfere with natural processes of erosion and sedimentation. [CGS Section 22a-92(b)(2)(C)]

Policy #7

To encourage the restoration and enhancement of disturbed or modified beach systems. [CGS Section 22a-92(b)(2)(C)]

Policy #8

To require as a condition in permitting new coastal structures, including but not limited to, groins, jetties or breakwaters, that access to, or along, the public beach below mean high water must not be unreasonably impaired by such structures and to encourage the removal of illegal structures below mean high water which unreasonably obstruct passage along the public beach. [CGS Section 22a-92(c)(1)(K)]

COMPLIANCE

Based on shoreline walkdowns, a review of aerial photographs (Figures 2 and 3) and field reconnaissance (most recently on October 7, 2015), beaches and dunes do not exist on or adjacent to the proposed Project Site. Accordingly, the proposed construction and operation of the proposed improvements will not affect beaches and dunes. As such, this policy is not applicable.

2.3 Bluffs & Escarpments

Bluffs and escarpments are naturally eroding shorelands marked by dynamic escarpments or sea cliffs which have slope angles that constitute an intricate and dynamic balance between erosion, substrate, drainage and degree of plant cover.

Policy #9

To manage coastal bluffs and escarpments so as to preserve their slope and toe. [CGS Section 22a-92(b)(2)(A)]

Policy #10

To discourage uses which do not permit continued natural rates of erosion. CGS Section [22a-92(b)(2)(A)]

Policy #11

To disapprove uses that accelerate slope erosion and alter essential patterns and supply of sediments to the littoral transport system. [CGS Section 22a-92(b)(2)(A)]

COMPLIANCE

Based on shoreline walkowns, a review of aerial photographs (Figures 2 and 3) and field reconnaissance (most recently on October 7, 2015), the Project Site is not located on or near bluffs or escarpments. Accordingly, the proposed construction and operation of the proposed improvements will not affect bluffs or escarpments. As such, this policy is not applicable.

2.4 Coastal Hazard Area

Coastal hazard areas are land areas that become inundated with water during coastal storm events or are subject to erosion induces by such events, including flood hazard areas as defined and determined by the National Flood Insurance Act and all erosion hazard areas as determined by the Commissioner. These areas are designated within A-zone and V-zones by the Federal Emergency Management Agency (FEMA).

Policy #12

To manage coastal hazard areas so as to insure that development proceeds in such a manner that hazards to life and property are minimized. [CGS Section 22a-92(b)(2)(F)]

Policy #13

To promote nonstructural solutions to flood and erosion problems except in those instances where structural alternatives prove unavoidable and necessary to protect existing inhabited structures, infrastructural facilities or water-dependent uses. [CGS Section 22a-92(b)(2)(F)]

Policy #14

To maintain the natural relationship between eroding and depositional coastal landforms.[CGS Section 22a-92(b)(2)(J)]

Policy #15

To minimize the adverse impacts of erosion and sedimentation on coastal land uses through the promotion of nonstructural mitigation measures. [CGS Section 22a-92(b)(2)(J)]

Policy #16

Structural solutions are permissible when necessary and unavoidable for the protection of infrastructural facilities, water-dependent uses, or existing inhabited structures, and where there is no feasible, less environmentally damaging alternative and where all reasonable mitigation measures and techniques have been provided to minimize adverse environmental impacts. [CGS Section 22a-92(b)(2)(J)]

Policy #17

To maintain, enhance, or, where feasible, restore natural patterns of water circulation and fresh and saltwater exchange in the placement or replacement of culverts, tide gates or other drainage or flood control structures. [CGS Section 22a-92(c)(2)(B)]

Policy #18

It is hereby found and declared that, because of the occurrence of severe storms accompanied by winds up to hurricane force, abnormal high tides and tide flooding, the lives and property of residents and other persons within areas exposed to such hazards are endangered, and that, in the interest of public health, safety and general welfare, it is necessary to minimize, and as far as possible to prevent, loss of life, property and revenue to municipalities and the state from taxation by the construction of protective works on or near shores and beaches within such areas. As title to the land between high and low watermark is vested in the state, it is further found and declared to be in the public interest to secure such exposed areas by the most economical and effective means for safeguarding life and protecting property and, because it is uneconomical and ineffective for the general purpose for an individual landowner to attempt to maintain protective installations separated from and lacking co-extension with those of abutting properties, that it is in the public interest to provide ways and means for collective and cooperative action to alleviate the dangers and destruction common to such exposed areas. It is further found and declared that because of the recurrence of severe flooding of many of the waterways of the state and their tributaries, taking a huge toll in life and property, extensive flood protection measures must be inaugurated. It is, therefore, found and declared to be in the public interest that encroachment limits along waterways be established and any flood control features at dams and reservoirs be utilized as a part of the construction and installation of any flood control project. [CGS Section 25-69, referenced by CGS Section 22a-92(a)(2)]

Policy #19

Land areas fronting on the ocean, or on bays, inlets and coves, or bordering on rivers in which tides occur, that are subject to the full force of storms; or land areas in direct contact with storm waves, including banks, bluffs, cliffs, promontories and headlands or similar topographical or geological formations, that are subject to erosion through wave action; or open beach areas, including spits, dunes and barrier beaches, that are subject to loss of sand through high waves, strong currents or scouring wave action; or land areas subject to inundation during storms or vulnerable to storm damage because of geographic situation, may be classed as exposed areas within the meaning of Sections 25-69 to 25-75, inclusive. The limits of such areas shall be the extent of the natural configuration of the land surface not necessarily co-extensive with political boundaries, and shall include privately-owned and municipally-owned properties upon which public money may be spent and public debt incurred for the protection and conservation thereof, and taxes levied to support expenditures for such purposes. [CGS Section 25-70, referenced by CGS Section 22a-92(a)(2)]

Policy #20

The commissioner shall establish, along any tidal or inland waterway or flood-prone area considered for stream clearance, channel improvement or any form-of flood control or flood alleviation measure, lines beyond which, in the direction of the waterway or flood-prone area, no obstruction or encroachment shall be placed by any person, firm or corporation, public or private, unless authorized by

said commissioner. The commissioner shall issue or deny permits upon applications for establishing such encroachments based upon his findings of the effect of such proposed encroachments upon the flood carrying and water storage capacity of the waterways and floodplain, flood heights, hazards to life and property, and the protection and preservation of the natural resources and ecosystems of the state, including but not limited to ground and surface water, animal, plant and aquatic life, nutrient exchange, and energy flow, with due consideration given to the results of similar encroachments constructed along the reach of waterway. [CGS Section 22a-342, referenced by CGS Section 22a-92(a)(2)]

Policy #21

To require as a condition in permitting new coastal structures, including but not limited to, groins, jetties or breakwaters, that access to, or along, the public beach below mean high water must not be unreasonably impaired by such structures and to encourage the removal of illegal structures below mean high water which unreasonably obstruct passage along the public beach. [CGS Section 22a-92(c)(1)(K)]

COMPLIANCE

The Project's compliance with the above coastal policies is assessed below:

- *insure that development proceeds in such a manner that hazards to life and property are minimized [CGS Section 22a-92(b)(2)(F)];*

Per the current FEMA 2013 Flood Insurance Rate Map (FIRM), the majority of the existing Bridgeport Harbor Station site is mapped within the 100-year floodplain (Zone AE), which is at elevation 14 feet North American Vertical Datum 1988 (NAVD88) (see Figure 2). Existing base elevations at the site are approximately 9.5 feet to 10.0 feet NAVD88. The flood protection level of the proposed structures will be 16.5' NAVD88, which is above the storm surge elevation as discussed below.

As noted, the proposed structures for the new plant will be flood protected to an elevation of 16 feet 6 inches NAVD, or 2 feet 6 inches above the FEMA 1% recurrence interval (100 year) flood level of 14 feet (Zone AE per FEMA Flood Insurance Rate Map [FIRM] for Fairfield County, Connecticut, Panel 441 or 626; Map Number 09001C0441G Revised July 8, 2013) for the BHS Site.

The 0.2% recurrence (500 year) flood level is not reported on the FEMA FIRM, however those levels can be estimated on the basis of data presented in the FEMA Flood Insurance Study (09001CV001C, Fairfield County, Connecticut, Revised October 16, 2013). The portion of the study that addresses the flood elevations at the site is summarized in Table 10 (page 110) for Transect 47 and the reported 1% recurrence interval stillwater elevation is 9.8 feet NAVD and 12.2 feet NAVD with the effects of wave setup included. On the basis of these computed values, a base flood elevation of 14 feet NAVD was established by FEMA for the area of the site. The reported 0.2% recurrence stillwater flood elevation is 11.1 feet NAVD, or 1.3 feet higher than the 1%

recurrence stillwater flood elevation. The top of the containment and building flood protection wall elevations are 16 feet 6 inches NAVD, or 2.5 feet higher than the 1% recurrence base flood elevation, as well as above the 0.2% recurrence flood. It is also important to note that the site is located within the zone of no significant wave action (AE), adding additional margin to these values. Figure 2 indicates the potential for moderate wave action along the southern and eastern facing shorelines (Zone VE). No work is being performed in this zone.

The FEMA mapping and flood elevation / recurrence frequencies were modified by FEMA after coastal storm Sandy.

In order to achieve the above-described design criteria, PSEG is proposing establishing a ground elevation for the proposed combined cycle development site at elevation 16.50 NAVD 88. Building finished floor elevations and top of equipment pads are proposed to be placed at nominally elevation 18.50. As illustrated in the preliminary site development plan, PSEG is proposing use of a structural retaining wall and import of fill to accommodate the increase in grade with the smallest feasible structural footprint. There is not sufficient room at the site to use a simpler earthen berm with sloped face. Based on existing site grades, the proposed design will raise the proposed development site an average of approximately 7.5 feet above existing grade.

To address spill prevention features of the proposed Unit 5 tank, the secondary containment will have a steel outer wall and be designed with an impervious liner and necessary access points. The secondary containment will be open at the top with a sump and petro-barrier to allow separation of oil from rainwater. The containment is sized to be able to fully contain 110% of the tank inventory including rain quantities, as required by the applicable CT DEEP regulations. Tank level indications will be provided both locally and in the BHS Unit 5 Control Room on a continuous basis. Local and Control Room level alarms and interlocks will be installed to prevent over-filling of the tank.

As detailed above, the Project minimizes the potential hazards to life and property to the maximum extent practicable. The Project is consistent with this coastal policy.

- *to promote nonstructural solutions to flood and erosion problems except in those instances where structural alternatives prove unavoidable and necessary to protect existing inhabited structures, infrastructural facilities or water-dependent uses [CGS Section 22a-92(b)(2)(F)];*
- *to minimize the adverse impacts of erosion and sedimentation on coastal land uses through the promotion of nonstructural mitigation measures [CGS Section 22a-92(b)(2)(J)];*

The proposed development will comply with the above Coastal Hazard Area policies. Given the site's waterfront location, redevelopment of the proposed combined cycle site will not result in a potential for increased flooding or erosion of downstream and/or off-site properties. Based on existing site subsurface conditions the use of non-structural methods to manage site stormwater is not proposed. The stormwater collection system to be designed for the Project will be in accordance with CT DEEP and City

requirements. A Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the CT DEEP general permit "Stormwater and Dewatering Wastewaters from Construction Activities" (DEEP-WPED-GP-015) will be prepared and implemented. The SWPPP will conform to the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and its implementation will ensure that off-site impacts due to soil erosion do not occur. As a critical infrastructure site, the use of non-structural methods to address potential site flooding concerns is not appropriate. Potential site flooding concerns will be addressed through the storm hardening design detailed above.

- *to maintain the natural relationship between eroding and depositional coastal landforms [CGS Section 22a-92(b)(2)(J)];*
- *to maintain, enhance, or, where feasible, restore natural patterns of water circulation and fresh and saltwater exchange in the placement or replacement of culverts, tide gates or other drainage or flood control structures [CGS Section 22a-92(c)(2)(B)].*

The proposed development will comply with the above Coastal Hazard Area policies. The proposed Project will result in the redevelopment of a portion of the existing PSEG Bridgeport Harbor Generating Station site. The proposed redevelopment of the existing industrial waterfront site will have no effect on the existing natural relationship between eroding and depositional landforms. Further, the Project does not propose the placement of culverts, tide gates, or other flood control structures that will impact existing patterns of water circulation and fresh and saltwater exchange.

2.5 Coastal Waters & Estuarine Embayments

Coastal Waters are those waters of Long Island Sound and its harbors, embayments, tidal rivers, streams and creeks, which contain a salinity concentration of at least five hundred parts per million under the low flow stream conditions as established by the commissioner.

Estuarine Embayments are a protected coastal body of water with an open connection to the sea in which saline sea water is measurably diluted by fresh water including tidal rivers, bays, lagoons and coves.

> *Policy #22*
>
> *It is found and declared that the pollution of the waters of the state is inimical to the public health, safety and welfare of the inhabitants of the state, is a public nuisance and is harmful to wildlife, fish and aquatic life and impairs domestic, agricultural, industrial, recreational and other legitimate beneficial uses of water, and that the use of public funds and the granting of tax exemptions for the purpose of controlling and eliminating such pollution is a public use and purpose for which public moneys may be expended and tax exemptions granted, and the necessity and public interest for the enactment of this chapter and the elimination of pollution is hereby declared as a matter of legislative determination. [CGS Section 22a-422, as referenced by CGS Section 22a-92(a)(2)]*

Policy #23

To manage estuarine embayments so as to insure that coastal uses proceed in a manner that assures sustained biological productivity, the maintenance of healthy marine populations and the maintenance of essential patterns of circulation, drainage and basin configuration. [CGS Section 22a-92(c)(2)(A)]

Policy #24

To protect, enhance and allow natural restoration of eelgrass flats except in special limited cases, notably shellfish management, where the benefits accrued through alteration of the flat may outweigh the long-term benefits to marine biota, waterfowl, and commercial and recreational finfisheries. [CGS Section 22a-92(c)(2)(A)]

Policy #25

The commissioner of environmental protection shall adopt, and may thereafter amend, standards of water quality applicable to the various waters of the state or portions thereof as provided in subdivision (a) of Section 22a-6. Such standards shall be consistent with the federal Water Pollution Control Act and shall be for the purpose of qualifying the state and its municipalities for available federal grants and for the purpose of providing clear and objective public policy statements of a general program to improve the water resources of the state; provided no standard of water quality adopted shall plan for, encourage or permit any wastes to be discharged into any of the waters of the state without having first received the treatment available and necessary for the elimination of pollution. Such standards of quality shall: (1) apply to interstate waters or portions thereof within the state; (2) apply to such other waters within the state as the commissioner may determine is necessary; (3) protect the public health and welfare and promote the economic development of the state; (4) preserve and enhance the quality of state waters for present and prospective future use for public water supplies, propagation of fish and aquatic life and wildlife, recreational purposes and agricultural, industrial and other legitimate uses; (5) be consistent with health standards as established by the state department of health. [CGS Section 22a-426(a), as referenced by CGS Section 22a-92(a)(2)]

COMPLIANCE

The BHS site is located along the Pequonnock River/Bridgeport Harbor shoreline. Excluding the dock repair and stormwater outfall, the proposed combined cycle and related equipment will be constructed above the Connecticut Coastal Jurisdiction Line (Elevation 5' NAVD88), above mean higher high water (MHHW, 3.48' NAVD88), and outside of delineated tidal wetlands. To facilitate construction, two temporary barge unloading areas are proposed along the Pequonnock River/Bridgeport Harbor shoreline. Barges will be used to deliver materials and major equipment to the construction site, and will be anchored to the bottom using retractable spuds.

Appropriate soil erosion and sediment control measures will be taken (including, but not necessarily limited to silt fence, turbidity curtains around temporary dock repair and barge activities, etc.) to prevent discharge of materials into the Bridgeport Harbor or increasing suspended sediment concentrations. The construction and operation of the

new unit(s) at the BHS site will not affect sustained biological productivity, the maintenance of healthy marine populations, the maintenance of essential patterns of circulation, drainage and basin configuration, or eelgrass flats. As such, the proposed Project is in compliance with this policy.

2.6 Developed Shorefront

Developed Shorefronts are those harbor areas which have been highly engineered and developed resulting in the functional impairment or substantial alteration of their natural physiographic features or systems.

Policy #26

To promote, through existing state and local planning, development, promotional and regulatory programs, the use of existing developed shorefront areas for marine-related uses, including but not limited to commercial and recreational fishing, boating and other water-dependent commercial, industrial and recreational uses. [CGS Section 22a-92(b)(2)(G)]

COMPLIANCE

The existing conditions at the BHS site comprise developed shorefront. The existing shoreline is armored with rip-rap at or near the high tide line, and existing appurtenances related to the station's operation (e.g., barge docks, intake structures, etc.) represent highly engineered development that has altered the natural physiographic features of Bridgeport Harbor.

The development of the proposed combined cycle and related improvements at the BHS station is in compliance with this policy. The existing Bridgeport Harbor Generating Station's Unit 3 is a water-dependent use as it relies on water from the adjacent Bridgeport Harbor for cooling purposes. The proposed combined cycle facility will not impact operations of this existing water-dependent use. While the proposed combined cycle facility will not require surface water withdrawals from Bridgeport Harbor to provide for facility cooling, it is expected to rely, at least partially, on marine deliveries of ULSD fuel oil. Therefore, a deepwater accessible, waterfront site is required by the Project. Therefore, the proposed Project is in compliance with this policy.

2.7 Freshwater Wetlands and Watercourses

Freshwater wetlands are transition areas between uplands and aquatic habitats and include ponds, marshes and swamps. Watercourses are natural bodies of running water flowing on or beneath the earth.

Policy #27

It is, therefore, the purpose of Sections 22a-36 to 22a-45, inclusive, to protect the citizens of the state by making provisions for the protection, preservation, maintenance and use of the inland wetlands and watercourses by minimizing their disturbance and pollution; maintaining and improving water quality in accordance with the highest standards set by federal, state or local authority; preventing damage from erosion, turbidity or siltation; preventing loss of fish and

other beneficial aquatic organisms, wildlife and vegetation and the destruction of the natural habitats thereof; deterring and inhibiting the danger of flood and pollution; protecting the quality of wetlands and watercourses for their conservation, economic, aesthetic, recreational and other public and private uses and values; and protecting the state's potable fresh water supplies from the dangers of drought, overdraft, pollution, misuse and mismanagement by providing an orderly process to balance the need for the economic growth of the state and the use of its land with the need to protect its environment and ecology in order to forever guarantee to the people of the state, the safety of such natural resources for their benefit and enjoyment and for the benefit and enjoyment of generations yet unborn. [CGS Section 22a-36 as referenced by CGS Section 22a-92(a)(2)]

Policy #28

In carrying out the purposes and policies of Sections 22a-36 to 22a-45, inclusive, including matters relating to regulating, licensing and enforcing of the provisions thereof, the commissioner shall take into consideration all relevant facts and circumstances, including but not limited to:

(1) The environmental impact of the proposed action;

(2) The alternatives to the proposed action;

(3) The relationship between short-term uses of environment and the maintenance and enhancement of long-term productivity;

(4) Irreversible and irretrievable commitments of resources which would be involved in the proposed activity;

(5) The character and degree of injury to, or interference with, safety, health or the reasonable use of property which is caused or threatened; and

(6) The suitability or unsuitability of such activity to the area for which it is proposed.

[CGS Section 22a-41(a), referenced by CGS Section 22a-92(a)(2)]

COMPLIANCE

Freshwater wetlands are present at the BHS site, located east of the proposed Project site. The construction of the proposed Project will not result in the filling of this wetland area. The closest proposed activity is approximately 150 feet away with no surface or hydraulic connections. The boundaries of these wetlands were determined by a field delineation conducted on April 9, 2014 by GEI Consultants, Inc. (GEI 2014). The locations of the delineated wetlands delineated are shown in Figure 7. A Jurisdictional Determination (JD) will be filed with the United States Army Corps of Engineers (USACE) to document and memorialize the federally jurisdictional wetlands on the site.

During the field assessment and delineation, two vegetated pocket wetland systems were identified to the east of the proposed Project site. Based on historic aerials, the majority of these wetland areas were once part of Bridgeport Harbor. “Tongue Point” extended through the southern wetland and apparent industrial development extended up to the west side of both wetlands. The two areas are separated from the Sound by a

fill embankment topped by a paved road which is generally oriented north to south on the east side of the wetlands and east to west along the south side of the wetlands. The fill embankment is typically 20 to 40 feet wide on the east side and approximately 60 to 100 feet wide to the south. A lighthouse is located at the southeast corner (on the outside of the 90 degree bend) of the roadway. While the National Wetlands Inventory (NWI) shows this area mapped as a single wetland system, an east-west vegetated berm separates the area into two distinct systems. The northern pocket wetland is a freshwater wetland dominated by common reed (*Phragmites australis*) and gray birch (*Betula populifolia*). The southern pocket wetland receives tidal influence, and is discussed under the Tidal Wetlands policy below.

The northern wetland corresponds to the NWI's Cowardin classification of PEM1Eh: palustrine (P), emergent (EM), persistent (1), seasonally flooded/saturated (E), and diked/impounded (h). The invasive vine, dodder (*Cuscuta sp.*), blankets vegetation throughout the wetland. The wetland is characterized by variations in ground surface (microtopography) within the common reed stands and around fallen trees. The side slopes and road edge upland areas are dominated by quackgrass (*Elymus repens*), mugwort (*Artemisia vulgaris*), black locust (*Robinia pseudoacacia*), oak (*Quercus sp.*), and mowed lawn. The wetland boundary was determined to be along the fill slope (GEI 2014).

The construction of the proposed Project will not result in the filling of this wetland area. During construction, appropriate soil erosion and sediment control measures (e.g., silt fence, etc.) will be installed to prevent loose sediment from entering the wetland. The operation of the proposed combined cycle facility will not result in any discharges into this regulated wetland. As such, the proposed Project is in compliance with this policy.

2.8 Intertidal Flats

Intertidal Flats are very gently sloping or flat areas located between high and low tides composed of muddy, silty and fine sandy sediments and generally devoid of vegetation. CGS Section 22a-93(7)(D)

> *Policy #29*
>
> *To manage intertidal flats so as to preserve their value as a nutrient source and reservoir, a healthy shellfish habitat and a valuable feeding area for invertebrates, fish and shorebirds. [CGS Section 22a-92(b)(2)(D)]*
>
> *Policy #30*
>
> *To encourage the restoration and enhancement of degraded intertidal flats. [CGS Section 22a-92(b)(2)(D)]*
>
> *Policy #31*
>
> *To allow coastal uses that minimize change in the natural current flows, depth, slope, sedimentation and nutrient storage functions. [CGS Section 22a-92(b)(2)(D)]*

Policy #32

To disallow uses that substantially accelerate erosion or lead to significant despoliation of tidal flats. [CGS Section 22a-92(b)(2)(D)]

Policy #33

To require as a condition in permitting new coastal structures, including but not limited to groins, jetties or breakwaters, that access to, or along, the public beach below mean high water must not be unreasonably impaired by such structures. [CGS Section 22a-92(c)(1)(K)]

COMPLIANCE

The proposed combined cycle facility and related improvements, excluding the dock repair and stormwater outfall, will be constructed above the Connecticut Coastal Jurisdiction Line (Elevation 5' NAVD88), above mean higher high water (MHHW, 3.48' NAVD88), and outside of delineated tidal wetlands. To facilitate construction, temporary barge unloading areas are proposed along the Pequonnock River/Bridgeport Harbor shoreline. Barges will be used to deliver materials and major equipment to the construction site, and will be anchored to the bottom using retractable spuds below the elevation of mean low water. Barge off-loading will be accomplished via temporary bridging equipment. A small (less than 500 square foot) temporary impact at the shoreline may be necessary to structurally support bridging units; this may not be required, but if it is, the areas temporarily impacted will be restored upon completion of barge delivery phase of the Project. As such, the proposed Project will not affect intertidal flats, and as a consequence, is in compliance with this policy.

2.9 Islands

Islands are lands that are completely surrounded on all sides by water.

Policy #34

To manage undeveloped islands in order to promote their use as critical habitats for those bird, plant and animal species which are indigenous to such islands or which are increasingly rare on the mainland. [CGS Section 22a-92(b)(2)(H)]

Policy #35

To maintain the value of undeveloped islands as a major source of recreational open space. [CGS Section 22a-92(b)(2)(H)]

Policy #36

To disallow uses which will have significant adverse impacts on islands or their resource components. [CGS Section 22a-92(b)(2)(H)]

COMPLIANCE

The proposed combined cycle facility and related improvements are not located on undeveloped islands; therefore, this policy is not applicable.

2.10 Rocky Shorefront

Rocky Shorefronts are shorefront areas composed of bedrock, boulders and cobbles that are highly erosion resistant and are an insignificant source of sediments for other coastal landforms.

Policy #37

To manage rocky shorefronts so as to insure that development proceeds in a manner which does not irreparably reduce the capability of the system to support a healthy intertidal biological community; to provide feeding grounds and refuge for shorebirds and finfish, and to dissipate and absorb storm and wave energies. [CGS Section 22a-92(b)(2)(B)]

COMPLIANCE

The BHS site is not located along a naturally rocky shorefront. Existing rip-rap armoring for erosion protection was placed during the construction of the existing station. As such, this policy is not applicable.

2.11 Shellfish Concentration Areas

Shellfish Concentration Areas are actual, potential or historic areas in coastal waters, in which one or more species of shellfish aggregate.

Policy #38

To manage the state's fisheries in order to promote the economic benefits of commercial and recreational fishing, enhance recreational fishing opportunities, optimize the yield of all species, prevent the depletion or extinction of indigenous species, maintain and enhance the productivity of natural estuarine resources and preserve healthy fisheries resources for future generations. [CGS Section 22a-92(c)(1)(I)]

Policy #39

The department of health services is empowered to prohibit the taking or harvesting of shellfish in certain tidal flats, shores and coastal waters whenever it finds by examinations and surveys that such flats, shores or coastal waters are contaminated or polluted to the extent that the waters do not meet standards of purity established by said department, and that shellfish obtained therefrom may be unfit for food and dangerous to the public health. Such closure may be permanent, temporary or contingent upon the occurrence of specified events. [CGS Section 19a-98(a)]

Policy #40

The department of health services may inspect shellfish beds and areas in this state where shellfish are grown or harvested for market, all boats, tools and appliances used in the production and preparation of shellfish for market and all wharves or buildings where shellfish are opened, packed and prepared for sale

or shipment. It may prescribe regulations for the sanitary growth, production and preparation of shellfish for market. [CGS Section 19a-96]

Policy #41

Nothing in Sections 19a-95 to 19a-101, inclusive, shall prohibit the taking of shellfish by commercial harvesters from permanently closed areas when they are removed for transplanting to approved areas under permits issued by the department of health services and under supervision of state and local health agencies having jurisdiction. [CGS Section 19a-101]

COMPLIANCE

According to CT DEEP mapping, the waters of the Pequonnock River/Bridgeport Harbor are designated "Prohibited" for commercial shellfish harvesting, and there is no recreational shellfishing permitted in the area. Although the harbor historically served as shellfish habitat, and an area is leased for limited harvest to the south of the Site, the proposed footprint of the new combined cycle facility at the BHS site is landward of mean high water and will not impact shellfish. However, there will be measures in place to prevent oil from entering the adjacent coastal waterways, including the construction of appropriate secondary containments. The secondary containments will not discharge uncontrolled during a storm event. The containments will be drained after inspection, through a petro barrier, and after the storm event ends.

The containments are sized to be able to fully contain 110% of the tank inventory including rain quantities, as required by the applicable CT DEEP regulations. Tank level indications will be provided both locally and in the new plant Control Room on a continuous basis. Local and Control Room level alarms and interlocks will be installed to prevent over-filling of the tank.

PSEG's current Spill Prevention, Control, and Countermeasure Plan for the existing site will be updated to include the new Facilities. The spill response plan will be revised prior to placing the new systems in service. Spill prevention provisions are included in the design, including the aforementioned integrated containment, the containment drainage features which will include engineered petroleum product barriers, and the necessary level monitoring instrumentation. Also, appropriate spill protection provisions, soil erosion and sediment control measures, and stormwater management are included in the design.

The Project includes renovation to the existing fuel dock terminal facility at BHS that was damaged during Superstorm Sandy on October 29, 2012. The repairs will involve the demolition and removal of portions of the existing timber walkways, maintenance repairs to existing platforms and mooring dolphins, construction of new walkways, and upgrading and replacing existing fender units and mooring hardware. No new piers or piles are planned as part of this work. The amount of in-water work is minimal, consisting primarily of repairs to the concrete surfaces of the piers, and impacts to fisheries, finfish, and shellfish are not expected because the proposed work will not result in substantial underwater noise (i.e., no pile driving) and will not result in the resuspension of bottom sediments. In addition, the repairs will result in a net reduction in over water/over bottom shading, representing a minor local improvement to the

aquatic habitat. The length of walkway will be reduced by approximately 40% from the existing oil dock design.

Minor, temporary impacts to benthic shellfish habitat associated with barge spuds during construction are expected to be minimal and highly localized to two specific areas to the east of the station, near the shoreline. It is not expected that this activity will result in the depletion or extinction of indigenous species, and will maintain and enhance the productivity of natural estuarine resources and preserve healthy fisheries resources for future generations. As such, the proposed Project is in compliance with this policy.

2.12 Shorelands

Shorelands are those land areas within the coastal boundary exclusive of coastal hazard areas, which are not subject to dynamic coastal processes and which are comprised of typical upland features such as bedrock hills, till hills and drumlins. Also, shorelands are not located within coastal flood or erosion hazard areas and do not consist of tidal wetlands, beaches or dunes.

Policy #42

To regulate shoreland use and development in a manner which minimizes adverse impacts upon adjacent coastal systems and resources. [CGS Section 22a-92(b)(2)(I)]

COMPLIANCE

The BHS site is not located in areas designated as “shorelands” and is within the Coastal High Hazard Area. As such, this policy is not applicable.

2.13 Tidal Wetlands

Tidal Wetlands are those areas which border on or lie beneath tidal waters, such as, but not limited to banks, bogs, salt marsh, swamps, meadows, flats, or other low lands subject to tidal action, including those areas now or formerly connected to tidal waters, and whose surface is at or below an elevation of one foot above local extreme high water; and upon which may grow or be capable of growing salt tolerant plants.

Policy #43

To preserve tidal wetlands and to prevent the despoliation and destruction thereof in order to maintain their vital natural functions. [CGS Section 22a-92(b)(2)(E)]

Policy #44

To encourage the rehabilitation and restoration of degraded tidal wetlands. [CGS Section 22a-92(b)(2)(E)]

Policy #45

Where feasible and environmentally acceptable, to encourage the creation of wetlands for the purpose of shellfish and finfish management, habitat creation and dredge spoil disposal. [CGS Section 22a-92(b)(2)(E)]

Policy #46

It is declared that much of the wetlands of this state have been lost or despoiled by unregulated dredging, dumping, filling and like activities and despoiled by these and other activities, that such loss or despoliation will adversely affect, if not entirely eliminate, the value of such wetlands as sources of nutrients to finfish, crustacea and shellfish of significant economic value; that such loss or despoliation will destroy such wetlands as habitats for plants and animals of significant economic value and will eliminate or substantially reduce marine commerce, recreation and aesthetic enjoyment and that such loss of despoliation will, in most cases, disturb the natural ability of tidal wetlands to reduce flood damage and adversely affect the public health and welfare; that such loss or despoliation will substantially reduce the capacity of such wetlands to absorb silt and will thus result in the increased silting of channels and harbor areas to the detriment of free navigation. Therefore, it is declared to be the public policy of this state to preserve the wetlands and to prevent the despoliation and destruction thereof. [CGS Section 22a-28 as referenced by CGS Section 22a-92(a)(2)]

Policy #47

To disallow any filling of tidal wetlands and nearshore, offshore and intertidal waters for the purpose of creating new land from existing wetlands and coastal waters which would otherwise be undevelopable, unless it is found that the adverse impacts on coastal resources are minimal. [CGS Section 22a-92(c)(1)(B)]

Policy #48

In granting, denying or limiting any permit the commissioner or his duly designated hearing officer shall consider the effect of the proposed work with reference to the public health and welfare, marine fisheries, shellfisheries, wildlife, the protection of life and property from flood, hurricane and other natural disasters, and the public policy set forth in Sections 22a-28 to 22a-35 inclusive. The fact that the department of energy and environmental protection is in the process of acquisition of any tidal wetlands by negotiation or condemnation under the provisions of Section 26-17a, shall be sufficient basis for denial of any permit. [CGS Section 22a-33 as referenced by CGS Section 22a-92(a)(2)]

COMPLIANCE

Tidal wetlands are present at the BHS site, located east of the proposed Project site. The construction of the proposed Project will not result in the filling of this wetland area. The closest proposed activity is approximately 150 feet away with no surface or hydraulic connections. The boundaries of these wetlands were determined by a field delineation conducted on April 9, 2014 by GEI Consultants, Inc. (GEI 2014). The locations of the delineated wetlands delineated are shown in Figure 7. A Jurisdictional

Determination (JD) will be filed with the United States Army Corps of Engineers (USACE) to document and memorialize the federally jurisdictional wetlands on the site.

During the field assessment and delineation, two vegetated pocket wetland systems were identified in the southeast portion of the Site. Based on historic aerials, the majority of these wetland areas were once part of Bridgeport Harbor. “Tongue Point” extended through the southern wetland and apparent industrial development extended up to the west side of both wetlands. The two areas are separated from the Sound by a fill embankment topped by a paved road which is generally oriented north to south on the east side of the wetlands and east to west along the south side of the wetlands. The fill embankment is typically 20 to 40 feet wide on the east side and approximately 60 to 100 feet wide to the south. A lighthouse is located at the southeast corner (on the outside of the 90 degree bend) of the roadway. While NWI mapped this area as a single wetland system, an east-west vegetated berm separates the area into two distinct systems.

The northern pocket wetland is discussed above under Freshwater Wetlands and Watercourses above. The southern wetland area has a tidal connection, is approximately rectangular in shape, and is within a bermed or otherwise filled perimeter. The filled side slopes are generally 2:1 or steeper (GEI 2014). Sections of the wetland appear to be open water habitat that are permanently flooded at low tide.

The southern wetland interior, which as stated above has a tidal influence, has varying topography including hummocks, concrete, an interior low berm in the southeast corner, and shallow fill along the west side. Standing water occupies approximately half of the wetland and the bottom elevation is 2 to 3 feet below elevation of the northern (non-tidal) wetland bottom.

Wetland soils (very poorly drained and hydric) consisted of a black, muck and peat. The non-wetland side slopes on the north and east sides consisted of sand and gravel intermixed with varying amounts of brick, concrete and coal slag. These materials including larger pieces of concrete and metal were noted along the southern and western side slopes. Areas along the eastern and southern side of the southern wetland contained debris apparently from the overtopping of the roadway, likely during Hurricane sandy.

A culvert located along the east side of the wetland connects to the intertidal zone through the east berm and beneath the roadway. The construction of the culvert could not be ascertained as it was inundated at the time of field delineation. Surface water on the west side of the culvert, within the wetland, was clearly subject to tidal action. The pipe outfall is located below the spring high water mark within the rock revetment.

The southern wetland pocket system is a salt marsh habitat dominated by common reed; however, many native plants were identified in each tidal zone including smooth cordgrass (*Spartina alterniflora*) in the low marsh, sea lavender (*Limonium carolinianum*) and saltmeadow cordgrass (*Spartina patens*) in the high marsh, and marsh elder (*Iva frutescens*) and groundseltree (*Baccharis halimifolia*) in the spring tide zone. This wetland system corresponds to the NWI’s Cowardin classification of E2EM1Ph: estuarine (E), intertidal (2), emergent (EM), persistent (1), irregularly flooded

(P), and diked/impounded (h). Sections of the wetland appear to be open water habitat that are permanently flooded at low tide.

The wetland area transitions abruptly along the north berm and eastern road edge slopes; these areas are dominated by weedy groundcovers, black locust and tree-of-heaven (*Ailanthus altissima*). The wetland transition is more gradual to the south and west shifting into a forest fringe dominated by black locust and oak species. Ribbed mussels were abundant along the hummocks bordering the open water zone. Great egret (*Ardea alba*), mallard (*Anas platyrhynchos*), Canada goose (*Branta canadensis*), mourning dove (*Zenaida macroura*), and redwing blackbird (*Agelaius phoeniceus*) were observed and wild turkey (*Meleagris gallopavo*) tracks were noted. (GEI 2014).

The construction of the proposed Project at the BHS will not result in the filling of this wetland area. During construction, appropriate soil erosion and sediment control measures (e.g., silt fence, etc.) will be installed to prevent loose sediment from entering the wetland. As such, the proposed Project is in compliance with this policy.

3.0 Consistency with Applicable Statutory Coastal Use Activity Goals and Policies

As stated in the July 1999 edition of the Connecticut Department of Energy and Environmental Protection (CT DEEP) Reference Guide to Coastal Policies and Definitions, the coastal policies developed for the Connecticut Coastal Management Act (CCMA) provide uniform standards and criteria for all public agencies that conduct or regulate activities subject to the management program. The CCMA is based on policies, which are grouped into the following categories: General Development, Boating, Coastal Recreation and Access, Coastal Structures and Filling, Cultural Resources, Dams, Dikes & Reservoirs, Dredging and Navigation, Energy Facilities, Fisheries, Fuel, Chemical & Hazardous Materials, Open Space and Agricultural Lands, Ports and Harbors, Sewer and Water Lines, Solid Waste, Transportation and Water-dependent Uses. The following discussion identifies the coastal use policies, and includes an assessment of how the proposed project relates to those policies.

3.1 General Development

General Development Policies include:

> *Policy #49*
>
> To ensure that the development, preservation or use of land and water resources of the coastal area proceeds in a manner consistent with the capability of the land and water resources to support development, preservation or use without significantly disrupting either the natural environment or sound economic growth (CGS §22a-92(a)(1)).
>
> *Policy #50*
>
> Preserve and enhance coastal resources in accordance with the policies established by chapters 439, 440, 446i, 446k, 447, 474 and 477.2 (CGS §22a-92(a)(2)).

Policy #51

Coordinate planning and regulatory activities of public agencies at all levels of government to ensure maximum protection of coastal resources while minimizing conflicts and disruption of economic development (CGS §22a-92(a)(9)).

COMPLIANCE

The proposed Project is consistent with the above policies. The proposed combined cycle facility and related improvements at the existing BHS site will result in the continued use of an existing industrial site for the generation of energy. Energy production has occurred at the site since the first generating unit at Bridgeport Harbor Station became operational in 1957.

As the development will occur within a previously disturbed industrial site, potential environmental impacts to coastal resources are avoided to the maximum extent practicable as compared to the development of a similar project on a "greenfield" site within the coastal zone. The proposed Project will continue to support economic growth, by allowing the continued generation of energy to meet projected demand and by providing employment and tax revenues. Therefore, the proposed Project will be consistent with existing land use, will not disrupt the natural environment, and will support sound economic growth.

Further, the proposed combined cycle facility and related improvements will occupy previously developed areas of the BHS site, including areas currently occupied by the existing Bridgeport Harbor Generating Station's four fuel oil storage tanks. Excepting the stormwater outfall, all permanent features related to the new developments are above the Connecticut Coastal Jurisdiction Line (Elevation 5' NAVD88), above mean higher high water (MHHW, 3.48' NAVD88), and outside of delineated tidal wetlands. To facilitate construction, temporary barge unloading areas are proposed along the Pequonnock River/Bridgeport Harbor shoreline. Barges will be used to deliver materials and major equipment to the construction site, and will be anchored to the bottom using retractable spuds. Equipment and materials will be offloaded using temporary bridging equipment.

The proposed Project is in compliance with this policy.

3.2 Boating

Policy #52

To encourage increased recreational boating use of coastal waters, where feasible, by (i) providing additional berthing space in existing harbors, (ii) limiting non-water-dependent land uses that preclude boating support facilities, (iii) increasing state-owned launching facilities, and (iv) providing for new boating facilities in natural harbors, new protected water areas and in areas dredged from dry land. [CGS Section 22a-92(b)(1)(G)]

Policy #53

To protect coastal resources by requiring, where feasible, that such boating uses and facilities (i) minimize disruption or degradation of natural coastal resources, (ii) utilize existing altered, developed or redevelopment areas, (iii) are located to assure optimal distribution of state-owned facilities to the state-wide boating public and (iv) utilize ramps and dry storage rather than slips in environmentally sensitive areas. [CGS Section 22a-92(b)(1)(H)]

Policy #54

To protect and where feasible, upgrade facilities serving the commercial fishing and recreational boating industries. [CGS Section 22a-92(b)(1)(I)]

Policy #55

To maintain existing authorized commercial fishing and recreational boating harbor space unless the demand for these facilities no longer exists or adequate space has been provided. [CGS Section 22a-92(b)(1)(I)]

Policy #56

To design and locate, where feasible, proposed recreational boating facilities in a manner which does not interfere with the needs of the commercial fishing industry.[CGS Section 22a-92(b)(1)(I)]

Policy #57

In performance of his duties under part II the commissioner shall (1) Classify all waters and all vessels for the purpose of establishing uniformity in the regulation of such waters and such vessels; (2) prescribe uniform navigation aids for state waters and regulate the use of such aids; (3) establish restricted zones or sea lanes within navigable waters and adopt regulations pertaining thereto for the purpose of protecting the natural ecology of such waters and the abutting shoreline from environmental damage resulting from marine accidents which cause the release of petroleum products or other hazardous substances and materials into the waters of the state, provided before establishing such lanes, zones and regulations the commissioner shall consider at least the following factors: (i) The danger in transporting the type of material; (ii) the evidence of deleterious incidents arising from the transportation of such hazardous materials; (iii) available alternatives; (iv) the public need; and (v) the effect on interstate commerce; and further provided any such regulations promulgated by the commissioner shall list and define the substance and materials which are classified as hazardous; (4) prescribe uniform standards for safety devices and equipment required by part II and certify the types of devices and equipment which meet such standards; (5) designate and assist the several towns in designating prohibited and restricted boating areas and waters limited to special boating purposes and prescribe uniform standards for the marking and regulation of such areas; (6) adopt such regulations respecting water skiing and underwater swimming and diving as he finds necessary for public safety; (7) study, plan and recommend the development of boating facilities, safety education and means of improving boating safety; (8) in cooperation with the department of health, investigate matters relating to and recommended means of improving boating sanitation; (9) cooperate with the department of transportation and the bureau of aeronautics concerning regulations governing

the operation of seaplanes on state waters; (10) cooperate with the United States and the several states in promoting uniformity of boating laws and regulations and their administration and enforcement, and (11) subject to the applicable provisions of chapter 54 and Section 4-117 and the limitations of part II, adopt such regulations to provide for public safety and environmental quality as he finds necessary to administer and enforce the provisions of said part and to promote the safe use and protection of waters and the safe operation of vessels, provided the commissioner shall make no regulations respecting the operation of vessels on Long Island Sound except as are necessary to secure inshore waters and establish and secure restricted areas. [CGS Section 15-121(b)]

COMPLIANCE

The development of the proposed combined cycle facility and related improvements at the existing Bridgeport Harbor Generating Station site does not affect existing or potential boating opportunities in the project area; therefore, this policy is not applicable.

3.3 Coastal Recreation and Access

Policy #58

To encourage public access to the waters of Long Island Sound by expansion, development and effective utilization of state-owned recreational facilities within the coastal area that is consistent with sound resource conservation procedures and constitutionally protected rights of private property owners. [CGS Section 22a-92(a)(6)]

Policy #59

To make effective use of state-owned coastal recreational facilities in order to expand coastal recreational opportunities including the development or redevelopment of existing state-owned facilities where feasible.[CGS Section 22a-92(c)(1)(J)]

Policy #60

To require as a condition in permitting new coastal structures, including but not limited to, groins, jetties or breakwaters, that access to, or along, the public beach below mean high water must not be unreasonably impaired by such structures and to encourage the removal of illegal structures below mean high water which unreasonably obstruct passage along the public beach. [CGS Section 22a-92(c)(1)(K)]

Policy #61

In making grants-in-aid for open space land acquisition or development from out of funds authorized before July 1, 1998, the Commissioner of Environmental Protection shall: (a) Seek to achieve a reasonable balance among all parts of the state in the relative adequacy of present areas devoted to recreational and conservation purposes and the relative anticipated future needs for additional areas devoted to recreational and conservation purposes; (b) give due consideration to the special park requirement needs of urban areas; (c) wherever possible, give priority to land which will be utilized for multiple

recreational and conservation purposes; (d) give due consideration to coordination with the plans of departments of the state and regional planning agencies with respect to land use or acquisition; and (e) give primary consideration to the needs of municipalities that have formed local housing partnerships pursuant to the provisions of section 8-336f.

Policy #62

Maintenance of areas and facilities for recreation or natural resources purposes to such extent as may be necessary to assure the proper operation and maintenance of areas and facilities acquired by municipalities or regional authorities pursuant to any program participated in by this state under authority of sections 22a-21 to 22a-26, inclusive, such areas and facilities shall be publicly maintained for outdoor recreation or natural resources purposes, and such city or other local governmental unit shall give such assurances to the state as may be required by the Commissioner of Environmental Protection, that it has available sufficient funds to meet its share of the cost of the project and that the acquired or developed areas will be operated and maintained at municipal or regional expense for public outdoor recreation or natural resources use.

COMPLIANCE

Public access to the waterfront from the existing Bridgeport Harbor Generating Station site is not appropriate in light of security requirements, including any applicable U.S. Coast Guard Maritime Security (MARSEC) requirements, associated with protection of the critical energy infrastructure located on-site. Further, the development of the proposed Project does not involve the use of state-owned recreational facilities and does not affect coastal recreational opportunities, including access to the public beach. New coastal structures are not proposed and there are no public beaches at or near the Project Site. Development of the proposed Project does not involve open space land acquisitions or development. Development of the proposed Project does not involve or impact recreation or natural resource areas. Therefore, the Project is in compliance with this policy.

3.4 Coastal Structures and Filling

Policy #63

To require that structures in tidal wetlands and coastal waters be designed, constructed and maintained to minimize adverse impacts on coastal resources, circulation and sedimentation patterns, water quality, and flooding and erosion, to reduce to the maximum extent practicable the use of fill, and to reduce conflicts with the riparian rights of adjacent landowners. [CGS Section 22a-92(b)(1)(D)]

Policy #64

Disallow any filling of tidal wetlands and nearshore, offshore and intertidal waters for the purpose of creating new land from existing wetlands and coastal waters which would otherwise be undevelopable, unless it is found that the adverse impacts on coastal resources are minimal. [CGS Section 22a-92(c)(1)(B)]

Policy #65

To require as a condition in permitting new coastal structures, including but not limited to, groins, jetties or breakwaters, that access to, or along, the public beach below mean high water must not be unreasonably impaired by such structures.

Policy #66

To encourage the removal of illegal structures below mean high water which unreasonably obstructs passage along the public beach.

Policy #67

To maintain, enhance, or, where feasible, restore natural patterns of water circulation and fresh and saltwater exchange in the placement or replacement of culverts, tide gates or other drainage or flood control structures.

Policy #68

The Commissioner of Environmental Protection shall regulate dredging and the erection of structures and the placement of fill, and work incidental thereto, in the tidal, coastal or navigable waters of the state waterward of the high tide line. Any decisions made by the commissioner pursuant to this section shall be made with due regard for indigenous aquatic life, fish and wildlife, the prevention or alleviation of shore erosion and coastal flooding, the use and development of adjoining uplands, the improvement of coastal and inland navigation for all vessels, including small craft for recreational purposes, the use and development of adjacent lands and properties and the interests of the state, including pollution control, water quality, recreational use of public water and management of coastal resources, with proper regard for the rights and interests of all persons concerned.

COMPLIANCE

The proposed Project will not adversely impact the circulation and sedimentation patterns, water quality, flooding and erosion. In-water work consists of a stormwater outfall that will be constructed in the tidal waters of Bridgeport Harbor and concrete repairs to the existing oil dock. The discharge of stormwater will be in compliance with CT DEEP and City requirements as described in the stormwater management report. There are no public beaches within or near the Project Site. Development of the proposed Project on previously disturbed/developed areas will not impact any fresh or saltwater circulation patterns in the area. Development of the proposed Project will not require any dredging in tidal, coastal or navigable waters or the erection of any structures or placement of any fill in these areas.

Another in-water activity involves renovation to the existing fuel dock terminal facility at BHS that was damaged during Superstorm Sandy on October 29, 2012 and is not currently used due to disrepair. The repairs will re-establish fuel oil unloading capabilities. The existing oil dock was designed for oil tankers much larger than necessary to support the new Facility, so the repairs to the existing dock will involve demolition and removal of portions of the existing timber walkways, performing maintenance repairs to existing platforms and mooring dolphins, constructing new

walkways, and upgrading and replacing existing fender units and mooring hardware. No new piers are necessary. The proposed Project is in compliance with this policy.

3.5 Cultural Resources

Policy #69

To require reasonable mitigation measures where development would adversely impact historical, archaeological, or paleontological resources that have been designated by the state historic preservation officer. [CGS Section 22a-92(b)(1)(J)]

Policy #70

Any municipality may, by vote of its legislative body and in conformance with the standards and criteria formulated by the Connecticut Commission on Culture and Tourism, establish within its confines an historic district or districts to promote the educational, cultural, economic and general welfare of the public through the preservation and protection of the distinctive characteristics of buildings and places associated with the history of or indicative of a period or style of architecture of the municipality, of the state or of the nation. [CGS Section 7-147a(b)].

Policy #71

The legislative body of any municipality may make appropriations for the purpose of carrying out the provisions of this part.

Policy #72

Any municipality or private organization may acquire, relocate, restore, preserve and maintain historic structures and landmarks and may receive funds from the state and federal governments for such purposes. Grants-in-aid may be made to owners of historic structures or landmarks in an amount not to exceed fifty per cent of the nonfederal share of the total cost of such acquisition, relocation, historic preservation and restoration. Grants-in-aid shall be made through an assistance agreement signed by the owner. Subsequent to the execution of any such assistance agreement, advances of funds may be made by the commission to the owner of such an historic structure or landmark.

Policy #73

It is found that the lower Connecticut River and the towns abutting the river possess unique scenic, ecological, scientific and historic value contributing to public enjoyment, inspiration and scientific study, that it is in the public interest that the provisions of this chapter be adopted to preserve such values and to prevent deterioration of the natural and traditional riverway scene for the enjoyment of present and future generations of Connecticut citizens and that the powers of the Commissioner of Environmental Protection, conferred by the provisions of section 22a-25, should be exercised in the furtherance of the purposes hereof in conformity with his general responsibility to preserve the natural resources of the state.

Policy #74

The commission may, using such funds as may be appropriated to it or available from any other source, acquire by gift, grant, bequest, devise, lease, purchase or otherwise historic structures or landmarks, including such adjacent land as may be necessary for the comfort and safety of the visiting public, which the commission determines to be of national or state historical importance and to be of such concern to the public at large that they should be held forever in good condition for visitation by the public and for the protection of the heritages of the people of this state and nation. The commission may restore, maintain and operate, or may lease to private organizations or municipalities for the purpose of restoring, maintaining and operating, such properties in such a condition as to render them suitable for public visitation and to inform the public of the historic event or circumstance connected therewith. The commission may charge reasonable visitation or special event fees, and operate or contract for the operation of gift shops at such properties and use funds received to help defray the cost of maintenance and operation of such properties and to replenish stock. The commission may cooperate with the Department of Environmental Protection and any other appropriate municipal, state or federal agency or private organization in carrying out functions under this section and may enter into agreements for such purposes.

COMPLIANCE

The Connecticut State Historic Preservation Office (SHPO) concurred that no historic properties will be affected by the proposed Combined Cycle Project and no further review was needed. The confirmation letter from Connecticut SHPO is included in Appendix A. The closest historic resource to the Project site is the State and National Register of Historic Places-listed Tongue Point Lighthouse, nearly 600 feet away, at the eastern end of the peninsula known as Tongue Point. The Mary and Eliza Freeman Houses at 354 and 360 Main Street (S/NR-listed and Connecticut Freedom Trail) are still further removed from the proposed Project, in excess of approximately 800 feet from the nearest feature of the Project site.

The Project site also has a low sensitivity for archaeological resources because it is located on land largely reclaimed from Bridgeport Harbor in the late 19th and early 20th century. The Bridgeport Harbor Station has operated at this location since 1957. The plant's Unit 1 generator became operational in 1957 as a coal burning facility. Bulk coal storage was located in approximately the same area as it is today. A second coal-burning unit (Unit 2) was added to the plant in 1961 and by 1968 the third BHS generating unit (Unit 3) was operational. Today, Unit 3 and a 20 MW peaking turbine remain operational at the site. A total of 3 exhaust stacks are located at the site, the tallest of which is 498 feet above grade. Therefore, the proposed combined cycle facility and related improvements will be located on a developed property that is the location of existing generating units, including all visible appurtenances such as the existing exhaust stacks, boilers; oil tanks, and barge docks.

In light of this existing industrial development, the proposed addition of the equipment required in support of the combined cycle facility, including the proposed 300-foot exhaust stack, will result in an incremental change in the appearance of the Bridgeport

Harbor Generating Station Property. The proposed 300-foot stack will be lower than the existing 498-foot stack at the site and the remaining facility structures will be generally consistent with the height of the other structures at the BHS site. Therefore, the potential for indirect impacts as a result of the proposed combined cycle facility and related improvements will be limited, to a large extent, by the siting of the facility at an existing site that has been used for the generation of power for many years and by the presence of several other industrial facilities in this portion of the City of Bridgeport.

Therefore, the potential for indirect impacts as a result of the proposed Project and related improvements will be limited, to a large extent, by the siting of the facility at an existing site that has been used for the generation of power for many years and by the presence of several other industrial facilities in this portion of the City of Bridgeport. As noted, the Connecticut SHPO concurred that no historic properties will be affected by the proposed combined cycle project. Compliance with this policy is met.

3.6 Dams, Dikes and Reservoirs

Policy #75

All dams, dikes, reservoirs and other similar structures, with their appurtenances, without exception and without further definition or enumeration herein, which, by breaking away or otherwise, might endanger life or property, shall be subject to the jurisdiction conferred by this chapter. [CGS Section 22a-401 formerly CGS Section 25-110, as referenced by CGS Section 22a-92(a)(2)]

Policy #76

The commissioner or his representative, engineer or consultant shall determine the environmental impact of the construction work on the inland wetlands of the state, in accordance with the provisions of Sections 22a-36 to 22a-45, inclusive, and the need for a fishway in accordance with the provisions of Section 26-136, and examine the documents and inspect the site, and, upon approval thereof, the commissioner shall issue a permit authorizing the proposed construction work under -such conditions as the commissioner may direct. [CGS Section 22a-403 formerly CGS Section 25-112 as referenced in CGS Section 22a-92(a)(2)]

COMPLIANCE

The proposed Project does not involve the construction or maintenance of dams, dikes, or reservoirs. As such, this policy is not applicable.

3.7 Dredging and Navigation

Policy #77

To encourage, through the state permitting program for dredging activities, the maintenance and enhancement of existing federally maintained navigation channels, basins and anchorages. [CGS Section 22a-92(c)(1)(C)]

Policy #78

To discourage the dredging of new federally maintained navigation channels, basins and anchorages. [CGS Section 22a-92(c)(1)(C)]

Policy #79

To reduce the need for future dredging by requiring that new or expanded navigation channels, basins and anchorages take advantage of existing or authorized water depths, circulation and siltation patterns and the best available technologies for reducing controllable sedimentation. [CGS Section 22a-92(c)(1)(D)]

Policy #80

To disallow new dredging in tidal wetlands except where no feasible alternative exists and where adverse impacts to coastal resources are minimal. [CGS Section 22a-92(c)(1)(E)]

Policy #81

The commissioner of environmental protection shall regulate the taking and removal of sand, gravel and other materials from lands under tidal and coastal waters with due regard for the prevention or alleviation of shore erosion, the protection of necessary shellfish grounds and finfish habitats, the preservation of necessary wildlife habitats, the development of adjoining uplands, the rights of riparian property owners, the creation and improvement of channels and boat basins, the improvement of coastal and inland navigation for all vessels including small craft for recreational purposes and the improvement, protection or development of uplands bordering upon tidal and coastal waters, with due regard for the rights and interests of all persons concerned. [CGS Section 22a-383 as referenced by CGS 22a-92(a)(2)]

Policy #82

Harbor masters shall have the general care and supervision of the harbors and navigable waterways over which they have jurisdiction, subject to the discretion and control of the commissioner of transportation, and shall be responsible to the commissioner for the safe and efficient operation of such harbor and navigable waterways in accordance with the provisions of this chapter. The commissioner may delegate, any of his powers and duties under this chapter to such harbor masters or to any existing board of harbor commissioners, but shall at all times be vested with responsibility for the overall supervision of the harbors and navigable waterways of the state. [CGS Section 15-1]

COMPLIANCE

Dredging or alteration of existing water depths for circulation/siltation patterns are not proposed in support of the development of the proposed combined cycle facility and related improvements. Therefore, this policy is not applicable.

3.8 Energy Facilities

Policy #83

The legislature finds that power generating plants and transmission lines for electricity and fuels, community antenna television towers and telecommunication towers have had a significant impact on the environment and ecology of the state of Connecticut; and that continued operation and development of such power plants, lines and towers, if not properly planned and controlled, could adversely affect the quality of the environment, the ecological, scenic, historic and recreational values of the state. The purposes of this chapter are: to provide for the balancing of the need for adequate and reliable public utility services at the lowest reasonable cost to consumers with the need to protect the environment and ecology of the state and to minimize damage to scenic, historic, and recreational values; to provide environmental quality standards and criteria for the location, design, construction and operation of facilities for the furnishing of public utility services at least as stringent as the federal environmental quality standards and criteria, and technically sufficient to assure the welfare and protection of the people of the state; to encourage research to develop new and improved methods of generating, storing and transmitting electricity and fuel and of transmitting and receiving television and telecommunications with minimal damage to the environment and other values described above; to require annual forecasts of the demand for electric power, together with identification and advance planning of the facilities needed to supply that demand and to facilitate local, regional, state-wide and interstate planning to implement the foregoing purposes. [CGS Section 16-50g]

Policy #84

In a certification proceeding, the council shall render a decision upon the record either granting or denying the application as filed, or granting it upon such terms, conditions, limitations or modifications of the construction or operation of the facility as the council may deem appropriate. The council's decision shall be rendered within twelve months of the filing of an application concerning a facility described in subdivisions (1) to (3), inclusive, of subsection (a) of Section 16-50i or subdivision (4) of said subsection if the application was incorporated in an application concerning a facility described in subdivision (1) of said subsection, and within one hundred eighty days of the filing of any other application concerning a facility described in subdivision (4) of said subsection and an application concerning a facility described in subdivisions (5) and (6) of said subsection, provided such time periods may be extended by the council by not more than one hundred eighty days with the consent of the applicant. The council shall file, with its order, an opinion stating in full its reasons for the decision. The council shall not grant a certificate, either as proposed or as modified by the council, unless it shall find and determine: (1) A public need for the facility and the basis of the need; (2) the nature of the probable environmental impact, including a specification of every significant adverse effect, whether alone or cumulatively with other effects, on, and conflict with the policies of the state concerning the natural environment, ecological balance,

public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish and wildlife; (3) why the adverse effects or conflicts referred to in subdivision (2) of this subsection are not sufficient reason to deny the application; (4) in the case of an electric transmission line, (A) what part, if any, of the facility shall be located overhead, (B) that the facility conforms to a long-range plan for expansion of the electric power grid of the electric systems serving the state and interconnected utility systems and will serve the interests of electric system economy and reliability, and (C) that the overhead portions of the facility, if any, are consistent with the purposes of this chapter, with such regulations as the council may adopt pursuant to subsection (a) of Section 16-50t, and with the Federal Power Commission "Guidelines for the Protection of Natural Historic Scenic and Recreational Values in the Design and Location of Rights-of-Way and Transmission Facilities" or any successor guidelines and any other applicable federal guidelines; (5) in the case of an electric or fuel transmission line, that the location of the line will not pose an undue hazard to persons or property along the area traversed by the line. [CGS Section 16-50p(a)]

COMPLIANCE

The Project will comply with this policy. The primary combined cycle development Site is currently the site of four large, above-ground existing fuel oil storage tanks that support operation of the existing Bridgeport Harbor Generating Station, a water-dependent use. The four existing oil tanks have a combined total storage capacity of approximately 28.5 million gallons.

Construction of the new combined cycle facility will require the demolition and removal of the existing four fuel oil storage tanks and the associated piping and pumping facilities; followed by the remediation of the soil under and around the tanks. Remedial activities will be in accordance with the state of Connecticut cleanup standards, known as the Remediation Standards Regulations. Three of the existing oil storage tanks at the site are currently not in use. They have been cleaned in anticipation of demolition, which will occur as part of a separate project. The final storage tank is the current source of fuel oil that is required for startup of the station's existing Unit #3. Therefore, prior to the start of the demolition program a new startup fuel oil delivery, storage and forwarding system must be constructed at a new location closer to Unit 3. The new Unit's Fuel Oil Storage Tank is anticipated to have a storage capacity of approximately 5.5 million gallons.

As noted previously, the new combined cycle facility is being proposed to help meet the region's growing demand for electricity. The generation of electricity is an essential public service that not only supports the regional economy but also is a critical component to the reliable operation of many safety and security systems.

In addition to the proposed ULSD storage tank, a 20,000-gallon aqueous ammonia storage tank (19% solution) is also required to support operation of the facilities selective catalytic reduction system (SCR), which is a component of the 14 facility's air emissions control systems. The ammonia storage facility will be designed in accordance with applicable state, federal, and local requirements.

Facilities for the delivery, bulk storage and transfer of the multiple chemicals required for maintaining auxiliary cooling water chemistry and injection into the feedwater/steam cycle for the new unit(s) will also be required. Process drains from equipment and chemical storage areas, which may have contaminants, will be directed to a central wastewater sump, treated in an oil/water separator and be pumped for discharge to the city sewer system in accordance with City of Bridgeport Water Pollution Control Authority effluent limitations and discharge permit conditions.

The Project is in compliance with this policy. The development of the combined cycle project will result in a significant reduction in the potential oil storage capacity at the station site. The proposed fuel oil storage tanks will replace four existing fuel oil tanks, each with a potential storage capacity in excess of approximately 7 million gallons. The new ULSD tank for the proposed combined cycle facility will have a storage capacity of approximately 5.5 million gallons. All fuel storage and handling facilities will be provided with spill protection, collection, and treatment technologies to minimize the risk that fuel will be released into the estuarine environment. Similarly, hazardous or potentially hazardous chemicals will be stored with appropriate environmental spill controls and containment, and all discharges will be made in accordance with NPDES effluent limitations and discharge permit conditions. Moreover, the proposed oil and chemical storage and use is associated with the generation of electricity, an essential public service, at an existing industrial site that has been used for the generation of electricity for many years. The use of ULSD as a back-up fuel will assist in ensuring fuel diversity and operational flexibility, which in turn, will result in increased operational reliability and dependability of the facility, particularly during the winter months when natural gas supplies may be unavailable at the site.

3.9 Fisheries

Policy #85

To manage the state's fisheries in order to promote the economic benefits of commercial and recreational fishing, enhance recreational fishing opportunities, optimize the yield of all species, prevent the depletion or extinction of indigenous species, maintain and enhance the productivity of natural estuarine resources and preserve healthy fisheries resources for future generations. [CGS Section 22a-92(c)(1)(I)]

Policy #86

The party States, for the purpose of promoting the restoration of Anadromous Atlantic salmon, hereinafter referred to as Atlantic salmon, to the Connecticut River basin by the development of a regional program for stocking, protection, management, research and regulation, do hereby establish the Connecticut River Atlantic Salmon Commission. [CGS Section 26-302, Article I]

COMPLIANCE

The National Marine Fisheries Service (NMFS) lists the Atlantic Ocean waters within Long Island Sound within the square affecting south of the following: Bridgeport, CT., Fairfield, CT., Blackrock, CT., Southport, CT., Green Farms, CT., and Greenfield, CT.,

along with Black Rock Harbor from the entrance to the Pequonnock River west to Sherwood Pt. (just east of Sherwood Mill Pond) within Long Island Sound as Essential Fish Habitat (EFH) for the species and life stages listed in Table 1.

Table 1
NMFS Essential Fish Habitat Species and Life Stages for the Project Area

Species Name	Eggs	Larvae	Juveniles	Adults
Atlantic salmon *(Salmo salar)*			X	X
Pollock *(Pollachius virens)*			X	X
Whiting *(Merluccius bilinearis)*				X
Red hake *(Urophycis chuss)*	X	X	X	X
Winter flounder *(Pseudopleuronectes americanus)*	X	X	X	X
Windowpane flounder *(Scophthalmus aquosus)*	X	X	X	X
American plaice *(Hippoglossoides platessoides)*			X	X
Ocean pout *(Macrozoarces americanus)*	X	X	X	X
Atlantic sea herring *(Clupea harengus)*			X	X
Bluefish *(Pomatomus saltatrix)*			X	X
Atlantic mackerel *(Scomber scombrus)*	X	X	X	X
Summer flounder *(Paralichthys dentatus)*			X	
Scup *(Stenotomus chrysops)*	X	X	X	X
Black sea bass *(Centropristis striata)*	n/a		X	
King mackerel *(Scomberomorus cavalla)*	X	X	X	X
Spanish mackerel *(Scomberomorus maculatus)*	X	X	X	X
Cobia *(Rachycentron canadum)*	X	X	X	X
Sand tiger shark *(Carcharias taurus)*		X		

The proposed Project will not adversely affect fisheries. Potential impacts to aquatic resources have been minimized through the incorporation of an air-cooled condenser into the facility design. Use of an air-cooled condenser not only eliminates the need for local surface water withdrawals but also eliminates the need for discharge of heated cooling water to Bridgeport Harbor. Process wastewater discharge will be minimal and directed to the municipal sanitary sewer system. Make-up water for the facility will also be obtained from municipal sources. Hence, potential impacts to aquatic resources are avoided.

Stormwater from the combined cycle site will be managed in accordance with CT DEEP and City of Bridgeport requirements. Prior to site disturbance a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the CT DEEP general permit "Stormwater and Dewatering Wastewaters from Construction Activities" (DEEP-WPED-GP-015) will be prepared and implemented. The SWPPP will conform to the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and will detail the appropriate soil erosion and sediment control measures that will be taken during construction (including, but not necessarily limited to silt fence, turbidity curtains around temporary barge activities, etc.) to prevent discharge of materials into the Bridgeport Harbor or increasing suspended sediment concentrations.

The Project includes renovation to the existing fuel dock terminal facility at BHS that was damaged during Superstorm Sandy on October 29, 2012. The repairs will involve the demolition and removal of portions of the existing timber walkways, maintenance repairs to existing platforms and mooring dolphins, construction of new walkways, and upgrading and replacing existing fender units and mooring hardware. No new piers or piles are planned as part of this work. The amount of in-water work is minimal, and impacts to fisheries, finfish, and shellfish are not expected because the proposed work will not result in substantial underwater noise (i.e., no pile driving) and will not result in the resuspension of bottom sediments. In addition, the repairs will result in a net reduction in over water/over bottom shading, representing a minor local improvement to the aquatic habitat. A reduction in walkway length of approximately 40% will be incorporated in the repair plans for the dock

Therefore, the Project is in compliance with this policy.

3.10 Fuel, Chemicals And Hazardous Materials

Policy #87

To minimize the risk of oil and chemical spills at port facilities.[CGS Section 22a-92(b)(1)(C)]

Policy #88

To disallow the siting within the coastal boundary of new tank farms and other new fuel and chemical facilities which can reasonably be located inland.[CGS Section 22a-92(b)(1)(E)]

Policy #89

To require any new storage tanks which must be located within the coastal boundary to abut existing storage tanks or to be located in urban industrial areas and to be adequately protected against floods and spills.[CGS Section 22a-92(b)(1)(E)]

Policy #90

To minimize the risk of spillage of petroleum products and hazardous substances. [CGS Section 22a-92(c)(1)(A)]

Policy #91

To provide effective containment and clean up facilities for accidental spills. [CGS Section 22a-92(c)(1)(A)]

Policy #92

To disallow offshore oil receiving systems that have the potential to cause catastrophic oil spills in the Long Island Sound estuary. [CGS Section 22a-92(c)(1)(A)]

Policy #93

The commissioner of environmental protection shall, to the extent possible, immediately, whenever there is discharge, spillage, uncontrolled loss, seepage or filtration of oil or petroleum or chemical liquids or solid, liquid or gaseous

products or hazardous wastes upon any land or into any of the waters of the state or into any offshore or coastal waters, which may result in pollution of the waters of the state, damage to beaches, wetlands, stream banks or coastal areas, or damage to sewers or utility conduits or other public or private property or which may create an emergency, cause such discharge, spillage, uncontrolled loss, seepage or filtration to be contained and removed or otherwise mitigated by whatever method said commissioner considers best and most expedient under the circumstances. The commissioner shall also determine the person, firm or corporation responsible for causing such discharge, spillage, uncontrolled loss, seepage or filtration. [CGS Section 22a-449(a), as referenced by CGS Section 22a-92(a)(2)]

Policy #94

The commissioner may: 1) License terminals in the state for the loading or unloading of oil or petroleum or chemical liquids or solid, liquid or gaseous products or hazardous wastes and shall adopt, in accordance with Chapter 54, reasonable regulations in connection therewith for the purposes of identifying terminals subject to licensure and protecting the public health and safety and for preventing the discharge, spillage, uncontrolled loss, seepage or filtration of oil or petroleum or chemical liquids or solid, liquid or gaseous product or hazardous wastes. Each license issued under this section shall be valid for a period of not more than one year commencing July first, unless sooner revoked by the commissioner and there shall be charged for each such license or renewal thereof a fee established by regulation and sufficient to cover the reasonable cost of the state of inspecting and licensing such terminals; 2) provide by regulations for the establishment and maintenance in operating condition and position of suitable equipment to contain as far as possible the discharge, spillage, uncontrolled loss, seepage or filtration of any oil or petroleum or chemical liquids or solid, liquid-or gaseous products or hazardous wastes; 3) inspect periodically all hoses, gaskets, tanks, pipelines and other equipment used in connection with the transfer, transportation or storage of oil or petroleum or chemical liquids or solid, liquid or gaseous products or hazardous wastes to make certain that they are in good operating condition, and order the renewal of any such equipment found unfit for further use. Any person, firm or corporation which operates any such terminal in this state on or after the first day of July following the effective date of regulations adopted pursuant to this subsection, without a license issued by the commissioner, shall be fined one hundred dollars per day during any period of unlicensed operation. [CGS Section 22a-449(b), as referenced by CGS Section 22a-92(a)(2)]

Policy #95

The safe and sanitary disposal of toxic or hazardous wastes shall be the responsibility of the generator and shall be accomplished in a manner approved by the commissioner. CGS 22a-220(a)

Policy #96

The commissioner of environmental protection shall (1) provide and maintain necessary equipment and train adequate emergency response personnel for the purpose of oil spill containment and removal within the lower Connecticut river and adjacent shoreline area; and (2) assist in and coordinate the development

of oil spill containment and removal contingency plans for the towns located within the lower Connecticut river and adjacent shoreline area. [CGS Section 25-102t(b)]

COMPLIANCE

The Project will comply with this policy. The primary combined cycle development site is currently the site of four large, above-ground existing fuel oil storage tanks that support operation of the existing Bridgeport Harbor Generating Station, a water-dependent use. The four existing oil tanks have a combined total storage capacity of approximately 28.5 million gallons.

Construction of the new combined cycle facility will require the demolition and removal of the existing four fuel oil storage tanks and the associated piping and pumping facilities; followed by the remediation of the soil under and around the tanks. This is a separate project being performed to support the operation of the existing Unit 3 at the Site. Remedial activities will be in accordance with the state of Connecticut cleanup standards, known as the Remediation Standards Regulations. Three of the existing oil storage tanks at the site are currently not in use. The final storage tank is the current source of fuel oil that is required for startup of the station's existing Unit 3.

As noted previously, the new combined cycle facility is being proposed to help meet the region's growing demand for electricity. The generation of electricity is an essential public service that not only supports the regional economy but also is a critical component to the reliable operation of many safety and security systems.

The new facility will be dual fuel capable, utilizing both natural gas and ultra-low sulfur distillate fuel ("ULSD"). Natural gas would be utilized as the primary fuel with provisions to use ULSD as a back-up fuel. The use of ULSD as a back-up fuel will assist in ensuring fuel diversity and operational flexibility, which in turn, will result in increased operational reliability and dependability of the facility, particularly during the winter months when natural gas supplies may be unavailable at the site. To accommodate operation of the new combined cycle facility on ULSD, a 5.5 million gallon USLD storage tank is proposed.

In addition to the proposed ULSD storage tanks, a 20,000-gallon aqueous ammonia storage tank (19% solution) is also required to support operation of the facilities selective catalytic reduction system (SCR), which is a component of the facility air emissions control systems. The ammonia storage facility will be designed in accordance with applicable state, federal, and local requirements.

Facilities for the delivery, bulk storage and transfer of the multiple chemicals required for maintaining auxiliary cooling water chemistry and injection into the feedwater/steam cycle for the new unit(s) will also be required. Process drains from equipment and chemical storage areas, which may have contaminants, will be directed to a central wastewater sump, treated in an oil/water separator and be pumped for discharge to the city sewer system in accordance with NPDES effluent limitations and discharge permit conditions.

The Project is in compliance with this policy. The development of the combined cycle project will result in a significant reduction in the potential oil storage capacity at the station site. The proposed new fuel oil storage tanks will replace four existing fuel oil tanks, each with a potential storage capacity of approximately 7 million gallons. All fuel storage and handling facilities will be provided with spill protection, collection, and treatment technologies to minimize the risk that fuel will be released into the estuarine environment. Similarly, hazardous or potentially hazardous chemicals will be stored with appropriate environmental spill controls and containment, and all discharges will be made in accordance with NPDES effluent limitations and discharge permit conditions. Moreover, the proposed oil and chemical storage and use is associated with the generation of electricity, an essential public service, at an existing industrial site that has been used for the generation of electricity for many years. The use of ULSD as a back-up fuel will assist in ensuring fuel diversity and operational flexibility, which in turn, will result in increased operational reliability and dependability of the facility, particularly during the winter months when natural gas supplies may be unavailable at the site.

3.11 Open Space and Agricultural Lands

Policy #97

It is hereby declared (a) that it is in the public interest to encourage the preservation of farm land, forest land and open space land in order to maintain a readily available source of food and farm products close to the metropolitan areas of the state (b) that it is in the public interest to prevent the forced conversion of farm land, forest land and open space land to more intensive uses as the result of economic pressures caused by the assessment thereof for the purposes of property taxation at values incompatible with their preservation as such farm land, forest land and open space land, and (c) that the necessity in the public interest of the enactment of the provisions of Sections 7-131c and 12-107b to 12-107e, inclusive, is a matter of legislative determination. [CGS Section 12-107a]

Policy #98

The general assembly finds that the growing population and expanding economy of the state have had a profound impact on the ability of public and private sectors of the state to maintain and preserve agricultural land for farming and food production purposes, that unless there is a sound, state-wide program for its preservation, remaining agricultural land will be lost to succeeding generations and that the conservation of certain arable agricultural land and adjacent pastures, woods, natural drainage areas and open space is vital for the well-being of the people of Connecticut. [CGS Section 22-26aa]

Policy #99

Connecticut is a state of relatively small area, undergoing rapid industrialization and rapid diminution of areas remaining in their natural condition. It is, therefore, declared to be the public policy that carefully selected areas of land and water of outstanding scientific and educational interest be preserved. In implementation of this policy, there is established a Connecticut system of natural area preserve. [CGS Section 23-5a as referenced by CGS Section 22a-92(a)(2)]

Compliance – The proposed combined cycle facility and related improvements will be located on areas previously developed at the existing Bridgeport Harbor Generating Station site. No effects to open space or agricultural lands are expected. As such, this policy is not applicable.

3.12 Ports and Harbors

Policy #100

To promote, through existing state and local planning, development, promotional and regulatory authorities, the development, reuse or redevelopment of existing urban and commercial fishing ports giving highest priority and preference to water-dependent uses, including but not limited to commercial and recreational fishing and boating uses. [CGS Section 22a-92(b)(1)(C)]

Policy #101

To disallow uses which unreasonably congest navigation channels, or unreasonably preclude boating support facilities elsewhere in a port or harbor. [CGS Section 22a-92(b)(1)(C)]

COMPLIANCE

The development of the proposed combined cycle facility and related improvements at the existing Bridgeport Harbor Generating Station will not affect existing or future commercial and/or recreational fishing and boating uses in the area and will not affect ports or harbors or congest navigation channels. Therefore, this policy is not applicable to the proposed Project.

3.13 Sewer and Water Lines

Policy #102

To locate and phase sewer and water lines, so as to encourage concentrated development in areas which are suitable for development. [CGS Section 22a-92(b)(1)(B)]

Policy #103

*To disapprove extension of sewer and water services into developed and undeveloped beaches, barrier beaches and tidal wetlands except that, when necessary to abate existing sources of pollution, sewers that will accommodate existing uses with limited excess capacity may be used. [CGS Section 22a-*92(b)(1)(B)]

COMPLIANCE

The existing Bridgeport Harbor Station site is served by both municipal sewer and water connections. The development of the proposed combined cycle facility and related improvements at the existing Bridgeport Harbor Generating Station will not result in the introduction of sewer or water services to areas currently unserved by these facilities within the regulated coastal zone. As such, this policy is not applicable.

3.14 Solid Waste

Policy #104

Each municipal authority shall make provisions for the safe and sanitary disposal of all solid wastes which are generated within its boundaries, including septic tank pumping, sludge from water pollution abatement facilities and water supply treatment plants, solid residues and sludge from air pollution control facilities and solid wastes from commercial, industrial, agricultural and mining operations, but excluding wastes which are toxic or hazardous. [CGS Section 22a-220]

Policy #105

The commissioner shall administer and enforce the pluming and implementation requirements of this chapter. He shall examine all existing or proposed solid waste facilities, provide for their planning, design, construction and operation in a manner which conserves, improves and protects the natural resources and environment of the state and shall order their alteration, extension and replacement when necessary to conserve, improve and protect the state's natural resources and environment and to control air, water and land pollution so that the health, safety and welfare of the people of the state may be safeguarded and enhanced. [CGS Section 19-524b]

COMPLIANCE

This policy is not applicable to the proposed Project. Consistent with existing BHS operations, solid wastes generated during the operation of the proposed combined cycle facility will be managed through private vendors, and as a consequence, will not impact existing municipal waste services within the City.

The solid waste generated at the facility generally would be limited to small quantities of office waste and general plant refuse. All solid waste would be loaded into on-site dumpsters and removed from the project site under a contract with a local private vendor. By the placement of appropriate containers, newspapers, corrugated cardboard and metals consumed at the facility during operations would be recycled by operational staff to the maximum extent practicable. Other wastes typical of power generation operations include used oils collected from the oil/water separator, spent lubricating oils, oil filters from the combustion turbines and air filters. These wastes would be transported offsite by an outside contractor and properly recycled or disposed.

Potentially hazardous wastes generated on-site would be separated from normal waste through segregation of storage areas and proper labeling of containers. All hazardous waste would be removed from the project site by licensed contractors in accordance with applicable regulatory requirements and disposed at either local or regional approved facilities.

3.15 Transportation

Policy #106

To make use of rehabilitation, upgrading and improvement of existing transportation facilities as the primary means of meeting transportation needs in the coastal area. [CGS Section 22a-92(b)(1)(F)]

Policy #107

To require that new or improved shoreline rail corridors be designed and constructed so as (i) to prevent tidal and circulation restrictions and, when practicable, to eliminate any such existing restrictions, (ii) to improve or have a negligible adverse effect on coastal access and recreation and (iii) to enhance or not unreasonably impair the visual quality of the shoreline. [CGS Section 22a-92(c)(1)(F)]

Policy #108

To require that coastal highways and highway improvements, including bridges, be designed and constructed so as to minimize adverse impacts on coastal resource. [CGS Section 22a-92(c)(1)(G)]

Policy #109

To require that coastal highway and highway improvements give full consideration to mass transportation alternatives. [CGS Section 22a-92(c)(1)(G])

Policy #110

To require that coastal highways and highway improvements where possible enhance, but in no case decrease coastal access and recreational opportunities. [CGS Section 22a-92(c)(1)(G)]

Policy #111

To disallow the construction of major new airports. [CGS Section 22a-92(c)(1)(H)]

Policy #112

To discourage the substantial expansion of existing airports within the coastal boundary. [CGS Section 22a-92(c)(1)(H)]

Policy #113

To require that any expansion or improvement of existing airports minimize adverse impacts on coastal resources, recreation or access. [CGS Section 22a-92(c)(1)(H)]

COMPLIANCE

Most vehicle traffic, including heavy trucks and employee commuters accessing the site is expected to utilize Interstate 95 and Routes 8 and 25. Traffic accessing the site from I-95 will most likely exit the interstate at Interchange 26 or 27 and drive approximately one mile, passing commercial, residential, and light industrial areas, prior to entering the existing station site.

Routine access to the existing site is limited to Atlantic Street for industrial security reasons. The exact location for construction gates has not been determined, however it is expected that access will be via Atlantic Street, Kiefer Street, and Henry Street. Station entrances located on Kiefer and Henry Streets are used, when required, by station personnel and for construction worker access related to the existing site.

The development of the proposed combined cycle facility and related improvements at the BHS site does not involve the construction of new roads, or will not affect existing transportation, including highways, rail corridors, or airports. As such, this policy is not applicable to the proposed Project.

3.16 Water-Dependent Uses

Water-dependent uses are those uses and facilities which require direct access to, or location in, marine or tidal waters and which therefore cannot be located inland, including but not limited to: Marinas, recreational and commercial fishing and boating facilities, finfish and shellfish processing plants, waterfront dock and port facilities, shipyards and boat building facilities, water - based recreational uses, navigation aides, basins and channels, industrial uses dependent upon water - borne transportation or requiring large volumes of cooling or process water which cannot reasonably be located or operated at an inland site and uses which provide general public access to marine or tidal waters. [CGS Section 22a - 93(16)].

Policy #114

To give high priority and preference to uses and facilities which are dependent upon proximity to the water or the shorelands immediately adjacent to marine and tidal waters. [CGS Section 22a-92(a)(3)]

Policy #115

To manage uses in the coastal boundary through existing municipal planning, zoning and other local regulatory authorities and through existing state structures, dredging, wetlands, and other state siting and regulatory authorities, giving highest priority and preference to water-dependent uses and facilities in shorefront areas. [CGS Section 22a-92(b)(1)(A)]

COMPLIANCE

The proposed Project does not conflict with this policy. The purposes of this policy is to give high priority and preference to uses and facilities which are dependent upon proximity to the water or the shorelands immediately adjacent to marine and tidal waters. The existing Bridgeport Harbor Generating Station's Unit 3 is a water-dependent use as it relies on water from the adjacent Bridgeport Harbor for cooling purposes. The proposed combined cycle facility will not impact operations of this existing water-dependent use. While the proposed combined cycle facility will not require surface water withdrawals from Bridgeport Harbor to provide for facility cooling, it is expected to rely on marine deliveries of ULSD fuel oil. Therefore, a deepwater accessible waterfront site is required by the Project.

4.0 OTHER POLICIES

The policies discussed in this section pertain to intergovernmental coordination, permit simplification, planning programs, national interest and related topics. Their purpose is to provide direction and standards for program implementation, coordination, and longrange planning by governmental entities in Connecticut.

4.1 Intergovernmental Coordination

Policy #116

To coordinate planning and regulatory activities of public agencies at all levels of government to insure maximum protection of coastal resources while minimizing conflicts and disruption of economic development. [CGS Section 22a-92(a)(9)]

COMPLIANCE

Before construction of the proposed Project can commence, numerous approvals at the federal, state and municipal level need to be obtained. The regulatory proceeding/reviews required during the development phase ensure that the State's and Municipality's policies/objectives and coastal resources are protected. This Coastal Consistency Review process ensures that the project is reviewed for its potential impact on coastal resources as defined by the Connecticut Coastal Management Act. Therefore, the Project will comply with this policy.

4.2 Coordination and Consistency

Policy #117

To coordinate the activities of public agencies to insure that state expenditures enhance development while affording maximum protection to natural coastal resources and processes in a manner consistent with the state plan for conservation and development adopted pursuant to Part I of chapter 297. [CGS Section 22a-92(a)(8)]

Policy #118

In addition to the policies in this section, the policies of the state plan of conservation and development adopted pursuant to Part I of chapter 297 shall be applied to the area within the coastal boundary in accordance with the requirements of Section 16a-31. [CGS Section 22a-92(d)]

Sec. 16a-31. Application of plan

(a) The following actions when undertaken by any state agency, with state or federal funds, shall be consistent with the plan:

(1) The acquisition of real property when the acquisition costs are in excess of one hundred thousand dollars;

(2) The development or improvement of real property when the development costs are in excess of one hundred thousand dollars

(3) The acquisition of public transportation equipment or facilities when the acquisition costs are in excess of one hundred thousand dollars; and

(4) The authorization of each state grant, any application for which is not pending on July 1, 1991, for an amount in excess of one hundred thousand dollars, for the acquisition or development or improvement of real property or for the acquisition of public transportation equipment or facilities.

(b) A state agency shall request, and the secretary shall provide, an advisory statement commenting on the extent to which any of the actions specified in subsection (a) of this section conforms to the plan and any agency may request and the secretary shall provide such other advisory reports as the state agency deems advisable.

(c) The secretary shall submit and the State Bond Commission shall consider prior to the allocation of any bond funds for any of the actions specified in subsection (a) an advisory statement commenting on the extent to which such action is in conformity with the plan of conservation and development.

(d) Notwithstanding subsection (b) of this section, The University of Connecticut shall request, and the secretary shall provide, an advisory statement commenting on the extent the projects included in the third phase of UConn 2000, as defined in subdivision (25) of section 10a-109c, conform to the plan and the university may request and the secretary shall provide such other advisory reports as the university deems advisable. Notwithstanding subsection (c) of this section, the secretary shall submit and the State Bond Commission shall consider prior to the approval of the master resolution or indenture for securities for the third phase of UConn 2000, pursuant to subsection (c) of section 10a-109g, the advisory statement prepared under this subsection.

(e) Whenever a state agency is required by state or federal law to prepare a plan, it shall consider the state plan of conservation and development in the preparation of such plan. A draft of such plan shall be submitted to the secretary who shall provide for the preparer of the plan an advisory report commenting on the extent to which the proposed plan conforms to the state plan of conservation and development.

Policy #119

In furtherance of and pursuant to Sections 22a-1 and 22a-15, the general assembly, recognizing the profound impact of man's activity on the interrelations of all components of the natural environment, particularly the profound influence of population growth, high-density urbanization, industrial expansion, resource exploitation, and new and expanding technological advances, and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man, declares that it is the continuing policy of the state government, in cooperation with federal and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements to present and future generations of Connecticut's residents. In order to carry out the policy set forth in Sections 22a-1a to 22a-1f, inclusive, it is the continuing responsibility of

the state government to use all practicable means, consistent with other essential considerations of the state policy, to improve and coordinate state plans, functions, programs, and resources to the end that the state may: (1) Fulfill the responsibility of each generation as trustee of the environment for succeeding generations; (2) assure for all residents of the state safe, healthful, productive, and esthetically and culturally pleasing surroundings; (3) attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences; (4) preserve important historic; cultural, and natural aspects of our Connecticut heritage, and maintain, wherever possible, an environment which supports diversity and variety of individual choice; (5) achieve an ecological balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources; and (7) practice conservation in the use of energy, maximize the use of energy efficient systems and minimize the environmental impact of energy production and use. CGS Section 22a-1a(a) and (b) as referenced by [CGS Section 22a-92(a)(2)]

Policy #120

The general assembly finds that the growing population and expanding economy of the state have had a profound impact on the life-sustaining natural environment. The air, water, land and other natural resources, taken for granted since the settlement of the state, are now recognized as finite and precious. It is now understood that human activity must be guided by and in harmony with the system of relationships among the elements of nature. Therefore the general assembly hereby declares that the policy of the state of Connecticut is to conserve, improve and protects its natural resources and environment and to control air, land and water pollution in order to enhance the health, safety and welfare of the people in the state. It shall further be the policy of the state to improve and coordinate the environmental plans, functions, powers and programs of the state, in cooperation with the federal government, regions, local governments other public and private organizations and concerned individuals, and to manage the basic resources of air, land and water to the end that the state may fulfill its responsibility as trustee of the environment for the present and future generations. [CGS Section 22a-1 as referenced by CGS Section 22a-92(a)(2)]

Policy #121

The secretary of the office of policy and management shall develop a form for capital development impact statements on which state agencies shall indicate the manner in which a planned or requested capital project or program addresses the following goals: (1) Revitalization of the economic base of urban areas by rebuilding older commercial and industrial areas, and encouraging new industries to locate in the central cities in order to protect existing jobs and create new job opportunities needed to provide meaningful economic opportunity for inner city residents; (2) revitalization of urban neighborhoods to reduce the isolation of various income, age and minority groups through the promotion of fair and balanced housing opportunities for low and moderate income residents; (3) revitalization of the quality of life for the residents of urban

areas by insuring quality education, comprehensive health care, access to balanced transportation, adequate recreation facilities, responsive public safety, coordinated effective human service programs, decent housing and employment and clean water and by insuring full and equal rights and opportunities for all people to reap the economic and social benefits of society; (4) coordination of the conservation and growth of all areas of the state to insure that each area preserves its unique character and sense of community and further insure a balanced growth and prudent use of the state's resources. The secretary shall establish criteria for determining the capital projects and programs for which such statements shall be required to be filed with said secretary and with the state bond commission. [CGS Section 4-66b as referenced by CGS Section 22a-92(a)(8)]

COMPLIANCE

The proposed Project is not being developed through the expenditures of public funding or by a state agency. Therefore, *Policies #117* and *#121* are not applicable to the proposed Project. The proposed Project does not involve a state agency acquiring, developing or improving real property with state or federal funds. Therefore, *Policy #118* is not applicable. The proposed Project has been sited at a location which is consistent with the city of Bridgeport's zoning regulations and consistent with surrounding land uses, adjacent to existing power generating facilities. The location maximizes the use of existing, required infrastructure (i.e., electric, natural gas, sewer, water, roadways). The proposed Project has been designed to minimize and/or avoid potential environmental impacts while complying with the requirements/conditions of regulatory agencies at the federal, state and municipal level. Development of the Project at this location will not (1) impact important historic, cultural, ecological or coastal resources in the area or (2) conflict with the state's policy for giving high priority and preference to uses and facilities that are dependent on the proximity to the water or the shorelands immediately adjacent to marine and tidal waters. Therefore, the Project will comply with state objectives specified within *Policy #119*. As stated previously, the proposed Project must obtain numerous regulatory permits/approvals at the federal, state and local level. By proceeding through the regulatory approval process, where information or development plans on the proposed Project are provided to and shared with the various regulatory agencies and, at times, contingent upon a prior agency's review and approval, the Project will comply with *Policy #120*.

4.3 Flooding and Erosion

Policy #122

To consider in the planning process the potential impact of coastal flooding and erosion patterns on coastal development so as to minimize damage to and destruction of life and property and reduce the necessity of public expenditure to protect future development from such hazards. [CGS Section 22a-92(a)(5)]

COMPLIANCE

Per the current FEMA 2013 Flood Insurance Rate Map (FIRM), the majority of the existing Bridgeport Harbor Station site is mapped within the 100-year floodplain (Zone AE), which is at elevation 14 feet North American Vertical Datum 1988 (NAVD88) (see

Figure 2). Existing base elevations at the site are approximately 9.5 feet to 10.0 feet NAVD88. The flood protection level of the proposed structures will be 16.5' NAVD88, which is above the storm surge elevation as discussed below.

As noted, the proposed structures of the combined-cycle unit will be flood protected to an elevation of 16 feet 6 inches NAVD, or 2 feet 6 inches above the FEMA 1% recurrence interval (100 year) flood level of 14 feet (Zone AE per FEMA Flood Insurance Rate Map [FIRM] for Fairfield County, Connecticut, Panel 441 or 626; Map Number 09001C0441G Revised July 8, 2013) for the BHS Site.

The 0.2% recurrence (500 year) flood level is not reported on the FEMA FIRM, however those levels can be estimated on the basis of data presented in the FEMA Flood Insurance Study (09001CV001C, Fairfield County, Connecticut, Revised October 16, 2013). The portion of the study that addresses the flood elevations at the site is summarized in Table 10 (page 110) for Transect 47 and the reported 1% recurrence interval stillwater elevation is 9.8 feet NAVD and 12.2 feet NAVD with the effects of wave setup included. On the basis of these computed values, a base flood elevation of 14 feet NAVD was established by FEMA for the area of the site. The reported 0.2% recurrence stillwater flood elevation is 11.1 feet NAVD, or 1.3 feet higher than the 1% recurrence stillwater flood elevation. The top of the containment and building flood protection wall elevations are 16 feet 6 inches NAVD, or 2.5 feet higher than the 1% recurrence base flood elevation, as well as above the 0.2% recurrence flood. It is also important to note that the site is located within the zone of no significant wave action (AE), adding additional margin to these values. Figure 2 indicates the potential for moderate wave action along the southern and eastern facing shorelines (Zone VE). No work is being performed in this zone.

In order to achieve the above-described design criteria, PSEG is proposing establishing a ground elevation for the proposed combined cycle development site at elevation 16.50 NAVD 88. Building finished floor elevations and top of equipment pads are proposed to be placed at nominally elevation 18.50. As illustrated in the preliminary site development plan, PSEG is proposing use of a structural retaining wall and import of fill to accommodate the increase in grade with the smallest feasible structural footprint. There is not sufficient room at the site to use a simpler earthen berm with sloped face. Based on existing site grades, the proposed design will raise the proposed development site an average of approximately 7.5 feet above existing grade.

The FEMA mapping and flood elevation / recurrence frequencies were modified by FEMA after coastal storm Sandy. Figure 2 indicates the potential for moderate wave action along the southern and eastern facing shorelines (Zone VE). No work is being performed in this zone, excepting the installation of the stormwater outfall.

To address spill prevention features from the new Unit 5 tank, the secondary containment will have a steel outer wall and be designed with an impervious liner and necessary access points. The secondary containment will be open at the top with a sump and petro-barrier to allow separation of oil from rainwater. The containment is sized to be able to fully contain 110% of the tank inventory including rain quantities, as required by the applicable CT DEEP regulations. Tank level indications will be provided both locally and in the BHS Unit 5 Control Room on a continuous basis. Local and

Control Room level alarms and interlocks will be installed to prevent over-filling of the tank.

PSEG's current Spill Prevention, Control, and Countermeasure Plan for the existing site will be updated to include the new Facilities. The spill response plan will be revised prior to placing the new systems in service. Spill prevention provisions are included in the design, including the aforementioned integrated containment, the containment drainage features which will include engineered petroleum product barriers, and the necessary level monitoring instrumentation.

As discussed, the proposed combined cycle plant and associated storage tank will be located in an urban industrial area and will be adequately protected against floods and spills. Therefore, the Project will comply with *Policy #88* and *Policy #89.*

The Project will minimize the risk of spillage of petroleum products and hazardous substances and provide effective containment and clean up facilities for accidental spills with measures PSEG already has in place.

Given the site's waterfront location, flooding of downstream/off-site properties within the coastal area will not occur as a result of the development of the proposed Project because the flood elevation on Connecticut's coast is determined by Long Island Sound, and ultimately, the Atlantic Ocean. Therefore development of proposed Project will not lead to increased coastal flooding to adjacent or regional properties due to the reduction in flood storage capacity.

The stormwater collection system design for the Project will be in accordance with CT DEEP and City requirements. PSEG's current Stormwater Pollution Prevention Plan (SWPPP) will be updated.

Therefore, the proposed Project will comply with *Policy #122*.

4.4 Dredging and Dredged Material Disposal Planning

Policy #123

To initiate in cooperation with the federal government and the continuing legislative committee on state planning and development a long range planning program for the continued maintenance and enhancement of federally maintained navigation facilities in order to effectively and efficiently plan and provide for environmentally sound dredging and disposal of dredged materials.[CGS Section 22a-92(c)(1)(C)]

COMPLIANCE

Construction of the proposed Project does not require dredging and the disposal of dredged materials. Therefore, *Policy #123* is not applicable.

4.5 Coastal Related Research

Policy #124

To conduct, sponsor and assist research in coastal matters to improve the database upon which coastal land and water use decisions are made.[CGS Section 22a-92(a)(7)]

COMPLIANCE

Policy #124 relates to government, agency and/or research institutional actions and is therefore not applicable to the proposed Project.

4.6 National Interest Facilities and Resources

Policy #125

To insure that the state and the coastal municipalities provide adequate planning for facilities and resources which are in the national interest as defined in Section 3 of this act and to insure that any restrictions or exclusions of such facilities or uses are reasonable. Reasonable grounds for the restriction or exclusion of a facility or use in the national interest shall include a finding that such a facility or use: (A) may reasonably be sited outside the coastal boundary; (B) fails to meet any applicable federal and state environmental, health or safety standard or (C) unreasonably restricts physical or visual access to coastal waters. This policy does not exempt any nonfederal facility in use from any applicable state or local regulatory or permit program nor does it exempt any federal facility or use from the federal consistency requirements of Section 307 of the federal Coastal Zone Management Act. [CGS Section 22a-92(a)(10)]

COMPLIANCE

The proposed Project is a facility in the National Interest per the definition (G) energy facilities serving statewide and interstate markets, including electric generating facilities (CGS Sec. 22a-93(14)). As detailed in previous responses to other coastal policies, the proposed Project does not restrict physical or visual access to coastal waters; it will comply with all applicable federal and state environmental, health and safety standards as required by the numerous permits/approvals that are needed to commence construction; and it will be sited at a location that is zoned for industrial use by the City and that is adjacent to existing power facilities. The Project will maximize the use of existing (required) infrastructure on or adjacent to the site. The proposed Project will continue to provide electricity to meet the growing demand for electric power in the region. In light of the above, the Project will comply with *Policy #125*.

4.7 Air Resources & Air Quality (Pollution)

Policy #126

The commissioner, in the manner provided in subdivision (1) of section 22a-6, shall have the power to formulate, adopt, amend and repeal regulations to control and prohibit air pollution throughout the state or in such areas of the state as are affected thereby, which regulations shall be consistent with the Federal Air Pollution Control Act and which qualify the state and its

municipalities for available federal grants. Any person heard at the public hearing on any such regulations shall be given written notice of the determination of the commissioner. [CGS Sec. 22a-174(a)]

Policy #126

The commissioner, in making regulations and issuing orders and in enforcing the provisions of this chapter, shall take into consideration all of the facts and circumstances bearing on the reasonableness of the activity involved and the regulations proposed to control it, including: (a) The character and degree of injury to, or interference with, safety, health or the reasonable use of property which is caused or threatened to be caused; (b) the social and economic value of the activity involved; (c) the suitability or unsuitability of such activity to the area in which it is located; and (d) the practicability, both scientific and economic, of reducing or eliminating the discharge resulting from such activity. In all cases the commissioner shall exercise a wide discretion in weighing the equities involved and the advantages and disadvantages to the residents of the area involved and to any lawful business, occupation or activity involved resulting from requiring compliance with the specific requirements of any order or regulation. [CGS Sec. 22a-176]

COMPLIANCE

In a combined cycle facility, hot gasses from the Combustion Turbine Generator ("CTG") are exhausted through ductwork to the HRSG, where energy is extracted and used to generate high pressure steam. The HRSG also contains a duct burner (natural gas-fired) which can be used to provide additional heat energy to the HRSG to increase steam production under certain operating conditions. Exhaust gas flow from the HRSG is discharged to the atmosphere through an approximately 300-foot tall stack. The CTG produces electricity directly and the exhaust heat from the CTG produces steam in the HRSG, which drives a steam turbine generator to produce additional electricity.

The proposed unit will be equipped with state-of-the-art air emissions control technology, including:

- Dry Low NO_x combustors, a selective catalytic reduction system, and water injection when firing liquid fuel which all serve to reduce NO_x emissions;
- An oxidation catalyst to reduce CO and VOC emissions; and
- An air-cooled condenser which avoids particulate emissions associated with evaporative (i.e. "wet") cooling systems.

An initial air quality impact study has been completed and was submitted to CT DEEP on April 7, 2015. This study has been updated and resubmitted to CT DEEP. The study uses the EPA-developed and preferred dispersion model, known as AERMOD, to evaluate the ground-level impact of Unit 5 stack emissions. Various operating conditions are studied including different ambient temperatures (which affect CTG performance), various CTG loads, firing on both fuels (natural gas and ULSD), and both

steady-state CTG operation and transient CTG operation.

Steady-state operation involves “normal” operation and is the usual state of the unit. Transient operating conditions involve start-up and shutdown activities. With the exception of nitrogen dioxide (“NO_2”), the study concludes that the impacts from the Unit 5 emissions, as proposed and after inclusion of a representative monitored background concentration to account for emissions of other sources in the region, do not exceed the NAAQS, the State ambient standards or the PSD Class II increments. The impact study did predict potential SIL exceedances for NO_2. The prediction of an SIL exceedance means only that further analysis is required for NO_2 to establish that the short-term NO_2 NAAQS will not be exceeded. The required studies are underway and will be submitted to CT DEEP.

The Project’s potential air quality impacts are minimized both through its state-of-the-art design including the addition of highly efficient pollution control equipment and through the use of the proposed fuels, pipeline quality natural gas and ULSD, which are the cleanest available fossil fuels in the market today. The Project will meet EPA and CT DEEP requirements to employ “Best Available Control Technology” (“BACT”) and/or Lowest Achievable Emission Rate (“LAER”) technology for the various pollutants. The application of BACT or LAER is determined on a pollutant-specific basis by the projected annual quantity of emissions and the attainment status of the Bridgeport area. BACT will be employed to control emissions of NOx, CO, PM, $PM_{2.5}$, PM_{10}, H_2SO_4 and Greenhouse Gases. LAER will be employed to control emissions of the ozone precursors NOx and VOC. The final LAER and BACT determinations are made by CT DEEP during the formal technical review process as part of the air permitting package review.

Employed together, the selected fuels, state-of-the-art turbine design and air emission controls ensure that the Project combines high energy efficiency with very low emission rates.

5.0 IDENTIFICATION OF POTENTIAL ADVERSE IMPACTS

5.1 Characteristics & Functions of Resources

A significant adverse impact on resources, including tidal wetlands, beaches and dunes, rocky shorefronts, and bluffs and escarpments can result from significant alteration of their natural characteristics or function. [CGS Section 22a-93(15)(H)]

COMPLIANCE

The proposed combined cycle electric generating facility and related improvements at the BHS site are not expected to adversely affect the characteristics and functions of regulated resources. As discussed elsewhere in this compliance statement, the construction and operation of the new plant has been planned to avoid filling or discharge to regulated wetlands and waters. Appropriate soil erosion and sedimentation control measures will be taken during construction to prevent discharge of loose soils into regulated wetlands or waters. Stormwater from the project will be managed in

accordance with City of Bridgeport and CT DEEP requirements. Therefore, the Project is consistent with this policy.

5.2 Coastal Flooding

A significant adverse impact on coastal flooding can result from significant alteration of shoreline configurations or bathymetry, particularly within high velocity flood zones. [CGS Section 22a-3(15)(E)]

COMPLIANCE

As discussed above under the Coastal Hazard Area policy, the development of the proposed electric generating facility and related improvements at the BHS proposes a "storm-hardened" design that anticipates coastal flooding and wave action for all onsite features.

Per the current FEMA 2013 Flood Insurance Rate Map (FIRM), the majority of the existing Bridgeport Harbor Station site is mapped within the 100-year floodplain (Zone AE), which is at elevation 14 feet North American Vertical Datum 1988 (NAVD88) (see Figure 2). Existing base elevations at the site are approximately 9.5 feet to 10.0 feet NAVD88. The flood protection level of the proposed combined-cycle unit structures will be 16.5' NAVD88, which is above the storm surge elevation as discussed below.

As noted, the proposed structures will be flood protected to an elevation of 16 feet 6 inches NAVD, or 2 feet 6 inches above the FEMA 1% recurrence interval (100 year) flood level of 14 feet (Zone AE per FEMA Flood Insurance Rate Map [FIRM] for Fairfield County, Connecticut, Panel 441 or 626; Map Number 09001C0441G Revised July 8, 2013) for the BHS Site.

The 0.2% recurrence (500 year) flood level is not reported on the FEMA FIRM, however those levels can be estimated on the basis of data presented in the FEMA Flood Insurance Study (09001CV001C, Fairfield County, Connecticut, Revised October 16, 2013). The portion of the study that addresses the flood elevations at the site is summarized in Table 10 (page 110) for Transect 47 and the reported 1% recurrence interval stillwater elevation is 9.8 feet NAVD and 12.2 feet NAVD with the effects of wave setup included. On the basis of these computed values, a base flood elevation of 14 feet NAVD was established by FEMA for the area of the site. The reported 0.2% recurrence stillwater flood elevation is 11.1 feet NAVD, or 1.3 feet higher than the 1% recurrence stillwater flood elevation. The top of the containment and building flood protection wall elevations are 16 feet 6 inches NAVD, or 2.5 feet higher than the 1% recurrence base flood elevation, as well as above the 0.2% recurrence flood. It is also important to note that the site is located within the zone of no significant wave action (AE), adding additional margin to these values. Figure 2 indicates the potential for moderate wave action along the southern and eastern facing shorelines (Zone VE). No work is being performed in this zone.

In order to achieve the above-described design criteria, PSEG is proposing establishing a ground elevation for the proposed combined cycle development site at elevation 16.50 NAVD 88. Building finished floor elevations and top of equipment pads are

proposed to be placed at nominally elevation 18.50. As illustrated in the preliminary site development plan, PSEG is proposing use of a structural retaining wall and import of fill to accommodate the increase in grade with the smallest feasible structural footprint. There is not sufficient room at the site to use a simpler earthen berm with sloped face. Based on existing site grades, the proposed design will raise the proposed development site an average of approximately 7.5 feet above existing grade.

The FEMA mapping and flood elevation / recurrence frequencies were modified by FEMA after coastal storm Sandy. Figure 2 indicates the potential for moderate wave action along the southern and eastern facing shorelines (Zone VE). No work is being performed in this zone.

To address spill prevention features, the secondary containment will have a steel outer wall and be designed with an impervious liner and necessary access points. The secondary containment will be open at the top with a sump and petro-barrier to allow separation of oil from rainwater. The containment is sized to be able to fully contain 110% of the tank inventory including rain quantities, as required by the applicable CT DEEP regulations. Tank level indications will be provided both locally and in the BHS Unit 5 Control Room on a continuous basis. Local and Control Room level alarms and interlocks will be installed to prevent over-filling of the tank.

PSEG's current Spill Prevention, Control, and Countermeasure Plan for the existing site will be updated to include the new Facilities. The spill response plan will be revised prior to placing the new systems in service. Spill prevention provisions are included in the design, including the aforementioned integrated containment, the containment drainage features which will include engineered petroleum product barriers, and the necessary level monitoring instrumentation.

With respect to offsite flooding, the design of the new combined cycle plant at the BHS will not adversely affect coastal flood storage capacity because the flood elevation on Connecticut's coast is determined by Long Island Sound, and ultimately, the Atlantic Ocean. The development of the new tank will not lead to increased coastal flooding to adjacent or regional properties due to the reduction in flood storage capacity. As such, the proposed Project is in compliance with this policy.

5.3 Coastal Waters Circulation Patterns

A significant adverse impact on circulation patterns of coastal waters can result from degrading patterns of tidal exchange or flushing rates, freshwater input, or existing basin characteristics and channel contours. [CGS Section 22a-93(15)(B)]

COMPLIANCE

The BHS site is located along the Pequonnock River/Bridgeport Harbor shoreline. Excluding the dock repair and stormwater outfall, the proposed combined cycle and related equipment will be constructed above the Connecticut Coastal Jurisdiction Line (Elevation 5' NAVD88), above mean higher high water (MHHW, 3.48' NAVD88), and outside of delineated tidal wetlands. To facilitate construction, two temporary barge

unloading areas are proposed along the Pequonnock River/Bridgeport Harbor shoreline. Barges will be used to deliver materials and major equipment to the construction site, and will be anchored to the bottom using retractable spuds.

Appropriate soil erosion and sediment control measures will be taken (including, but not necessarily limited to silt fence, turbidity curtains around temporary dock repair and barge activities, etc.) to prevent discharge of materials into the Bridgeport Harbor or increasing suspended sediment concentrations. The construction and operation of the new unit(s) at the BHS site will not affect sustained biological productivity, the maintenance of healthy marine populations, the maintenance of essential patterns of circulation, drainage and basin configuration, or eelgrass flats. As such, the proposed Project is in compliance with this policy.

5.4 Drainage Patterns

A significant adverse impact on drainage patterns can result from the significant alteration of groundwater flow and recharge and volume of runoff. [CGS Section 22a-93(15)(D)]

COMPLIANCE

The proposed structural stormwater management system combines use of cover stabilization practices, a subsurface gravity collection and conveyance system, a manufactured treatment device (MTD) and discharge control practices (i.e., outfall headwall and rip-rap outlet protection). Stormwater from the site discharges to Bridgeport Harbor (i.e., tidal waters). Therefore, peak flow attenuation criteria for the 2, 10, and 100-year storm events do not apply.

A new stormwater outfall structure will be constructed at the existing NPDES outfall DSN 014. The MTD (Contech "Vortechs 11000"), have been designed to treat one (1) inch of runoff from the site using an off-line configuration, and divert excess flows directly to the outfall.

An MTD will be used to satisfy the total suspended solids (TSS) removal goal for the Connecticut water quality design storm. The MTD will be installed in an off-line configuration, with excess flows diverted directly to the outfall. MTDs are frequently selected as a preferred stormwater management option for brownfield sites and sites having limited space for installation of conventional stormwater management structures. When properly designed, MTDs require significantly less space than conventional stormwater management practices.

The proposed system was evaluated for adequacy against the design and performance standards stated in the 2004 Connecticut Stormwater Quality Manual, and the City of Bridgeport, CT, Dept. of Public Facilities, Stormwater Management Manual, May 2008. The targeted reduction rate for TSS is eighty (80) percent of the anticipated load from the developed site assuming a 1 inch rainfall event.

Therefore, the proposed Project at the BHS site will not have a significant adverse impact on local or regional drainage patterns.

5.5 Patterns Of Shoreline Erosion And Accretion

A significant adverse impact on patterns of shoreline erosion and accretion can result from degrading natural erosion patterns through the significant alteration of littoral transport of sediments in terms of deposition or source reduction. [CGS Section 22a-93(15)(C)]

COMPLIANCE

As discussed above under the Coastal Hazard Area policy and Coastal Flooding above, the development of the Unit 5 plant at the BHS site has been designed to anticipate coastal flooding and wave action for all onsite features. With respect to patterns of shoreline erosion and accretion, the design of the plant and related improvements at the BHS will not have adverse effects because all proposed project elements are designed to be constructed above mean higher high water (MHHW, 3.48' NAVD88) and outside of delineated tidal wetlands. As such, the Project will not result in a significant adverse impact on shoreline erosion and accretion.

5.6 Visual Quality

A significant adverse impact on visual quality can result from degrading visual quality through significant alteration of the natural features of vistas and viewpoints. [CGS Section 22a-93(15)(F)]

COMPLIANCE

The design of the proposed Facility has been developed to meet the public need for electric generation capacity and energy supplies for the wholesale power markets while minimizing any potential adverse environmental impacts. PSEG selected the proposed location to minimize any potential visual impacts and designed the equipment layout to further reduce the potential environmental impacts. As an example of such design considerations, while the proposed stack height will be no taller than approximately 300 feet above the Site design grade, the Facility's new stack will be significantly lower than the existing 498-foot stack height of BHS Unit # 3.

Primary facility structures, including the proposed turbine building, Heat Recovery Steam Generator (HRSG) building, and air-cooled condenser are anticipated to have heights of approximately 97, 125 and 125 feet above the proposed site design grade, respectively. The new exhaust stack will be the most prominently visible new structure.

A total of four exhaust stacks are currently located at the site, the tallest of which is 498 feet above grade. Therefore, the proposed combined cycle Facility and related improvements will be located on a developed property that is the location of existing generating units, including all visible appurtenances such as the existing exhaust stacks, boilers, coal conveying equipment, oil tanks, and barge docks.

In light of this existing industrial development, the proposed addition of the equipment required in support of the combined cycle Facility, including the proposed 300-foot

exhaust stack, will result in an incremental but not material change in the appearance of the BHS. The proposed 300-foot stack will be lower than the existing 498-foot stack at the site and the remaining Facility structures will be generally consistent with the height of the other structures at the BHS site.

The five vantage points from which the viewshed photographs were taken are shown in Figures 6A through Figure 6F. Figure 6A depicts the vantage point locations. The existing view and photosimulation from Soundview Drive are shown in Figure 6B. The existing view and photosimulation from Broad Street and University Avenue are shown in Figure 6C. The view and photosimulation from Newfield Avenue boat ramp are shown in Figure 6D. The view and simulation from the new ferry site are shown in Figure 6E. The view and simulation from the corner of Soundview Drive and Cove Road are shown in Figure 6F.

As shown in the photosimulations, the new Project, where visible, will not be substantially different from the existing BHS, nor would it be in sharp contrast with the area surrounding the Site. Thus, the proposed Project will not significantly impair the visual landscape from any of the area resources of potential concern, nor will the Project interfere with or reduce the public or area residents' enjoyment and/or appreciation of the appearance of any open space or other scenic resources. In addition, residents and visitors to the area will not experience a significant change in the visual character of the area. Overall, the new Project will be visible, but will not be out of character with or out of proportion to the views of the existing BHS or other energy infrastructure in the immediate area. As such, the proposed development and related improvements at the BHS is not expected to adversely affect the visual quality of the area and is in compliance with this policy.

5.7 Water Quality

Degrading water quality through the significant introduction into either coastal waters or groundwater supplies of suspended solids, nutrients, toxics, heavy metals or pathogens, or through the significant alteration of temperature, pH, dissolved oxygen or salinity. [CGS Section 22a-93(15)(A)]

COMPLIANCE

The proposed structural stormwater management system combines use of cover stabilization practices, a subsurface gravity collection and conveyance system, a manufactured treatment device (MTD) and discharge control practices (i.e., outfall headwall and rip-rap outlet protection). Stormwater from the site discharges to Bridgeport Harbor (i.e., tidal waters). Therefore, peak flow attenuation criteria for the 2, 10, and 100-year storm events do not apply.

A new stormwater outfall structure will be constructed at the existing NPDES outfall DSN 014. The MTD (Contech "Vortechs 11000"), have been designed to treat one (1) inch of runoff from the site using an off-line configuration, and divert excess flows directly to the outfall.

Manufactured treatment device (MTD) will be used to satisfy the total suspended solids (TSS) removal goal for the Connecticut water quality design storm. The MTD will be installed in an off-line configuration, with excess flows diverted directly to the outfall. MTDs are frequently selected as a preferred stormwater management option for brownfield sites and sites having limited space for installation of conventional stormwater management structures. When properly designed, MTDs require significantly less space than conventional stormwater management practices.

The proposed system was evaluated for adequacy against the design and performance standards stated in the 2004 Connecticut Stormwater Quality Manual, and the City of Bridgeport, CT, Dept. of Public Facilities, Stormwater Management Manual, May 2008. The targeted reduction rate for TSS is eighty (80) percent of the anticipated load from the developed site assuming a 1 inch rainfall event.

Secondary Containments

The secondary containment will have a steel outer wall and be designed with an impervious liner and necessary access points. The secondary containment will be open at the top with a sump and petro-barrier to allow separation of oil from rainwater. The containment is sized to be able to fully contain 110% of the tank inventory including rain quantities, as required by the applicable CT DEEP regulations. Tank level indications will be provided both locally and in the BHS Unit 5 Control Room on a continuous basis. Local and Control Room level alarms and interlocks will be installed to prevent over-filling of the tank.

There will be measures in place to prevent oil from entering the adjacent coastal waterways, including the construction of a secondary containment. The secondary containment will have a steel outer wall and be designed with an impervious liner and man way access points. The secondary containment will be open at the top with a sump and petro-barrier to allow separation of oil from rainwater. The secondary containment will not discharge uncontrolled during a storm event. The containment will be drained only after inspection, through a petro barrier, and only after the storm event ends. This will ensure oil does not leak into the groundwater or adjacent waterways.

PSEG's current Spill Prevention, Control, and Countermeasure Plan for the existing site will be updated to include the new Facilities. The spill response plan will be revised prior to placing the new systems in service. Spill prevention provisions are included in the design, including the aforementioned integrated containment, the containment drainage features which will include engineered petroleum product barriers, and the necessary level monitoring instrumentation.

5.8 Wildlife, Finfish, Shellfish Habitat

A significant adverse impact on essential wildlife, finfish or shellfish habitat can result from significant alteration of the composition, migration patterns, distribution, breeding or other population characteristics of the natural species or significant alteration of the natural components of the habitat. [CGS Section 22a-93 (15)(G)]

COMPLIANCE

As discussed above under Fisheries, Coastal Waters & Estuarine Embayments, Freshwater Wetlands and Watercourses, Intertidal Flats, Shellfish Concentration Areas, and Tidal Wetlands, the proposed development of the combined cycle electric generating plant and related features at the BHS will not adversely affect wildlife, finfish, or shellfish habitat.

As the proposed development will occur within a previously disturbed industrial site, the construction or operation of the Project is not anticipated to impact any federal or state-listed species of concern. As illustrated by the site aerials provided as Figures 2 and 3, aside from grassed areas interspersed with limited woody vegetation, the proposed development site contains little vegetative cover. As a consequence, the Project site is not anticipated to provide quality wildlife habitat and significant impacts to vegetation and wildlife will not occur.

The Project also includes renovation to the existing fuel dock terminal facility at BHS that was damaged during Superstorm Sandy on October 29, 2012. The repairs will involve the demolition and removal of portions of the existing timber walkways, maintenance repairs to existing platforms and mooring dolphins, construction of new walkways, and upgrading and replacing existing fender units and mooring hardware. No new piers or piles are planned as part of this work. The amount of in-water work is minimal, and impacts to fisheries, finfish, and shellfish are not expected because the proposed work will not result in substantial underwater noise (i.e., no pile driving) and will not result in the resuspension of bottom sediments. In addition, the repairs will result in a net reduction in over water/over bottom shading, representing a minor local improvement to the aquatic habitat. A 40% reduction in walkway length will be implemented in the repair plans.

The September 2015 Natural Diversity Database Area Map for Bridgeport, CT (see Figure 8), indicates that the Project's proposed areas of development are located outside of the hatched Natural Diversity Database Areas (NDDBA) areas on the map. The small portions of the existing Bridgeport Harbor Generating Station site that contain hatched NDDBA areas are located along the industrial site's waterfront along Bridgeport Harbor. All of the proposed areas of impact are located above the mean high water line. The proposed tank has been designed with a secondary containment to minimize the risk of water quality degradation.

As noted, the installation of the new plant will be within the fenced perimeter of the existing BHS and the modification does not introduce a significant change in site infrastructure. PSEG has determined that there will be no impact to any state or federal-listed endangered, threatened or species of special concern by either the construction or the operation of the proposed modification. PSEG solicited CT DEEP inputs on potential impacts to any state or federal-listed endangered, threatened or species of special concern for another proposed project at the site. The response from the CT DEEP, dated October 21, 2014 is included in Appendix A. . A resubmittal to CT DEEP, based on the September 2015 mapping was filed in February 2016. CT DEEP determined that based on “the location and siting of this facility” (i.e. the other proposed

project)…"it is unlikely that construction activities and subsequent operations of the facility will negatively impact state-listed species".

To ensure potential concerns regarding federally-protected species are assessed, PSEG consulted with the United States Fish and Wild Life Service's (USFWS) Information, Planning, and Conservation System (IPAC) Version 1.4 database (accessed on 9/22/2014). The IPAC database review indicated the possible presence of several species that should be considered in an effects analysis for the Project. The USFWS emphasizes that the resource list is to be used for planning purposes only and it is not an official species list. A copy of the IPAC report generated for the Project site is provided in Appendix A.

From the Endangered Species Act Species List (USFWS Endangered Species Program), one species was identified. The endangered Roseate tern (*Sterna dougallii dougallii*) has the potential to occur in the project area. This species is a seabird of the tern family Sternidae. The species breeds on the Atlantic coasts of Europe and North America, and winters south to the Caribbean and western Africa. Both the European and North American populations have been in long term decline, though active conservation measures have reversed the decline in the last few years at some colonies. Roseate terns feed by plunge-diving for fish, almost invariably from the sea; and it is more marine than related tern species, only rarely visiting freshwater on the coast to bathe –but not fishing - in fresh water. Roseate terns breed in colonies on coasts and islands, nesting in a ground scrape, usually in a hollow or within dense vegetation, and it lays one to three eggs (USFWS 2014).

The existing Bridgeport Generating Station site (including the proposed area of development) is not nesting habitat for roseate terns; however, the surrounding waters of Pequonnock River/Bridgeport Harbor may serve as foraging habitat for the species. The construction and operation of the proposed project at the existing Bridgeport Harbor Station is not expected to adversely affect breeding or foraging for Roseate terns because all proposed project elements are all landward of the high tide line.

The USFWS's IPAC database did not identify any critical habitats or National Wildlife Refuges within the project area. The IPAC consultation identified USFWS Migratory Birds (USFWS Migratory Bird Program) having potential to occur in the project area. The protection of birds is regulated by the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA). Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. Table 2 below summarizes USFWS Migratory Birds (USFWS Migratory Bird Program) having potential to occur in the project area:

Table 2: USFWS Migratory Birds Having Potential to Occur in Project Area

Species Name	Bird of Conservation	Seasonal Occurrence in Project Area
American Oystercatcher (*Haematopus palliatus*)	Yes	Year-round
American bittern (*Botaurus lentiginosus*)	Yes	Breeding
Bald eagle (*Haliaeetus leucocephalus)*	Yes	Year-round
Black rail (*Laterallus jamaicensis*)	Yes	Breeding
Black-billed Cuckoo (*Coccyzus erythropthalmus*)	Yes	Breeding
Blue-winged Warbler (*Vermivora pinus*)	Yes	Breeding
Canada Warbler (*Wilsonia canadensis*)	Yes	Breeding
Horned Grebe (*Podiceps auritus*)	No	Wintering
Least Bittern (*Ixobrychus exilis*)	Yes	Breeding
Least tern (*Sterna antillarum*)	Yes	Breeding
Pied-billed Grebe (*Podilymbus podiceps*)	Yes	Year-round
Purple Sandpiper (*Calidris maritima*)	Yes	Wintering
Rusty Blackbird (*Euphagus carolinus*)	Yes	Wintering
Saltmarsh Sparrow (*Ammodramus caudacutus*)	Yes	Breeding
Seaside Sparrow (*Ammodramus maritimus*)	Yes	Year-round
Snowy Egret (*Egretta thula*)	Yes	Breeding
Wood Thrush (*Hylocichla mustelina*)	Yes	Breeding

Table 2: USFWS Migratory Birds Having Potential to Occur in Project Area

Species Name	Bird of Conservation	Seasonal Occurrence in Project Area
Worm eating Warbler (*Helmitheros vermivorum*)	Yes	Breeding

The construction and operation of the proposed project and related improvements at the BHS site is not expected to result in any take of these species.

Osprey (*Pandion haliaetus*) are present in the vicinity of the site, with intermittent nesting on or near waterfront structures. The proposed new plant is removed from these locations and will not cause a significant adverse change or alteration in the physical or environmental characteristics of the BHS site.

Therefore, the proposed Project will not have a significant adverse impact on wildlife, finfish, or shellfish habitat.

5.9 Potential Impacts on Water Dependent Uses

"Adverse impacts on future water-dependent development opportunities" and "adverse impacts on future water-dependent development activities" include but are not limited to (A) locating a non-water-dependent use at a site that (i) is physically suited for a water-dependent use for which there is a reasonable demand or (ii) has been identified for a water-dependent use in the plan of development of the municipality or the zoning regulations; (B) replacement of a water dependent use with a non-water-dependent use; and (C) siting of a non-water-dependent use which would substantially reduce or inhibit existing public access to marine or tidal waters. [CGS Section 22a-93(17)]

COMPLIANCE

The existing Bridgeport Harbor Generating Station's Unit 3 is a water-dependent use as it relies on water from the adjacent Bridgeport Harbor for cooling purposes. The proposed oil storage tank will not impact operations of or replace this existing water-dependent use. Therefore, the project will not result in the siting of a non-water-dependent use on a waterfront site. The current BHS site does not provide for public access to the waterfront in light of security requirements, including U.S. Coast Guard Maritime Security (MARSEC) requirements, associated with the operation of this critical energy infrastructure. Therefore, the development of the proposed oil storage tank at the existing BHS site will not result in a significant adverse impact on future water-dependent opportunities or activities.

6.0 REFERENCES

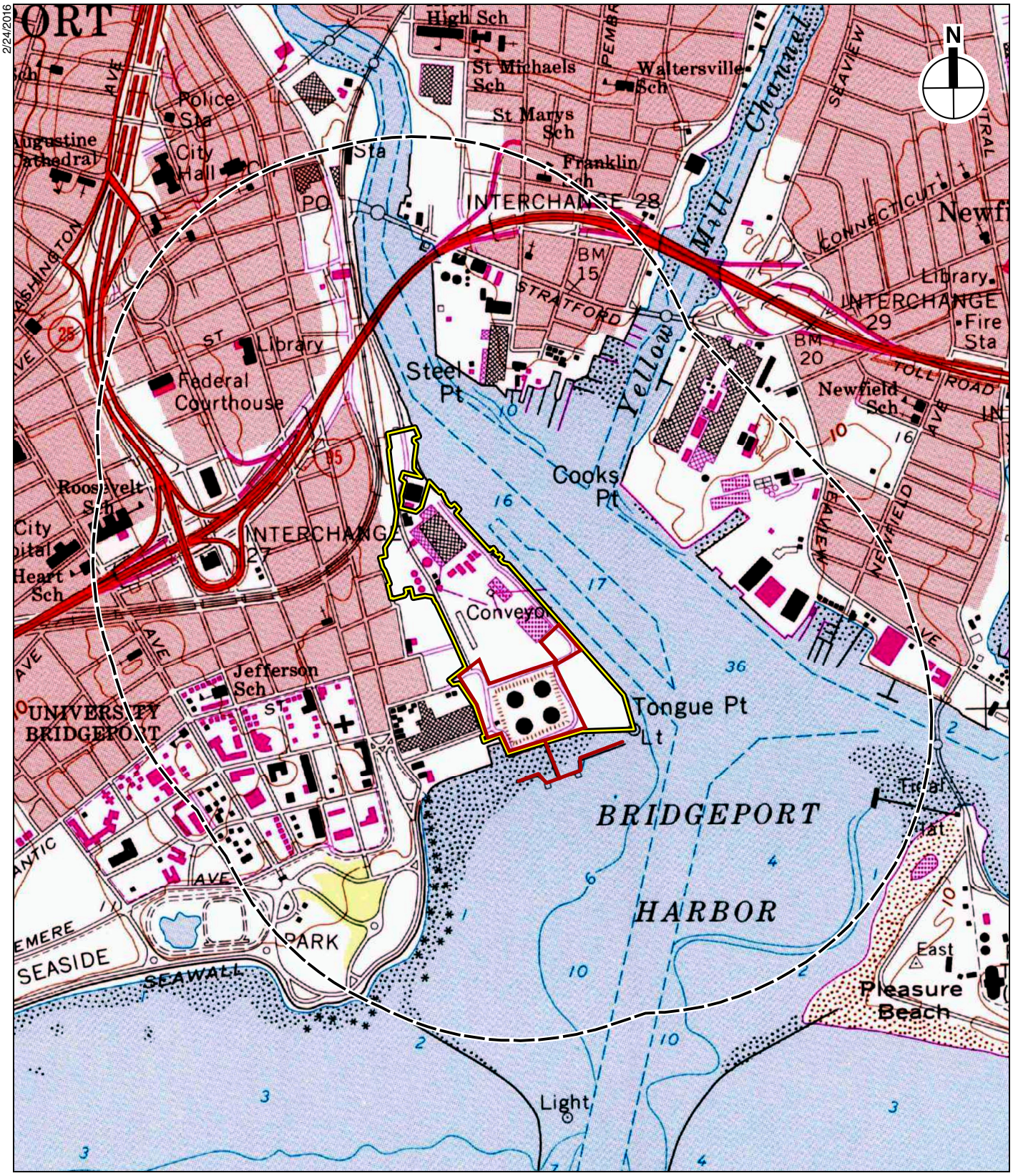
AKRF, Inc. 2016. Land Use and Environmental Report (Revision 1). February 2016.

GEI Consultants. 2014. Wetland Assessment Report, Bridgeport Harbor Station Select Areas. 1 Atlantic Street Bridgeport, Connecticut, May 2014

USFWS 2014. Roseate Tern: North American Subspecies Sterna dougallii dougallii. https://www.fws.gov/northeast/pdf/Roseatetern0511.pdf

FIGURES

2/24/2016



Project Site Property Boundary

Approximate Area of Development

1/2-Mile Study Area

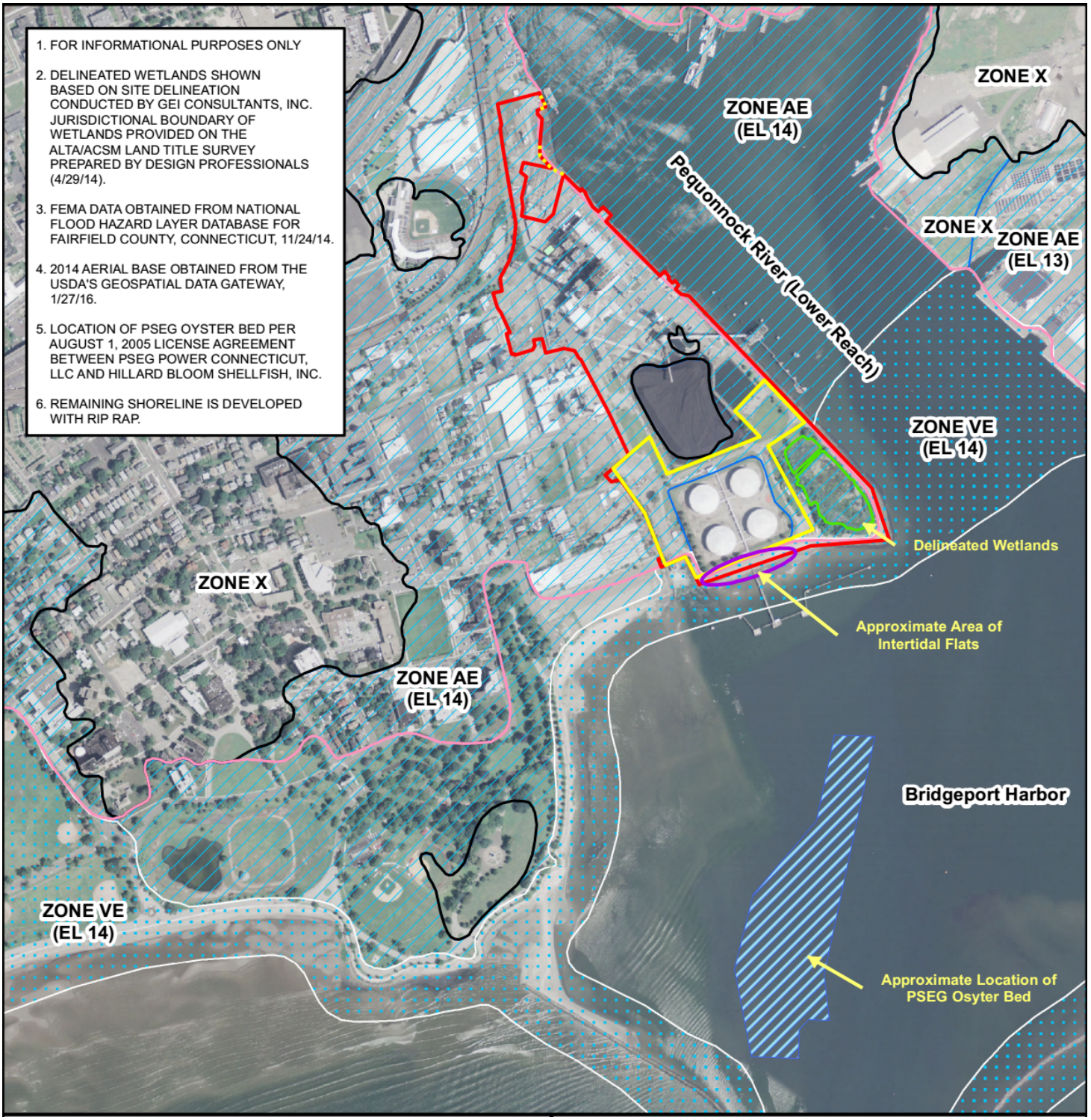
Approximate coordinates of Project Site:
41° 10' 10" N, 73° 10' 55" W

0 2,000 FEET

USGS 7.5 Minute Topographic Map
Bridgeport Quad

BRIDGEPORT HARBOR STATION - Combined Cycle Facility

Figure 1



BRIDGEPORT HARBOR STATION - Combined Cycle Facility

Coastal Resources

Figure 2

2/24/2016

Project Site Property Boundary

Approximate Area of Development

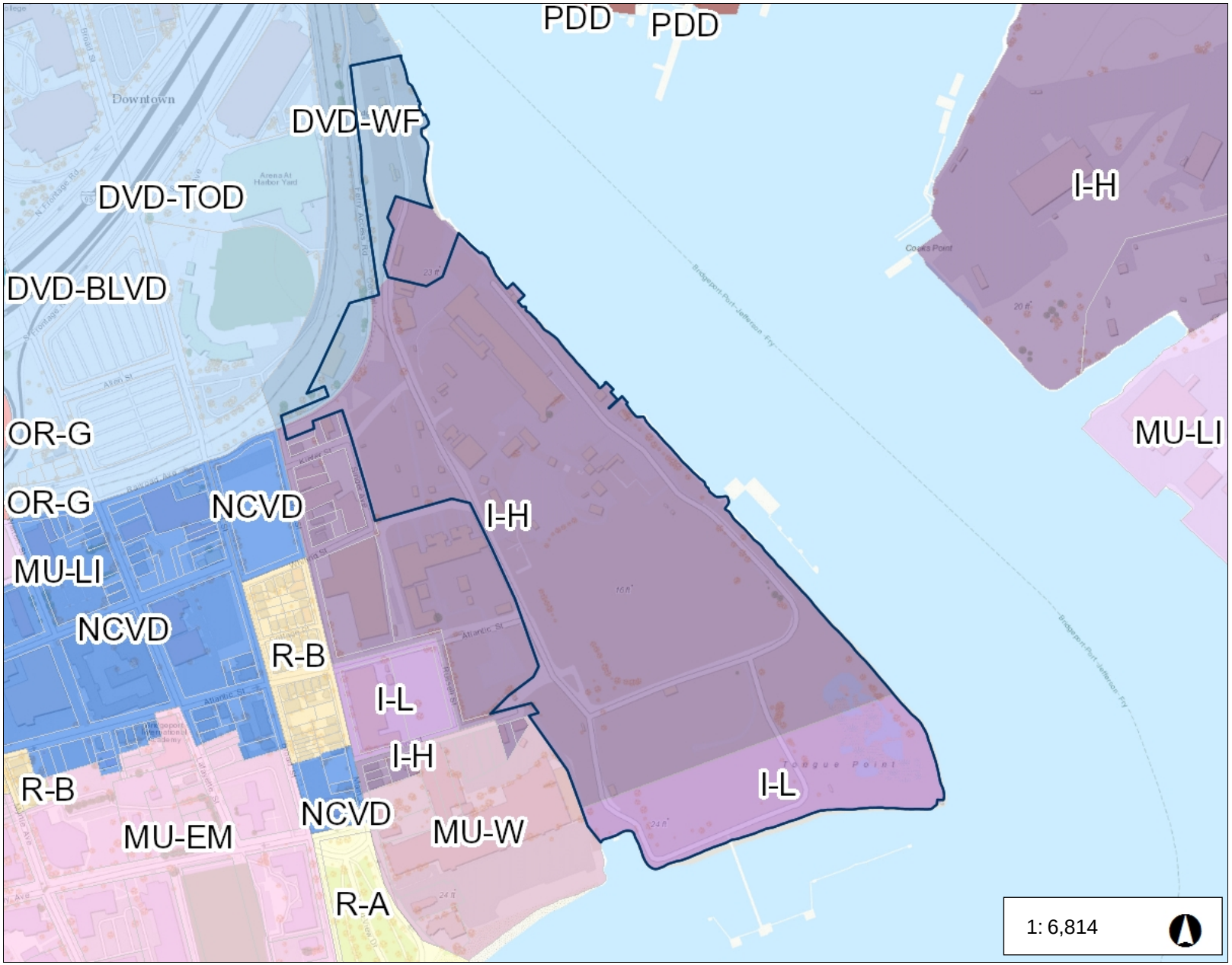
Site Aerial

Figure 3

BRIDGEPORT HARBOR STATION - Combined Cycle Facility

City of Bridgeport

Zoning



Legend

- Parcel Label
- Parcels
- Zoning
  - R-A, Residential - A Single Family
  - R-AA, Residential - AA Single Fami
  - R-B, Residential - B Two Family Zo
  - R-BB, Residential - BB Two and Th
  - R-C, Residential - C Multi-Family Z
  - NCVD, Neighborhood Center Villag
  - MU-LI, Mixed Use - Light Industrial
  - MU-EM, Mixed Use - Educational/M
  - MU-W, Mixed Use - Waterfront Zon
  - OR, Office/Retail Zone
  - OR-G, Office/Retail General
  - OR-R, Office/Retail Regional Zone
  - PDD, Planned Development Distric
  - DVD-CORE, Downtown Core Villag
  - DVD-TOD, Downtown Transit-Orier District
  - DVD-CIVIC, Downtown Civic Villag
  - DVD-BLVD, Downtown Boulevard
  - DVD-WF, Downtown Waterfront Vil
  - I-H, Industrial Heavy Zone
  - I-L, Industrial Light Zone
  - Z-P, Zoological Park Zone

Bridgeport Harbor Station Combined Cycle Facility

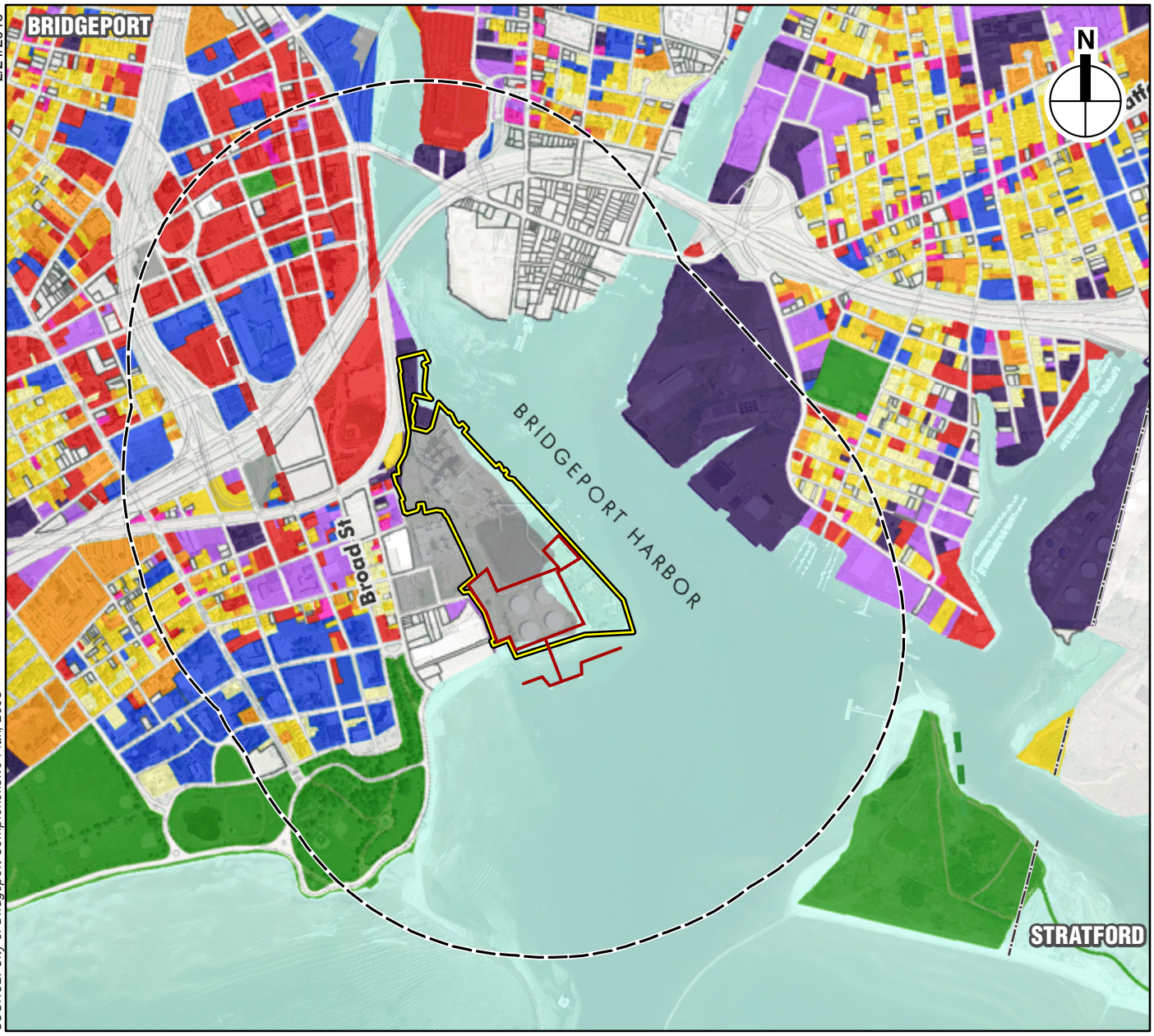
City of Bridgeport Zoning Map

Figure 4

1,135.6 0 567.79 1,135.6 Feet

WGS_1984_Web_Mercator_Auxiliary_Sphere
Created by Greater Bridgeport Regional Council

GBRC Greater Bridgeport Regional Council



2/24/2016

SOURCE: City of Bridgeport Comprehensive Plan, 2008

Existing Generalized Land Use

Figure 5

BRIDGEPORT HARBOR STATION - Combined Cycle Facility

2/24/2016

Vantage Point Locations

Figure 6A

BRIDGEPORT HARBOR STATION - Combined Cycle Facility

VIEW 1

EXISTING

PROPOSED

PSEG
Power Connecticut LLC

View from Soundview Drive

VIEW 2

EXISTING

PROPOSED

PSEG
Power Connecticut LLC

View from Broad Street &
University Avenue

VIEW 3

EXISTING

PROPOSED

PSEG
Power Connecticut LLC

View from Newfield Avenue Boat Ramp

2.24.16

VIEW 4

EXISTING

PROPOSED

PSEG
Power Connecticut LLC

View from New Ferry Site

BRIDGEPORT HARBOR STATION - Combined Cycle Facility

Figure 6E

VIEW 5

EXISTING

PROPOSED

PSEG
Power Connecticut LLC

View from the corner of
Soundview Drive and Cove Road

Legend

Note: Wetland data obtained from GEI's Wetland Delineation Report April 2014.

Wetlands

Unit 5 Area of Development

N

0 250 500 Feet

1 inch = 250 feet

BRIDGEPORT HARBOR STATION - Combined Cycle Facility

Approximate Wetlands Location
Figure 7

Natural Diversity Data Base Areas

BRIDGEPORT, CT

September 2015

State and Federal Listed Species & Significant Natural Communities

Town Boundary

NOTE: This map shows general locations of State and Federal Listed Species and Significant Natural Communities. Information on listed species is collected and compiled by the Natural Diversity Data Base (NDDB) from a number of data sources . Exact locations of species have been buffered to produce the general locations. Exact locations of species and communities occur somewhere in the shaded areas, not necessarily in the center. A new mapping format is being employed that more accurately models important riparian and aquatic areas and eliminates the need for the upstream/downstream searches required in previous versions.

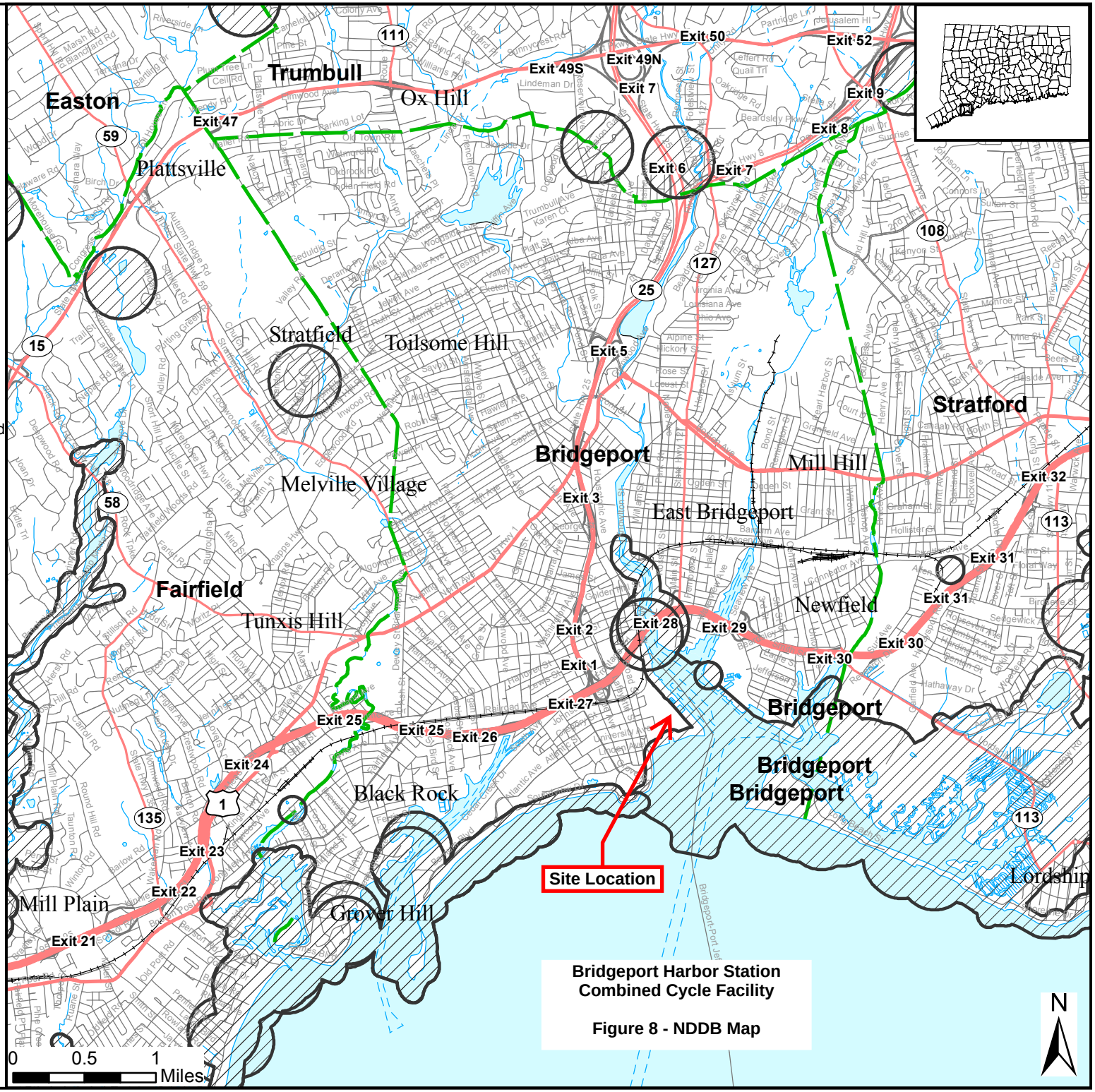
This map is intended for use as a preliminary screening tool for conducting a Natural Diversity Data Base Review Request. To use the map, locate the project boundaries and any additional affected areas. If the project is within a shaded area there may be a potential conflict with a listed species. For more information, complete a Request for Natural Diversity Data Base State Listed Species Review form (DEP-APP-007), and submit it to the NDDB along with the required maps and information. More detailed instructions are provided with the request form on our website.

www.ct.gov/deep/nddbrequest

Use the CTECO Interactive Map Viewers at www.cteco.uconn.edu to more precisely search for and locate a site and to view aerial imagery with NDDB Areas.

QUESTIONS: Department of Energy and Environmental Protection (DEEP)
79 Elm St., Hartford CT 06106
Phone (860) 424-3011

Connecticut Department of Energy & Environmental Protection
Bureau of Natural Resources
Wildlife Division



APPENDIX A

Agency Correspondence

Connecticut Department of

ENERGY &
ENVIRONMENTAL
PROTECTION

October 21, 2014

Kevin Mahar
AKRF, Inc.
307 Fellowship Road, Suite 214
Mount Laurel, NJ 08054

Re: PSEG Power Connecticut, Bridgeport Harbor Unit 5, Combined Cycle Project in Bridgeport Connecticut
NDDB 201408872

Dear Mr. Mahar:
Materials pertaining to the above project were forwarded to me for review by the DEEP Natural Diversity Database (NDDB). Their records indicate that state-listed species occur in the vicinity of this proposed project.

Given the proposed upgrades, as well as the location and siting of this facility, it is unlikely that construction activities and subsequent operations of the facility will negatively impact state-listed species.

Natural Diversity Database information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey 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 Database should not be substituted for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Database as it becomes available.

This is a preliminary site review and is not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to the DEEP for the proposed site. Please be advised that should state permits be required or should state involvement occur in some other fashion, specific restrictions or conditions relating to the species discussed above may apply. In this situation, additional evaluation of the proposal by the DEEP Wildlife Division should be requested and species-specific surveys may be required. If the proposed project has not been initiated within one year of this Wildlife Division review, you should contact the NDDB for an updated review.

If you have any additional questions, please feel free to contact me at Laura.Saucier@ct.gov, please reference the NDDB number in the subject line of this letter when you e-mail or write.

Sincerely,

Laura Saucier
Wildlife Biologist

Connecticut Department of
Energy & Environmental Protection
Bureau of Natural Resources
Wildlife Division

CPPU USE ONLY
App #:_____
Doc #:_____
Check #: No fee required
Program: Natural Diversity Database **Endangered Species**
Hardcopy _____ **Electronic** _____

Request for Natural Diversity Data Base (NDDB) State Listed Species Review

Please complete this form in accordance with the instructions (DEEP-INST-007) to ensure proper handling of your request.
There are no fees associated with NDDB Reviews.

Part I: Preliminary Screening & Request Type

Before submitting this request, you must review the most current Natural Diversity Data Base "State and Federal Listed Species and Significant Natural Communities Maps" found on the DEEP website. These maps are updated twice a year, usually in June and December.

Does your site, including all affected areas, fall in an NDDB Area according to the map instructions:

☒ Yes ☐ No **Enter the date** of the map reviewed for pre-screening: **September 2015**

This form is being submitted for a :

☒ *New* NDDB request ☐ *Renewal/Extension* of a NDDB Request, ***without*** *modifications and within* ***one year*** *of issued NDDB determination* (no attachments required) **Previous determination issued 10/21/14 NDDB 201408872** [*CPPU Use Only - NDDB-Listed Species Determination #* 1736]	☐ *New* **Safe Harbor Determination** (optional) must be associated with an application for a GP for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities ☐ *Renewal/Extension* of an existing Safe Harbor Determination ☐ With modifications ☐ Without modifications (no attachments required) [*CPPU Use Only - NDDB-Safe Harbor Determination #* 1736]
Enter NDDB Determination Number for Renewal/Extension:	Enter Safe Harbor Determination Number for Renewal/Extension:

Part II: Requester Information

***If the requester is a corporation, limited liability company, limited partnership, limited liability partnership, or a statutory trust, it must be registered with the Secretary of State. If applicable, the name shall be stated **exactly** as it is registered with the Secretary of State. Please note, for those entities registered with the Secretary of State, the registered name will be the name used by DEEP. This information can be accessed at the Secretary of the State's database CONCORD.*
(www.concord-sots.ct.gov/CONCORD/index.jsp)

If the requester is an individual, provide the legal name (include suffix) in the following format: First Name; Middle Initial; Last Name; Suffix (Jr, Sr., II, III, etc.).

If there are any changes or corrections to your company/facility or individual mailing or billing address or contact information, please complete and submit the Request to Change company/Individual Information to the address indicated on the form.

1. Requester*

Company Name: **AKRF, Inc.**

Contact Name: **Jeffrey J. Pantazes**

Address: **307 Fellowship Road, Suite 214**

City/Town: **Mount Laurel** State: **NJ** Zip Code: **08054**

Business Phone: **856-359-7645** ext.

E-mail: **jpantazes@akrf.com

**By providing this email address you are agreeing to receive official correspondence from the department, at this electronic address, concerning this request. Please remember to check your security settings to be sure you can receive emails from "ct.gov" addresses. Also, please notify the department if your e-mail address changes

a) Requester can best be described as:

☐ Individual ☐ Federal Agency ☐ State agency ☐ Municipality ☐ Tribal

☒ *business entity (* if a business entity complete i through iii):

i) Check type ☒ corporation ☐ limited liability company ☐ limited partnership
☐ limited liability partnership ☐ statutory trust ☐ Other:

ii) Provide Secretary of the State Business ID #: 0582535 This information can be accessed at the Secretary of the State's database (CONCORD). (www.concord-sots.ct.gov/CONCORD/index.jsp)

iii) ☐ Check here if your business is **NOT** registered with the Secretary of State's office.

b) Acting as (Affiliation), pick one:

☐ Property owner ☒ Consultant ☐ Engineer ☐ Facility owner ☐ Applicant

☐ Biologist ☐ Pesticide Applicator ☐ Other representative:

2. List Primary Contact to receive Natural Diversity Data Base correspondence and inquiries, if different from requester.

Company Name:

Contact Person: Title:

Mailing Address:

City/Town: State: Zip Code:

Business Phone: ext.

**E-mail:

Part III: Site Information

This request can only be completed for one site. A separate request must be filed for each additional site.

1. SITE NAME AND LOCATION

Site Name or Project Name: **PSEG Power Connecticut LLC - Bridgeport Harbor**

Town(s): **Bridgeport**

Street Address or Location Description:
PSEG Bridgeport Harbor Generating Station
1 Atlantic Street
Bridgeport, CT 06604-5513
(See Figures 1 and 2 - Site Location Map and Site Location Aerial, respectively)

Size in acres, or site dimensions: **Approximately 58 acres**

Latitude and longitude of the center of the site in decimal degrees (e.g., 41.23456 -71.68574):

Latitude: **41.167173** Longitude: **-73.180903**

Method of coordinate determination (check one):

☐ GPS ☐ Photo interpolation using CTECO map viewer ☒ Other (specify): **Google Earth**

2a. Describe the current land use and land cover of the site.

The development site is located within PSEG's existing Bridgeport Harbor Generating Station. The existing station is located within an industrial area located on the western shore of Bridgeport Harbor. The Bridgeport Harbor Station has operated at this location since 1957. The northern portion of the proposed site is located within the City of Bridgeport's Industrial-Heavy (I-H) Zone and the southern portion of the site within an Industrial-Light (I-L) Zone. The area surrounding the existing station is characterized by a mix of industrial, commercial, and residential uses.

As illustrated by the site aerial provided as Figure 2, aside from grassed or scrub vegetated areas interspersed with limited woody vegetation, the proposed development site contains little vegetative cover.

b. Check all that apply and enter the size in acres or % of area in the space after each checked category.

☒ Industrial/Commercial 100% ☐ Residential _____ ☐ Forest _____
☐ Wetland _____ ☐ Field/grassland _____ ☐ Agricultural _____
☐ Water _____ ☐ Utility Right-of-way _____
☐ Transportation Right-of-way _____ ☐ Other (specify): _____

Part IV: Project Information

1. PROJECT TYPE:

Choose Project Type: Commercial/Industrial development , If other describe: _____

2. Is the subject activity limited to the maintenance, repair, or improvement of an existing structure within the existing footprint? ☐ Yes ☒ No If yes, explain.

Part IV: Project Information (continued)

3. Give a detailed description of the activity which is the subject of this request and describe the methods and equipment that will be used. Include a description of steps that will be taken to minimize impacts to any known listed species.

PSEG Power Connecticut LLC (PSEG) is proposing to install and operate a combined cycle facility with a generating capacity of approximately 485 Megawatts (MW) at the site of its existing Bridgeport Harbor Station. As an unrelated project and to support continued operation of the station's existing Unit 3, a new fuel oil storage tank will be constructed at the station, north of the combined cycle development site. The existing Unit 3 oil storage tanks, presently located at the proposed Unit 5 site, will be demolished and removed, and the area will be remediated prior to implementation of the proposed Project. PSEG is also planning to repair the fuel oil delivery dock structure, which was severally damaged during Superstorm Sandy. That work is expected to be conducted during 2017, coincident with construction of the new plant.

Figure 1 shows the boundary of the existing Bridgeport Harbor Station and the approximate location of the proposed combined cycle area of development and other activities on the United States Geological Service (USGS) 7.5-minute map (Bridgeport, Connecticut Quadrangle) for the surrounding area. Figure 2 provides a detailed site aerial of the proposed project site illustrating existing site conditions and the location of the proposed development.

The proposed combined cycle facility will consist of one gas turbine and one steam turbine (i.e., 1x1 configuration) that will be dual fuel capable, utilizing both natural gas and ultra-low sulfur distillate fuel ("ULSD"), firing natural gas when supplies are available. Natural gas would be utilized as the primary fuel with provisions to use ULSD for up to 30 days per year as a back-up fuel. The new plant will be sited in an area where four fuel oil storage tanks are currently located. As noted, the existing tanks will be removed, and replaced with new tanks to support the existing Bridgeport Harbor Unit 3 and the new Facility. A preliminary site development plan is provided as Figure 3.

The new Unit 3 fuel oil storage tank facility, including a fuel oil forwarding pump house, and truck unloading area, is being proposed to replace the four (4) existing Unit 3 fuel oil storage tanks (and three smaller tanks), which will be removed following completion of the new tank and unloading facilities. A preliminary site development plan for these activites is provided as Figure 4.

The facility design will be based on good engineering practice, using state-of-the-art air quality control technology and utilizing clean burning natural gas as the Facility's primary fuel source. These measures will minimize potential impacts to air quality. Additionally, the design will incorporate mitigation measures for noise and an air-cooled condenser to minimize facility operational water requirements and to eliminate surface water impacts. To provide for storm hardening for this critical waterfront energy infrastructure, the elevation of the Unit 5 project site will be raised by approximately 8 to 10 feet. Grade changes will be accomplished through use of structural retaining walls and import of fill.

As the development will occur within a previously disturbed industrial site, the construction or operation of the project is not anticipated to impact any federal or state-listed species of concern. As illustrated by the site aerial provided as Figure 2, aside from grassed areas interspersed with limited woody vegetation, the proposed development site contains little vegetative cover. As a consequence, the project site is not anticipated to provide quality wildlife habitat and significant impacts to vegetation and wildlife will not occur. The September 2015 Natural Diversity Database Area Map for Bridgeport, CT (see Figure 5), indicates that the majority of the Project's proposed development area is located outside of the hatched NDDBA areas on the map. The small portions of the existing Bridgeport Harbor Generating Station site that contain hatched NDDBA areas are located along the industrial site's waterfront along Bridgeport Harbor. Potential impacts to aquatic resources have been minimized through the incorporation of an air-cooled condenser into the facility design. Use of an air-cooled condenser not only eliminates the need for local surface water withdrawals but also eliminates the need for discharge of heated cooling water to Bridgeport Harbor. Process wastewater discharge will be minimal and directed to the municipal sanitary sewer system. Make-up water for the facility will also be obtained from municipal sources. Hence potential impacts to aquatic resources are avoided. Stormwater from the combined cycle site will be managed in accordance with CTDEEP and City of Bridgeport requirements. Prior to site disturbance a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the CTDEEP general permit "Stormwater and Dewatering Wastewaters from

Construction Activities" (DEEP-WPED-GP-015) will be prepared and implemented. The SWPPP will conform to the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and its implementation will ensure that off-site impacts due to soil erosion do not occur.

All construction will be in accordance with applicable local and state construction standards and conditions of the regulatory approvals to be obtained for the Project.

4. If this is a renewal or extension of an existing Safe Harbor request *with* modifications, explain what about the project has changed.

   N/A

5. Provide a contact for questions about the project details if different from Part II primary contact.

   Name:

   Phone:

   E-mail:

Part V: Request Requirements and Associated Application Types

Check *one* box from either Group 1, Group 2 *or* Group 3, indicating the appropriate category for this request.

Group 1. If you check one of these boxes, complete Parts I – VII of this form and submit the required attachments A and B.

- ☐ Preliminary screening was negative but an NDDB review is still requested
- ☐ Request regards a municipally regulated or unregulated activity (no state permit/certificate needed)
- ☐ Request regards a preliminary site assessment or project feasibility study
- ☐ Request relates to land acquisition or protection
- ☐ Request is associated with a *renewal* of an existing permit, with no modifications

Group 2. If you check one of these boxes, complete Parts I – VII of this form and submit required attachments A, B, *and* C.

- ☒ Request is associated with a *new* state or federal permit application
- ☒ Request is associated with modification of an existing permit
- ☐ Request is associated with a permit enforcement action
- ☐ Request regards site management or planning, requiring detailed species recommendations
- ☐ Request regards a state funded project, state agency activity, or CEPA request

☐ **Group 3.** If you are requesting a **Safe Harbor Determination**, complete Parts I-VII and submit required attachments A, B, and D. Safe Harbor determinations can only be requested if you are applying for a GP for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities

If you are filing this request as part of a state or federal permit application(s) enter the application information below.

Permitting Agency and Application Name(s):
CTDEEP Permits: Prevention of Significant Deterioration (PSD) and Major (i.e. non-minor) modification of the existing Title V Air Permit; Certificate of Permission (COP) for Minor Waterfront Work (potential); Structures and Dredging Permit (potential)

General Permits - Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater (DEEP-WPED-GP-012); Discharge Permit - General Permit Registration Form for Minor Non-contact Cooling and Heat Pump Water Non-Contact Cooling and Heat Pump Water (DEP-PERD-GP-009); Contaminated Soil and/or Sediment Management (Staging and Transfer) (DEP-SW-GP-001); Stormwater and Dewatering Wastewaters from Construction Activities (DEEP-WPED-GP-015)

CT Siting Council Approval

Federal Permits - USACE Programmatic General Permit Approval (potential)

State DEEP Application Number(s), if known: _____

State DEEP Enforcement Action Number, if known: _____

State DEEP Permit Analyst(s)/Engineer(s), if known: _____

Is this request related to a previously submitted NDDB request? ☒ Yes ☐ No

If yes, provide the previous NDDB Determination Number(s), if known: **201408872**

Part VI: Supporting Documents

Check each attachment submitted as verification that *all* applicable attachments have been supplied with this request form. Label each attachment as indicated in this part (e.g., Attachment A, etc.) and be sure to include the requester's name, site name and the date. **Please note that Attachments A and B are required for all new requests and Safe Harbor renewals/extensions with modifications.** Renewals/Extensions with no modifications do not need to submit any attachments. Attachments C and D are supplied at the end of this form.

☒ Attachment A:	**Overview Map:** an 8 1/2" X 11" print/copy of the relevant portion of a USGS Topographic Quadrangle Map clearly indicating the exact location of the site.
☒ Attachment B:	**Detailed Site Map:** fine scaled map showing site boundary and area of work details on aerial imagery with relevant landmarks labeled. (Site and work boundaries in GIS [ESRI ArcView shapefile, in NAD83, State Plane, feet] format can be substituted for detailed maps, see instruction document)
☒ Attachment C:	**Supplemental Information, Group 2 requirement (attached, DEEP-APP-007C)** ☒ Section i: Supplemental Site Information and supporting documents ☒ Section ii: Supplemental Project Information and supporting documents
☐ Attachment D:	**Safe Harbor Report Requirements, Group 3 (attached, DEEP-APP-007D)**

Part VII: Requester Certification

The requester *and* the individual(s) responsible for actually preparing the request must sign this part. A request will be considered incomplete unless all required signatures are provided.

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of the individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief."

Signature of Requester (a typed name will substitute for a handwritten signature)	02/22/2016 Date
Jeffrey J. Pantazes Name of Requester (print or type)	Project Manager / Senior Technical Director Title (if applicable)
Signature of Preparer (if different than above)	2/22/16 Date
Christina E. Torok Name of Preparer (print or type)	Title (if applicable)

Note: Please submit the completed Request Form and all Supporting Documents to:

CENTRAL PERMIT PROCESSING UNIT
DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
79 ELM STREET
HARTFORD, CT 06106-5127

Or email request to: **deep.nddbrequest@ct.gov**

Attachment C: Supplemental Information, Group 2 requirement

Section i: Supplemental Site Information

1. Existing Conditions

Describe all natural and man-made features including wetlands, watercourses, fish and wildlife habitat, floodplains and any existing structures potentially affected by the subject activity. Such features should be depicted and labeled on the site plan that must be submitted. Photographs of current site conditions may be helpful to reviewers.

The existing PSEG Bridgeport Harbor Generating Station is located on an approximately 58 acre parcel adjacent to the Bridgeport Harbor (see Figure 1, USGS Site Location Map). As shown on the USGS Site Location Map, the station site is relatively flat, with a ground elevation of approximately 8 to 10 feet North American Vertical Datum 1988, (NAVD88). As shown on the site aerial provided as Figure 2, the property is currently developed as an electric generating station, with additional structures including a dock for the mooring and unloading of tankers and for the unloading of barges, four aboveground petroleum storage tanks, and associated utilities and internal access roadways. A portion of the site is dedicated to the storage of coal, which is used for fuel by the existing station's boilers. A detailed site aerial depicting existing environmental conditions within the Project's proposed development area is provided a Figure 6.

The existing Facility is bordered to the south and east by Bridgeport Harbor, which is a coastal water. Pursuant to the CTDEEP Coastal Boundary Map, dated January 2013, the Facility is located within the designated state coastal boundary. The area has been and currently is subject to dense industrial and commercial development. Within the vicinity of the Facility, Bridgeport Harbor and the Pequonnock River (which is located northeast of the site, north of the harbor) are classified as impaired waterbodies, pursuant to the CTDEEP Water Quality Standards. The majority of the existing station site is mapped within the 100-year floodplain (Zone AE), which is at elevation 14 feet NAVD88 (see Figure 6). Portions of the site not mapped as being located within the floodplain include the existing station coal pile and the area of the existing oil storage tanks (which is surrounded by a containment dike. Existing base elevations at the location of the proposed combined cycle facility range from approximately 7 feet to over 9+ feet NAVD 88. The Facility is not located within a regulated floodway.

Along the eastern station property boundary, the Bridgeport Harbor shoreline is primarily stabilized with a riprap revetment, with the exception of a bulkhead that surrounds an intake area and a retaining wall along the northern portion of the shoreline. Along the southern property boundary, the shoreline is also stabilized with a riprap revetment. These man-made bank stabilization controls have generally replaced natural beach or dune areas along the coastal waters. The riprap along portions of this shoreline, particularly to the south of the oil tank area, does not extend to the intertidal area, exposing sandy intertidal areas during periods of low tide.

Two vegetated wetlands exist on the station property, adjacent to the proposed location of the combined cycle facility to the east. The locations of these wetlands are noted on the development site aerial provided as Figure 6. The two wetland areas are separated from Bridgeport Harbor by a fill embankment topped by a paved road which is generally oriented north to south on the east side of the wetlands and east to west along the south side of the wetlands (see Figure 6). The fill embankment is typically 20 to 40 feet wide on the east side and approximately 60 to 100 feet wide to the south. The northern wetland area is an isolated system, approximately rectangular in shape, and is within a bermed perimeter. The southern wetland area has a tidal connection, is approximately rectangular in shape, and is within a bermed or otherwise filled perimeter. The jurisdictional boundary of these wetland areas were delineated by GEI Consultants, Inc. April 2014. The construction of the proposed Project will not result in the filling of this wetland area. During construction, appropriate soil erosion and sediment control measures (e.g., silt fence, etc.) will be installed to prevent loose sediment from entering the wetland.

☒ **Site Photographs (optional) attached**

☒ **Site Plan/sketch of existing conditions attached**

2. Biological Surveys

Has a biologist visited the site and conducted a biological survey to determine the presence of any endangered, threatened or special concern species ☐ Yes ☒ No

If yes, complete the following questions and submit any reports of biological surveys, documentation of the biologist's qualifications, and any NDDB survey forms.

Biologist(s) name: _____

Habitat and/or species targeted by survey: _____

Dates when surveys were conducted: _____

☐ **Reports of biological surveys attached**

☐ **Documentation of biologist's qualifications attached**

☐ **NDDB Survey forms for any listed species observations attached**

Section ii: Supplemental Project Information

1. Provide a schedule for all phases of the project including the year, the month and/or season that the proposed activity will be initiated and the duration of the activity.

   Pending receipt of required permits and authorizations, PSEG intends to initiate construction of the new Unit 5 facility during the first quarter of 2017, with completion (commercial operations) by June 1, 2019. TheUnit 3 Fuel Oil Tank facility construction is expected to start in June 2016, with the new tank being placed in service in October 2016. Subsequent to that the demolition and limited remediation activities in the existing fuel oil tank area will be initiated, with completion by the second quarter of 2017.

2. Describe and quantify the proposed changes to existing conditions and describe any on-site or off-site impacts. In addition, provide an annotated site plan detailing the areas of impact and proposed changes to existing conditions.

   A preliminary site plan detailing the proposed built condition is provided as Figures 3 and 4. These figures provide an annotated listing of the power generation equipment to be installed as part of the project. Development of the project will result in removal of the four, large existing fuel oil tanks the comprise the majority of the Project's site development area. Due to the lack of substantive vexation at the site, minimal clearing of woody vegetation will be required to support construction. To provide for storm hardening for this critical waterfront energy infrastructure, the elevation of the project site will be raised by approximately 8 to 10 feet. Grade changes will be accomplished through use of structural retaining walls and import of fill.

   The preliminary site plan provided as Figures 3 and 4 includes an annotated listing of the power generation equipment to be installed as part of the project.

   ☒ **Annotated Site Plan attached**

Attachment D: Safe Harbor Report Requirements

Submit a report, as Attachment D, that synthesizes and analyzes the information listed below. Those providing synthesis and analysis need appropriate qualifications and experience. A request for a safe harbor determination shall include:

1. **Habitat Description and Map(s), including GIS mapping overlays, of a scale appropriate for the site, identifying:**

    - wetlands, including wetland cover types;
    - plant community types;
    - topography;
    - soils;
    - bedrock geology;
    - floodplains, if any;
    - land use history; and
    - water quality classifications/criteria.

2. **Photographs** - The report should include photographs of the site taken from the ground and also all reasonably available aerial or satellite photographs and an analysis of such photographs.

3. **Inspection** - A visual inspection(s) of the site should be conducted, preferably when the ground is visible, and described in the report. This inspection can be helpful in confirming or further evaluating the items noted above.

4. **Biological Surveys** - The report should include all biological surveys of the site where construction activity will take place that are reasonably available to a registrant. A registrant shall notify the Department's Wildlife Division of biological studies of the site where construction activity will take place that a registrant is aware of but are not reasonably available to the registrant.

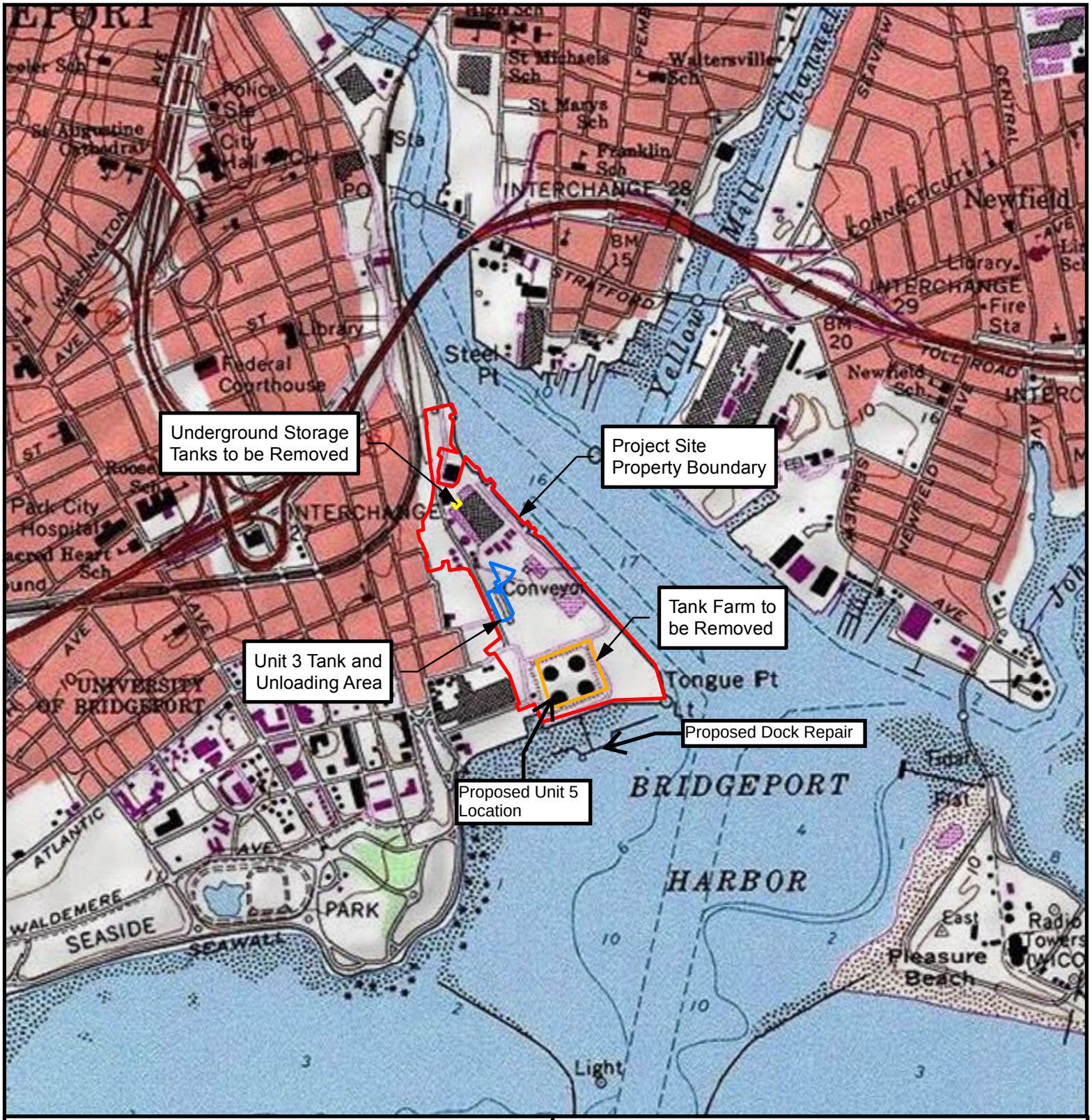
5. **Based on items #1 through 4 above, the report shall include a Natural Resources Inventory of the site of the construction activity.** This inventory should also include a review of reasonably available scientific literature and any recommendations for minimizing adverse impacts from the proposed construction activity on listed species or their associated habitat.

6. **In addition, to the extent the following is available at the time a safe harbor determination is requested, a request for a safe harbor determination shall include and assess:**

    - Information on Site Disturbance Estimates/Site Alteration information
    - Vehicular Use
    - Construction Activity Phasing Schedules, if any; and
    - Alteration of Drainage Patterns

Attachment A
Overview Mapping

Figure 1 - USGS Site Location Map



Legend

Service Layer Credits: Copyright: © 2013 National Geographic Society

- Project Site Property Boundary
- Unit 3 Tank and Unloading Area
- Underground Storage Tanks to be Removed
- Tank Farm to be Removed / Proposed Unit 5 Location

0 1,250 2,500 Feet

1 inch = 1,250 feet

N

AKRF
307 Fellowship Rd., Suite 214
Mt Laurel, NJ 08054
856-797-9930

USGS TOPOGRAPHIC MAP

PSEG POWER CONNECTICUT LLC
BRIDGEPORT HARBOR STATION
UNIT 3 TANK PROJECT
BRIDGEPORT, FAIRFIELD COUNTY, CT

FIGURE 1	JANUARY 2016

Attachment B
Detailed Site Map

Figure 2 - Site Aerial Photograph

Legend

- Project Site Property Boundary
- Unit 3 Tank and Unloading Area
- Underground Storage Tanks to be Removed
- Tank Farm to be Removed / Proposed Unit 5 Location

0 800 1,600 Feet

1 inch = 836 feet

N

Note: Basemap obtained from the USDA's Geospatial Data Gateway on 1/27/2016.

AKRF
307 Fellowship Rd., Suite 214
Mt Laurel, NJ 08054
856-797-9930

SITE AERIAL

PSEG POWER CONNECTICUT LLC
BRIDGEPORT HARBOR STATION
UNIT 3 TANK PROJECT
BRIDGEPORT, FAIRFIELD COUNTY, CT

FIGURE 2	JANUARY 2016

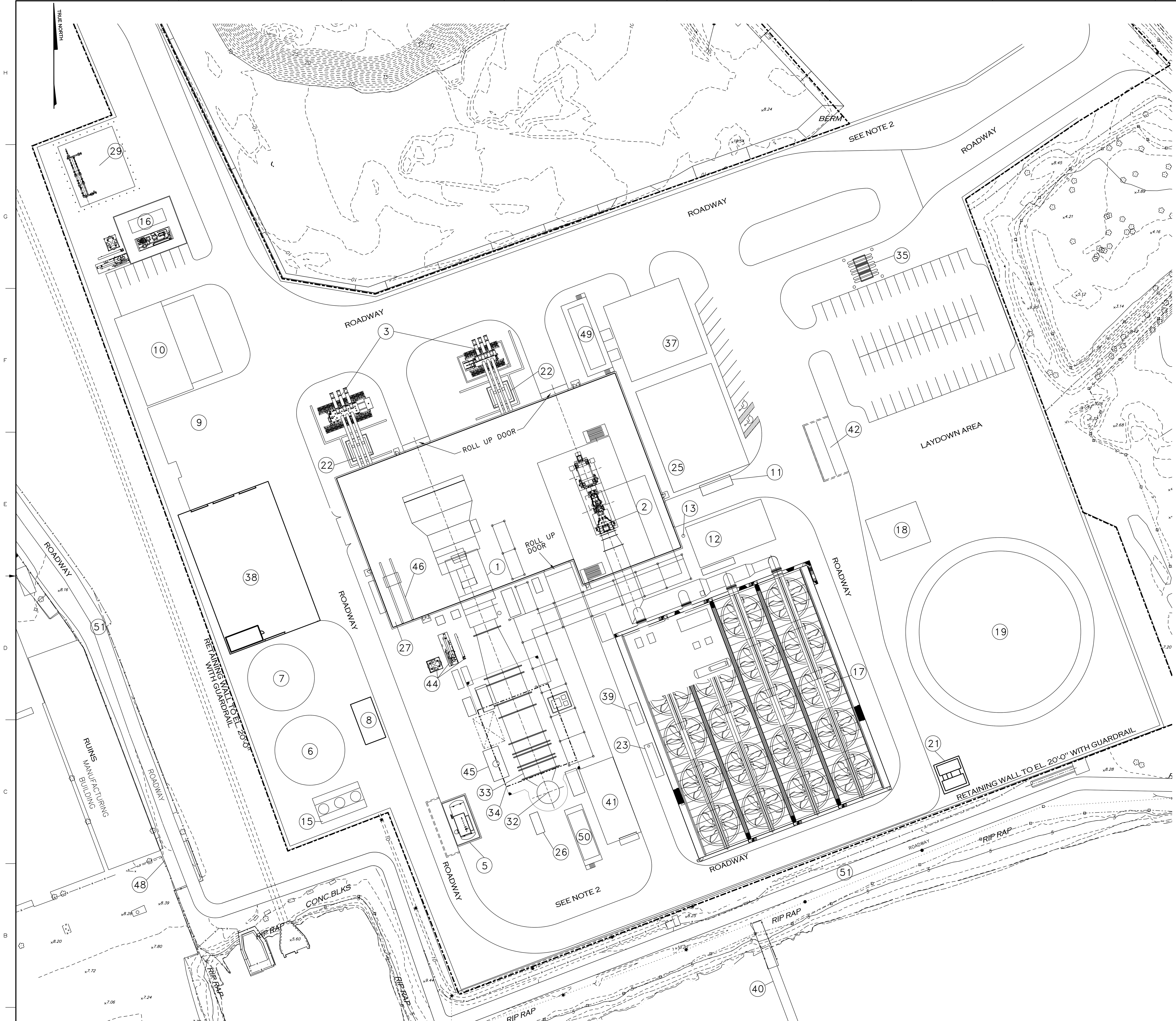
Attachment C
Supplemental Information

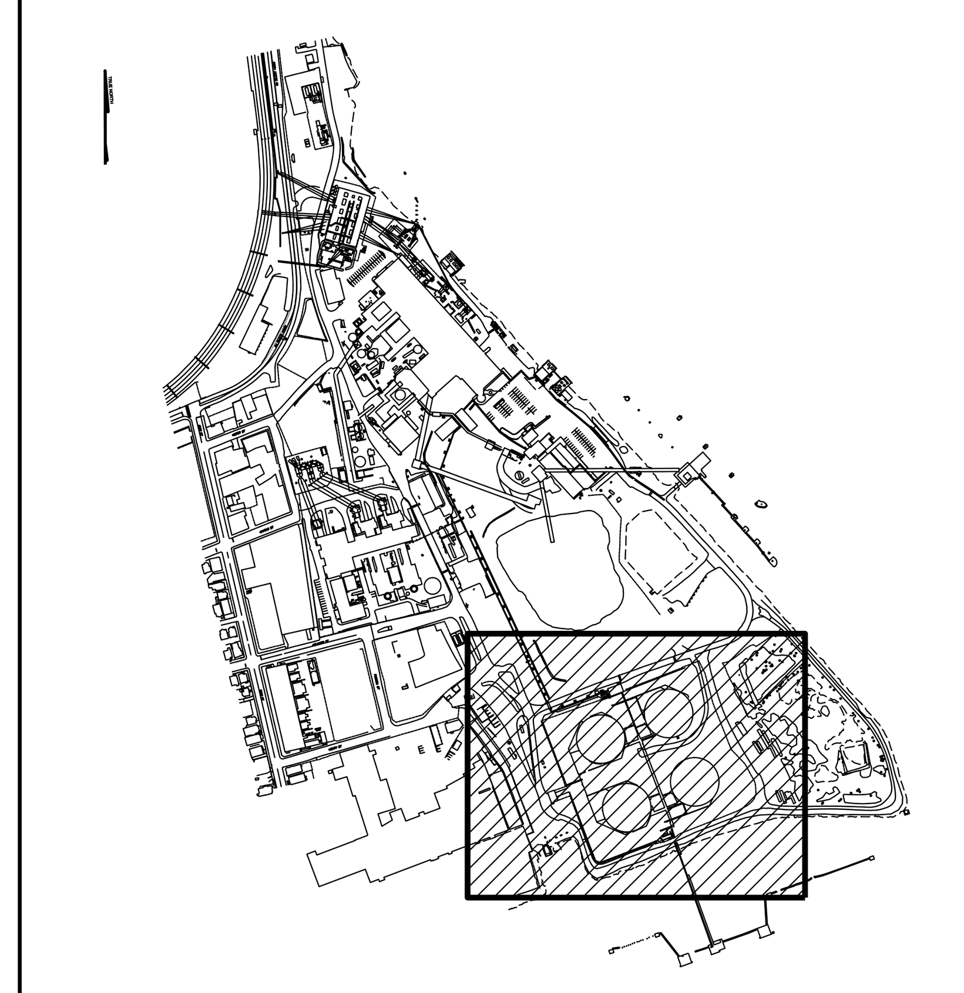
Figure 3 – Preliminary Site Development Plan Unit 5 Combined Cycle Project

Figure 4 – Preliminary Site Development Plan Unit 3 Oil Storage Tank

Figure 5 – NDDB Area Map – City of Bridgeport

Figure 6 – Coastal Resource Map





KEY PLAN

LEGENDS/SYMBOL KEYS:

- PSEG FENCE LINE
- PROPOSED STRUCTURES
- XX ITEM NUMBER
- PSEG PROPERTY LINE
- LIMIT OF AREA OF DISTURBANCE

INDEX

ITEM	DESCRIPTION	NOTES
1	COMBUSTION TURBINE GENERATOR (CTG)	
2	STEAM TURBINE GENERATOR (STG)	
3	GSU TRANSFORMERS 345KV (CTG/STG)	
4	PACKAGE ELECTRONIC & ELECTRICAL CONTROL CONPARTMENT (PEECC)	(NOT SHOWN)
5	AMMONIA TRUCK UNLOADING AND STORAGE	20,000 GALLON
6	RO/DEMINERALIZED WATER TANK	1,000,000 GALLON
7	SERVICE WATER/FIRE WATER STORAGE TANK	900,000 GALLON
8	FIRE PROTECTION AND SERVICE WATER PUMP HOUSE	3,000 sqft (75'x40')
9	DEMINERIALIZED WATER TRAILERS/REVERSE OSMOSIS	BY VENDOR
10	345KV GIS BUILDING	6,450sqft (75.5'x85.5')
11	EMERGENCY DIESEL GENERATOR	2000KW
12	AUX. BOILER BUILDING	40'x75' (EL. 44'-6")
13	AUX. BOILER STACK	2.83'DIA. (EL.176'-6")
14	(NOT USED)	
15	AUX. COOLING TOWER	1,125 sqft (45'x25'x23')
16	FUEL GAS PROCESSING BUILDING	2,632 sqft (47'x56')
17	AIR COOLED CONDENSERS (ACC) 20 CELLS	219'x189' (EL.141'-6")
18	FUEL OIL FORWARDING PUMP HOUSE	2,000 sqft (50'x40')
19	ULSD TANK	5,500,000 GAL. TOTAL
20	EXCITATION TRANSFORMER	(NOT SHOWN)
21	MANUFACTURED TREATMENT DEVICE (BELOW GROUND)	
22	AUX. TRANSFORMER	
23	OIL/WATER SEPARATOR (BELOW GROUND)	550 GAL. 55GPM
24	STATIC START ISOLATION TRANSFORMER	(NOT SHOWN)
25	CONTROLS SERVICE/AUX ELECT BUILDING (2 STORIES)	(2x 8.500sqf) 17,000 sqft
26	CEMS EQUIPMENT MODULE	225 sqft (15'x15')
27	TURBINE BUILDING	44,546 sqft (279'x150'-7") + (99'-8"x25'-5")
28	BATTERY COMPARTMENT	(NOT SHOWN)
29	FUEL GAS METERING & REGULATING STATION	3,240 sqft (54'x60')
30	LCI AND EXCITER COMPARTMENT	(NOT SHOWN)
31	ST GENERATOR EXCITATION COMPARTMENT	(NOT SHOWN)
32	HRSG STACK	21' DIA. (EL.316'-6")
33	HEAT RECOVERY STEAM GENERATOR (HRSG)	164'-4"x36'-10" (EL.115'-10")
34	HRSG PENTHOUSE	
35	HYDROGEN STORAGE VESSELS	
36	MAINTENANCE BUILDING (NOT SHOWN)	800 sqft (20'x40')
37	WAREHOUSE	5,625 sqft (75'x75')
38	GENERAL SERVICES BUILDING	12,270 sqft (138'x90')
39	WASTE WATER SUMP	
40	FUEL OIL UNLOADING DOCK (EXISTING)	
41	BOILER FEED WATER PUMP BUILDING	2,475 sqft (75'x33')
42	FUEL OIL TRUCK UNLOADING AREA (2 STATIONS)	
43	AIR COMPRESSOR SKID	(NOT SHOWN)
44	FUEL GAS PERFORMANCE HEATER, FUEL GAS ABSOLUTE SEPARATOR & FEED WATER HEATER	
45	HSRG BLOWDOWN TANK	
46	OVERHEAD CRANE	
47	GENERATOR CIRCUIT BREAKERS (2)	(NOT SHOWN)
48	PROPERTY LINE	
49	CT PDC	
50	HRSG PDC	
51	EXISTING ROADWAY TO LIGHTHOUSE	

DESIGN NOTES:

1. STORM WATER DRAINAGE WILL BE DESIGNED IN ACCORDANCE WITH THE CITY OF BRIDGEPORT CONN. DEPT. OF PUBLIC FACILITIES STORM WATER MANAGEMENT MANUAL.
2. FINAL FINISHED GRADE (EXTERIOR) AT EL. 16'-6" (PER NAVD88). TOP OF CONCRETE SLABS OF FLOOR AT EL. 18'-6".
3. TOP OF RETAINING WALL AT EL. 20'-0" NAVD 88.
4. THIS DRAWING WAS DEVELOPED FROM DRAWINGS BPH-DWG-16 AND BPH-DWG-23 (GTCC EXPANSION PROJECT FEASIBILITY STUDY PHASE III).

Bridgeport Unit 5 Combined Cycle Project

Figure 3 - Preliminary Site Development Plan

REFERENCES:

BPHU5-DWG-014-C-0101:	EXISTING CONDITIONS PLAN
BPHU5-DWG-014-C-0104:	AREA OF DISTURBANCE/LIMITS OF DISTURBANCE PLAN
BPHU5-DWG-014-C-0120:	PROPOSED SOIL BORINGS & TEST PITS LOCATIONS

PRELIMINARY

12.5 50
25 0 25
GRAPHIC SCALE (FEET)

TECHNICAL TABLES/SPECIFICATIONS:

REVISION NOTES:

REV. OD-REVISED PER LATEST GENERAL ARANGEMENT
REV. OE-ADDED PDC'S/ HSRG PENTHOUSE/ 2 FEUL OIL UNLOADING STATIONS

NO	DATE	ACCT	DESCRIPTION	DWN	CKD	EXD	REV	REV	APD
OE	11/25/15		SEE REVISION NOTE OE	KW	SB	TF	-	-	-
OD	11/19/15		SEE REVISION NOTE OD	KW	SB	TF	-	-	-
NO	DATE	ACCT	DESCRIPTION	DWN	CKD	EXD	REV	REV	APD

REVISION

RCM Technologies
Power System Services

BRIDGEPORT 05
PLANT LAYOUT
COMBINED CYCLE PROJECT
PROPOSED GENERAL ARRANGEMENT
ARRANGEMENT DESIGN-CIVIL GENERAL

PROJECT ENGINEERING DIVISION

PSEG Power LLC

DRAWN	CHECKED	EXAMINED (SR DESIGNER)
(BY RCMT) KEN WALLACE	(BY RCMT) SCOT BLANTON	(BY RCMT) TONY FOSTER
REVIEWED (ENGR)	REVIEWED (PROJ ENGR)	APPROVED (PRINCIPAL)

DWG SCALE:

SEAL:

VENDOR NO.

BPHU5-DWG-014-C-0102

LAST C.A.D.D. UPDATE:

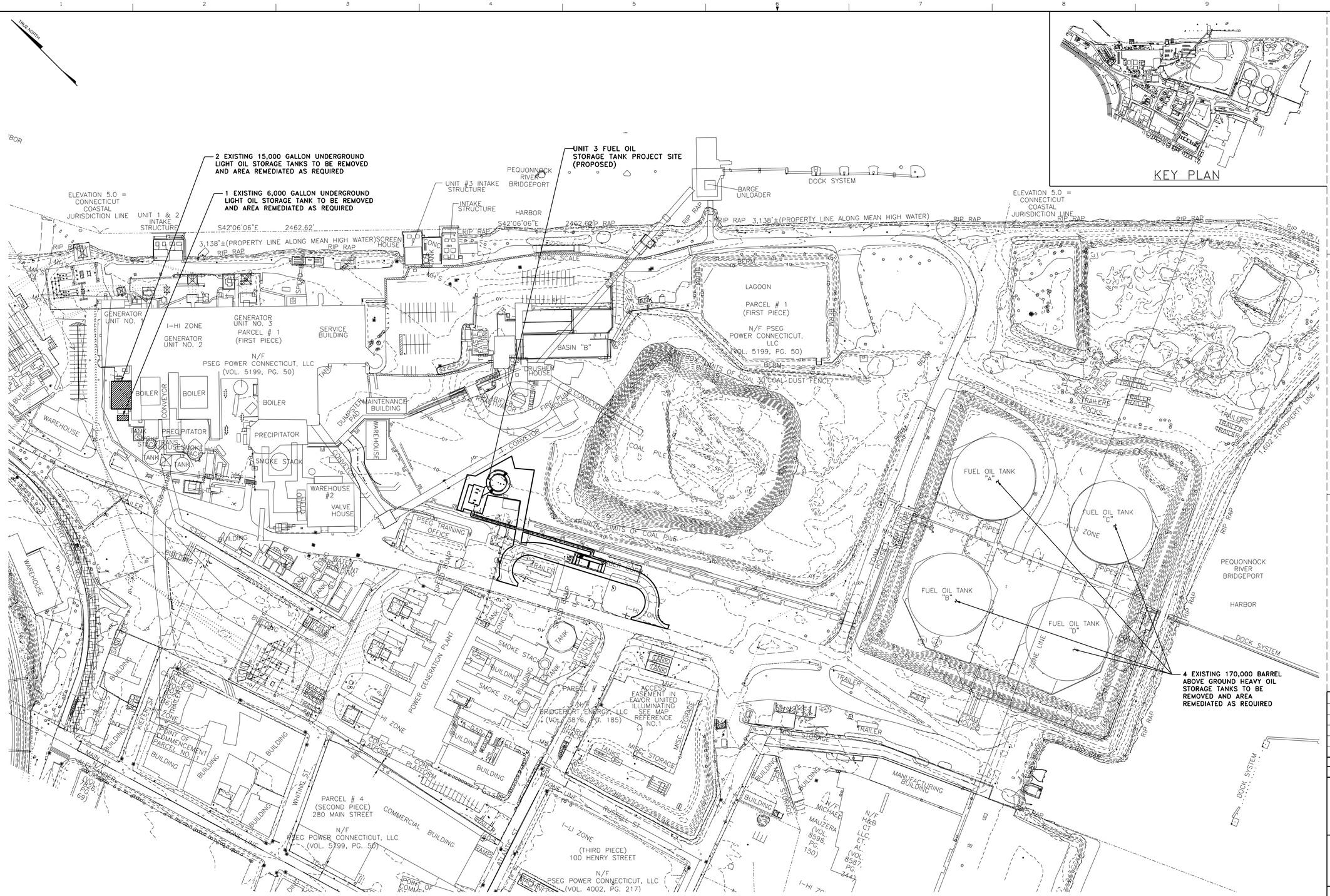
CONT. ___ ___ ___ MECH. ___ ___ ___ SPON. ___ ___ ___
ELEC. ___ ___ ___ CIVIL ___ ___ ___ OTHER ___ ___ ___

SPONSOR: DONALD A. SAUERBORN

ANSI D SIZE

VERSION: OE

$$$filename$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$
$$$date$$$



LEGENDS/SYMBOL KEYS:

- EXISTING CONTOUR LINES
- 8.2, 10.0 EXISTING SPOT ELEVATION
- EXISTING STRUCTURES, STACKS AND TANKS
- EXISTING TREES OR SHRUBS
- EXISTING TREE GROUPS

DESIGN NOTES:

1. BACKGROUND SHOWN WAS OBTAINED FROM SITE SURVEY CAD FILE PROVIDED BY PSEG. REFERENCE DESIGN PROFESSIONALS TOPOGRAPHICSURVEY DRAWINGS VT-1 THROUGH VT-5 AND ALTA LAND TITLE SURVEY, DRAWINGS VS-1 THROUGH VS-6 FOR ADDITIONAL INFORMATION.

REFERENCES:

Figure 4

NO	DATE	ACCT	DESCRIPTION	DWN	CKD	EXD	REV	REV	APD
0	02/03/16		ISSUED FOR PERMITS	TW	KM	TF	RS	SB	

REVISION

RCM Technologies
Energy Services

BRIDGEPORT 03
PLANT LAYOUT
FUEL OIL FACILITY
STORAGE TANK REMOVAL PLAN
SITE PLAN DESIGN-CIVIL GENERAL

PROJECT ENGINEERING DIVISION

PSEG Fossil LLC

DRAWN (BY RCMT) TOM WALKER	CHECKED (BY RCMT) KEVIN McGETTIGAN	EXAMINED (SR DESIGNER) (BY RCMT) TONY FOSTER
REVIEWED (ENGR) (BY RCMT) RALPH SELLITTO	REVIEWED (PROJ ENGR) (BY RCMT) SCOT BLANTON PE	APPROVED (PRINCIPAL) (BY RCMT)

VENDOR NO.
BPHU3-DWG-014-C-0124

DWG SCALE: 1"=80'-0"

SEAL:

TECHNICAL TABLES/SPECIFICATIONS:

REVISION NOTES:

LAST C.A.D.D. UPDATE:

CONT. ___ MECH. ___ SPON. ___
ELEC. ___ CIVIL ___ OTHER ___

SPONSOR: DONALD SAUERBORN

ANSI D SIZE

VERSION: 0

Natural Diversity Data Base Areas

BRIDGEPORT, CT

September 2015

State and Federal Listed Species & Significant Natural Communities

Town Boundary

NOTE: This map shows general locations of State and Federal Listed Species and Significant Natural Communities. Information on listed species is collected and compiled by the Natural Diversity Data Base (NDDB) from a number of data sources . Exact locations of species have been buffered to produce the general locations. Exact locations of species and communities occur somewhere in the shaded areas, not necessarily in the center. A new mapping format is being employed that more accurately models important riparian and aquatic areas and eliminates the need for the upstream/downstream searches required in previous versions.

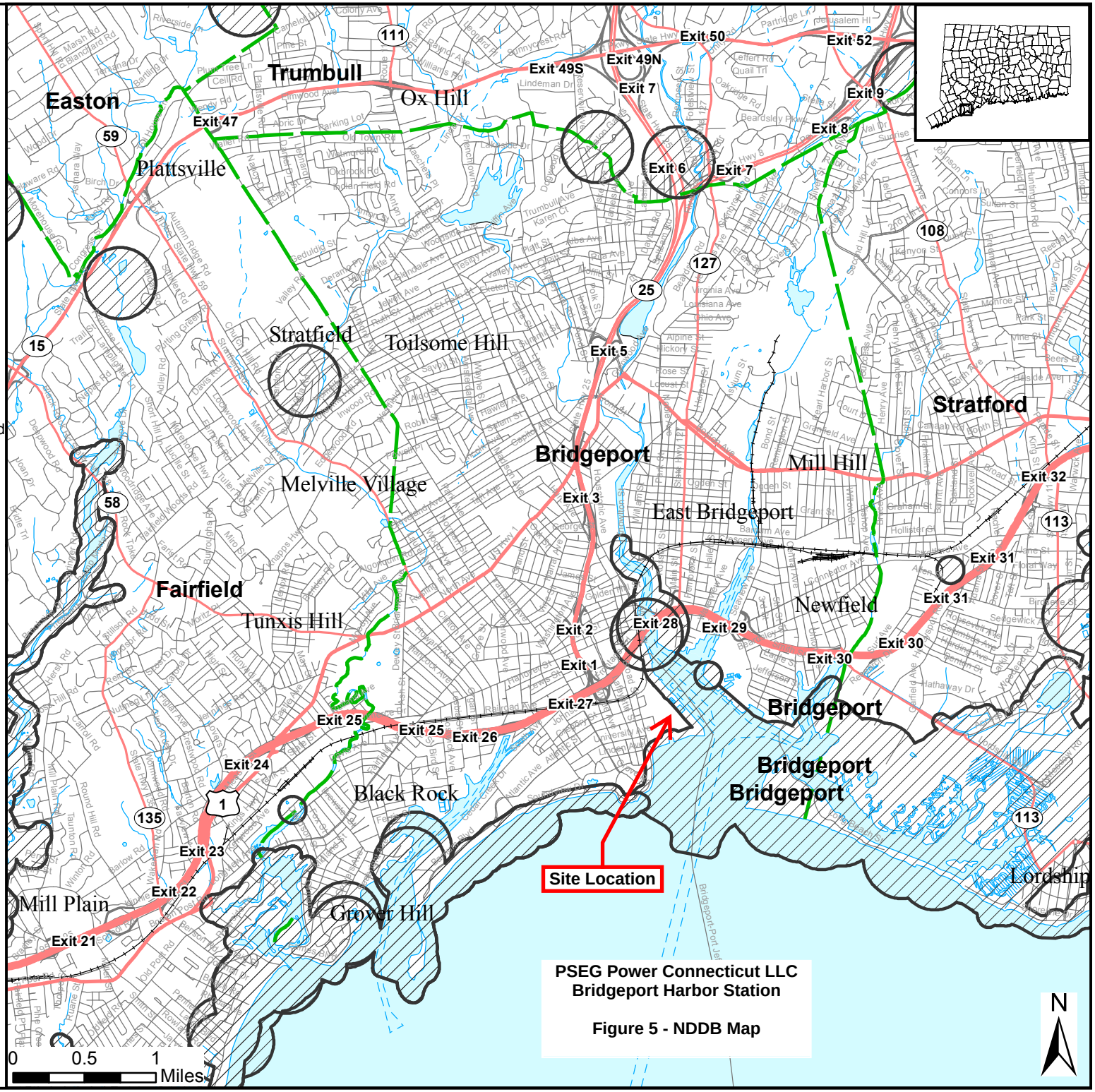
This map is intended for use as a preliminary screening tool for conducting a Natural Diversity Data Base Review Request. To use the map, locate the project boundaries and any additional affected areas. If the project is within a shaded area there may be a potential conflict with a listed species. For more information, complete a Request for Natural Diversity Data Base State Listed Species Review form (DEP-APP-007), and submit it to the NDDB along with the required maps and information. More detailed instructions are provided with the request form on our website.

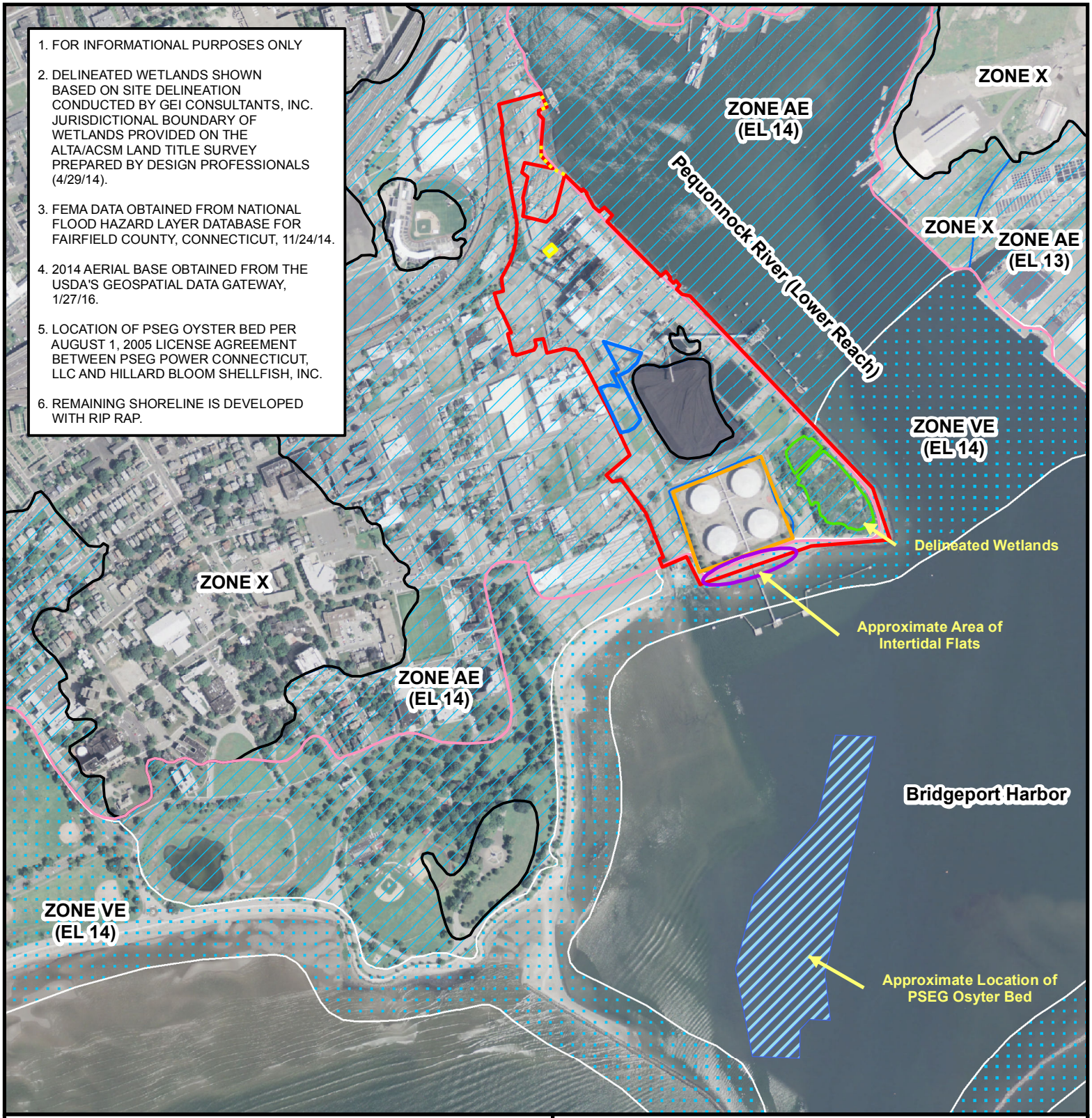
www.ct.gov/deep/nddbrequest

Use the CTECO Interactive Map Viewers at www.cteco.uconn.edu to more precisely search for and locate a site and to view aerial imagery with NDDB Areas.

QUESTIONS: Department of Energy and Environmental Protection (DEEP)
79 Elm St., Hartford CT 06106
Phone (860) 424-3011

Connecticut Department of Energy & Environmental Protection
Bureau of Natural Resources
Wildlife Division





Legend

- Limit of Wave Action
- Existing Retaining Wall
- Project Site Property Boundary
- Unit 3 Tank and Unloading Area
- Underground Storage Tanks to be Removed
- Tank Farm to be Removed / Proposed Unit 5 Location

National Flood Hazard Data
Flood Zones

- AE
- VE
- X

0 800 1,600 Feet

1 inch = 800 feet

N

AKRF
307 Fellowship Rd., Suite 214
Mt Laurel, NJ 08054
856-797-9930

COASTAL RESOURCE MAP

PSEG POWER CONNECTICUT LLC
BRIDGEPORT HARBOR STATION
UNIT 3 TANK PROJECT
BRIDGEPORT, FAIRFIELD COUNTY, CT

FIGURE 6	JANUARY 2016

Attachment D

Photographs

Photo showing the proposed tank and pump house location. This photo was taken looking towards the north.

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Mt Laurel, NJ 08054
856-797-9930

SITE PHOTOS

PSEG POWER CONNECTICUT LLC
BRIDGEPORT HARBOR STATION
UNIT 3 TANK PROJECT
BRIDGEPORT, FAIRFIELD COUNTY, CT

Photo 1	FEBRUARY 2016

Photo showing the proposed tank farm to be removed and Unit 5 location. Photo taken looking towards the southeast.

AKRF
307 Fellowship Rd., Suite 214
Mt Laurel, NJ 08054
856-797-9930

SITE PHOTOS

PSEG POWER CONNECTICUT LLC
BRIDGEPORT HARBOR STATION
UNIT 3 TANK PROJECT
BRIDGEPORT, FAIRFIELD COUNTY, CT

Photo 2	FEBRUARY 2016

Photo showing dock to be repaired

AKRF
307 Fellowship Rd., Suite 214
Mt Laurel, NJ 08054
856-797-9930

SITE PHOTOS

PSEG POWER CONNECTICUT LLC
BRIDGEPORT HARBOR STATION
UNIT 3 TANK PROJECT
BRIDGEPORT, FAIRFIELD COUNTY, CT

Photo 3	FEBRUARY 2016

U.S. Fish and Wildlife Service

Trust Resources List

This resource list is to be used for planning purposes only — it is not an official species list.

Endangered Species Act species list information for your project is available online and listed below for the following FWS Field Offices:

New England Ecological Services Field Office
70 COMMERCIAL STREET, SUITE 300
CONCORD, NH 3301
(603) 223-2541
http://www.fws.gov/newengland

Project Location Map:

U.S. Fish and Wildlife Service

Trust Resources List

Project Counties:

Fairfield, CT

Geographic coordinates (Open Geospatial Consortium Well-Known Text, NAD83):

MULTIPOLYGON (((-73.1839593 41.1732141, -73.180054 41.1706944, -73.1761058 41.1669146, -73.1774791 41.1654931, -73.1852038 41.1634577, -73.1873925 41.1707913, -73.1839593 41.1732141)))

Project Type:

Power Generation

Endangered Species Act Species List (USFWS Endangered Species Program).

There are a total of **1** threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fishes may appear on the species list because a project could cause downstream effects on the species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section below for critical habitat that lies within your project area. Please contact the designated FWS office if you have questions.

Species that should be considered in an effects analysis for your project:

Birds	Status		Has Critical Habitat	Contact
Roseate tern (*Sterna dougallii dougallii*) Population: northeast U.S. nesting pop.	Endangered	species info		New England Ecological Services Field Office

Critical habitats within your project area:

There are no critical habitats within your project area.

FWS National Wildlife Refuges (USFWS National Wildlife Refuges Program).

There are no refuges found within the vicinity of your project.

U.S. Fish and Wildlife Service

Trust Resources List

FWS Migratory Birds (USFWS Migratory Bird Program).

The protection of birds is regulated by the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA). Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. For more information regarding these Acts see http://www.fws.gov/migratorybirds/RegulationsandPolicies.html.

All project proponents are responsible for complying with the appropriate regulations protecting birds when planning and developing a project. To meet these conservation obligations, proponents should identify potential or existing project-related impacts to migratory birds and their habitat and develop and implement conservation measures that avoid, minimize, or compensate for these impacts. The Service's Birds of Conservation Concern (2008) report identifies species, subspecies, and populations of all migratory nongame birds that, without additional conservation actions, are likely to become listed under the Endangered Species Act as amended (16 U.S.C 1531 et seq.).

For information about Birds of Conservation Concern, go to http://www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html.

Migratory birds of concern that may be affected by your project:

There are **18** birds on your Migratory birds of concern list. The Division of Migratory Bird Management is in the process of populating migratory bird data with an estimated completion time of Fall 2014; therefore, the list below may not include all the migratory birds of concern in your project area at this time. While this information is being populated, please contact the Field Office for information about migratory birds in your project area.

Species Name	Bird of Conservation Concern (BCC)	Species Profile	Seasonal Occurrence in Project Area
American Oystercatcher (*Haematopus palliatus*)	Yes	species info	Year-round
American bittern (*Botaurus lentiginosus*)	Yes	species info	Breeding
Bald eagle (*Haliaeetus leucocephalus*)	Yes	species info	Year-round
Black rail (*Laterallus jamaicensis*)	Yes	species info	Breeding
Black-billed Cuckoo (*Coccyzus erythropthalmus*)	Yes	species info	Breeding

Trust Resources List

Blue-winged Warbler (*Vermivora pinus*)	Yes	species info	Breeding
Canada Warbler (*Wilsonia canadensis*)	Yes	species info	Breeding
Horned Grebe (*Podiceps auritus*)	No	species info	Wintering
Least Bittern (*Ixobrychus exilis*)	Yes	species info	Breeding
Least tern (*Sterna antillarum*)	Yes	species info	Breeding
Pied-billed Grebe (*Podilymbus podiceps*)	Yes	species info	Year-round
Purple Sandpiper (*Calidris maritima*)	Yes	species info	Wintering
Rusty Blackbird (*Euphagus carolinus*)	Yes	species info	Wintering
Saltmarsh Sparrow (*Ammodramus caudacutus*)	Yes	species info	Breeding
Seaside Sparrow (*Ammodramus maritimus*)	Yes	species info	Year-round
Snowy Egret (*Egretta thula*)	Yes	species info	Breeding
Wood Thrush (*Hylocichla mustelina*)	Yes	species info	Breeding
Worm eating Warbler (*Helmitheros vermivorum*)	Yes	species info	Breeding

NWI Wetlands (USFWS National Wetlands Inventory).

The U.S. Fish and Wildlife Service is the principal Federal agency that provides information on the extent and status of wetlands in the U.S., via the National Wetlands Inventory Program (NWI). In addition to impacts to wetlands within your immediate project area, wetlands outside of your project area may need to be considered in any evaluation of project impacts, due to the hydrologic nature of wetlands (for example, project activities may affect local hydrology within, and outside of, your immediate project area). It may be helpful to refer to the USFWS National Wetland Inventory website. The designated FWS office can also assist you. Impacts to wetlands and other aquatic habitats from your project may be subject to regulation under Section 404 of the

Clean Water Act, or other State/Federal Statutes. Project Proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate U.S. Army Corps of Engineers District.

Data Limitations, Exclusions and Precautions
The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery and/or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Exclusions - Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Precautions - Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

The following wetland types intersect your project area in one or more locations:

Wetland Types	NWI Classification Code	Total Acres
Estuarine and Marine Deepwater	E1UBL	915401.4107
Estuarine and Marine Wetland	E2US2P	6.5666

Trust Resources List

Estuarine and Marine Wetland	E2US2N	0.7542
Freshwater Emergent Wetland	PEM1Eh	2.4565
Freshwater Pond	PUBHx	1.38

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State Historic Preservation Office

One Constitution Plaza | Hartford, CT 06103 | 860.256.2800 | Cultureandtourism.org

PROJECT REVIEW COVER FORM

1. This information relates to a previously submitted project. ☐ You do not need to complete the rest of the form if you have been previously issued a SHPO Project Number. Please attach information to this form and submit.

SHPO Project Number _____
(Not all previously submitted projects will have project numbers)

Project Address _____
(Street Address and City or Town)

2. This is a new Project. [X] If you have checked this box, it is necessary to complete ALL entries on this form .

Project Name PSEG Power Connecticut LLC - New Unit 3 Oil Storage Tank Project

Project Location Bridgeport Harbor Generating Station - 1 Atlantic Street, Bridgeport CT, 06604-5513
Include street number, street name, and or Route Number. If no street address exists give closest intersection.

City or Town Bridgeport CT, 06604-5513
In addition to the village or hamlet name (if appropriate), the municipality must be included here.

County Fairfield
If the undertaking includes multiple addresses, please attach a list to this form.

Date of Construction (for existing structures) The Bridgeport Harbor Station has operated at this location since 1957. Existing oil storage tanks proposed for demolition were installed in 1968 .

PROJECT DESCRIPTION SUMMARY (include full description in attachment):

PSEG Power Connecticut LLC or an affiliated special purpose entity (PSEG) is proposing to install a new oil storage tank and associated equipment at its existing Bridgeport Harbor Station located at 1 Atlantic Street in Bridgeport, Connecticut. The proposed oil storage tank and associated equipment (e.g., fuel unloading area, fire protection house, and forwarding pumps) will be sited on previously disturbed and developed land within the approximately 84-acre station site that comprises PSEG Power Connecticut LLC's existing Bridgeport Harbor Generating Station. In addition to the installation of the new oil storage tank and related equipment, PSEG intends to demolish four existing oil storage tanks located within a tank farm located at the southern end of the Bridgeport Harbor Station Site. A full description of proposed project activities is provided in Attachment 1.

TYPE OF REVIEW REQUESTED

a. Does this undertaking involve funding or permit approval from a State or Federal Agency?

[X] Yes [ ] No

Agency Name/Contact	Type of Permit/Approval	State	Federal
CT DEEP	Remedial Action Work Plan Amendment/Engineering Control Variance Application Approval	X	
CT DEEP	Coverage under Construction Stormwater General Permit (DEEP-WPED-GP-015)	X	
CT Siting Council	Exempt Modification Approval	X	

	Yes	No
b. Have you consulted the SHPO and UCONN Dodd Center files to determine the presence or absence of previously identified cultural resources within or adjacent to the project area?		X
If yes: Was the project site wholly or partially located within an identified archeologically sensitive area?		
Does the project site involve or is it substantially contiguous to a property listed or recommended for listing in the CT State or National Registers of Historic Places?		
Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older?		

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PROJECT REVIEW COVER FORM

The Historic Preservation Review Process in Connecticut Cultural Resource Review under the National Historic Preservation Act – Section 106 http://www.achp.gov/106summary.html involves providing technical guidance and professional advice on the potential impact of publicly funded, assisted, licensed or permitted projects on the state's historic, architectural and archaeological resources. This responsibility of the State Historic Preservation Office (SHPO) is discharged in two steps: (1) identification of significant historic, architectural and archaeological resources; and (2) advisory assistance to promote compatibility between new development and preservation of the state's cultural heritage.

Project review is conducted in two stages. First, the SHPO assesses affected properties to determine whether or not they are listed or eligible for listing in the Connecticut State or National Registers of Historic Places. If so, it is deemed "historic" and worthy of protection and the second stage of review is undertaken. The project is reviewed to evaluate its impact on the properties significant materials and character. Where adverse effects are identified, alternatives are explored to avoid, or reduce project impacts; where this is unsuccessful, mitigation measures are developed and formal agreement documents are prepared stipulating these measures. For more information and guidance, please see our website at: http://www.cultureandtourism.org/cct/cwp/view.asp?a=3933&q=293820

ALL PROJECTS SUBMITTED FOR REVIEW MUST INCLUDE THE FOLLOWING MATERIALS*:

[X] **PROJECT DESCRIPTION** Please attach a full description of the work that will be undertaken as a result of this project. Portions of environmental statements or project applications may be included. The project boundary of the project should be clearly defined**

[X] **PROJECT MAP** This should include the precise location of the project – preferably a clear color image showing the nearest streets or roadways as well as all portions of the project. Tax maps, Sanborn maps and USGS quadrangle maps are all acceptable, but Bing and Google Earth are also accepted if the information provided is clear and well labeled. The project boundary should be clearly defined on the map and affected legal parcels should be identified.

[X] **PHOTOGRAPHS** Clear, current images of the property should be submitted. Black and white photocopies will not be accepted. Include images of the areas where the proposed work will take place. May require: exterior elevations, detailed photos of elements to be repaired/replaced (windows, doors, porches, etc.) All photos should be clearly labeled.

For Existing Structures	Yes	N/A	Comments
Property Card	☐	☐	
For New Construction	**Yes**	**N/A**	**Comments**
Project plans or limits of construction (if available)	☒	☐	See Figures 5a through 5b of Attachment 1
If project is located in a Historic District include renderings or elevation drawings of the proposed structure	☐	☒	
Soils Maps http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm	☒	☐	See Appendix B of Attachment 1
Historic Maps http://magic.lib.uconn.edu/	☒	☐	See Appendix A of Attachment 1
For non-building-related projects (dams, culverts, bridge repair, etc)	**Yes**	**N/S**	**Comments**
Property Card	☐	☐	
Soils Map (see above)	☐	☐	
Historic Maps (see above)	☐	☐	

STAFF REVIEW AREA	Above	Date	Below	Date
Indicate date of Review and Initials of Reviewer				

PROJECT CONTACT

Name Kevin Maher Title Consulting Licensing Manager

Firm/Agency AKRF, Inc.

Address 307 Fellowship Road, Suite 214

City Mount Laurel State New Jersey Zip 08054

Phone 856.359.7612 Cell Fax 856.797.9932

Email kmaher@akrf.com

*Note that he SHPO's ability to complete a timely project review depends largely on the quality of the materials submitted.

** Please be sure to include the project name and location on *each page* of your submission.

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State Historic Preservation Office

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PROJECT REVIEW COVER FORM

SHPO USE ONLY

Based on our review of the information provided to the State Historic Preservation Office, it is our opinion that:

- [X] No historic properties will be affected by this project. No further review is requested.
- [ ] This project will cause no adverse effects to the following historic properties. No further review is requested:
- [ ] This project will cause no adverse effects to the following historic properties, conditional upon the stipulations included in the attached letter:
- [ ] Additional information is required to complete our review of this project. Please see the attached letter with our requests and recommendations.
- [ ] This project will adversely affect historic properties as it is currently designed or proposed. Please see the attached letter for further details and guidance.

Daniel T. Forrest — Date: 2/5/14

Daniel T. Forrest
~~Deputy~~ State Historic Preservation Officer