

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

Kathleen M. Shanley

Manager – Transmission Siting Tel: (860) 728-4527

September 23, 2019

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

Re: Sub-Petition No. 1293-NM-01

Dear Ms. Bachman:

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") is filing the attached Sub-Petition No.1293-NM-01 with the Connecticut Siting Council ("Council"), regarding maintenance work within its transmission right-of-way in New Milford Connecticut. The work includes replacing 19 existing wooden transmission structures with new weathering steel transmission structures.

Eversource notified the officials of the municipality of New Milford of Eversource's submission of the Sub-Petition and sent copies of the Sub-Petition to owners of directly abutting properties (see Proof of Notice).

Enclosed please find an original and 3 copies of this filing.

Please contact me at 860-728-4527 if you have any questions regarding the enclosed Sub-Petition.

Sincerely,

Enclosures

Attachments:

Exhibit A: Sub-Petition

Exhibit B: Photographs and Photo Simulation

Exhibit C: Maps

Exhibit D: Abutter Letter and Proof of Notice

ATTACHMENT A SUB-PETITION

THE CONNECTICUT LIGHT AND POWER COMPANY doing business as <u>EVERSOURCE ENERGY</u>

Sub-Petition
CONNECTICUT SITING COUNCIL – PETITION NO. 1293
TRANSMISSION FACILITY ASSET CONDITION
MAINTENANCE IMPROVEMENTS TO COMPLY WITH
THE UPDATED NATIONAL ELECTRIC SAFETY CODE
CLEARANCE REQUIREMENTS

Town: New Milford

Sub-Petition 1293-NM-01

Project: 321 Transmission Line Structure Replacement Project

Structure Locations: 19 Transmission Line Structures located in New Milford, Connecticut

I. <u>Introduction:</u>

In accordance with Condition 1 of the March 30, 2017 ruling by the Connecticut Siting Council (the "Council") (as set forth in the Council's March 31, 2017 letter) regarding Petition No. 1293, The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") submits this Sub-Petition.

II. <u>Description of Transmission Work Activities:</u>

Eversource's 321 Transmission Line Structure Replacement Project (the "Project") is part of an ongoing maintenance program which evaluates the integrity of its utility structures and implements repair, upgrade or replacement in order to ensure the safe and reliable transmission of power to its customers. Due to asset condition, many structures require replacement on a portion of the 321 Line in New Milford, between Long Mountain Substation and a location just south of Sunny Valley Lane. The 321 Line, in its entirety, is a 345-kilovolt single-circuit line that extends from Long Mountain Substation in New Milford to Plumtree Substation in Bethel. Of the structures that will be replaced, 19 structures require a slight increase in structure height to comply with current clearance requirements. These 19 structures to be replaced are a mix of wood H-Frame and monopole structures.

Eversource plans to conduct transmission structure replacement work to remediate wood structure damage caused by structure age, weather, and woodpecker activity. The following work ("Work Activities") will be performed:

Replace 19 existing wood structures with new weathering steel structures. Each replacement structure
will be of the same design as its corresponding existing structure, though slightly taller (10 feet or less)
than the existing structure. The replacement structures will be installed within 15 feet of the existing
structure locations.

III. No Substantial Adverse Environmental Effect:

Eversource respectfully submits that the proposed modifications would have no "substantial adverse environmental effect" pursuant to Conn. Gen. Stat. § 16-50k, based on the following factors:

- a) All Work Activities would take place in areas within Eversource's property or existing rights-of-way ("ROW") utilizing existing and proposed new permanent access roads, as well as some temporary access roads (collectively the "Work Areas"). Some of the existing access roads would be improved. Eversource can access each of the structure replacement locations utilizing its existing rights but, is currently working with a private landowner to obtain rights to utilize an alternative off-ROW access route that would reduce the amount of proposed access roads that would need to be installed within the ROW.
- b) Collectively, the Work Activities would result in approximately 11,298 square feet ("SF") of temporary wetland/watercourse impacts, limited to temporary construction matting required for the construction of access roads and work pads for three structures as follows:

Wetland Number	Structure Number	Construction Work Pads Temporary Impacts (SF)	Access Roads Temporary Impacts (SF)
W013	10142	±4,809	0
W021	10165	0	±1,717
W022	10165	0	±433
W025	10169	±1,975	0
W028	10169	0	±2,364
Sui	ototals:	±6,784	±4,514
TOTAL:		±11,	,298

Work would be conducted in accordance with Eversource's *Best Management Practices Manual for Massachusetts and Connecticut (Construction and Maintenance Environmental Requirements)*, September 2016 ("BMPs") to avoid impacts to nearby wetland and watercourse resources.

c) No direct impacts to vernal pools ("VP") would result from the proposed Work Activities. Vernal pool species protection measures will be implemented where Work Activities extend into the vernal pool envelopes ("VPE"). A total of two VP habitats have been identified near Work Activities. A portion of the temporary work pad for Structure 10142 would be located within the VPE associated with VP04, and the temporary access road for Structure 10173 would be located within the VPE associated with VP07. Existing access roads will not be widened or altered where they extend into the VPEs of isolated VP habitats. Elevated construction matting, or "bridge matting", will be installed within VPEs where access roads bisect wetland habitats that may provide migratory routes for amphibian movement during active vernal pool season. Non-elevated construction matting would be utilized on the temporary work pads to avert amphibian access and avoid entrapment. Vegetation removal in VPEs will be minimized and limited to hand clearing only.

An environmental monitor will oversee the Work Areas for activities conducted during the amphibian breeding season. If amphibian migration activity starts during the Work Activities, additional BMPs will be implemented to protect vernal pool species. With the implementation of these protective measures, no adverse impact to vernal pools would result from the proposed Work Activities.

d) As a result of Eversource's review of the Connecticut Department of Energy and Environmental Protection's ("CTDEEP") Natural Diversity Data Base ("NDDB"), only the Work Activities associated with the access road and work pad for Structure 10169 are proposed within a NDDB buffered area and wetland jurisdictional area and therefore would be subject to a NDDB review request. Eversource is currently in consultation with CTDEEP regarding Eversource's proposed work in this area and will adhere to any state-listed species protection measures recommended by CTDEEP, as necessary. Any recommended measures will be incorporated into Eversource's BMPs during construction. With these protection measures, no adverse impacts to state-listed rare species are anticipated.

- e) The Work Activities will not require any tree clearing. However, Eversource may need to undertake minor tree trimming and/or vegetation removal/mowing within the managed ROW corridor to improve access to portions of the Work Areas.
- f) A Phase 1A assessment review of previously recorded cultural resources on file with the Connecticut State Historic Preservation Office conducted by Heritage Consultants, LLC ("Heritage") revealed two previously identified archaeological sites (Sites 96-63 and 96-163) located within 500 feet of the Work Areas. No National or State Register of Historic Places properties/districts were identified within 500 feet of the Work Areas.

Based on a review of historic maps, aerial photographs and available soil profiles, five of the proposed work pad locations associated with Structures 10142, 10143, 10169, 10171 and 10176.5 and the access road associated with Structure 10169 were identified to possess a potential for moderate to high archaeological sensitivity. With the exception of Structure 10143, which will have a partial gravel work pad, timber matting will be used during construction at the remaining structures and access road to avoid potential impacts. No further investigation is recommended. Due to the use of a partial gravel work pad at Structure 10143, a Phase 1B cultural reconnaissance survey (shovel pit testing) was performed and found no physical evidence of cultural deposits or archeological significance; therefore, no further investigation is recommended or warranted. The two archaeological sites previously mentioned (Sites 96-63 and 96-163) would not be affected by the Work Activities and no protection measures are necessary.

- g) Increases in the heights of the 19 replacement structures will average approximately 7 feet and none will exceed 10 feet.
- h) Replacement structures would be located within 15 feet of existing structures.
- i) There are no 100-year flood zones in the Work Areas.
- j) No change in noise levels would result from the installation of the new structures and the applicable lines would continue to comply with the State of Connecticut noise regulations.
- k) Any changes in electric and magnetic field levels outside the ROW would be negligible.

IV. <u>Mitigation:</u>

Temporary environmental effects from construction will be mitigated as follows:

- Erosion and sediment controls ("E&S") will be employed and maintained, as needed, for the duration of the Work Activities in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and the BMPs.
- Potential impacts to wetlands and watercourses will be mitigated with the use of temporary construction matting and adherence to the BMPs.
- Vernal pool protective measures will be incorporated into the Eversource's BMPs during construction.
- Any rare species protective measures recommended by NDDB will be incorporated into Eversource's BMPs during construction.

- Eversource's contractor will perform construction sequencing such that any earth materials are exposed for a minimum of time before they are covered, seeded, or otherwise stabilized to prevent erosion.
- During construction, when necessary, anti-tracking mats would be installed at construction entrances onto public roads to prevent tracking of soil onto local streets.
- Upon completion of the Work Activities, all disturbed/exposed areas would be stabilized and revegetated. After the establishment of permanent ground cover, Eversource's contractor would remove the temporary E&S controls and remove/dispose of any accumulated sediments and debris from areas where such measures were used.

V. Access:

Some new permanent access roads would be constructed to facilitate access to structures within the ROW and existing access roads in upland areas may be hardened and temporarily widened at turning areas to facilitate the safe passage of construction vehicles. Construction matting would be used on temporary access roads in wetlands as well as in agricultural/maintained lawn upland areas. The matting will be removed upon completion of the Work Activities and the areas restored, as necessary.

Eversource would access the Work Areas by entering its property and/or the ROW from existing access points on public roads as follows:

- Long Mountain Road for structures 10127, 10128 and 10129
- Rooster Tail Hollow Road for structures 10136, 10140 and 10142
- Scoville Street for structures 10143 and 10146
- Candlewood Lake Road North for structures 10158, 10159, 10160, 10165, 10166 and 10168
- Sunny Valley Lane for structures 10169 and 10171
- Sunny Valley Road for structures 10173, 10174 and 10176.5

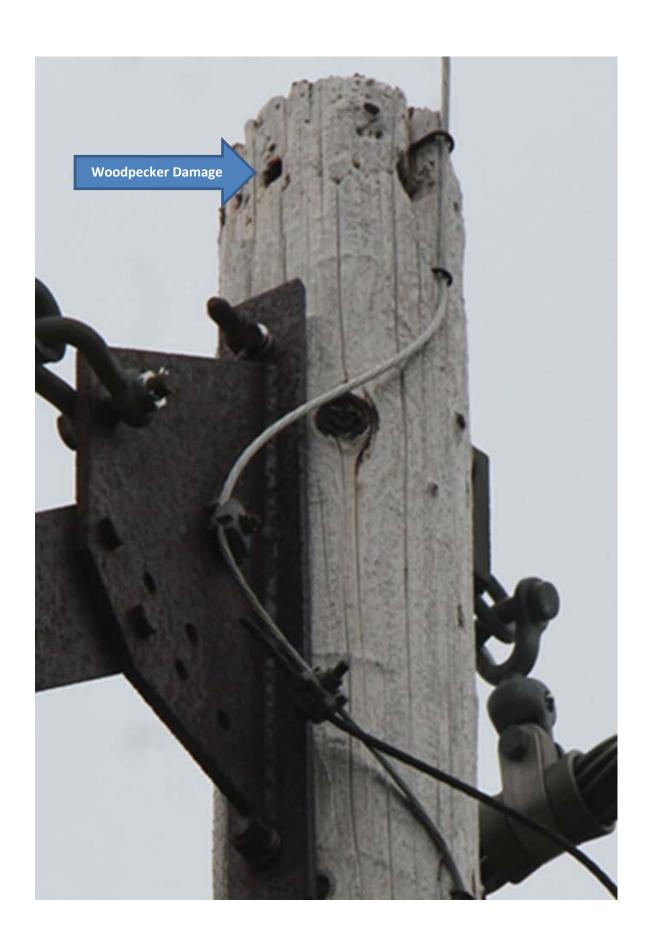
By:

Kathleen M./Shanley

Manager - Transmission Siting

ATTACHMENT B PHOTOGRAPHS AND PHOTO SIMULATION











RIGHT-OF-WAY OFF LONG MOUNTAIN ROAD NEW MILFORD, CT

STRUCTURE 10127

EVERS=URCE ENERGY

SOUTH



RIGHT-OF-WAY OFF LONG MOUNTAIN ROAD NEW MILFORD, CT

STRUCTURE 10127



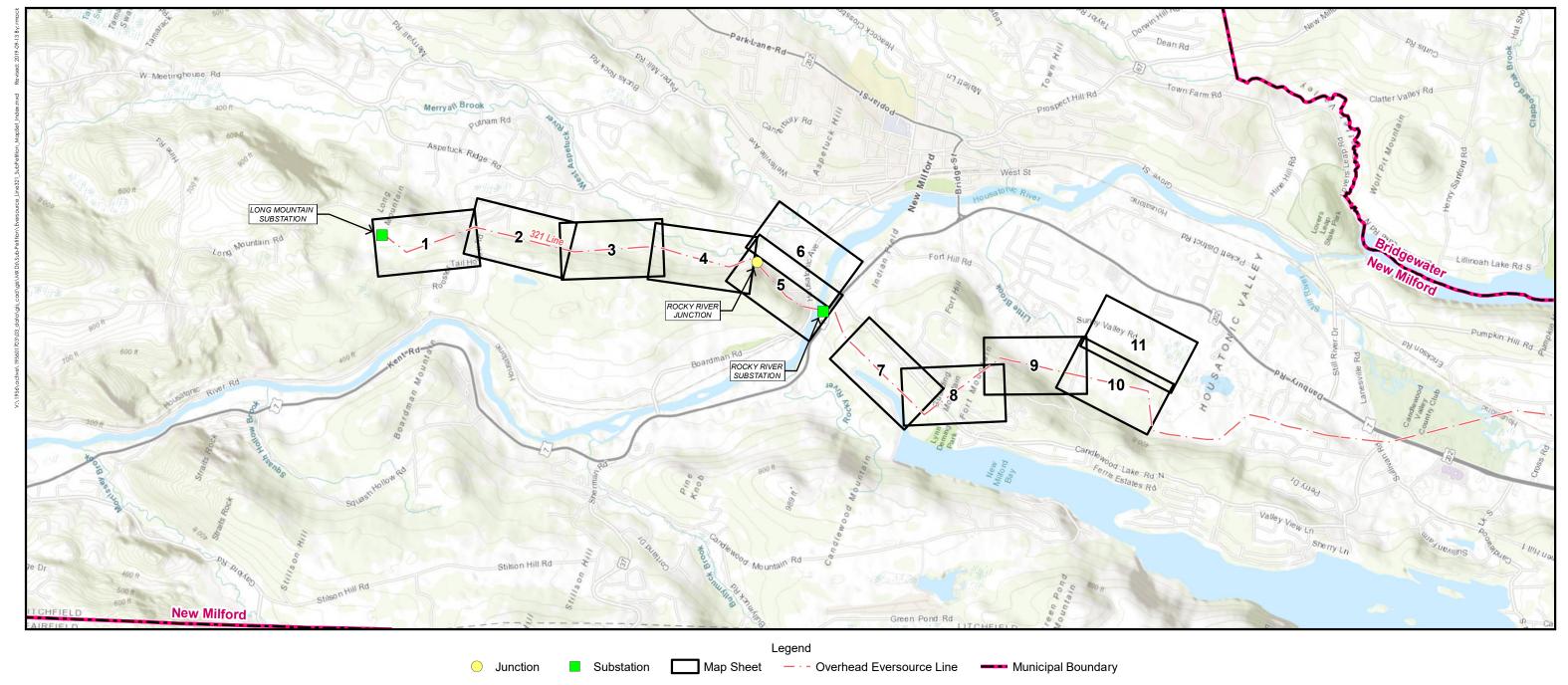
SOUTH

ATTACHMENT C MAPS

321 LINE STRUCTURE REPLACEMENT PROJECT

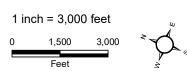
New Milford, CT Sub-Petition Map Set

Revised Date: September 13, 2019





107 Selden Street Berlin, CT 06037



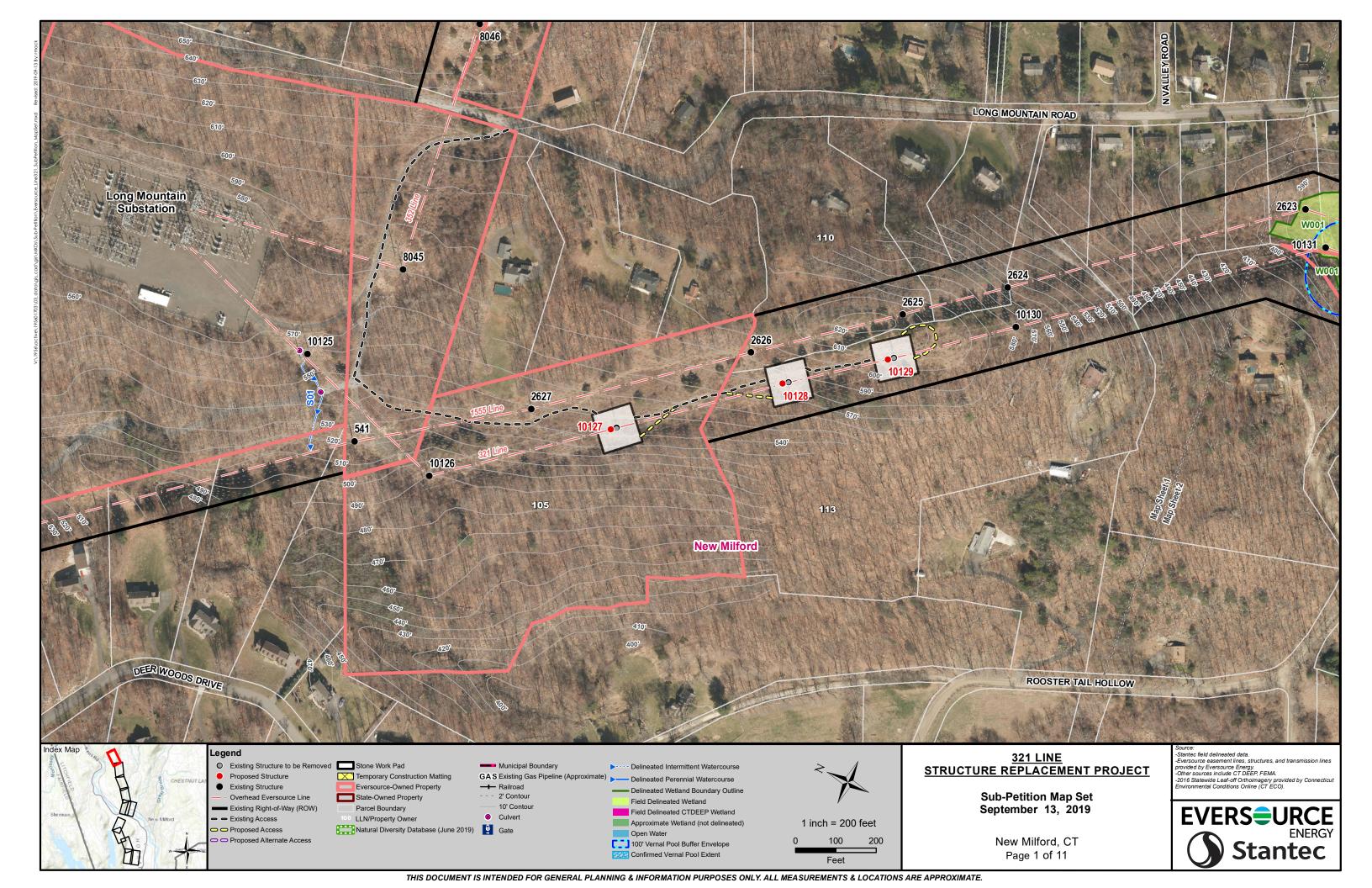
INDEX OF FIGURES
TITLE SHEET / INDEX MAP
MAP SHEETS 1-11
ABUTTER TABLES



30 Park Drive Topsham, ME 04086

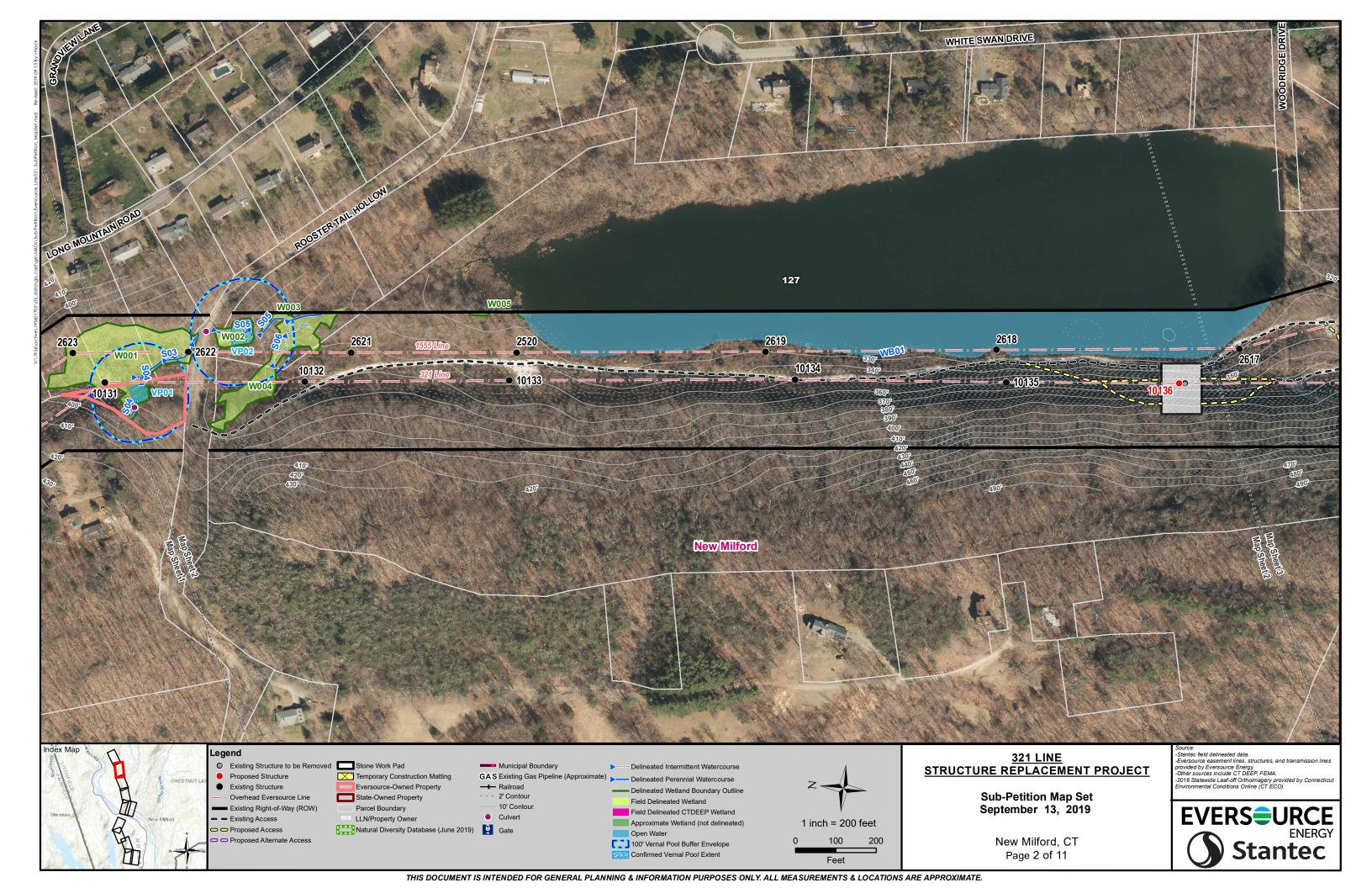
321 Line Structure Replacement Project Map Sheet 1 Abutters Table

Line List #	Owner Name	Parcel Address	Town	State
105	CONNECTICUT LIGHT + POWER	ROOSTER TAIL HLW	NEW MILFORD	СТ
110	NINA E DUNLAP-DYE	140 LONG MTN RD	NEW MILFORD	СТ
113	STEPHEN K + ANN MARIE DOLPH	115 LONG MTN RD	NEW MILFORD	CT



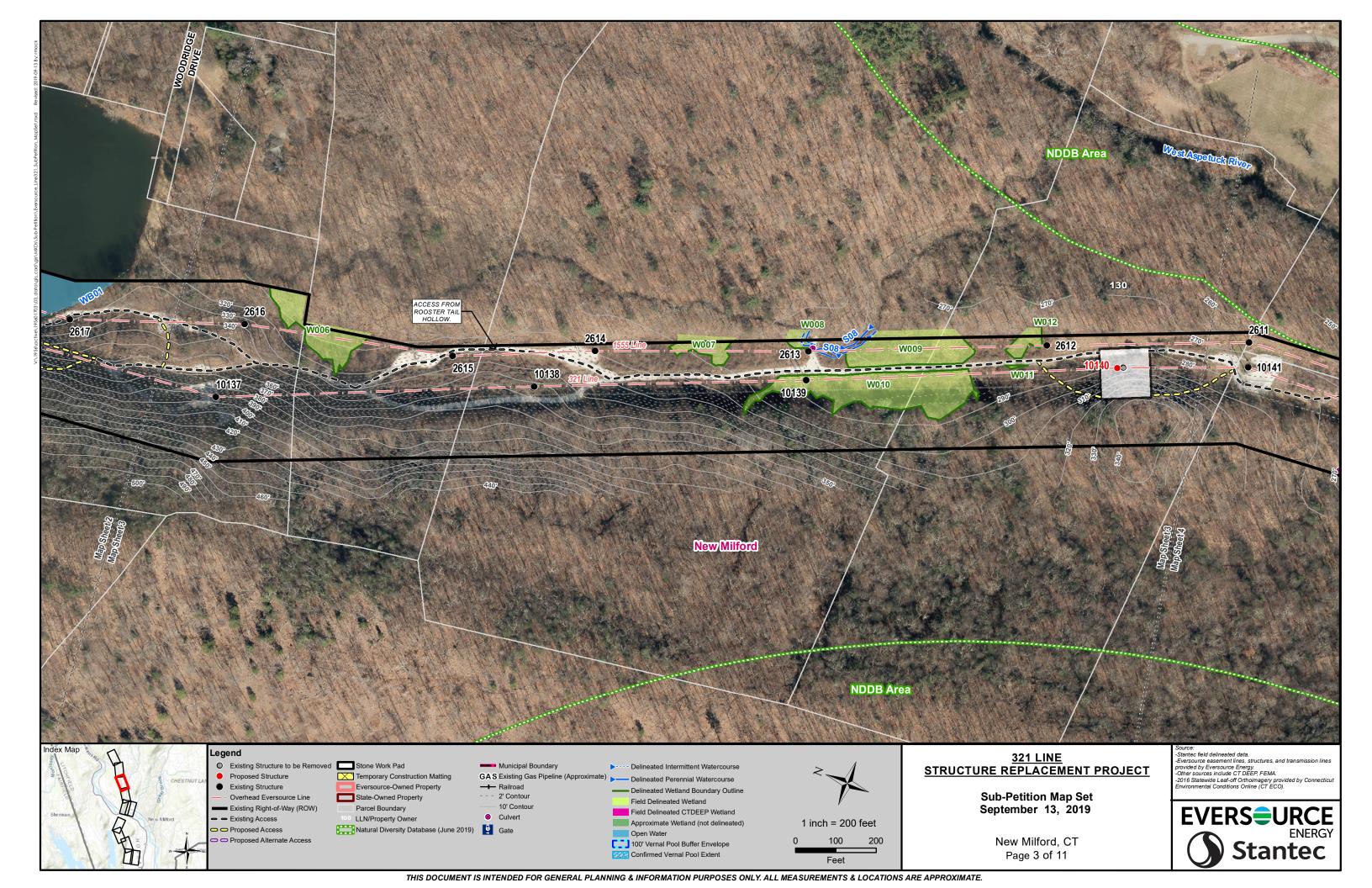
321 Line Structure Replacement Project Map Sheet 2 Abutters Table

Line List #	Owner Name	Parcel Address	Town	State
127	MARK T + THOMAD D TR ALTERMATT	ROOSTER TAIL HLW	NEW MILFORD	СТ



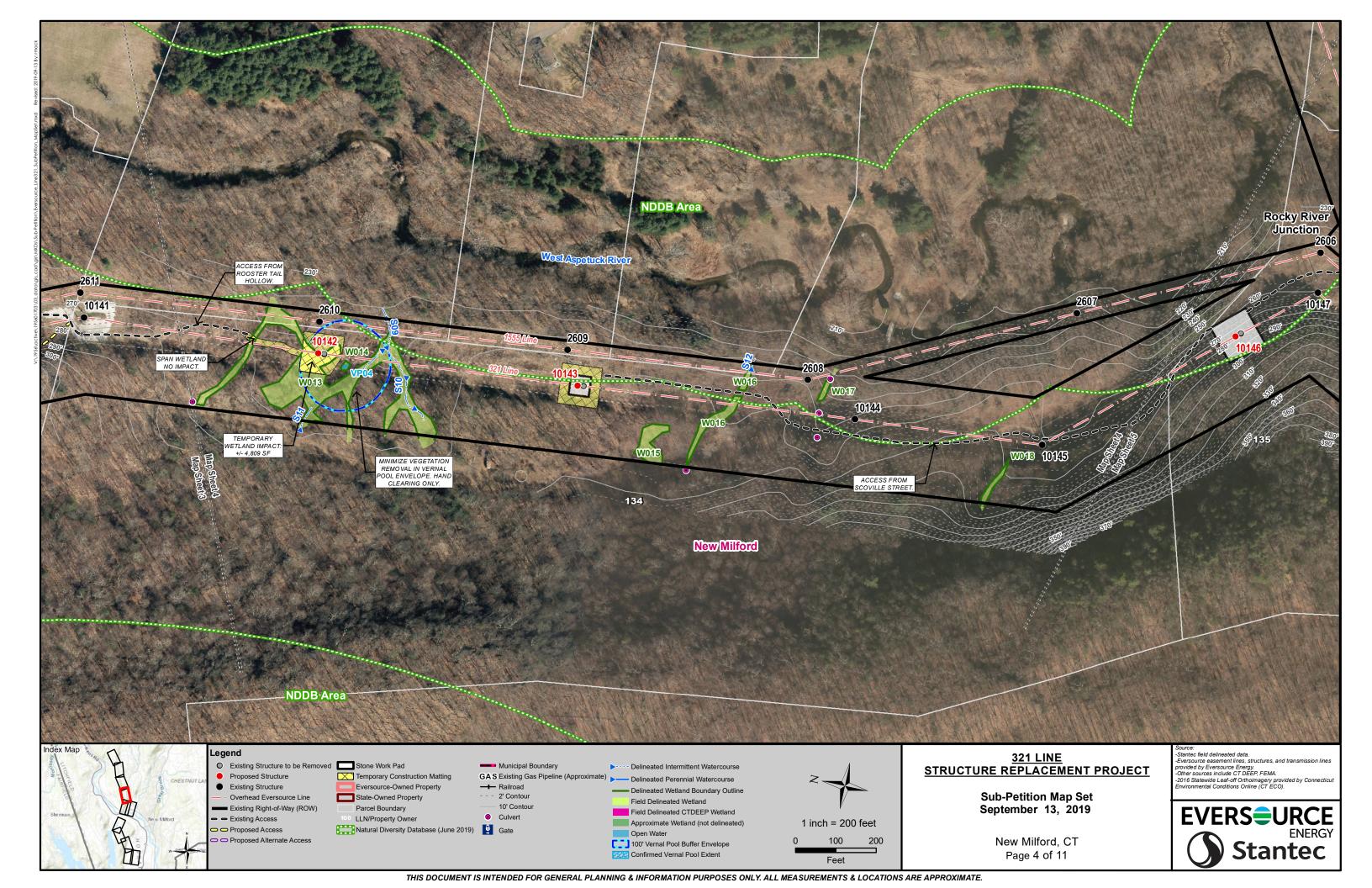
321 Line Structure Replacement Project Map Sheet 3 Abutters Table

Line List #	Owner Name	Parcel Address	Town	State
130	HELEN A LILLIS	ASPETUCK RDG RD	NEW MILFORD	СТ



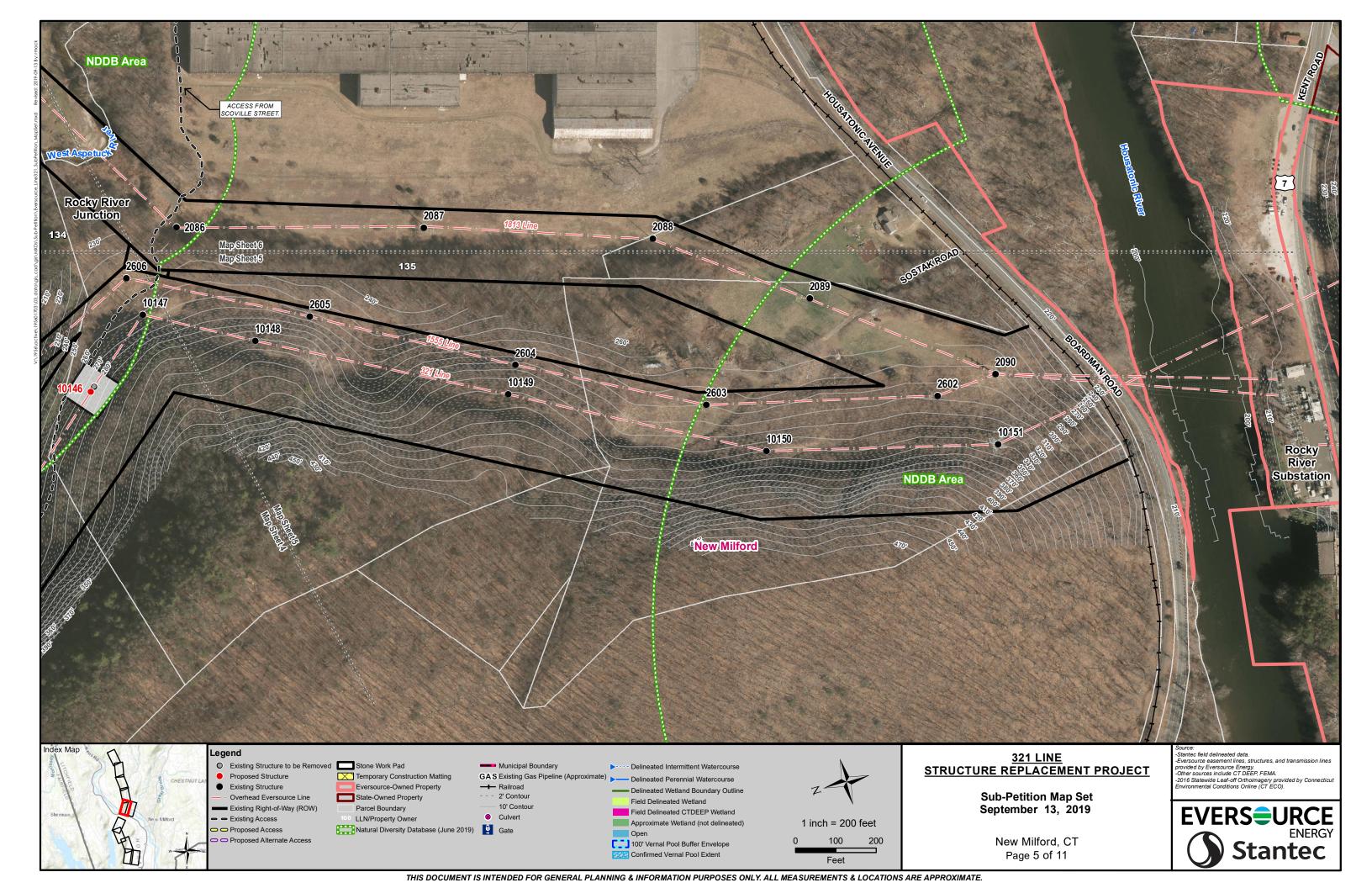
321 Line Structure Replacement Project Map Sheet 4 Abutters Table

Line List #	Owner Name	Parcel Address	Town	State
134	ASPETUCK FARMS LLC	2 TIMOTHY LN	INIEW MILEORI)	СТ
135	TOWN OF NEW MILFORD	12 SCOVILL ST	INIEW MILEORI)	СТ



321 Line Structure Replacement Project Map Sheet 5 Abutters Table

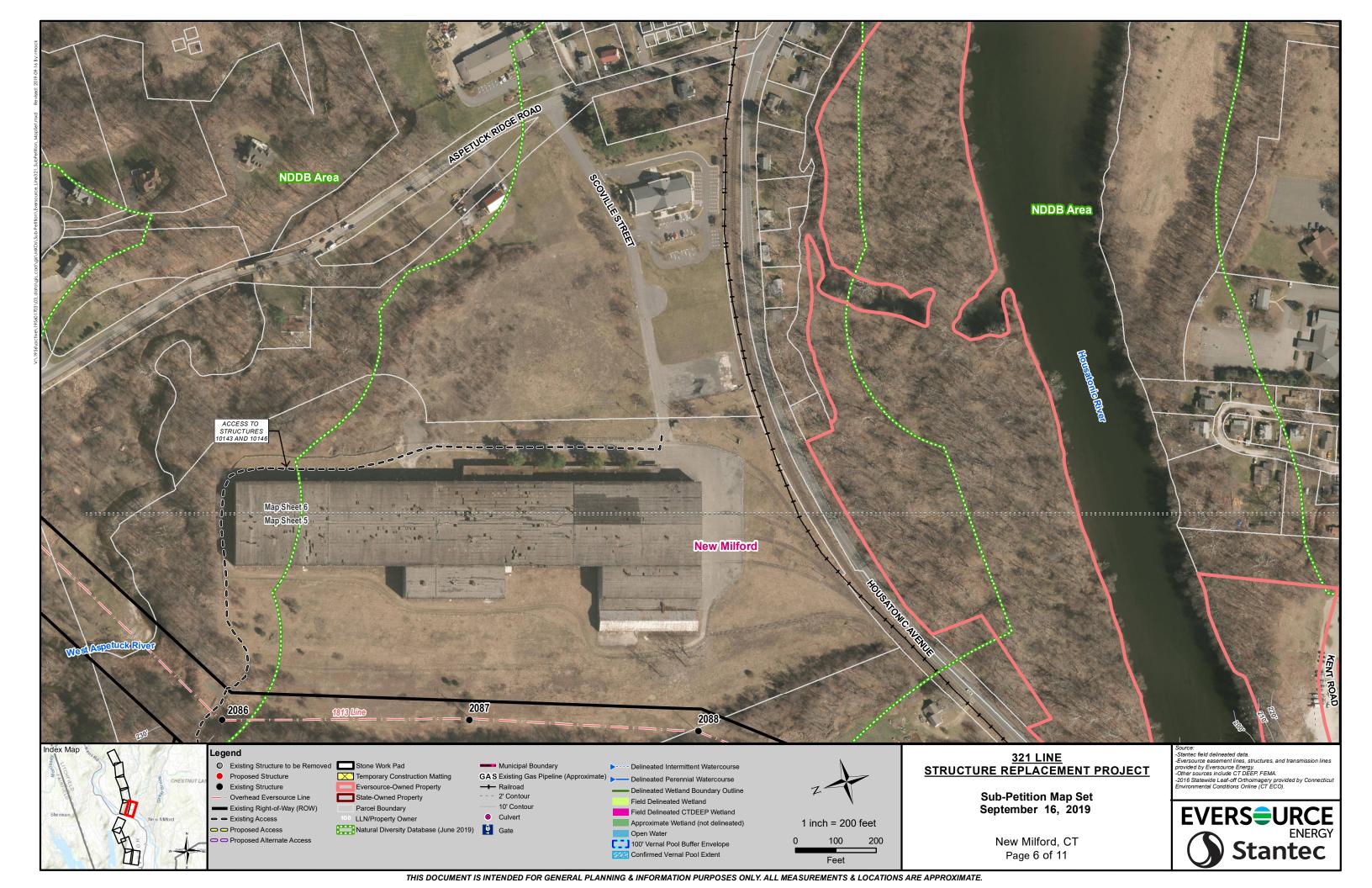
Line List #	Owner Name	Parcel Address	Town	State
134	ASPETUCK FARMS LLC	2 TIMOTHY LN	NEW MILFORD	CT
135	TOWN OF NEW MILFORD	12 SCOVILL ST	NEW MILFORD	CT



321 Line Structure Replacement Project Map Sheet 6 Abutters Table

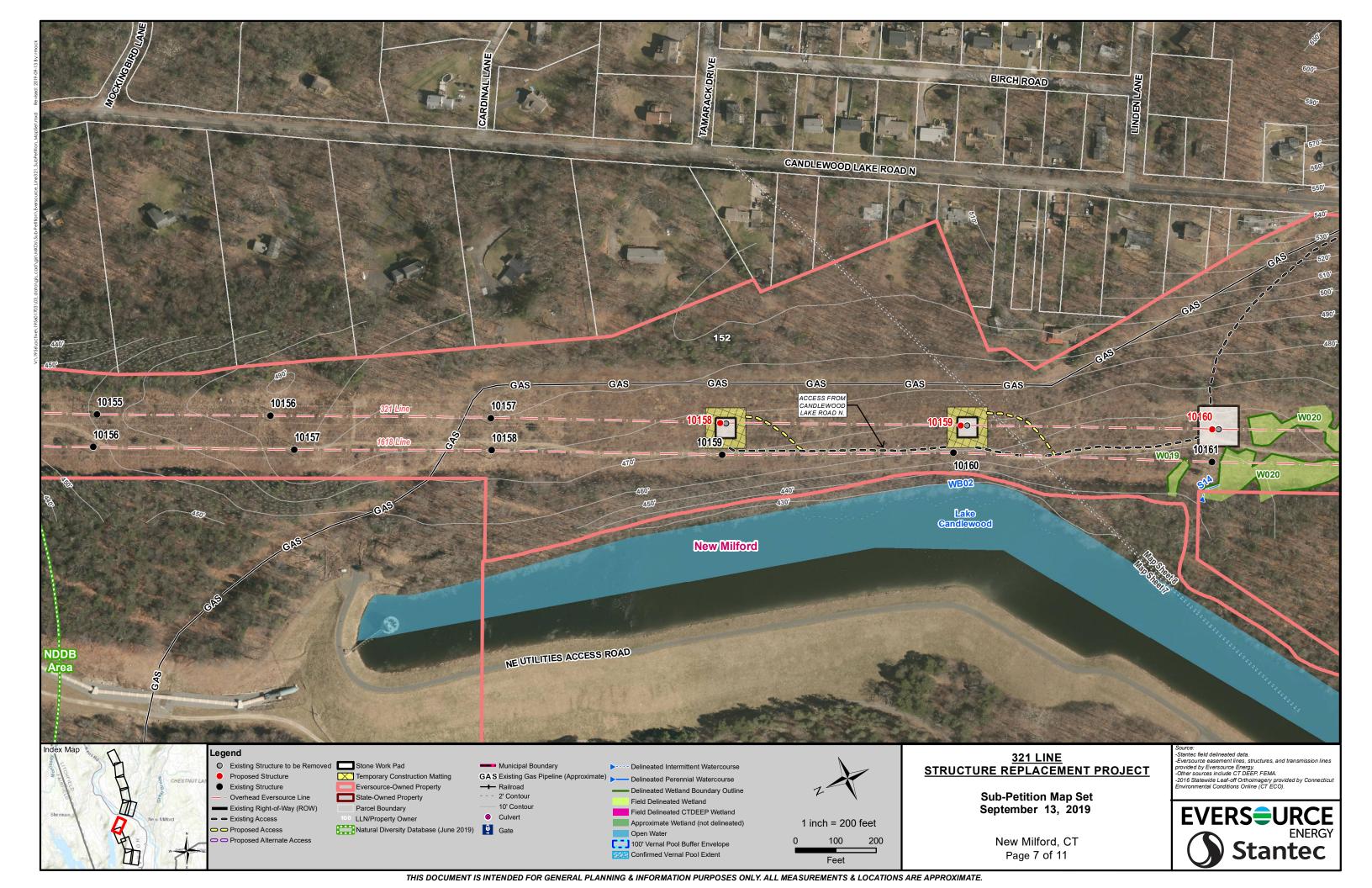
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No Abutters to Jurisdictional Work Areas



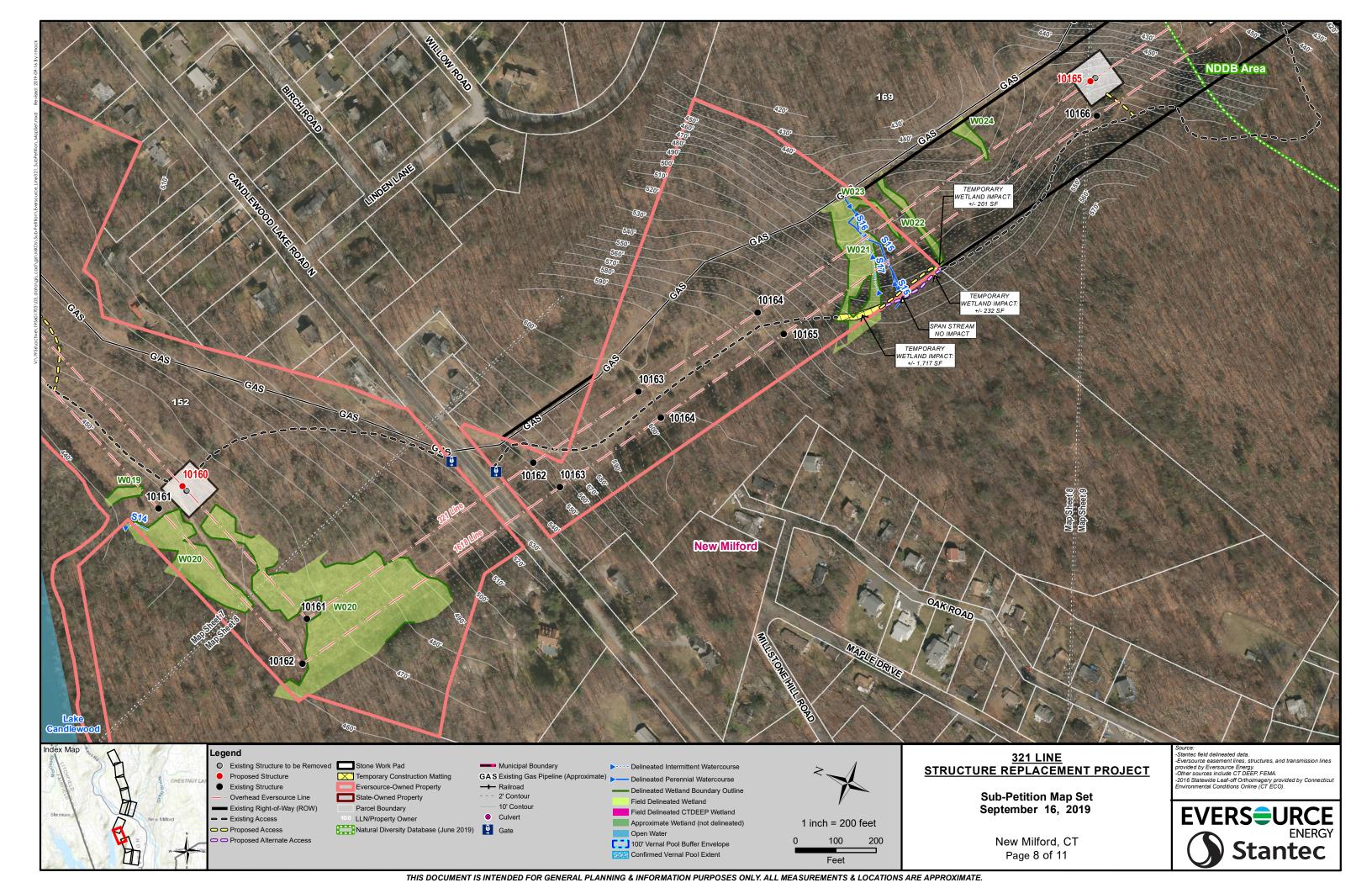
321 Line Structure Replacement Project Map Sheet 7 Abutters Table

Line List #	Owner Name	Parcel Address	Town	State
152	FIRSTLIGHT HYDRO GENERATING COMPANY	221 KENT RD	NEW MILFORD	СТ



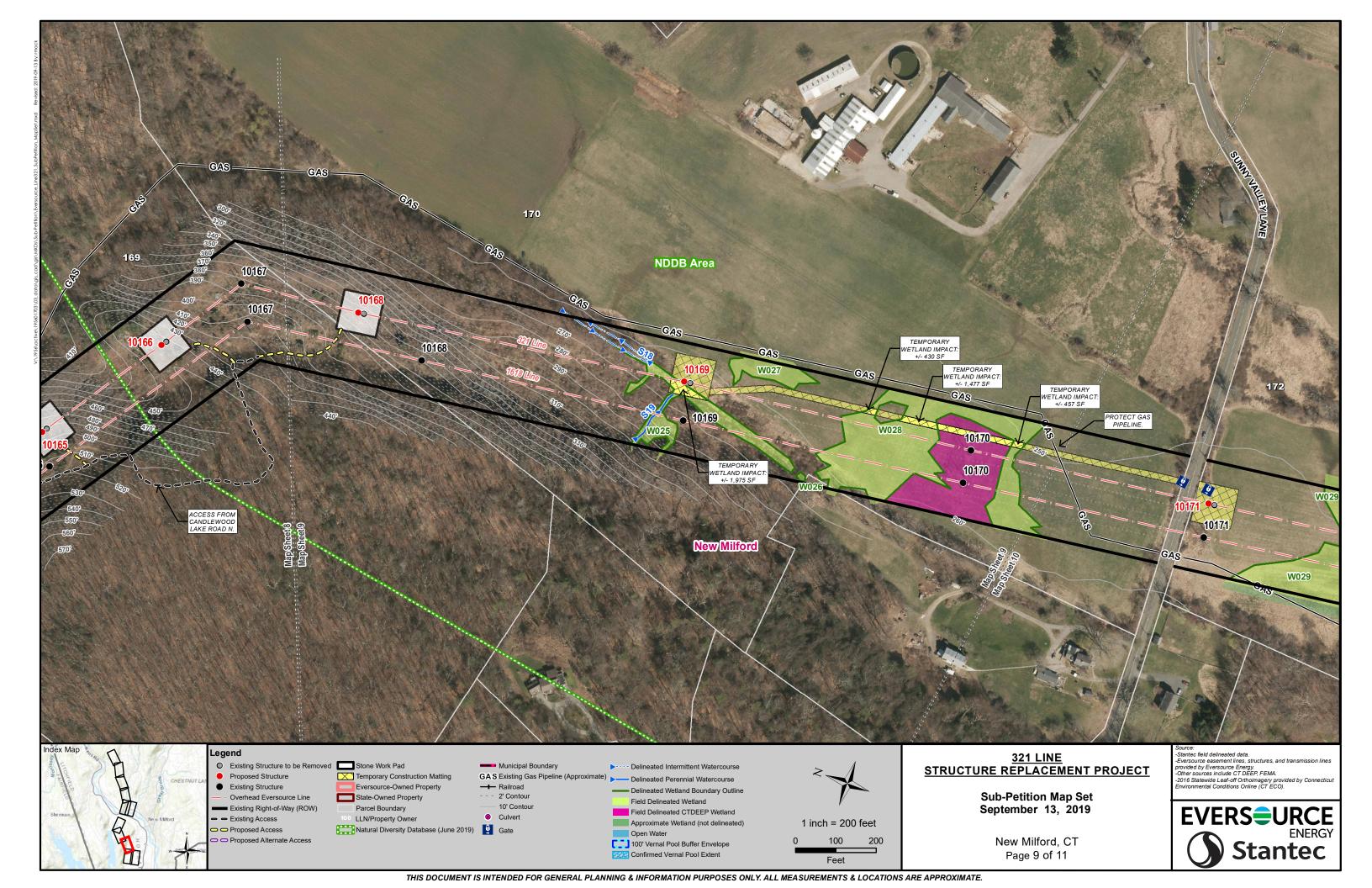
321 Line Structure Replacement Project Map Sheet 8 Abutters Table

Line List #	Owner Name	Parcel Address	Town	State
152	FIRSTLIGHT HYDRO GENERATING COMPANY	221 KENT RD		СТ
169	MAJOR W GLEN + CHECHE PETER	MAPLE DR		CT



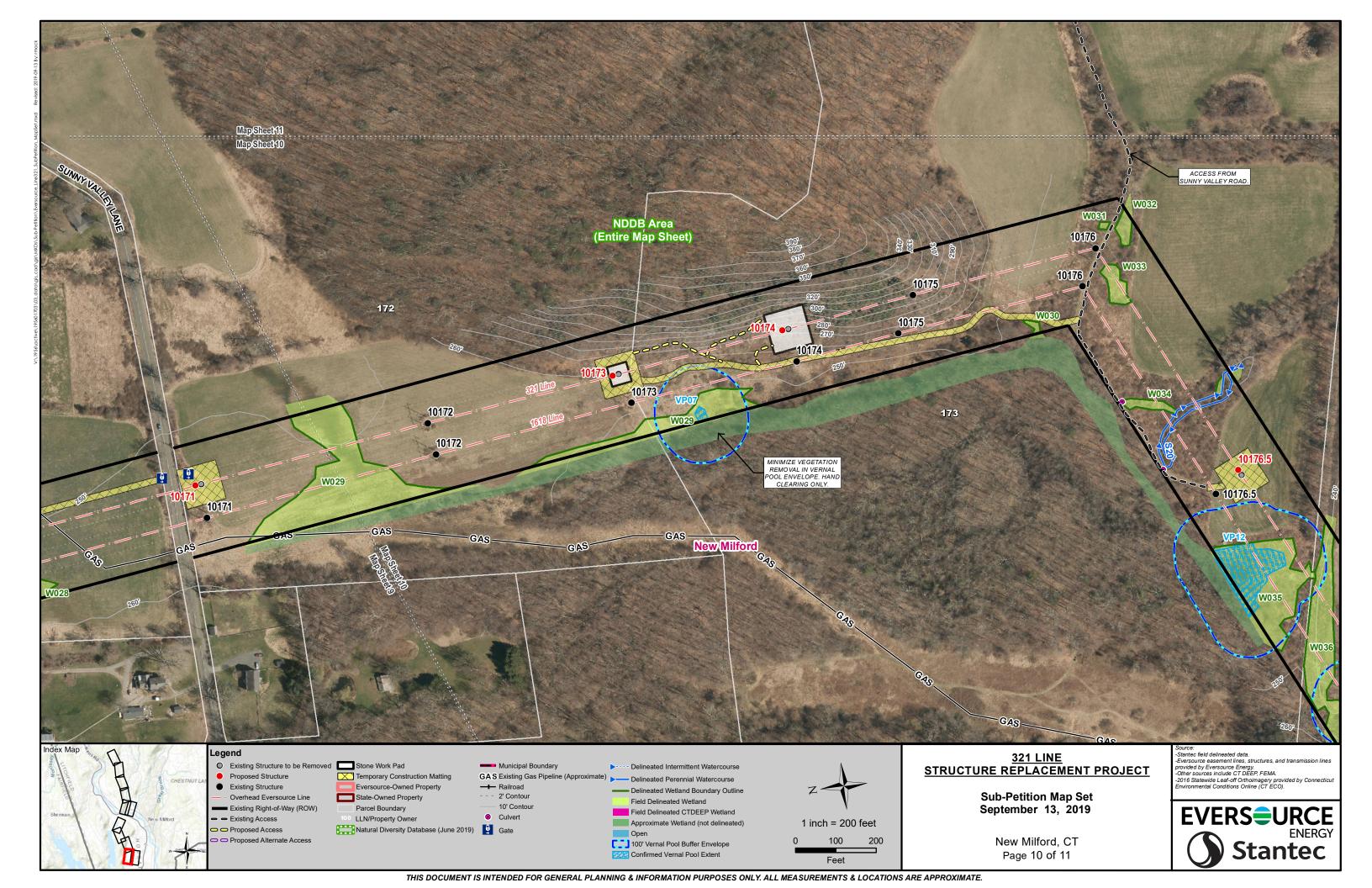
321 Line Structure Replacement Project Map Sheet 9 Abutters Table

Line List #	Owner Name	Parcel Address	Town	State
169	MAJOR W GLEN + CHECHE PETER	MAPLE DR	NEW MILFORD	СТ
170	NATURE CONSERVANCY OF CT INC	8 SUNNY VALLEY RD	NEW MILFORD	СТ
172	NATURE CONSERVANCY OF CT INC	JERUSALEM RD	NEW MILFORD	СТ



321 Line Structure Replacement Project Map Sheet 10 Abutters Table

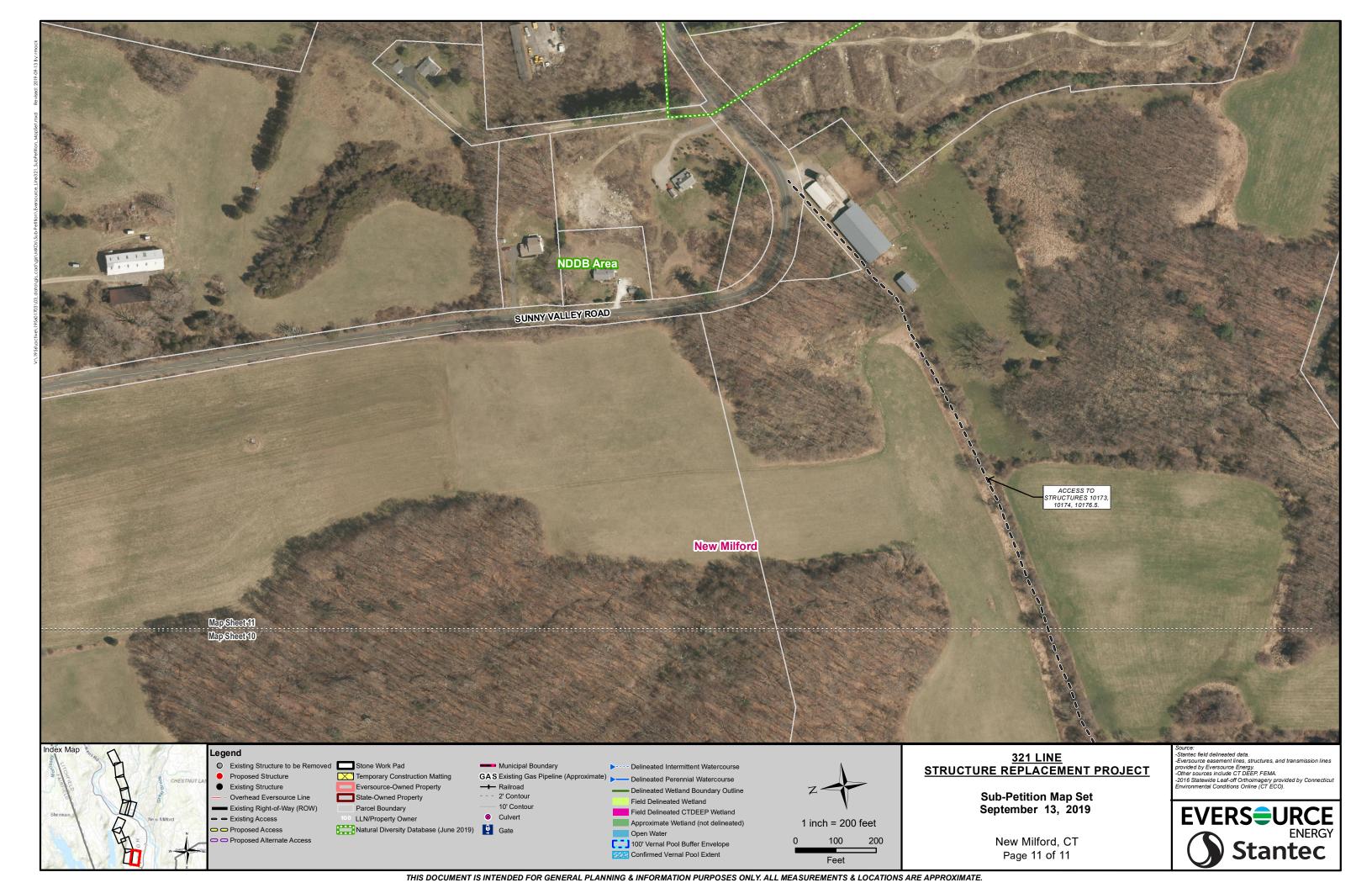
Line List #	Owner Name	Parcel Address	Town	State
172	NATURE CONSERVANCY OF CT INC	JERUSALEM RD	NEW MILFORD	СТ
173	NATURE CONSERVANCY OF CT INC	SUNNY VALLEY RD	NEW MILFORD	СТ



321 Line Structure Replacement Project Map Sheet 11 Abutters Table

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No Abutters to Jurisdictional Work Areas



ATTACHMENT D ABUTTER LETTER AND PROOF OF NOTICE



September 23, 2019

Dear Neighbor,

As part of our everyday effort to deliver reliable energy to our customers and communities, we're planning work in your area to replace electric transmission structures. Maintaining the infrastructure that supports the electric lines is one of the ways Eversource ensures the safe, secure transmission of electricity throughout the region.

You're receiving this letter and a copy of the Sub-Petition because the proposed work would be taking place within the right of way on or near your property in New Milford. A Sub-Petition is a document with detailed information about the proposed upgrades. Eversource is submitting Sub-Petition No. 1293-NM-01 this week to the Connecticut Siting Council (CSC) for its review and approval.

About This Electric System Improvement: What You Can Expect

First, we want you to know that this work will not interrupt electric service to your property.

As part of this project, we are proposing to replace, and slightly increase the height of the existing wood structures. The new, weathering steel structures will increase in height by 10 feet or less, depending on the location.

We are proposing to do the work within the existing rights of way on or near your property. The new structures will provide continued reliability of the transmission system.

Connecticut Siting Council Process and Timing

With this letter, Eversource is providing notice to you of its proposed work activity, as described in the enclosed Sub-Petition. If you have any comments or concerns about the project, please send them to the CSC at the following address within 30 days of the date of this letter: Melanie Bachman, Acting Executive Director; Connecticut Siting Council; Ten Franklin Square; New Britain, CT 06051. You may also email them to the siting.council@ct.gov. If you choose to send comments to the CSC, please reference Sub-Petition No. 1293-NM-01 in your correspondence.

Our Commitment to You

We are committed to be a good neighbor and doing our work with respect for you and your property. If you would like more information about this work please call 1-800-793-2202, or send an email to ProjectInfo@eversource.com. Thank you.

Sincerely,

Jared Kupiec

Jared Kupiec Eversource Project Manager – Transmission Maintenance

AFFIDAVIT OF SERVICE OF NOTICE

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

In accordance with Condition 2 of the Connecticut Siting Council's ("Council") March 31, 2017 declaratory ruling on Petition No. 1293, I hereby certify that on September 23, 2019, I caused notice of the proposed maintenance activities including a copy of the Sub-Petition No.1293-NM-01 of The Connecticut Light and Power Company dba Eversource Energy ("Eversource") to be served on the municipality listed below and 11 abutters. The notice of the proposed maintenance activities states that comments or concerns regarding the maintenance activities described in the Sub-Petition should be submitted to the Council within 30 days of the date of such notice.

Municipal Official:

Town of New Milford Peter Bass, Mayor 10 Main Street New Milford, CT 06776

James L. Smith

Project Siting Specialist

On this the 23^{rq} day of September, 2019, before me, the undersigned representative, personally appeared, James L. Smith, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing instrument and acknowledged that he executed the same for the purposes therein contained.

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

Notary Public

My Commission expires:

ROSANNI QUILES
NOTARY PUBLIC
MY COMMISSION EXPIRES MAY 31, 2024