



**Connecticut
Light & Power**

The Northeast Utilities System

56 Prospect Street, Hartford, CT 06103

Northeast Utilities Service Company

P.O. Box 270

Hartford, CT 06141-0270

(860) 728-4532

January 6, 2015

Mr. Robert Stein, Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

RE: Docket No. 424: Interstate Reliability Project
Development & Management Plan Change Notice Request:
Alignment Modification to On-Right-of-Way Access Road in the Vicinity of Structures 253 and
254 – Town of Killingly

Dear Chairman Stein:

Pursuant to Section 16-50j-62(a)(1) of the Regulations of Connecticut State Agencies (RCSA) and Section 7.2 of the *Development and Management (D&M) Plan for the Construction of the Interstate Reliability Project (Project, Interstate) New 345-kV Transmission Lines and Related Minor Modifications to Adjacent Lines*, The Connecticut Light and Power Company (CL&P) submits the above-referenced proposed D&M Plan change to the Connecticut Siting Council (Council) for review and approval.

As illustrated on the revised D&M Plan, Volume 3 Mapsheet 50 (refer to Attachment A), CL&P proposes to realign a portion of a previously-approved on-right-of-way (ROW) access road between Structures 253 and 254 in the Town of Killingly (Line List #s 30409, Lannon / Berk, and 30411, Garvey). Specifically, in this location, the access road would be shifted from the eastern side of the ROW to the western portion of the ROW. CL&P proposes this access road modification at the request of the landowner. This alternative access road would be used in lieu of the previously approved portion of the access road, which would not be built.

The alternative access road would be primarily aligned through uplands, although it would cross the same small stream and an associated wetland as the originally approved access road. However, compared to the approved access road, the use of the alternative access road would reduce temporary water resource impacts and would not result in significant adverse effects to other environmental resources.

The alternative access road would extend for approximately 1,000 feet from just south of Structure 253 north to Structure 254 along the west side of CL&P's easement, and would traverse generally west of or beneath CL&P's existing 115-kV transmission lines, primarily within portions of the ROW where vegetation is already managed consistent with overhead transmission line operation. This alternative route would replace an approximately 925-foot-long section of the access road that was previously approved for the Project (refer to D&M Plan, Volume 3, Mapsheet 50, dated February 14, 2014).

Like the originally approved on-ROW access road, the alternative access road would extend primarily through uplands, except for a small stream and associated wetland crossings. However, the alternative access road would entirely avoid one wetland (W20-171A), which would have been impacted by the originally approved road. As a result, the use of the alternative access road will result in approximately 420 square feet less temporary impacts to water resources.

Table 1 compares the water resource characteristics and impacts associated with both access road segments.

Table 1
Comparison of Approved and Proposed Alternative Access Roads: Structures 253-254, Town of Killingly

Wetland / Stream	Wetland / Stream Type	Wetland Functions / Values	Vernal Pool	Water Resource Impacts (sq. ft.): Temporary Access Road	
				Permitted Access Road	Alternative Access Road
W20-171A	PSS	Low	No	1,238	-
W20-171 S20-57A	PSS/PFO, P	Low	No	629	1,447
Total				1,867	1,447

Notes: Along either access road, impacts to water resources would be temporary. For the crossing of Stream S20-57A, a timber mat span may be used instead of a temporary culvert. The alternative access road would avoid any crossing of wetland W20-171A, but would involve two crossings of wetland W20-171.

Both the approved and alternative access roads would cross mapped Lepidoptera host plant habitat; however, the use of the alternative access road would minimize the crossing of the host plant habitat. In particular, the alternative access road would traverse approximately 100 feet of mapped Lepidoptera host plant habitat (which extends linearly across the ROW south of stream S20-57A). In comparison, the approved access road would cross approximately 125 feet of this habitat.

CL&P will direct its contractor to construct the alternative access road across water resources (i.e., W20-171 and S20-57A) using timber mats, which would be removed in conjunction with the completion of Project construction activities. Potential adverse effects to buried cultural resources (should any be present) will be avoided by the use of protective fill during the development of the access road in uplands, as well as by the installation of fencing.

The proposed access road modification was reviewed and approved by the Connecticut State Historic Preservation Office (SHPO), the Connecticut Department of Energy and Environmental Protection (CT DEEP), and the U.S. Army Corps of Engineers (USACE). Copies of approvals from these agencies regarding the proposed access road are included in Attachment B.

Chairman Stein
January 6, 2015
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TRANSMISSION TTA

In addition to the alternative access road between Structures 253 and 254, to the north of the Structure 254 work pad, CL&P proposes a minor shift (of less than approximately 25 - 50 feet) to an approximately 200-foot-long portion of the approved access road. This access road shift is proposed to improve construction traffic flow between the alternative access road to the south, the Structure 254 work pad, and the access to Structure 255 to the north. The minor access road shift is entirely within an upland portion of the existing ROW and the Project's approved vegetation clearing limits for construction (refer to Mapsheet 50).

CL&P is providing notice of the proposed D&M Plan change to the affected property owner and chief elected official of the Town of Killingly. In addition, enclosed please find an original and 15 copies of this submission.

Should you or other Council members have any questions regarding this submission, please do not hesitate to contact me via e-mail at john.morissette@nu.com or telephone at (860) 728-4532.

Sincerely,



John R. Morissette
Project Manager – Transmission Siting

Enclosures

Cc: Service List
Mr. Sean Hendricks, Town Manager, Town of Killingly
The Honorable John Hallbergh, Council Chairman, Town of Killingly
Landowners: M. Lannon / K. Berk and E.S. Garvey

ATTACHMENT A

**D&M PLAN, VOLUME 3, MAPSHEET 50:
REVISED TO ILLUSTRATE ALTERNATIVE ACCESS ROAD ALIGNMENT AND
MINOR SHIFT TO ACCESS ROAD NORTH OF STRUCTURE 254**

ATTACHMENT B

**COPIES OF CORRESPONDENCE FROM THE USACE, CT DEEP, AND CT SHPO
APPROVING THE PROPOSED ACCESS ROAD REALIGNMENT**



December 10, 2014

Mr. Robert Deptula
NUSCO Environmental Affairs
Northeast Utilities System
107 Selden Street
Berlin, CT 06037

Subject: Interstate Reliability Project Access Road Realignment
Killingly, Connecticut.

Dear Mr. Deptula:

The State Historic Preservation Office (SHPO) has reviewed the referenced change in project plans associated with the previously reviewed and accepted Interstate Reliability Project cultural resources survey reports. SHPO understands that the Connecticut Light and Power Company (CL&P) would like to abandon construction of a previously surveyed 925 ft long access road to the east of and between Structures 253 and 254 in favor of a 1000 ft long access road to the west of these structures. Although the newly proposed access road has not been surveyed and because of time constraints, CL&P proposes to implement avoidance and protection measures outlined in CL&P's *Historic Resources Management Plan* (Section B.1) during construction of the newly proposed access road. The protection measures include the use of geotextile fabric and clean fill, installation of a protective fence, removal of vegetation with minimal ground disturbance, and oversight by a cultural resource monitor. SHPO also was informed that consultation has been carried out with the consulting Native American tribal nations.

During the archeological reconnaissance survey of the originally proposed road, no cultural material was found on the access road or in association with Structure 253, but precontact artifacts were recovered in the vicinity of Structure 254. Subsurface testing indicated that the site extended to the north, but little testing was completed to the west of Structure 254. As a result, the area of the newly proposed access road is considered to be archeologically sensitive. SHPO is sympathetic to CL&P's time constraints for this project amendment, but this is an unorthodox approach that should not be employed as normal operating procedure. While avoidance and protection are the preferred method for mitigating project impacts to known cultural resources, it is not an alternative to the identification and assessment process. Based on the information submitted to this office, SHPO has no objections to the proposed implementation of avoidance and protection measures for the newly proposed access road between Structures 253 and 254.

SHPO appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act and Section 106 of the National Historic Preservation Act, as amended. For additional information, please contact Catherine Labadia, Environmental Reviewer, at (860) 256-2764 or catherine.labadia@ct.gov.

Sincerely,

Mary B. Dunne
Deputy State Historic Preservation Officer

State Historic Preservation Office

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

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The Connecticut Light and Power Company
P.O. Box 270
Hartford, CT 06141

Attn: Robert Deptula

Re: **Request for Technical Plan Revision**
Permit Nos.: WQC-201205697
Project: Interstate Reliability Project
USACOE No.: NAE-2008-1671
Town: Killingly

Dear Mr. Deptula:

The department has completed a review of your December 9, 2014 request for a technical plan revision to the above referenced Clean Water Act Section 401 Water Quality Certification. The revision involves modification to the location of approximately 925 feet of access road located between Structure 253 and Structure 254 in the town of Killingly. You state that this revision is being considered at the request of the land owner, and that this alternate road location will result in a 410 square foot reduction in wetland impact as compared to the currently approved location.

Your request for technical plan revision is hereby approved. The above modification shall be in accordance with Mapsheet 101 of 134 and Mapsheet 102 of 134 dated 12/16/2013, as revised to 12/02/2014.

If you have questions regarding this matter please contact Doug Hoskins at (860) 424-4192, douglas.hoskins@ct.gov. All correspondence regarding this permit should reference the permit numbers identified above and be addressed to Doug Hoskins, Inland Water Resources Division, Bureau of Water Protection and Land Reuse, Department of Energy and Environmental Protection, 79 Elm St., Hartford, CT 06106-5127.

Dec 16, 2014
Date


Cheryl A. Chase
Director
Inland Water Resources Division
Bureau of Water Protection and Land Reuse

CC:DH

WQC-201205697

CL&P / Interstate Reliability Project

Killingly CT

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cc: For the town of Killingly:

Mayor/First Selectman

Conservation Commission

Inland Wetland Agency

Planning & Zoning Commission

Susan Lee, New England District, USACE, 696 Virginia Road, Concord MA 01742-2751

Chris Fritz, Burns & McDonnell, 108 Leigus Rd., Suite 1100, Wallingford, CT 06492



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

December 23, 2014

Regulatory Division
File No. **NAE-2008-1671**

Attn: Mr. Robert Deptula
The Connecticut Light and Power Company
107 Selden Street
Berlin, CT 06037

Dear Mr. Deptula:

In accordance with a recent request dated December 12, 2014, your Department of the Army permit number NAE-2008-1671, issued on February 12, 2014, and which authorized fill in wetlands/waters for construction of the Interstate Reliability Project, is hereby modified as follows:

Place temporary fill (timber construction mats) in approximately 1,447 SF (two areas) of wetlands/water areas in association with the relocation of a temporary construction access road in Killingly, Connecticut. This access road extends approximately 1,000 LF from just south of Structure 253 northerly to structure 254 along the west side of the CL&P easement area. This work is located in wetlands/waters identified as W20-171/S20-57A, as described and shown on the enclosed plans (Mapsheets 101 and 102 of 134) entitled "INTERSTATE RELIABILITY PROJECT", four (4) sheets, all sheets dated "11/25/13"; Revised "12/02/2014". The 1,447 SF temporary fill represents a reduction in temporary fill area from the originally authorized temporary fill area of 1,867 SF in wetlands W20-171A and W20-171/S20-57A.

This authorization is subject to the special condition below:

Historic/cultural resource avoidance and protection measures shall be implemented during construction of the relocated access road, as described and shown in the enclosed 'ATTACHMENT B CULTURAL RESOURCE AVOIDANCE AND PROTECTION MEASURES TO BE IMPLEMENTED ALONG RELOCATED ACCESS ROAD'.

The conditions of the original permit remain in full force and effect.

We continually strive to improve our customer service. In order for us to better serve you, we would appreciate your completing our Customer Service Survey located at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey.

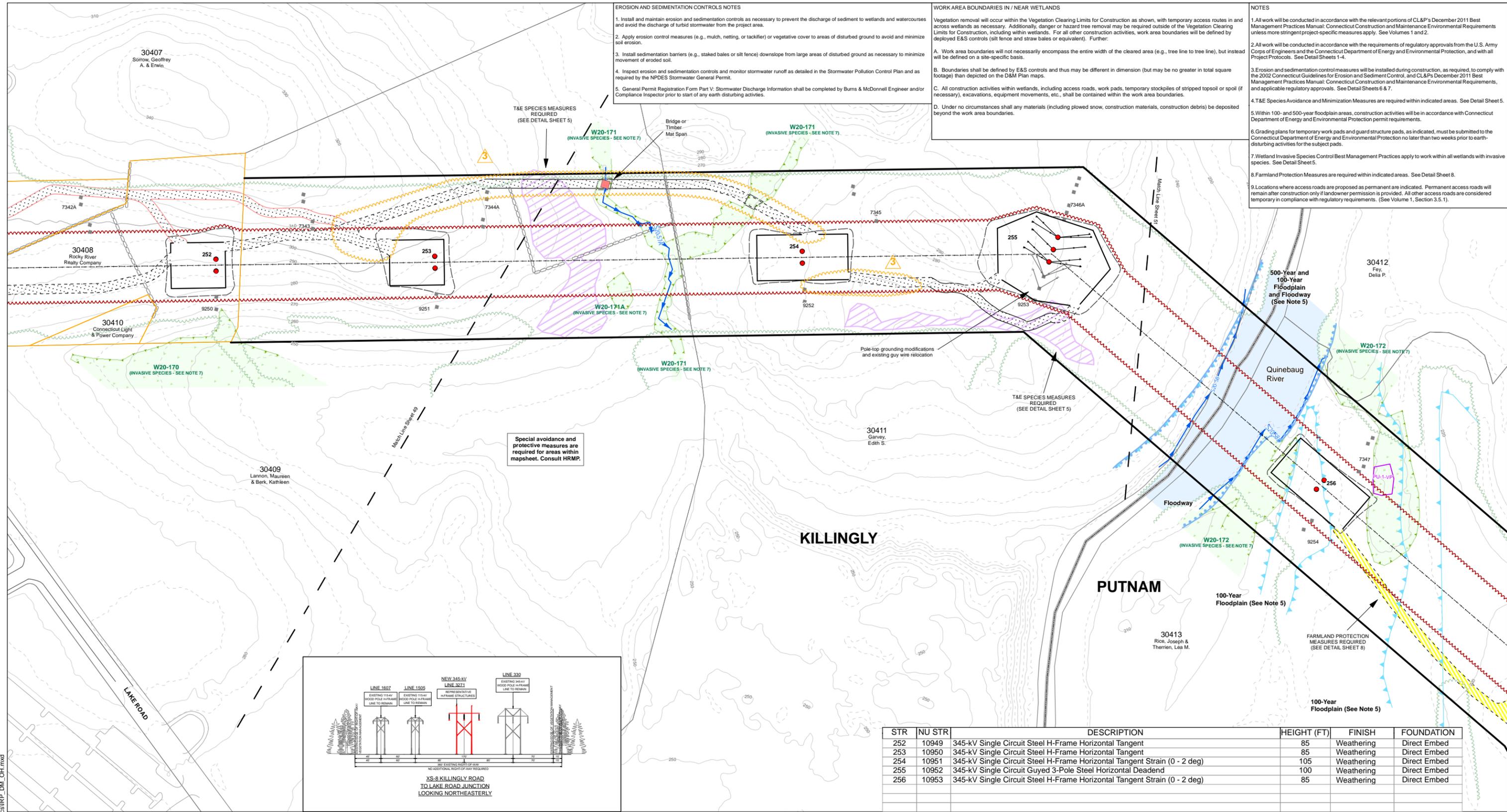
If you have any questions, please contact Susan Lee of my staff at (978) 318-8494.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Newman".

Barbara Newman
Acting Chief, Permits and Enforcement Branch
Regulatory Division

Enclosures



EROSION AND SEDIMENTATION CONTROLS NOTES

1. Install and maintain erosion and sedimentation controls as necessary to prevent the discharge of sediment to wetlands and watercourses and avoid the discharge of turbid stormwater from the project area.
2. Apply erosion control measures (e.g., mulch, netting, or tackifier) or vegetative cover to areas of disturbed ground to avoid and minimize soil erosion.
3. Install sedimentation barriers (e.g., staked bales or silt fence) downslope from large areas of disturbed ground as necessary to minimize movement of eroded soil.
4. Inspect erosion and sedimentation controls and monitor stormwater runoff as detailed in the Stormwater Pollution Control Plan and as required by the NPDES Stormwater General Permit.
5. General Permit Registration Form Part V, Stormwater Discharge Information shall be completed by Burns & McDonnell Engineer and/or Compliance Inspector prior to start of any earth disturbing activities.

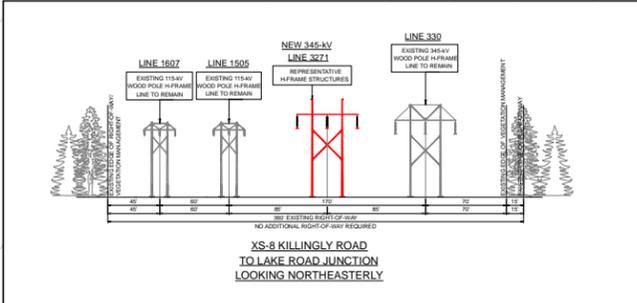
WORK AREA BOUNDARIES IN / NEAR WETLANDS

Vegetation removal will occur within the Vegetation Clearing Limits for Construction as shown, with temporary access routes in and across wetlands as necessary. Additionally, danger or hazard tree removal may be required outside of the Vegetation Clearing Limits for Construction, including within wetlands. For all other construction activities, work area boundaries will be defined by deployed E&S controls (silt fence and straw bales or equivalent). Further:

- A. Work area boundaries will not necessarily encompass the entire width of the cleared area (e.g., tree line to tree line), but instead will be defined on a site-specific basis.
- B. Boundaries shall be defined by E&S controls and thus may be different in dimension (but may be no greater in total square footage) than depicted on the D&M Plan maps.
- C. All construction activities within wetlands, including access roads, work pads, temporary stockpiles of stripped topsoil or spoil (if necessary), excavations, equipment movements, etc., shall be contained within the work area boundaries.
- D. Under no circumstances shall any materials (including plowed snow, construction materials, construction debris) be deposited beyond the work area boundaries.

NOTES

1. All work will be conducted in accordance with the relevant portions of CL&P's December 2011 Best Management Practices Manual; Connecticut Construction and Maintenance Environmental Requirements unless more stringent project-specific measures apply. See Volumes 1 and 2.
2. All work will be conducted in accordance with the requirements of regulatory approvals from the U.S. Army Corps of Engineers and the Connecticut Department of Energy and Environmental Protection, and with all Project Protocols. See Detail Sheets 1-4.
3. Erosion and sedimentation control measures will be installed during construction, as required, to comply with the 2002 Connecticut Guidelines for Erosion and Sediment Control, and CL&P's December 2011 Best Management Practices Manual; Connecticut Construction and Maintenance Environmental Requirements, and applicable regulatory approvals. See Detail Sheets 6 & 7.
4. T&E Species Avoidance and Minimization Measures are required within indicated areas. See Detail Sheet 5.
5. Within 100- and 500-year floodplain areas, construction activities will be in accordance with Connecticut Department of Energy and Environmental Protection permit requirements.
6. Grading plans for temporary work pads and guard structure pads, as indicated, must be submitted to the Connecticut Department of Energy and Environmental Protection no later than two weeks prior to earth-disturbing activities for the subject pads.
7. Wetland Invasive Species Control Best Management Practices apply to work within all wetlands with invasive species. See Detail Sheet 5.
8. Farmland Protection Measures are required within indicated areas. See Detail Sheet 8.
9. Locations where access roads are proposed as permanent are indicated. Permanent access roads will remain after construction only if landowner permission is provided. All other access roads are considered temporary in compliance with regulatory requirements. (See Volume 1, Section 3.5.1).



STR	NU STR	DESCRIPTION	HEIGHT (FT)	FINISH	FOUNDATION
252	10949	345-kV Single Circuit Steel H-Frame Horizontal Tangent	85	Weathering	Direct Embed
253	10950	345-kV Single Circuit Steel H-Frame Horizontal Tangent	85	Weathering	Direct Embed
254	10951	345-kV Single Circuit Steel H-Frame Horizontal Tangent Strain (0 - 2 deg)	105	Weathering	Direct Embed
255	10952	345-kV Single Circuit Guyed 3-Pole Steel Horizontal Deadend	100	Weathering	Direct Embed
256	10953	345-kV Single Circuit Steel H-Frame Horizontal Tangent Strain (0 - 2 deg)	85	Weathering	Direct Embed



Legend

- New Transmission Structure Pole
- New Transmission Line
- Existing Transmission Structure Pole
- Existing Distribution Lines
- Existing Distribution Structures
- New Guy Anchor
- Relocated Guy Anchor
- New Guy Wire
- Relocated Guy Wire
- Existing Access Road
- Proposed New Access Road
- Alternate Access Road
- Permanent (See Note 9)
- Work Pad
- Limit of Disturbance
- Existing ROW
- Stone Wall
- Property Lines
- Town Line
- Named Public Trails
- Vegetation Clearing Limits for Construction
- Existing Tree Canopy Line
- Wetland
- Open Water
- Perennial Stream
- Intermittent Stream
- Vernal Pool
- Amphibian Breeding Habitat
- T&E Species Area

Revisions

NO.	DATE	REVISIONS	BY	CHK	APP	APP
3	12/31/2014	Access route change	LD	CF		
2	8/27/2014	Structure and guy wire adjustment	LD	MK		
1	2/14/2014	404/401 Permit Revisions	LD	MK		

Burns & McDonnell
SINCE 1898

DESIGNED: M. Kasinskas & M. Goetz
CHECKED: M. Kasinskas

Northeast Utilities Service Co.
THE CONNECTICUT LIGHT & POWER CO.

Interstate Reliability Project Development & Management Plan

DATE: 8/30/2013
BY: 64261
CHKD: DATE
APP: DATE
APP: DATE

Map Sheet 50 of 66

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