



TOWN OF ENFIELD

Office of Town Manager

July 6, 2009

Daniel F. Caruso, Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Docket 370 – APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY (CL&P) CONCERNING THE CONNECTICUT PORTION OF THE GREATER SPRINGFIELD RELIABILITY TRANSMISSION LINE PROJECT

Dear Chairman Caruso:

The Enfield Town Council, as an Intervenor Party to this application wishes to convey its support for the “Greater Springfield Reliability Project – Preferred Northern Route,” and expresses its steadfast opposition to the Massachusetts Southern Route Alternative.” Additionally, please find attached to this correspondence, letters of concern from both the Enfield Conservation Commission, and the Enfield Inland Wetlands and Watercourses Agency.

The “Massachusetts Southern Route Alternative” as proposed severely impacts the northern portion of Enfield. The alternative route consists of the transmission line entering Enfield from Longmeadow alongside an existing, overhead transmission line; traveling across Enfield Street at Brightmeadow Boulevard; going east in the area north of Brainerd Park; and eventually exiting Enfield into East Longmeadow at the northern end of Shaker Lake.

Equally detrimental is a proposed underground line alternative which would run under Campania Drive, Manning Road, Enfield Street, Brainard Road, and North Maple Street. This alternate route requires two new transition stations to be constructed in Enfield where the underground line meets the overhead transmission line. One station would be located near Campania Drive and the other would be near the north end of Shaker Lake. This underground line involves streets in three residential neighborhoods – Campania Drive, Manning Road, and Brainard Road.

820 Enfield Street/Enfield, Connecticut 06082/(860) 253-6350

The reasons why the Town of Enfield is opposed to the Massachusetts Southern Route Alternative are as follows:

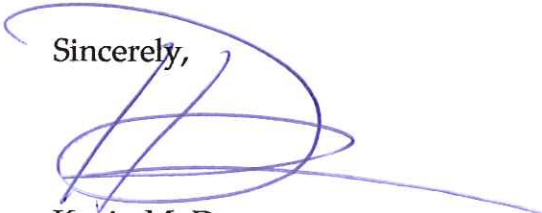
- Negative impact on land values.
- Doubling the width area cleared of vegetation – particularly trees for the new transmission line. The cleared area would increase from 90 feet to nearly 200 feet. The adverse impact of this action is even more severe as the majority of the expanded cleared area passes through or in very close proximity to several residential neighborhoods.
- Removing trees and vegetation from forested wetlands.
- Increased risk of soil erosion in the cleared area.
- Erection of new, taller transmission line towers.
- Increased trespassing complaints within the transmission lines' cleared area that stem from dirt bike and all-terrain-vehicle (ATV) activities. This in turn leads to increased noise and nuisance complaints, which directly impacts the workload of the Enfield Police. The Enfield Police Department is already confronted with these enforcement problems from the existing transmission lines.
- The increased use of dirt bikes and ATVs will greatly contribute to soil erosion as their tires destroy vegetation.
- Negative impact on the Town's North Gate Project to improve the northern corridor of Enfield at the Exit 49-Longmeadow border. The new transmission lines will increase overhead "clutter" and contradict the intent of North Gate goals to make this area aesthetically more attractive.
- There are heatedly contested issues surrounding health risks associated with transmission lines and their links to cancer.
- Where the Massachusetts Southern Route Alternative crosses over the Connecticut River there is a State-sanctioned hunting area and home to what is known as the Enfield Cove amongst local waterfowl hunters and fisherman alike. The Enfield Cove area boasts vernal pools and has significant sections of wetlands.
- With regard to the proposed underground transmission line:
 - Access to the western transition station would be via the residential neighborhood on Manning Road and Campania Drive.
 - The disruption generated by construction necessary to install the transmission line under roads.
 - The need to identify who will be responsible for conducting long-term road repairs when the road-cut trench settles.
 - The need to identify how frequently underground lines require repairs and the impact of repair work within residential neighborhoods.

- o In addition to having many homes along it, Brainard Road serves as a significant travel corridor for commercial vehicles between I-91's Exit 49, Enfield Street, and the industrial parks located to the east along Bacon Road, Shaker Road, Taylor Road, and in East Longmeadow.

At this point, it is difficult to quantify the local budget impact of the Massachusetts Southern Route Alternate on Enfield. While some additional tax revenue from CL&P is anticipated, it will be offset by anticipated expenditure increases from greater law enforcement activities, road maintenance, etc. along with reduced revenue from declining property values.

For these reasons, the Town of Enfield Town Council strongly recommends that the Connecticut Siting Council approve the Greater Springfield Reliability Project – Preferred Northern Route.

Sincerely,



Kevin M. Deneen
Town Attorney

DTV

Attachments

Cc: Enfield Town Council
Enfield Conservation Commission
Enfield Inland Wetlands and Watercourses Agency
Matthew W. Coppler, Town Manager
Senator Joseph Liebermann
Senator Christopher Dodd
Congressman Joseph Courtney
State Senator John Kissel
State Representative Kathleen Tallerita
State Representative Karen Jarmoc

ENFIELD TOWN COUNCIL

RESOLUTION NO. 495

**Submission of Intervenor Statement to the Connecticut Siting Council
Regarding the Greater Springfield Reliability Transmission Line Project**

RESOLVED, that the Enfield Town Council does hereby authorize Town Attorney Kevin M. Deneen to submit the attached Intervenor Statement dated July 6, 2009 to the Connecticut Siting Council in regards to the Greater Springfield Reliability Transmission Line Project; and

BE IT FURTHER RESOLVED, the Town Attorney Kevin M. Deneen is authorized to represent the Town of Enfield before the Connecticut Siting Council at all hearings and sessions of said body in regards to the Greater Springfield Reliability Project.

Prepared By: Daniel T. Vindigni, Assistant Town Manager

Date Prepared: July 1, 2009

Date Adopted by Enfield Town Council: July 6, 2009; Vote: 10-0-0



ENFIELD CONSERVATION COMMISSION

July 2, 2009

Scott Kaupin, Mayor
Enfield Town Council
820 Enfield Street
Enfield, CT 06082

SUBJECT: Connecticut Portion of Massachusetts Southern Route Alternative for the Agawam to Ludlow 345-kV Line Route / Connecticut Siting Council Docket No. 370 Consolidated Proceeding (370A)

Dear Mayor Kaupin

The above proposed project was reviewed by the Conservation Commission at our regular meeting of June 9, 2009. The commission's observations and comments follow and support the Town Council position opposing the Southern Route Alternative.

OVERHEAD LINE ROUTE (OLR):

- A. Although the Municipal Consultation Filing (MCF) covers EMF's (electric and magnetic fields) and possible biological impacts, the Conservation Commission is concerned that unresolved debate remains on MF (magnetic field) health related issues and children. There are substantial numbers of residential structures in close proximity to the current power lines that would be increasingly impacted by additional construction of larger, more powerful transmission lines.
- B. Considerable recreation activity takes place in a number of locations along the right-of-way (R.O.W.). Some of it is sanctioned and benign; a great deal of it, especially at the east end of the right-of-way, is not and causes significant damage. Clearing of large areas of the right-of-way for new towers will encourage further destruction of the ecosystem.
- C. Archaeological resources - pre- and post-contact – are a major concern in the CT River Valley. Enfield, soon to be a Certified Local Government, recognizes the potential for disturbances in such a project and must make the inevitable comparison of all such potential large scale activities with the monumental losses we have experienced to our historic and cultural resources. The commission does not encourage unnecessary intrusion into or undesirable public discussion of sensitive areas.

- D. As noted in a 2004 ERT report ¹ that included a portion of the eastern section of the right-of-way: 1] The forested habitat (in the area) serves as a wildlife corridor; 2] Further land development may jeopardize the integrity of the ecosystem and its flora and fauna; 3] Deforestation may degrade the riparian buffers of streams that pass through; and 4] From a watershed perspective, ground water quality may suffer from a number of impacts caused by vegetation loss.
- E. The right-of-way, with additional cleared and developed areas, traverses sensitive, productive, and extremely high quality agricultural lands. The Connecticut River Valley contains internationally recognized agricultural soils that must be protected and managed. The commission strongly endorses and promotes the continuing support of farmers and the agricultural industry at the local level, recognizing that local sustainability will continue to grow as an important concern here and everywhere in the nation.
- F. Wetland impacts: The Conservation Commission defers, in this instance, to the Enfield IWWA on wetland comments in general. However, several specific points of concern are worth noting again. 1] Approximately 27 wetlands have been identified in the R.O.W. (as noted in the MCF); 2] Vernal pools are also noted, including associated flora & fauna that are additionally impacted by loss or segmentation of the upland forests; 3] Both routes cross a major Level B aquifer containing wells that serve thousands of people.
- G. It is clear that the uncertainties associated with living near or abutting high power transmission lines have and do affect real estate values. It is inevitable that expansion of transmission line presence and capacity will have a negative impact on any Enfield real estate under such circumstances.

UNDERGROUND LINE ROUTE (ULR):

- A. The entire route lies in a CT Aquifer Protection District. While the commission recognizes best management practices exist to prevent or minimize temporary groundwater quality impacts, the commission has serious concerns with the dielectric fluid contained in the underground power line conduits. A failure of the system or an unintentional intrusion could create a highly undesirable groundwater pollution scenario. This is in addition to the potential problems with groundwater impacts from construction disturbance and potentially extended erosion noted in the Municipal Consultation Filing.
- B. A 40-ft. right-of-way along Brainard Road to allow construction and maintenance access would be devastating to existing trees and other vegetation. The town is wary of any such proposals after the loss of large numbers of 200+ year old trees along Hazard Avenue during an earlier 'Blue Sky' improvement project.
- C. A large number of residents will be inconvenienced during the construction along neighborhood roads.
- D. Both transitional stations will consume large footprints and displace vegetation and local fauna. The western station clearly intrudes in the desirable habitats mentioned

¹ ERT Report / Somerset Homes, LLC, Proposed Senior Residential Development, 2004 – IW447

in the letter from the IWWA; the eastern station will impact in the same manner as noted in OLR, section D, above.

CONCLUSION:

Reasonable people must accept the necessity of transmission lines and the inherent conflict associated with their presence. The existing power lines in Southern Route Alternative provide their recognized benefits to society and Enfield, as every community must, has lived with the inevitable problems that such intrusion into residential and open space areas generate. The discord caused by trespassers and irresponsible recreation enthusiasts, the destruction of sensitive and productive ecosystems, and the degradation, or potential increased degradation of the aquifer are the hidden costs – both to the quality of life and to the town budget in dealing with things such as erosion, increased ground water runoff, and law enforcement needs – that compel the Conservation Commission to support the position of the Town Council and Inland Wetland and Watercourses Agency. Neither the overhead nor the underground route alternatives are desired or acceptable to the Town of Enfield.

Very truly yours,



Michael Dynia, Chairman, Enfield Conservation Commission

Cc: Enfield Town Council
Matthew W. Coppler, Town Manager
Kevin M. Deneen, Town Attorney
Senator Joseph Liebermann
Senator Christopher Dodd
Congressman Joseph Courtney
State Senator John Kissel
State Representative Kathleen Tallarita
State Representative Karen Jarmoc



TOWN OF ENFIELD

INLAND WETLANDS AND WATERCOURSES AGENCY

July 2, 2009

Attn: Mayor Scott Kaupin
Enfield Town Council
820 Enfield Street
Enfield, CT 06082

Re: *Docket 370 – APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY (CL&P) CONCERNING THE CONNECTICUT PORTION OF THE GREATER SPRINGFIELD RELIABILITY TRANSMISSION LINE PROJECT*

Dear Mayor Kaupin:

The Town of Enfield (TOE) Inland Wetlands and Watercourses Agency (IWWA), as an Intervenor Party to this application wishes to convey its observations and concerns regarding the proposed “Massachusetts Southern Route Alternative” for The Connecticut Portion of the Greater Springfield Reliability Project proposed by The Connecticut Light & Power Company. The Enfield Town Council has submitted a position letter dated July 6, 2009 which mirrors the concerns of the Enfield IWWA.

The Enfield IWWA would like to expand on select items discussed within the Town Council’s July 6th letter. The following are the specific concerns with the proposed overhead utility option for the “Southern Route Alternative” through the Town of Enfield. While both the underground and overhead options are undesirable, the IWWA feels that the overhead option would pose the greatest detriment to our community.

Expansion of the ROW Width

The overhead portion of the project shows that the clearing within the existing Right of Way (ROW) would expand in size from approximately 90 feet to nearly 200 feet in width. This proposition would require that vegetation within the ROW be cleared, which would clear cut forested wetlands. Those forested wetlands would then be converted to a wetland without a canopy layer to accommodate the utility lines. It has been observed that open areas such as these are prone to colonization by invasive species which is a strong concern with the current overhead line proposition. In addition, species that utilize the forested areas will be forced to relocate, changing the habitat characteristics and species composition within the area.

In general, the TOE topography is rather flat causing many areas to routinely experience detrimental flooding during large storm events. The TOE relies on maintaining the health of the abundant wetlands in our community to aid in controlling such flooding. It is a concern that the removal of mature canopy cover in wetland areas and their Upland Review Area (URA), which can extend up to 200 feet from a wetland, may impact wetlands ability to control stormwater as efficiently. The EPA Water Trivia Facts (EPA 810-F-95-001) dated April 1995 lists that a birch tree will give off approximately 70 gallons per day of water via evapotranspiration.

Arial photographs depict that the majority of the overhead utility line that is proposed within the TOE is located within mature forested areas. A rough calculation indicates that approximately 21,400 linear feet of line will be located in mature forested areas. If the clearing was to extend from 90 to 200 feet in width, multiplied by 21,400 linear feet, equals approximately 54 acres of mature forest to be cleared as part of the proposed overhead utility line option within the TOE.

For example, assuming that one acre of forest can accommodate 2,178 birch trees (at a diameter of 20 square feet), at 70 gallons per tree per day, multiplied by 54 acres equals 8,232,840 gallons per day of water that is evaporated by the existing mature forest within the proposed overhead utility line location. It is understood that some of that water will be absorbed by the ground cover and shrubs that will re-establish the corridor, but the smaller vegetation will never equal the same amount of water released through evapotranspiration within the existing forest.

The IWWA is also concerned that with the expansion of the ROW width will promote increased ATV activity within this ROW, a problem the TOE is currently struggling with along the current corridor. The ATV use creates issues with erosion as their tires prohibit the growth of vegetation, impacting the nearby wetlands and streams. In addition, the abutting farmland, associated crops and residential neighborhoods are currently impacted from the ATV activity. This is a difficult issue to police and the TOE is concerned that the proposed overhead utility option will exacerbate this issue.

Crossing the Connecticut River

The portion of the proposed project that crosses the Connecticut River also crosses an area known as the Enfield Cove amongst local waterfowl hunters and fisherman alike. The Enfield Cove area boasts vernal pools and has significant sections of wetlands. This area is considered to be unique habitat which Enfield would like to preserve for future generations. Clearing additional mature forest and disturbing this habitat is seen as a detriment and potentially a destruction of this unique habitat.

If the underground route were to be installed, the IWWA is concerned that the proposed transition station, to be located immediately adjacent to the Kalish and Campania Roads residential neighborhood and the wildlife habitat area known as Enfield Cove would

dramatically change the aesthetics of residential neighborhood as well as clear cut a forested area that serves as a buffer to the abutting habitat known as Enfield Cove.

The reasons stated above and those listed within the Enfield Town Council's July 6th letter support the TOE IWWA recommendation that the Connecticut Siting Council not approve the "Massachusetts Southern Route Alternative". If discussion regarding the "Massachusetts Southern Route Alternative" progresses, it is requested that all concerns discussed above be thoroughly addressed.

Sincerely,



Douglas C. Maxellon
Chairman of TOE IWWA

Cc: TOE IWWA
Enfield Town Council
Matthew W. Coppler, Town Manager
Kevin M. Deneen, Town Attorney
Senator Joseph Liebermann
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