



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



March 16, 2010

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

RE: Sherwood Substation  
Connecticut Light and Power Company  
Westport, Connecticut  
Docket No. 398

Dear Chairman Caruso:

Staff of this department has reviewed the above-referenced application for a Certificate of Environmental Compatibility and Public Need and has visited the proposed site for this facility. Based on these efforts, the following comments are offered to the Council for your use in this proceeding.

Connecticut Light and Power proposes to construct a 115-kV to 13.8-kV bulk power substation on the site of a currently vacant residential structure at 6 New Creek Road in the Greens Farms section of Westport.

Description of Proposed Site

The roughly two and one half acre proposed site consists of an upland, very generally level portion east of the existing home (the back yard), a westward sloping yard west of the home (the front yard) and a freshwater wetland west and northwest of this sloping front yard. The front yard is landscaped with spreading arbor vitae and junipers, boxwood, and a selection of mature trees, while the back yard consists of a central fenced area containing several animal enclosures, surrounded by a border of mature trees to the north, east and south.

From the site, the adjacent home to the west, 1 Beachside Avenue, is clearly visible atop a hill on the opposite side of the wetland area which separates the two properties. This home sits at a higher elevation than the host site and will have a clear view of the substation. The application notes that CL&P has had extensive conversations with the owner of the 1 Beachside Avenue property concerning landscaping at the substation. Other properties seen from the host site are the Greens Farms Academy and several homes along Maple Road, all of which are located across the Greens Farms Brook tidal wetland complex to the south of the site. The Greens Farms Metro-North rail station across New Creek Road to the east of the site is the only other significant visual receptor in the viewshed.

As noted in the application, the inland wetland on the western portion of the host site originates at the base of the railroad embankment. An abundance of iron-fixing bacteria in the wetland give much of it a rust color. There is no sign of any tidal influence reaching above the culvert under New Creek Road into this wetland, though tidal action does extend to the outlet of the culvert on the south side of the road. The proposed rip-rap protection at the outlet of the drainage swale on the site, as shown in site plan C-3 of Exhibit 1, would serve to slow the velocity of incoming flows to the wetland and reduce water quality impacts, as will the reduction in the areal coverage of impervious surfaces draining to the wetland after the existing house and driveway are removed. The gravel surface of the substation will enhance rainfall infiltration compared to the existing impervious surfaces.

In order to obtain a level site upon which to construct the substation, extensive earthwork will be required which will lower the elevation of the substation site by four to eight feet below existing grades. This will somewhat lessen the visibility of the substation from off-site vantage points, principally those from the south.

The effect of this excavation on the existing stone wall, which borders the host site from beyond the wetland outlet culvert to the sharp bend in New Creek Road, is not discussed in the application. This wall is a nice landscaping feature of the site and should be preserved to the extent possible. The conceptual planting plan on the last page of Exhibit 1 indicates an intent to preserve the 68" dbh oak south of the house and adjacent to New Creek Road. This is an impressive tree and should be preserved if consistent with the safety and clearance needs of the substation.

#### Miscellaneous Application Commentary

As a tidal creek, Greens Farms Brook, aka New Creek, has a water quality classification of SB rather than B, as noted on page H-8.

The projected seasonal peak and peak day average flows in circuits 1130 and 1890 as discussed on page M-2 indicate that the seasonal peak flows are greater than the peak day average flows. Is this consistent with Table M-1 on page M-4 which indicates that the magnetic field levels are greater, in three of the four cases, under peak day current conditions than under seasonal peak conditions? Does the phasing of the two circuits explain this seeming discrepancy?

Two of the e-mail transmittals in Exhibit 4 concerning the DEP Natural Diversity Data Base describe the New Creek Road site as being in Waterford rather than in Westport. The other descriptions in those letters indicate that the correct site was reviewed.

Similarly, the service list in Exhibit 7 lists State Senator Andrea Stillman as having received this application. That would be correct for Waterford, but not for Westport. State Senator Toni Boucher would be appropriate for Westport. This error was communicated to Don Biondi of CL&P.

Lastly, this proposed substation would have no impact on Sherwood Island State Park which is just under a mile from the proposed site.

Thank you for the opportunity to review this application and to submit these comments to the Council. Should you, other Council members or Council staff have any questions, please feel free to me at (860) 424-4110.

Respectfully yours,



Frederick L. Riese  
Senior Environmental Analyst

cc: Commissioner Amey Marrella