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September 21, 2015

Melanie Bachman  
Acting Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain CT 06051

Attention: Ms. Bachman and members of the Siting Council

**Re: Docket 461**

I have been granted intervenor status in the above-referenced matter. These are my statements of position and allegations of fact, and my pre-hearing questions.

**Statements of Position:**

Eversource Energy is proposing to run underground transmission circuits which will transit Bruce Park in connection with their proposed bulk substation to be located at 290 Railroad Avenue, Greenwich, CT.

Bruce Park contains undiscovered ground water and subsurface water conditions which will likely be seriously and adversely affected by the construction and subsequent existence of these underground transmission circuits and related infrastructure.

These conditions have not been investigated in connection with this proposed project. The magnitude of the project and its location may affect underground and surface water conditions at the time of construction. As will be shown below, it may also affect underground and surface water conditions with a considerable time lag.

Until or unless a full investigation of all surface and subsurface water conditions shows that both at present, and over the life of the transmission lines, this project is and will continue to be compatible with the conditions in and uses of Bruce Park, it must not be located there.

**Allegations of Fact:**

First Allegation of Fact:

I reside at 1 Kinsman Lane, Greenwich, CT. My property is at the corner of Kinsman Lane and Bruce Park Drive. The property slopes gradually downward from South-South-East to North-North-West along Bruce Park Drive toward Kinsman Lane.

I purchased the residence in 1998. The previous owners had installed a new septic system in 1996. The new septic system was located upland from Kinsman Lane. I was told by the installation company, J Bond Septic Service (Bond), that the system should last at least 20 years and likely more.

In 2003, 7 years installation I began to experience intermittent surface water in the area of the septic system. After the same condition worsened in 2004, Bond investigated by drilling small test wells on my property upland from the septic system. They discovered significant subsurface water flowing downhill through my property, from South-East to North-West, which was being partially blocked by the septic system.

To cure the problem Bond installed a permitted curtain drain to intercept the water flowing toward the septic system. During installation they discovered two old "farm drains" which were presumably created many decades ago to remove surface water to allow the land in what is now Bruce Park to be farmed.

After the installation of the septic system it took several years for the ground water problem to manifest itself. I recently reviewed this issue with the people at Bond who installed the septic system and curtain drain. They pointed out that Bruce Park is a "bowl" with the land and therefore drainage sloping downward toward the Indian Harbor inlet and adjacent ponds within the Park.

#### Second Allegation of Fact:

There is every reason to believe that there are many more subsurface water issues within the Park, as my experience is limited to my .6 acre property adjacent to the 80+ acre Bruce Park bowl.

During the recent dry spell in our area, ground water was evident after a significant precipitation event. According to readings taken at the Westchester County Airport, during the one month period from August 12, 2015 through September 11, 2015 there were 22 days with no precipitation; 6 days of .1" or less; one day – August 21 – with .5"; and on September 10 a significant rainfall totaling 2.64". See [http://www.wunderground.com/history/airport/KHPN/2015/8/1/CustomHistory.html?day\\_end=12&monthend=9&yearend=2015&req\\_city=&req\\_state=&req\\_statename=&reqdb.zip=&reqdb\\_magic=&reqdb\\_wmo=&MR=1](http://www.wunderground.com/history/airport/KHPN/2015/8/1/CustomHistory.html?day_end=12&monthend=9&yearend=2015&req_city=&req_state=&req_statename=&reqdb.zip=&reqdb_magic=&reqdb_wmo=&MR=1)

In spite of those extremely dry conditions, on the morning of September 11 I observed standing water at several locations in Bruce Park. I have attached two photographs taken in Bruce Park that morning, Exhibit A and Exhibit B, showing that standing water.

#### Third Allegation of Fact:

The underground transmission lines would be significant in size. According to the Eversource June 2015 submission at page ES-9, "At a minimum, trenching for installing the transmission supply lines will require excavations measuring 4.5 feet wide by 5.5 feet deep. The underground transmission supply line system also requires splice vaults, cable splices, grounding, insulating fluid reservoir, pump house, terminations (at the substations), and a cathodic protection system.

Concrete splice vaults would be installed along the route below ground for cable installation and splicing. Vaults are typically spaced up to 2,800 feet apart depending upon cable construction and route characteristics (i.e., community impacts and existing underground utilities). To install each concrete splice vault, an excavation area approximately 16 feet wide by 12 feet high and up to 24 feet long would be required."

At no point in their submission in June 2015 does Eversource consider the surface and ground water problem in Bruce Park. Instead on page J-5, Under Flood Hazard Areas, the submission states, "Portions of the Preferred Route are located within mapped flood hazard areas. However, no permanent above ground structures are proposed in the areas. Therefore, no adverse effects on these areas are anticipated. My experience says this is likely incorrect.

On page ES-10, "The D&M [Development and Management] Plan will include specific procedures such as erosion and sedimentation control methods and placement (where necessary), dewatering, spill prevention and control..." No provision has been made for the ongoing subsurface and ground water issues identified above.

**Prehearing Question:**

Will the Siting Council consider these Allegations of Fact and Statements of Position, and require Eversource Energy to find a location for their underground transmission circuits outside Bruce Park, deeming the location not suitable for the intended purpose?

Sincerely,

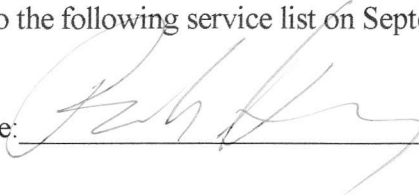


Parker Stacy

Attachments: Exhibit A and Exhibit B

**Certification:** I hereby certify that a copy of the foregoing document was electronically mailed to the following service list on September 22, 2015:

Signature:



Printed name: Parker Stacy

**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
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## **EXHIBIT A**





## **EXHIBIT B**

