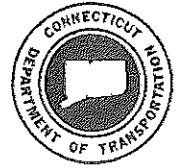




STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION



2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546

Phone:

January 23, 2015

Ms. Jacqueline Gardell
Project Manager
The Connecticut Light & Power Company
56 Prospect Street
Hartford, CT 06103

Dear Ms. Gardell:

Subject: Evaluation of the Three Proposed Transmission Line Route Variations from Cos Cob Substation to Greenwich Substation

The Department of Transportation (Department) has reviewed The Connecticut Light & Power Company's (CL&P) proposal for three route variations of the new 115 kilovolt transmission lines from the Cos Cob Substation to the Greenwich Substation in Connecticut. The three proposed route variations reviewed by the Department were the North Easement, Middle Easement and South Easement.

As CL&P may be aware, the State is currently in the preliminary stages of outlining the vision for an improved transportation system. One of the key components of this vision will be to address the traffic congestion in the southwestern portion of the State, which includes Greenwich. Therefore, the Department does not endorse the utilization of the I-95 corridor or the New Haven line corridor when there are other viable alternatives.

The North Easements would have a serious detrimental impact to the Department and Metro-North Railroad (MNR). Any construction activities associated with the installation of overhead or underground transmission lines within 25 feet of the tracks would require a shutdown of the tracks and/or work could only be done at night. Based on the severity of the impact to the railroad facilities, a License Agreement with the Department's Office of Rails and a License Agreement and/or entry permit with MNR would be required.

Both the Middle Easement and South Easement are undesirable since they would prevent the Department from making improvements to I-95. Thus, for the Department to ensure that its interests are protected an Encroachment Agreement between CL&P and the Department would be required. Certainly, adoption of the Middle Easement or the South Easement route for the transmission facility may create a situation whereby CL&P would be required to relocate the newly installed transmission facility at its expense in the future.

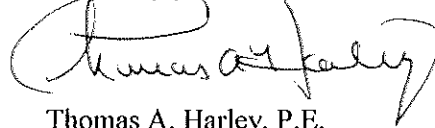
In both the Middle Easement and South Easement routes, the transmission facilities would impede the nonaccess lines of Interstate 95. The Department's Utility Accommodation Manual states that a utility facility shall not be permitted longitudinally within the right of way of a limited access highway.

Additional information concerning the established criteria for the longitudinal installation of utility facilities within the right of way of limited access is provided in the Department's publication entitled, "Utility Accommodation Manual," dated February 2009, which is available on-line at <http://www.ct.gov/dot/lib/dot/documents/dutilities/ACCOMMODATION.pdf>.

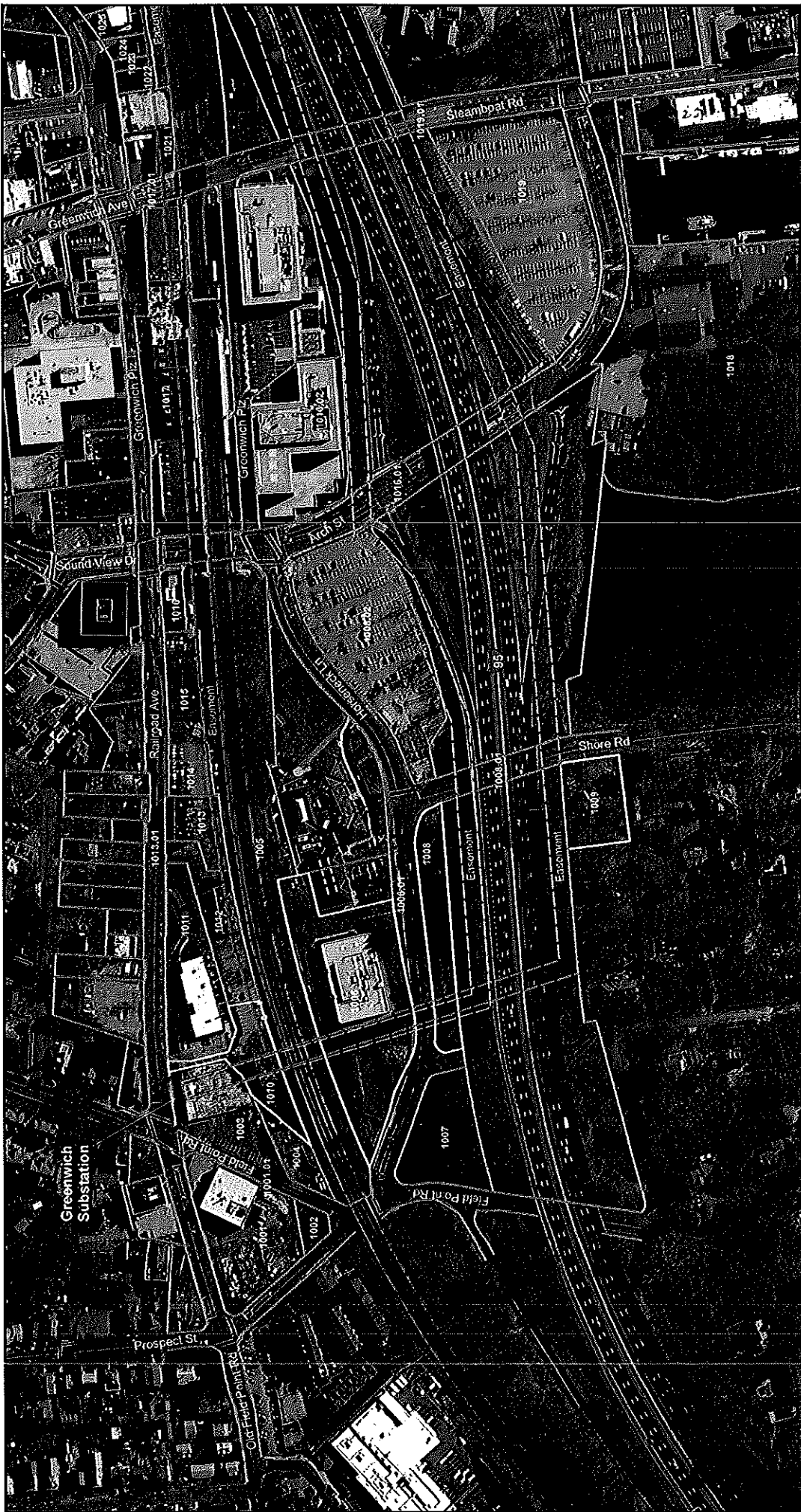
In summary, the Department has concluded that all three of these proposed route variations are not desirable.

Should you have any questions regarding this matter, please feel free to contact Mr. Sohrab Afrazi, Transportation Principal Engineer, Utilities Section, at (860) 594-3262.

Very truly yours,

A handwritten signature in black ink, appearing to read "Thomas A. Harley". The signature is written in a cursive style with a large initial "T" and a long, sweeping tail.

Thomas A. Harley, P.E.
Chief Engineer
Bureau of Engineering and Construction



Proposed Power Line Cos Cob Substation to Greenwich Substation	
Page 1 of 4	Comerstone ARCHITECTS
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DATE: OCT 03, 2014	

CONCEPTUAL ROUTES Legend

Parcels

Purchase Type

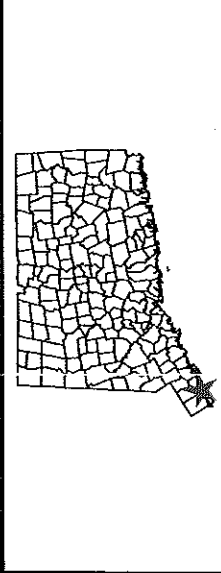
- Fee Purchase
- Easement
- Parcels

Easement

- North Easement
- Middle Easement
- South Easement

Scale: 0' 200' 300' 400' Feet

FOR DISCUSSION PURPOSES ONLY





Proposed Power Line
Cos Cob Substation to
Greenwich Substation

Comerstone

Page 2 of 4

DRAWN BY: CS

SCALE: 1" = 200'

DATE: OCT 03, 2014

CONCEPTUAL ROUTES Legend

Parcel Type

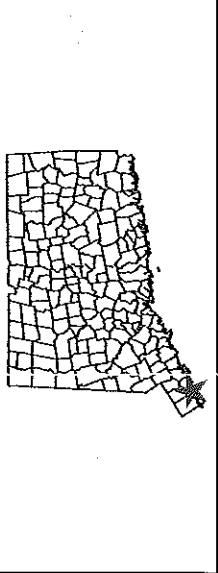
- Fee Purchase
- Easement
- Parcels

Parcel Types:

- North Easement
- Middle Easement
- South Easement

Scale: 0' 200' 300' 400' Feet

FOR DISCUSSION PURPOSES ONLY





Proposed Power Line Cos Cob Substation to Greenwich Substation	
Page 3 of 4	Comerstone ENGINEERS
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DATE: OCT 03, 2014	

CONCEPTUAL ROUTES Legend

Parcel Type

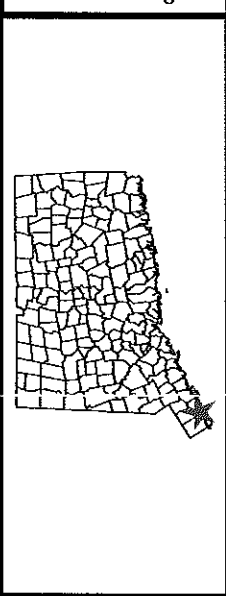
- North Easement
- Middle Easement
- South Easement

Purchase Type

- Fee Purchase
- Easement
- Parcels

0' 200' 300' 400' Feet

FOR DISCUSSION PURPOSES ONLY





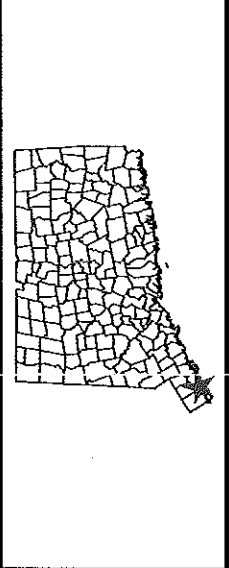
Proposed Power Line Cob Cob Substation to Greenwich Substation		Cornerstone Engineering & Surveying, Inc.
Page 4 of 4	DRAWN BY: CS	SCALE: 1" = 200'
DATE: OCT 03, 2014		

CONCEPTUAL ROUTES Legend

North Easement
 Middle Easement
 South Easement
 Parcels
 Fee Purchase
 Easement
 Parcels

0 200' 300' 400' Feet

FOR DISCUSSION PURPOSES ONLY





Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

August 1, 2014

Amanda Mayhew
The Connecticut Light And Power Company
107 Seldon Street
Berlin, CT 06037
amanda.mayhew@nu.com

Project: CL&P Greenwich Substation and Line Project in Greenwich
NDDB Determination No.: 201407467

Dear Amanda Mayhew,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map provided for the proposed CL&P Greenwich Substation and Line Project in Greenwich, Connecticut. I do not anticipate negative impacts to State-listed species (RCSA Sec. 26-306) resulting from your proposed activity at the site. This determination is good for one year. Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by August 1, 2015.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available. The result of this review does not preclude the possibility that listed species may be encountered on site and that additional action may be necessary to remain in compliance with certain state permits.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov . Thank you for consulting the Natural Diversity Data Base.

Sincerely,

A handwritten signature in cursive script that reads 'Dawn M. McKay'.

Dawn M. McKay
Environmental Analyst 3



United States Department of the Interior



FISH AND WILDLIFE SERVICE

New England Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5087
<http://www.fws.gov/newengland>

January 7, 2015

To Whom It May Concern:

This project was reviewed for the presence of federally listed or proposed, threatened or endangered species or critical habitat per instructions provided on the U.S. Fish and Wildlife Service's New England Field Office website:

<http://www.fws.gov/newengland/EndangeredSpec-Consultation.htm> (accessed January 2015)

Based on information currently available to us, no federally listed or proposed, threatened or endangered species or critical habitat under the jurisdiction of the U.S. Fish and Wildlife Service are known to occur in the project area(s). Preparation of a Biological Assessment or further consultation with us under section 7 of the Endangered Species Act is not required. No further Endangered Species Act coordination is necessary for a period of one year from the date of this letter, unless additional information on listed or proposed species becomes available.

Thank you for your cooperation. Please contact Maria Tur of this office at 603-223-2541 if we can be of further assistance.

Sincerely yours,

Thomas R. Chapman
Supervisor
New England Field Office



June 2, 2015

Mr. Justin Adams
Eversource Energy
107 Selden Street
Berlin, CT 06037

Subject: Proposed Substation and Transmission Line Project
Greenwich, Connecticut.

Dear Mr. Adams:

The State Historic Preservation Office (SHPO) is in receipt of your request for our comments on the potential effects of the referenced project on historic properties received April 20, 2015. SHPO understands that Eversource Energy has completed a cultural resources review of a proposed 115-kilovolt bulk substation and associated underground transmission supply line that would extend 2.3 miles from the Cos Cob Substation on Sound Shore Drive to 290 Railroad Avenue. The proposed project is being planned to better serve customers by reducing overloads on current system equipment.

SHPO also understands that three routes are under current consideration: the Preferred Route, the Northern Route, and the Southern Route. The Northern Route is situated with or adjacent to several districts and individual properties listed on the National Register of Historic Places (NRHP). The proposed Southern and Preferred Routes are located adjacent to a single property listed on the NRHP, the Cos Cob Railroad Station. Because the proposed substation is situated at an appreciable distance from any of these historic properties and the transmission line will be buried, SHPO does not anticipate permanent impacts to the identified historic properties. This office does recommend, however, that extreme caution be exercised during vibration producing activities within those portions of the project corridors situated within or in close proximity to any of the properties listed on the NRHP. SHPO also acknowledges that the proposed Northern Route underground transmission corridor is situated within previously disturbed rights-of-way that are unlikely to impact significant archeological deposits. The Southern and Preferred Routes are situated in close proximity to previously recorded sites 51-49 and 51-55. Based on the known archaeological resources in the region and the environmental characteristics of the project corridor, it is SHPO's opinion that intact and relatively level well-drained soils within the Area of Potential Effect have an elevated potential to contain significant archaeological resources. We are therefore requesting that a professional archaeological reconnaissance survey be completed prior to construction. Subsurface testing should evaluate all areas of anticipated ground disturbance within the identified intact and archeologically sensitive soils. All work should be in compliance with our *Environmental Review Primer for Connecticut's Archaeological Resources* and no construction or other project-related ground disturbance should be initiated until SHPO has had an opportunity to review and comment upon the requested survey.

This office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act. 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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TOWN OF GREENWICH

Town Hall • 101 Field Point Road • Greenwich, CT 06830

Inland Wetlands
and
Watercourses Agency
(203) 622-7736
(Fax) (203) 622-7764

Michael N. Chambers
Director

March 27, 2015

Justin W. Adams
Environmental Affairs
Eversource Energy
107 Selden Street
Berlin, CT 06037

Re: Eversource Energy Greenwich Substation and Transmission Line Project

Dear Mr. Adams:

The Greenwich Inland Wetlands & Watercourses Agency (the Agency) is providing the following comments in response to the information contained in the February 2015 Municipal Consultation Filing report on Eversource Energy's Greenwich Substation and Transmission Line Project (the Project). The Agency considered the Project at its February 23 and March 23, 2015 regular monthly meetings. Agency members reviewed the February 2015 Municipal Consultation Filing report as they considered what questions, comments, concerns, and recommendations they wished to submit to Eversource Energy regarding the preliminary project design. At the conclusion of its discussion at the March 23rd meeting, the Agency voted unanimously to approve the submission of the following comments in response to the Municipal Consultation Filing:

Greenwich Substation at 290 Railroad Avenue

There are no wetlands or watercourses on the 290 Railroad Avenue property or within its 100' Upland Review Area. Horseneck Brook, the closest wetland or watercourse to the site, is about 120' to the southwest. The Agency finds that the substation can be constructed without impact to Horseneck Brook and other off-site wetland and watercourse areas if standard erosion and sedimentation control measures are employed during the Project, with particular attention paid to isolating the catch basins and drain lines that exist on the site so they do not become conduits for sediment or other waterborne material to bypass the perimeter erosion controls.

Transmission Line

The Municipal Consultation Filing report describes a number of alternative routes that were considered for connecting the Sound Shore Drive substation with the new Greenwich substation. The “Preferred Route with Horizontal Directional Drilling (HDD)” appears to the Agency to pose the least potential of causing adverse wetland impacts out of all of the alternatives, including the open trench variant of the Preferred Route, which would require coffer damming across Indian Harbor north of Davis Avenue. The following comments refer to the “Preferred Route with HDD” alternative:

1. There is a pocket wetland at the northeast end of Kinsman Lane on the Town of Greenwich Public Works garage property (100 Field Point Road). This wetland is described in IWWA Application #2005-112 as a rocky, wooded wetland that has been impacted by surrounding land uses.
 - Eversource Energy should develop an erosion and sedimentation control plan designed specifically for this site that will protect this wetland from all sediment inputs. This plan should include measures to control the slurry from the HDD operation and to properly filter water that is pumped from open trench excavations.
2. The Municipal Consultation Filing report describes the work corridor for trenching will be 24’ wide (p.I-4), the trenches will be 8 – 10’ deep (p.G-5) and up to 5’ wide where shoring is needed (p.I-7), and the splice vaults that will be placed every 2,000 – 2,800 feet require excavations 12’ wide x 24’ long x 12’ deep.
 - Appropriate measures for excavation dewatering, inlet protection, spill prevention, and preservation of existing woody vegetation in the vicinity of wetlands and watercourses are among the key components of the erosion and sedimentation control plan the Agency expects to see prior to the commencement of construction. Provisions should also be made to isolate the primary and secondary Construction Support Areas (p.I-5) with appropriate E&S controls, anti-tracking pads, etc. The Agency would like to review any details of these and the other E&S measures that will be employed during this project that Eversource Energy can provide prior to the completion of its “Development and Management Plan” (p.ES-8, G-1).
3. The Municipal Consultation Filing report states that Eversource Energy will “work closely with Town officials and affected private landowners to develop an appropriate plan to be implemented at the completion of the project [to restore vegetation impacted by removals or pruning]” (p.G-10).
 - The Agency expects Eversource Energy to restore affected vegetation in the vicinity of wetlands and watercourses as soon as the work in each of these areas has been finished, not at the end of the Project.

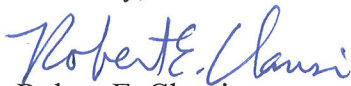
4. Agency members and IWWA staff make regular inspection trips around Town and, in doing so, may happen to observe construction practices related to the installation of the substation or transmission lines that might be revised in order to better protect wetlands and watercourses, such as silt fencing that needs maintenance or trenches being dewatered by a method that is not adequately filtering out sediment.

- The Agency expects that Eversource Energy will promptly address any such concerns that the Agency may bring to its attention. In order to facilitate communications, the Agency would like Eversource Energy to provide it with contact information for an individual who can be reached with any issues that may arise and who has the authority to ensure a response to address such issues.

[Note: The Agency was informed at its March 23, 2015 meeting that Justin W. Adams will serve as the Agency's point of contact with Eversource Energy during this project. Mr. Adams' title is Senior Licensing and Permitting Specialist, Environmental Affairs and his contact information is Eversource Energy, 107 Selden Street, Berlin, CT 06037 / (860) 839-8373 / justin.adams@eversource.com]

Please share the Agency's comments with the Connecticut Siting Council. The Agency looks forward to continued cooperation with Eversource Energy during implementation of this Project.

Sincerely,



Robert E. Clausi
Acting Director

c: Peter Tesei, First Selectman