STATE OF CONNECTICUT

SITING COUNCIL

DOCKET NO. 461 - EVERSOURCE ENERGY APPLICATION FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE, AND OPERATION OF A 115-KILOVOLT (KV) BULK SUBSTATION LOCATED AT 290 RAILROAD AVENUE, GREENWICH, CONNECTICUT, AND TWO 115-KV UNDERGROUND TRANSMISSION CIRCUITS EXTENDING APPROXIMATELY 2.3 MILES BETWEEN THE PROPOSED SUBSTATION AND THE EXISTING COS COB SUBSTATION, GREENWICH, CONNECTICUT, AND RELATED SUBSTATION IMPROVEMENTS	:	**DOCKET NO. 461**
	:	**AUGUST 25, 2015**

DIRECT TESTIMONY OF MICHAEL LIBERTINE REGARDING ENVIRONMENTAL MATTERS CONCERNING THE PROPOSED GREENWICH SUBSTATION AND LINE PROJECT

EXECUTIVE SUMMARY

Q. Please identify yourself and the other members of the panel who will respond to cross examination regarding environmental matters concerning the proposed Greenwich Substation ("Substation"), associated underground transmission supply lines and Cos Cob Substation modifications (collectively the "Project").

A. I am Michael Libertine, a licensed environmental professional in the State of Connecticut and Director of Siting and Permitting of All-Points Technology Corporation's ("All-Points") Killingworth, Connecticut office, with over 30 years of professional experience, including primary responsibilities in the coordination and oversight of environmental science and engineering projects in support of the utility

industry. A copy of my resume is attached as Exhibit A to this testimony. In addition, The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") employees and specialized Project consultants may be called upon to respond to questions that require knowledge of specific topics relating to environmental matters.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to summarize the environmental factors that were considered during the development of plans for the Project, factors which will continue to be important as the Project design, certification, permitting, and construction proceed.

My testimony will cover the following three topics:

1. Approach used to compile baseline environmental data;

2. Environmental studies and outcomes; and

3. Environmental resources and the potential effects that the Project would have on these resources.

Q. Will the Project have a significant adverse effect on the affected areas or the environment in the vicinity of such areas?

A. No. Due to the location of the proposed new substation in a commercial zone and its proximity to existing utility uses, the proposed location of the transmission supply lines underground and the careful design of the Project in a manner that minimizes environmental effects, the Project is compatible with the affected areas and the existing environment.

1. APPROACH USED TO COMPILE BASELINE ENVIRONMENTAL DATA

Q. What types of data were collected to characterize existing environmental conditions in the Project areas?

A. Environmental data for the Project were compiled in accordance with the specifications of the Council's April 2010 Electric Substation Facility and Electric and Fuel Transmission Line Facility Application Guides, and involved the collection and analysis of information to support the environmental documents in the Application, including the review of publicly-available information, performance of field investigations and consultations with state and local agencies.

Information was compiled from published sources such as the Connecticut Department of Energy and Environmental Protection ("CTDEEP") files, historic and contemporary aerial photographs, soil surveys, U.S. Geological Survey maps, Federal Emergency Management Agency maps and State and municipal land-use plans. In addition, the CTDEEP Natural Diversity Data Base and the State Historic Preservation Office ("SHPO") were consulted regarding specific resources within the Project area. Field surveys were conducted of wetlands, watercourses and wildlife habitats.

2. ENVIRONMENTAL STUDIES & OUTCOMES

Q. Please describe the wetland and watercourse analyses.

A. A desk-top review of the Project area was initially completed to identify major wetland resources and watercourses. Subsequent field reconnaissance identified a total of seven (7) wetland resources present in the Project Area. Those wetlands and

watercourses proximate to proposed routes were field delineated and surveyed for placement on Project mapping.

Q. Would any permanent direct or indirect impacts to wetlands result from the construction of the Project?

A. No. As proposed, construction of the Project would not result in any permanent direct or indirect impacts on wetlands.

Q. Would there be any temporary direct or indirect impacts on wetlands from the construction of the Project?

A. No, because any nearby wetlands will be fully protected by erosion and sedimentation control measures.

Q. Does the Town of Greenwich regulate an upland review area associated with wetlands?

A. Yes. In its regulations, the Greenwich Inland Wetland and Watercourses Agency ("IWWA") defines "Upland Review Area" as any area:

1. Within 100 feet measured horizontally from the boundary of any wetland or watercourse not located within any public water supply watershed, or

2. Within 150 feet measured horizontally from the boundary of any wetland or watercourse, located within any public water supply watershed, or

3. Within 200 feet measured horizontally from the mean high water mark of any public water supply reservoir, or

4. Any area defined by the agency or the agency's staff after an initial review of materials submitted by an applicant that is greater than the above mentioned distances due to special circumstances that may include, but shall not be limited to: steep slopes, impervious surfaces, topographical features, or any other reason the agency's staff or agency may deem necessary to include for the purpose of conducting its review operations.

Q. Would there be any permanent or temporary direct or indirect impacts to wetlands or watercourses from activity in the Town's Upland Review Area associated with the Project?

A. No. Any potential work within a wetland Upland Review Area would be surrounded by appropriate erosion and sedimentation control measures to protect those resources. There are no activities planned in proximity to public water supply watersheds or reservoirs.

Q. Would there be any permanent direct or indirect impacts to watercourses?

A. No. There would be no permanent direct or indirect impacts to Horseneck Brook or any other off-site wetland and watercourse areas.

Q. Would there be any temporary direct or indirect impacts on any watercourse from the construction of the Project?

A. No, because these areas will be fully protected by erosion and sedimentation control measures.

Q. Has the IWWA commented on the proposed Substation?

A. Yes, in its letter dated March 27, 2015 to Justin Adams of Eversource Service, the then Director of the Greenwich IWWA stated that:

> *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.*

The IWWA's Letter is attached as Exhibit B.

Q. Does Eversource intend to employ standard erosion and sedimentation control measures and pay particular attention to isolating the catch basins and drain lines that exist on the substation site as recommended by the IWWA?

A. Yes. Eversource will employ erosion and sedimentation control measures consistent with these recommendations as well as guidance provided in the 2002 *Connecticut Guidelines for Soil Erosion and Sediment Control.*

Q. Did the IWWA indicate any preference for the routing of the transmission lines?

A. Yes. The IWWA commented that the Preferred Route with horizontal directional drilling ("HDD") poses the least potential of causing adverse wetland impacts.

Q. Did the IWWA provide any other feedback?

A. Yes. The IWWA noted the following areas of concern:

1. an erosion and sedimentation control plan for the pocket wetland on the northeast end of Kinsman Lane including measures to control the slurry from the HDD operation and to properly filter pumped water;

2. appropriate measures for excavation dewatering, inlet protection, spill prevention and preservation of existing woody vegetation in the vicinity of wetlands and watercourses and provisions to isolate the primary and secondary support areas; and

3. restoration of vegetation in the vicinity of wetlands and watercourses as soon as the work is finished in these areas.

Q. Is Eversource willing to address these concerns?

A. Yes, Eversource will provide detail as to how it will address these concerns in its Development and Management Plan.

Q. Will Eversource promptly address any concerns of the IWWA and its staff during their regular inspection trips around Town?

A. Yes.

Q. Has Eversource provided contact information for an individual who can address any concerns of the IWWA if they arise?

A. Yes. Eversource notified the IWWA that Justin W. Adams, Senior Licensing and Permitting Specialist, Environmental Affairs, will be the Eversource contact and has provided the IWWA with Mr. Adam's contact information.

Q. Would there be any substantial effects on the environment during construction of the Project?

A. No. Construction activities are anticipated to create only minimal temporary effects. Eversource will take the following steps during construction to ensure this.

- Disturbed/exposed areas would be stabilized and revegetated. The areas that prior to the start of the Project were not paved would be dressed with topsoil and seeded with a seed mix based on guidance from the 2002 *Connecticut Guidelines for Soil Erosion and Sediment Control* to establish a cover of grasses, forbs, wildflowers and legumes that would provide restoration, soil stability and/or wildlife habitat value, as applicable.

- Erosion controls would remain in place until final site stabilization is achieved.

Q. Would there be any substantial effects on the environment once the Project, including restoration, is complete?

A. No.

Q. Are there any design features of the Project facilities that help protect the environment?

A. Yes. The following design features provide protections for the environment once the Project facilities are installed:

- The power transformers within the Greenwich Substation would be installed on foundations and each transformer would have insulating fluid (not containing PCBs). Secondary containment will surround each transformer, designed to hold 110% of an insulating fluid capacity of the transformer. The containment area would be periodically inspected.

- The pump house would also have secondary containment and a monitoring system to trigger an alarm if the fluid level reaches a prescribed level.

- The high-pressure fluid-filled pipe type cables (new transmission lines) would consist of three 8-inch steel pipes, installed in a trench encased in low-strength concrete slurry and capped by a protective layer of high-strength concrete.

Q. Does any area of the Project serve as habitat for any threatened species, endangered species or species of special concern?

A. No. There are no threatened, endangered species or species of special concern of plant or animal life within the Project area.

Q. Would the construction activities have any effect on federally-listed species?

A. No. On January 7, 2015, the U.S. Fish and Wildlife Service issued a letter confirming that no federally-listed or proposed, threatened or endangered species or critical habitat is known to occur in the Project areas. A copy of the USFWS letter is included in Appendix E, *Agency Correspondence*, of the Application.

Q. Would the construction activities have any effect on State-listed species?

A. No. On August 1, 2014, the CTDEEP issued a letter confirming this finding. A copy of the CTDEEP Communication is included in Appendix E, *Agency Correspondence*, of the Application. A second letter supporting this previous determination was issued by the CTDEEP on July 23, 2015. A copy of this CTDEEP communication is being filed with this Direct Testimony under separate cover.

Q. Please summarize any preliminary archeological assessment of the Project.

A. Eversource retained the services of Heritage Consultants, LLC ("Heritage") to conduct this assessment. On April 2, 2015, Heritage issued a report on its cultural resources review of the Project which is included in Appendix F of the Application. As a result of its assessment, Heritage concluded that:

> *Given the amount of development within the proposed project region, much of the area has been impacted in the past and no longer retains potential to yield intact archaeological resources. This is particularly true of the Udorthent soils, which have no potential to yield intact archaeological deposits. These areas do not require additional archaeological investigation. Further, the Urban Land soils shown in the orange polygons in Figure 11, have been previously impacted to a major degree by construction and also retain little, if any, potential to yield intact archaeological deposits. The only areas identified during this investigation that may retain some potential to yield intact archaeological deposits are the open grassy fields located along the northern border of Kinsman Lane, as well as the areas containing Sites 51-49 and 51-55 (sic).[1] These open grassy area (sic) along Kinsman Lane areas are shown in Photos 15 and 16. These are two areas where the proposed transmission line will leave the boundaries of local roads. Since these two areas are open and may contain undisturbed soils, they should be subjected to shovel testing prior to construction. In addition, the areas containing Site 57-49 and 57-55 also should be subjected to shovel testing to determine if the sites still exist and whether or not they contain intact cultural deposits and research potential. The remainder of the project items will require no additional examination prior to construction since the proposed power transmission line will be buried in the local streets, which have already been disturbed extensively by past construction and the installation of existing buried utilities (water pipes, sewers, cables, etc.)*

[1] Note there was a typographical error in the conclusion of the Heritage's report that mistakenly referred to these sites as 51-49 and 51-55; the SHPO letter also referenced these sites incorrectly. Figure 9 of the Heritage report correctly identifies these sites as 57-49 and 57-55, respectively.

Q. Please summarize the outcome of SHPO's review.

A. On June 2, 2015, SHPO provided comments on its review of the proposed Greenwich Substation and transmission line routes as follows:

> *The Northern Route is situated with (sic) 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 [57-49 and 57-55 – see footnote 1]. Based on the known archeological 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 archeological 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.*

A copy of SHPO's letter is included in Appendix E, *Agency Correspondence*, of the Application.

Q. Will Eversource conduct a professional archaeological reconnaissance survey in the areas of sites 57-49 and 57-55, including shovel testing prior to construction if the Council approves the proposed Project facilities in these areas?

A. Yes. In addition, as recommended by SHPO, Eversource will exercise extreme caution during vibration producing activities within these areas.

Q. Have you reviewed local, State and federal land use plans, particularly with respect to existing and future development?

A. Yes.

Q. Will the Project be consistent with the land uses and policies presented in these plans?

A. Yes. The proposed site for the new Greenwich Substation at 290 Railroad Avenue ("Proposed Site") is located in an area with industrial, commercial and residential land uses with a major transportation corridors (Interstate 95 and the Metro-North Railroad) to the south. Cos Cob Substation is located in an area with utility, recreational, commercial and residential land uses with the same transportation corridors located to the north. The Preferred Route passes through these transportation corridors and impervious surfaces (roads/parking lots) as well as through residential and commercial areas, Bruce Park, small areas of riparian habitat and very narrow blocks of upland forest and old filed/scrub-shrub habitat.

3. ENVIRONMENTAL RESOURCES

Q. Does Eversource anticipate any adverse effects from the Project on topography and geology?

A. Although some grading and earthwork activities will be necessary in Project areas, no substantive changes in site topography or grades are anticipated. Disruption to existing soil would be temporary, and all disturbed areas would be appropriately restored.

Q. Will the Project have any adverse effect on any water supply areas?

A. No. There are no known private or public water supply wells located within the Project Area.

Q. Are any portions of the Project Area within 100-year and 500-year flood boundaries?

A. The Proposed Site and Cos Cob Substation are not located within such areas. Portions of the Preferred Route are located in such areas, primarily in low-lying areas adjacent to Indian Harbor and in Bruce Park. However, because no permanent above ground structures are proposed in these areas, no adverse effects are anticipated.

Q. Are any portions of the Project within the Connecticut Coastal Boundary?

A. Yes. Portions of the northeast and southeast corners of the Proposed Site, consisting of approximately 1,120 square feet, and Cos Cob Substation are located in the Coastal Boundary. Further, portions of the Preferred Route are also within the Coastal Boundary, including coastal and marine resources associated with Long Island Sound, Cos Cob Harbor, Bruce Park, Indian Harbor, Smith Cove and Greenwich Harbor.

Q. Would any Project activities result in adverse impacts to coastal resources?

A. No. As explained more fully in Section J.2.4 of the Application, there will not be any adverse impacts to coastal resources. Eversource met with the CTDEEP Office of Long Island Sound and would coordinate its efforts with this agency to promote protection of resources within the Coastal Boundary.

Q. Are any CTDEEP Fisheries Management Areas proximate to the Proposed Site, Cos Cob Substation or along or in proximity to the Preferred Route?

A. No.

Q. Are any portions of the Proposed Site, Cos Cob Substation or the Preferred Route located within any aquifer protection area?

A. No.

Q. Are there any impacts to air quality expected from the Project and how will any impacts be minimized?

A. There are no impacts to air quality from the operation of the Project facilities. Any potential impacts to air quality associated with the Project would be short-term and localized, primarily from fugitive dust during some construction activities and from equipment emissions. Eversource intends to minimize fugitive dust from construction by minimizing exposed/disturbed areas, installing gravel tracking pads at construction vehicle ingress/egress and using water to wet down disturbed soils or work areas with heavy tracking, as needed.

Q. Do you anticipate any temporary or permanent adverse impacts on any scenic and recreational areas, statutory facilities or surrounding features identified in the Application?

A. Some temporary effects would occur, such as during earth work activities, primarily to areas within Bruce Park; however, all disturbed areas would be restored. No permanent adverse impacts to these areas are anticipated.

Q. How would the environment be protected from the insulating fluid used for the transformers?

A. The Project has been designed so that surrounding each transformer will be a secondary containment system designed to ensure leak and/or spill containment. The Substation will also have a spill prevention control and countermeasures plan to avoid or contain a discharge of oil to the environment.

Q. Will the secondary containment system be inspected and maintained on a regular basis?

A. Yes and maintenance will be performed as necessary to remove accumulations of silt and debris.

Q. Is there any new equipment planned for Cos Cob Substation that will contain fluids or other materials that would pose any potential risk to groundwater or surface water resources?

A. No.

Q. Please summarize Eversource's efforts to avoid, minimize or to mitigate any potential adverse environmental effects.

A. Eversource's efforts to avoid, minimize or mitigate any potential adverse environmental effects include:

1. Location of the Proposed Site on a commercially-zoned property surrounded by other commercial properties including warehouses, an electric substation (Eversource's Prospect Substation) and a utility storage yard, and in close proximity to transportation infrastructure (active rail line);

2. Location of the Preferred Route in a manner that maximizes the use of existing linear corridors, principally within or adjacent to public roads within Greenwich, and avoids sensitive environmental features, to the extent practicable.

3. Installation of an underground transmission line and use of construction techniques such as open trenching or horizontal directional drilling, where appropriate;

4. Utilization of a Development and Management Plan, including best management practices; and

5. Careful installation and monitoring of erosion and sedimentation control measures until all disturbed areas are stabilized.

Q. Based on your experience and expertise, do you expect the construction and operation of the Project, as proposed by Eversource in its Application, to have any significant permanent adverse environmental effects?

A. No, if the Project is constructed as contemplated in the Application in accordance with any conditions in governmental permits or approvals, including a Development and Management Plan, I do not expect that the Project would have any significant permanent adverse environmental effects. As stated earlier, there will be some unavoidable temporary effects resulting from construction. Most notably, select areas of Bruce Park will be disturbed for installation of the underground transmission lines, including the potential for limited tree pruning and removal. Those areas that were not paved prior to the start of the Project would be restored with topsoil and an appropriate seed mix of grasses, forbs, wildflowers and/or legumes, consistent with pre-construction conditions.

Q. Does this conclude your testimony?

A. Yes.

Exhibit A

Resume of Michael Libertine

Michael Libertine, LEP
Director of Siting and Permitting
All-Points Technology Corporation, P.C.
3 Saddlebrook Drive, Killingworth, CT 06419
860-663-1697 860-983-5153

General Background

Mr. Libertine has over 24 years of professional experience in the environmental consulting field. His experience includes regulatory compliance and permitting for utility clients involving extensive interactions with the local, state and federal agencies; environmental assessments/impact statements for NEPA compliance; site assessments and field investigations for property transfers; remedial strategy development; environmental due diligence; Brownfields redevelopment projects; and remedial investigations at RCRA facilities as well as state and federally recognized hazardous waste sites. Mike is a Licensed Environmental Professional in Connecticut and has been Project Manager on over 1700 environmental site assessments and field investigations for property transfers throughout New England.

Employment History

Vanasse Hangen Brustlin, Inc., 54 Tuttle Place, Middletown, Connecticut
- Director, Environmental Services May 1997 to January 2012

Atlantic Environmental Services, Inc./GEI Consultants, Colchester, Connecticut
- Project Manager/Team Leader, January 1991 to May 1997

Key Projects

Certificates of Environmental Compatibility and Public Need, Electrical Substations, Connecticut

Project Manager in support of Applications to the CSC for the permitting of five new bulk power substations in Killingly, Guilford, Windsor, Waterford and Westport, Connecticut (2004 through 2012). These projects required extensive coordination of numerous team members, including client's in-house discipline managers and engineers, consultants, legal counsel, staff, and subcontractors. Mike was responsible for overseeing pre-acquisition environmental due diligence services, site survey, site data collection and analysis, site/civil layout, and drafting of municipal documents and the Application to the CT Siting Council. Services included conducting natural resources inventories of existing flora and fauna, habitat evaluations, wetland delineation, noise analyses, hazardous waste investigations, site layout and design drawings, landscape architecture, preparation of technical documents, coordination with State and local agencies, and permitting. Mike was also responsible for the preparation of Development and Management Plans to the Siting Council and providing environmental monitoring for adherence to the CTDEP's General Permit for Construction Activities and environmental requirements set forth in the Client's contract documents and specifications.

Environmental Siting and Permitting Services, Solar Farm, Bozrah, Connecticut

Project Manager in support of environmental assessment to support a Petition filing to the Siting Council for the development of a 3.1 megawatt, solar-based electric generating facility. Mike and his team were responsible for assessing the existing conditions of 25+ acre site and evaluating post-development impacts on the environment. Services included environmental due diligence, Phase I ESA, wetland delineations, vernal pool study and impact evaluation, habitat and wildlife assessments, breeding bird survey, noise analysis, visibility assessment, archaeological survey, coordination with state agencies and development of protective measures for site resources during construction. Mike also assisted in drafting the Petition document and Development and Management Plan. His team is responsible for conducting environmental monitoring during construction activities.

Environmental Siting and Permitting Services, Electrical Utilities
Program Manager in support of various electrical transmission projects, including assessment and permitting of bulk power substations, transmission line corridors, structures, and underground utility installations in CT and MA. Services include overseeing civil engineering feasibility studies, pre-acquisition due diligence evaluations, natural resources inventories of existing flora and fauna, habitat evaluations, wetland delineations, noise analysis, hazardous waste investigations, site survey, layout and design drawings, landscape architecture, visual analyses, preparation of technical documents, coordination with federal, state and local agencies, regulatory permitting, public outreach, and expert witness testimony. Mike has assisted clients in the siting, design and permitting of new bulk power substations, modifications to existing substations and switch yards, installing transition stations, as well as transmission line corridor studies submitted to the CT Siting Council.

Environmental Evaluations and Regulatory Permitting, Wind Farm Colebrook, Connecticut
Project Manager for environmental considerations associated with the development of Connecticut's first commercial wind farm in northwest Connecticut. Responsibilities included overseeing due diligence, natural resource studies and environmental permitting activities. The 3.2 MW project involved extensive evaluations of wetland and other natural resources, flora and fauna studies, sound studies, flicker analyses, visual evaluations and expert testimony at the local and state level, including multiple public hearings. Mike assisted this client in preparing the Development and Management Plan and pre-construction coordination efforts.

Environmental Siting and Permitting Services, Fuel Cell Installation, South Windsor, CT
Project Manager for environmental considerations associated with the development of a 4.98 megawatt fuel cell generation facility. Mike prepared an environmental assessment documenting existing environmental conditions at the site and the proposed project's impacts to water resources, vegetation and wildlife, rare species, historic and cultural resources, scenic and recreational areas, and other natural resources. Noise and air quality assessments were also included in the evaluation of how the proposed build conditions might affect the surrounding environment.

Environmental Permitting Services for Wireless Telecommunications Clients, New England & NY
Program Manager for environmental due diligence, siting and permitting services in support of various telecommunications clients throughout New England and New York. Mike has worked directly for licensed wireless service providers and tower management firms since 1997. Representative project-related services include due diligence and land use evaluations; preliminary site screenings; preparation of compliance documentation, environmental assessments and Memorandums of Agreement to fulfill NEPA requirements; Phase I ESAs and Phase II field investigations; remedial planning and oversight; wetland assessments; vegetative/biological surveys; noise analyses; visibility analyses; graphic support; preparation of regulatory permit applications, and construction support. Mr. Libertine has testified on behalf of telecommunications clients in front of local municipalities and the CT Siting Council on over 350 applications.

Constructability Review, Greater Springfield Reliability Project, Massachusetts and Connecticut
Project Manager responsible for assessing the environmental and construction feasibility associated with the installation of a new 345-kV overhead transmission line, as well as existing electric distribution and transmission infrastructure upgrades, within approximately 57 miles of existing transmission line right-of-way (ROW) in Massachusetts and Connecticut. Project tasks included assessing the suitability of existing access roads to and within the ROW to determine their viability as construction routes; evaluating new access roads, developing primary access routes, identifying appropriate locations for construction pads at each proposed structure location, developing data collection and management methodologies, and, providing a GIS geo-database and mapping depicting field data. Mike also assisted the client on environmental permitting and compliance-related issues associated with the reconfiguration of three substations along the route, two in MA and one in CT.

Permitting Support Services, Interstate Reliability Project, Connecticut
Project Manager responsible for preparing Location Review documents associated with the Card Street Substation upgrades and overhead transmission line interconnections in Lebanon, Connecticut. Project tasks included evaluations of environmental impacts, including wetland resources and wildlife habitat, roadway improvements, site design, landscaping and visual impacts. Mr. Libertine acted as liaison with local officials during the technical review process and assisted in securing letters of support from the First Selectman, Planning and Zoning and Inland Wetlands Commissions.

Environmental Assessment and Constructability Review, Central Connecticut
Project Manager for natural resources inventory/assessment and construction evaluation along 35 miles of ROW corridor. Environmental tasks included Connecticut and federal wetland delineations, Army Corp of Engineers data plots, wetlands functions and values assessment, inventory of threatened and endangered species and critical habitats, biological surveys, and cover-type mapping. Once existing conditions were documented, a feasibility analysis was conducted to identify environmental and constructability conflicts associated with proposed new line installation and facility upgrades.

Education	University of Connecticut, B.S. Natural Resources Management, December 1990 Stonehill College, B.A. Marketing, May 1981
Certifications/ Licenses	Licensed Environmental Professional, State of Connecticut, LEP No. 345 OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) Training (29 CFR 1910.120)

Exhibit B

IWWA Letter of March 27, 2015

TOWN OF
GREENWICH

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

Inland Wetlands
and
Watercourses Agency
(203) 622-7736
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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

Robert E. Clausi
Acting Director

c: Peter Tesei, First Selectman