

DAVID A. BALL

Please Reply To Bridgeport
E-Mail: dball@cohenandwolf.com

March 16, 2018

Via Electronic Filing and Overnight Delivery

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

Re: Docket No. 461A - 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.

Dear Attorney Bachman:

Enclosed please find one (1) original and fifteen (15) copies of the written comments of the Town of Greenwich Department of Public Works to Eversource's Development and Management Plan, Volume 1, Part 1 filed on February 20, 2018.

I certify that copies have been sent on this date to all participants of record as reflected on the Council's service list.

Please do not hesitate to contact me if you have any questions regarding this filing.

Very truly yours,



David A. Ball

DAB/lcc
Enclosures

cc: Service List



AMY J. SIEBERT, P.E.
COMMISSIONER

JAMES W. MICHEL, P.E.
DEPUTY COMMISSIONER

DEPARTMENT OF PUBLIC WORKS

BUILDING INSPECTION
BUILDING MAINTENANCE
ENGINEERING
HIGHWAY
SEWER
WASTE DISPOSAL

March 15, 2018

Attn: Melanie Bachman, Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Greenwich Substation and Line Plan
Development and Management Plan Comments
Volume I – Part 1 – Cos Cob Substation Modifications
Town Project No. 18-15

Dear Siting Council,

The Town of Greenwich is in receipt of the Greenwich Substation & Line Project Development & Management Plan, Volume I, Part 1 filed by Eversource on February 20, 2018 relating to modifications to the Cos Cob Substation (the "Cos Cob D&M"). The Town met on two occasions prior to the submittal of the Cos Cob D&M to work together to resolve the concerns the Town had related to the plan. Unfortunately, a number of the Town's concerns were not included in the Cos Cob D&M. Below is a list of the concerns that were presented to Eversource but not incorporated into the plan.

1. A DEEP Coastal Area Management permit should be obtained as the work is within the coastal boundary subject to the Coastal Management Act.
2. All building permits should be obtained from the Town. Per the current version of the International Building Code, the following is a sample list of such required permits:
 - a. Retaining walls over 3'
 - b. Fences over 7 feet
 - c. Free standing walls – ie screening walls.
 - d. Any structure greater than 200 SF
 - e. Any foundations
3. Drainage approval for compliance with the Town of Greenwich Drainage Manual shall be obtained.
4. The Town is fairly confident that contaminated soils will be encountered during construction due to the prior power plant site in this area. Testing should be done before the D&M plan is approved. A detailed procedure should be provided that outlines the handling of the contaminated soils.
5. Lighting on the equipment is described but a photometrics plan was not submitted. The Town would expect a 0 foot candle design at the property line with proof this is being done.

6. The Erosion Control and Sediment Manual in the document (Appendix C) is a generic document. The Town requests a narrative description, a plan sheet and associated details that are specific to this site. With the proximity to a Town Park and playing field, the Town is extremely concerned about air quality, dust control and run-off of potential contaminated materials into both soils and groundwater/surface water.
7. Groundwater or surface water should be filtered prior to removal from the site. No water should be released to the Cos Cob Park site.
8. The Town has requested that Eversource post an irrevocable letter of credit with the Town to ensure that any damage to Town infrastructure or impacts to the residents can be corrected. The Town will provide notice to the contractor and Eversource of any problems that would require the use of funds prior to implementation with sufficient time to resolve said issues.
9. Eversource stated that certain circuits will be taken out of service which eliminates the backup power service to the Town. Eversource has not disclosed its contingency plan and how it plans to maintain power to Greenwich during this shutdown period. We suggest that this plan be submitted directly to the Town and be kept on record as a confidential document. It would only be shared with emergency personnel in the event of an outage during the construction.
10. The Town has a noise ordinance. Allowable working hours per ordinance are 7A-6P M-F, 9A-5P Sat. Any work outside these timeframes will require a noise ordinance variance from the Town's Health Department.
11. No construction vehicles will be allowed to wait/stage on Town roads or property which will block traffic.
12. All traffic to the Cos Cob Substation should utilize I-95 to exit 4 to Sound Shore to the site. No vehicles or materials should be transported on other Town roads.
13. A police officer should be staged at the gate to the entrance to the site during working hours to protect traffic entering/exiting Cos Cob Park.
14. Landscape screening should be placed to protect the views from the condos directly adjacent to the site. This may require working with the Town to place additional landscaping in the Cos Cob Park site. A proposed landscape plan should be submitted with these plans.
15. Eversource has stated that a blasting plan is not applicable to this project. However, rock can be expected in the area of construction. Therefore, Eversource should describe if blasting, hammering etc. will be used for the removal. The depth of the proposed footings and foundations shown on the plan would be at a similar elevation where the Town encountered rock during the park construction. Blasting requires coordination with the Town's Fire Marshal.
16. Drainage along the south end of the property needs to be maintained as a flow path currently exists in this area. The proposed plans do not clearly show drainage patterns in this area.
17. The Town expects weekly meetings with the contractor and Eversource to monitor the work and address concerns that arise during construction.
18. Any pruning of Town trees shall be done under the direction of the Town Tree Warden.

We have provided these comments recognizing that the Town's Appeal of the final decision in this matter is pending, and we do so without waiving any rights.

In addition to the comments described above, the Town objects to the Siting Council's approval of the Cos Cob D&M prior to Eversource's submission of a Development & Management Plan relating to the final design and construction of the substation at 290 Railroad Avenue. In its Decision and Order, the Council ordered Eversource to submit two Development & Management Plans: one relating to the substations and one relating to the proposed transmission lines. As a result, the Cos Cob D&M plan submitted by Eversource is incomplete and should not be approved at this time.

We trust that the Siting Council will require Eversource to incorporate these comments into the D&M plan prior to approval. The Town is willing to discuss the above comments if you have any questions or concerns. Please contact me at (203) 622-7813.

Sincerely,

A handwritten signature in black ink, appearing to read "JW Michel". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

James W. Michel, P.E.
Deputy Commissioner of Public Works

cc: A. Siebert (Greenwich DPW)
 P. Tesei (Greenwich First Selectman)
 Eversource Energy
 File 18-15
 Service List, Connecticut Siting Council Docket 461A