



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

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### VIA ELECTRONIC MAIL

June 25, 2025

Melanie Bachman, Executive Director  
Connecticut Siting Council  
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New Britain, CT 06051  
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PETITION NO. 1672 – The Connecticut Light and Power Company d/b/a Eversource Energy (Petitioner) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed Portland Substation to Hopewell Substation Rebuild Project consisting of the replacement of electric transmission line structures along approximately 9.14 miles of its existing 115-kilovolt (kV) 1759 Line right-of-way between Portland Substation in Portland and Hopewell Substation in Glastonbury, Connecticut, and related electric transmission line and substation improvements.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1672.

#### **Wetlands and Vernal Pools**

The Petitioner identified 22 watercourses, 62 wetlands, and eight potential vernal pools within the project area. The Petitioner also notes that two existing work pads, two matted access roads, and three existing gravel access roads would be located within the identified vernal pool envelopes (VPE) and “proposed work within VPEs would be limited to vegetation management, temporary matting, and clean fill top-dressing for work pads and existing access.” The Council recommends that the Petitioner assess the proposed placement of structures, work pads/pull pads, and access roads to minimize the potential temporary impacts on streams, wetland resources and vernal pools to the greatest extent practicable. The Council also recommends that the Petitioner implement best development practices<sup>1</sup> for “Site Clearing, Grading, and Construction Activities” in addition to the proposed protective measures identified in Section 5.4.3<sup>2</sup>.

The Council notes that the project plans identify areas to “Minimize Vegetation Removal In Vernal Pool Envelope”; however, it is unclear what “minimize vegetation removal” means since the Petitioner notes that “Eversource performed comprehensive vegetation management work within this ROW in 2021-2022 and has continued to conduct cyclical maintenance work within this ROW, most recently in April 2025.” The Council recommends that the Petitioner maintain native understory vegetation (e.g., shrubs and herbs) within the VPE and critical terrestrial habitat for the identified potential vernal pools to the greatest extent practicable.

#### **Spill Prevention**

The Petitioner states that “Eversource would also require its contractors to employ best management practices for the proper storage, secondary containment, and handling of diesel

fuel, motor oil, grease, and other lubricants, to protect water quality to adjacent watercourses, wetlands, and vernal pools within the Project Area.” The Petitioner also notes that “the staging area/laydown may also be used by construction crew members for parking personal vehicles and for construction vehicles, and for performing minor maintenance, when needed, on construction equipment.” The Council supports efforts to protect water resources and recommends that the Petitioner employ the proposed best management practices for the proper storage, secondary containment, and handling of diesel fuel, motor oil, grease, and other lubricants to the staging area(s), which might be outside of the proposed project area, such as Franklin, CT.

The Council’s comments above address only certain elements of the materials provided by the Petitioner at the time of the filing. Additional information can become evident through comments offered by other parties and during the Siting Council’s administrative hearing process. The absence of comment(s) by this Council about any Petition or Application, or any aspects thereof, may not be interpreted as an endorsement of a proposed project, or its components or that this Council might not have comments or concerns on more specific issues raised during the hearing process.

Thank you for your consideration of the Council’s comments.

Sincerely,

A handwritten signature in black ink that reads "Paul Aresta". The signature is written in a cursive, flowing style.

Paul Aresta  
Executive Director

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<sup>1</sup> Calhoun, A. J. K. and M. W. Klemens. 2002. Best development practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United States. MCA Technical Paper No. 5, Metropolitan Conservation Alliance, Wildlife Conservation Society; <https://www.nae.usace.army.mil/Portals/74/docs/regulatory/VernalPools/BestDevelopmentPractices20Oct2014.pdf>.

<sup>2</sup> Eversource would implement the protection measures including but is not limited to, scheduling civil construction near vernal pools outside of the breeding and migration seasons for the PVP indicator species, avoiding permanent habitat alteration within potential VPEs, and protecting compatible vegetation within potential VPEs.