

STATE OF CONNECTICUT

SITING COUNCIL

Re: The Connecticut Light and Power Company and The ) Docket 272  
United Illuminating Company Application for a )  
Certificate of Environmental Compatibility and Public )  
Need for the Construction of a New 345-kV Electric )  
Transmission Line and Associated Facilities Between )  
Scovill Rock Switching Station in Middletown and )  
Norwalk Substation in Norwalk, Connecticut Including )  
the Reconstruction of Portions of Existing 115-kV and )  
345-kV Electric Transmission Lines, the Construction of )  
the Beseck Switching Station in Wallingford, East )  
Devon Substation in Milford, and Singer Substation in )  
Bridgeport, Modifications at Scovill Rock Switching ) November 22, 2005  
Station and Norwalk Substation and the )  
Reconfiguration of Certain Interconnections )  
Supplemental Hearing Pursuant to Conn. Gen. Stat. )  
§ 4-183(h) )

**PRE-FILED TESTIMONY OF PATRICIA "TRISH" BRADLEY**

- 1 Q. Ms. Bradley, are you familiar with the video entitled "Royal Oak Park, August 29,  
2 2005," a copy of which is submitted as an Exhibit to this testimony?  
3 A. Yes, I am.  
4 Q. Please tell the Council how you came to be familiar with the video.  
5 A. I was present when the section of the video entitled "Additional Views" was shot, and in  
6 fact, it was I who suggested each of the locations shown in this section of the video. I  
7 have also carefully reviewed the entire video.

1 Q. The first section of the video, entitled "Siting Council Field Review Route" shows a  
2 portion of a map entitled "Driving Route, Durham, Haddam, Middlefield, Middletown",  
3 which appears in the Record on Appeal in this case as Item No. LII 19. In particular, the  
4 video shows the portion of this map that relates to the Council's drive through Royal Oak  
5 Park. Are you familiar with the streets in the Royal Oak Park subdivision shown on this  
6 map, and their surroundings?

7 A. Yes, I am.

8 Q. Does the first portion of the video, entitled "Siting Council Field Review Route," fairly  
9 represent what someone in a car driving along the route through Royal Oak Park shown  
10 on the driving map would see, at the time the video was taken in August of 2005?

11 A. Yes, it does.

12 Q. Thank you. Now, I would like to turn to the segment of the video entitled "Additional  
13 Views." Please describe the assistance you provided in the making of this segment of the  
14 video.

15 A. At the request of Mr. Fitzgerald, I identified several vantage points in Royal Oak from  
16 which the existing structures and right-of-way could be seen, and to the extent it was  
17 necessary to enter on to private property to shoot video images from these vantage points,  
18 I contacted the property owners and obtained their permission. I then met Mr. Fitzgerald  
19 and a videographer at my house at 47 Ironwood Lane in Durham on August 29. We took  
20 the first video footage on my property. After that, I accompanied Mr. Fitzgerald and the

1 videographer to each of the addresses listed in the video, and observed the videographer  
2 making the video. To the extent necessary, when we got to each address, I pointed out to  
3 the videographer vantage points from which the structures and right-of-way could be  
4 seen.

5 Q. How many different vantage points did you select for videotaping?

6 A. There are nine separate segments in the "Additional Views" sections of the video, but  
7 some of these segments include pictures taken from multiple vantage points.

8 Q. In the segment of the video entitled "Additional Views," the location of each vantage  
9 point and the camera angles that were used are indicated on a key map, which is a copy  
10 of Wilson Exhibit 5 in this proceeding. Does this key map fairly represent where the  
11 various segments of the video were taken, and where the camera was pointed?

12 A. Yes, it does.

13 Q. Taken as a whole, does the video fairly represent the visibility of the transmission line  
14 structures to people living in and walking or driving through the Royal Oak Park  
15 subdivision?

16 A. Yes, it does.

17 Q. Do the shots of the right-of-way in the video fairly represent the condition of the  
18 vegetation on and adjacent to the right-of-way, as it passes through Royal Oak Park?

19 A. Yes, they do.

1 Q. Ms. Bradley, in your final argument to the Council on March 31, 2005, on behalf of  
2 Citizens for Responsible Energy, you said (Tr., 3/31/05, at 220, 221):

3 The unsightliness of these massive towers will not be the only impact  
4 to the aesthetics of Royal Oak, the easement is not a cleared right-of-  
5 way, but is a thickly wooded area through the center of the  
6 neighborhood providing the neighborhood with mature beauty, a  
7 privacy wall, and a sanctuary for an abundance of wildlife...The  
8 existing 43-foot to 61-foot wooded H-frame poles blend into their  
9 surroundings and are barely noticeable...

10 Q. Does the video submitted with your testimony portray in pictures what you were  
11 portraying to the Council in words in that statement?

12 A. Yes, it does.

13 Q. Ms. Bradley, attached to your testimony is a copy of a letter from Allan Chapman of  
14 Northeast Utilities Service Company to Mitchell Bradley, dated July 1, 1997. Do you  
15 recognize that letter?

16 A. Yes. Mitchell Bradley is my husband.

17 Q. Please tell us how Mr. Bradley came to receive this letter.

18 A. When I learned from some men I encountered on the right-of-way that CL&P was  
19 planning to discontinue its practice of selective cutting of trees and other vegetation on  
20 the right-of-way and instead clear the right-of-way using defoliant, I organized a  
21 meeting of the neighborhood with CL&P representatives at my house. In the course of  
22 that meeting, we worked out an arrangement that would let us preserve the character of

1 the right-of-way and avoid pesticides if we did the work ourselves, and then Northeast  
2 Utilities sent out letters like the one my husband got to confirm the arrangement.

3 Q. What do you and your husband do to maintain the right-of-way as it passes over your  
4 property?

5 A. Twice a year, in the spring and fall, my husband tops the trees and maintains all the  
6 vegetation in accordance with the specifications of the letter. Each of these efforts  
7 requires several days of his labor. Sometimes, he will also pay to have a chipping  
8 service cut up and take away the brush and branches that he has cut.

9 Q. Does this conclude your testimony?

10 A. Yes.



Northeast  
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270  
(860) 665-5000

July 3, 1997

Mr. Mitchell Bradley  
47 Ironwood La.  
Durham, Ct 06422  
(860) 349-9137

Dear Mr. Bradley:

This will confirm our conversation on July 1, 1997 concerning the maintenance (trimming and pruning) of trees and shrubs within the 115 kV CL&P right of way from the Carpenter La. Jct. in Wallingford, Ct. to Oxbow Jct. in Haddam, Ct. If this letter correctly states our agreement on this matter, please sign it on the line after the word "Agreed" in the margin below and return it in the enclosed addressed envelope to:

Northeast Utilities

PO Box 270

Hartford, CT 06141

Attn.: Alan T. Chapman - Bldg. 3333

Proper maintenance of our transmission lines, including keeping the lines and structures free from contact or interference from woody vegetation, is essential to safe and reliable electric service. We have an easement on your land that allows us to control woody vegetation in the right-of-way, in order to keep our lines structures and access to them clear. Normally, all woody vegetation (trees and vines) are removed from the right-of-way. Because you do not want us to remove the trees from the right-of-way on your property, you have agreed to trim or prune these trees in accordance with the maximum heights listed below after initial :

- Trees within the conductor zone (the continuous area under the conductors extending outward a distance of 15 feet from the outermost conductors) shall be kept at or below a height of 18 feet and with initial cut at 15 feet. Trees to be cut in conductor zone are the tall growing hardwood trees (ash, maple and cherry). Trees to be trimmed are apple trees. Do not use any herbicides on this property.

**Call 48 hours before starting work.**

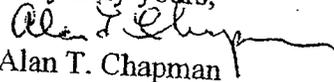
- The trees in the side zones shall be kept at or below 20 feet.

The woody vegetation that you have agreed to maintain includes all trees that are capable of growing tall enough to contact the overhead lines. You have agreed to keep these trees trimmed or pruned within the above stated heights and in accordance with the standards set forth in the enclosed Transmission Easement Right-of-Way Conditions to be Met in Lieu of Vegetation Removal ("Conditions").

However, if after that time the trees are not trimmed and we determine that the right-of-way area does not meet the standards set forth in the "Conditions" or with this agreement, we will remove the trees as allowed by our easement.

**WARNING:** The Transmission lines located in the right-of-way carry live electric current. As a safety precaution, you must not cut or trim trees that are in close proximity to the overhead conductors. Contact with the energized lines can cause serious injury or death. If trees are growing near the lines when this agreement is signed, the NU Representative will make a determination on whether or not CL&P will cut, top or trim back the trees away from the conductors to a safe distance. After that, the property owner or his contractor will be required to perform all future tree trimming and maintenance.

Very truly yours,



Alan T. Chapman  
Construction Representative

Agreed: \_\_\_\_\_  
(Land Owner)

Enclosure: Transmission Easement Right-of-Way Conditions and Easement

NORTHEAST UTILITIES  
TRANSMISSION  
EASEMENT RIGHT-OF-WAY CONDITIONS  
TO BE MET IN LIEU OF VEGETATION REMOVAL

- A. The right-of-way shall be cleared and kept clear at all times of live woody vegetation as follows:
1. Established access routes within the right-of-way easement area, areas around pole or tower structures and guying anchors shall be clear of all woody tree and brush species. Low growing shrubs that mature at a height of 2 feet or less (e.g. lowbush blueberry) may remain as well as grasses and forbs (e.g. herbs and ferns).
    - Access routes shall be maintained to a width of 14 feet.
    - Structure areas shall be maintained to a distance of 10 feet outward from each structure.
    - Anchors guys shall be maintained to a distance of 5 feet around each anchor.
- B. All trees and shrubs to remain within the right-of-way easement area shall be maintained, trimmed or pruned, so that they will not grow tall enough to potentially contact the overhead conductors.
- C. If cut-off brush, limbs or branches are piled by the land owner within the limits of the right-of-way easement area, they shall be piled as near to the cleared or maintained edges as possible and outside of the outermost conductors. No vegetative debris shall be piled within the cleared access route, within the cleared areas around structure or guy anchors or within any other area designated by the Northeast Utilities' Representative.
- If the debris is chipped, the land owner may spread the chips anywhere within the maintained portion of the right-of-way. The maximum depth of the chips shall not exceed three inches.
- D. The land owner shall identify with visible markings that boundaries of his property within the right-of-way.