



**Connecticut  
Light & Power**

The 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 22, 2014

Mr. Doug Hoskins  
Connecticut Department of Energy and Environmental Protection  
Inland Water Resources Division  
79 Elm Street, 3<sup>rd</sup> Floor  
Hartford, CT 06106-5127

RE: Interstate Reliability Project  
The Connecticut Light and Power Company  
WQC-201205697  
*Request for Technical Plan Revision to Reflect U.S. Army Corps of Engineers Determination that the Drainage Swale Portion of Wetland W21-15 is Non-Jurisdictional; Card Street Substation, Town of Lebanon*

Dear Mr. Hoskins:

In order to provide consistency with the non-jurisdictional determination made by the U.S. Army Corps of Engineers (USACE) on June 27, 2014, The Connecticut Light and Power Company (CL&P) requests that the Connecticut Department of Energy and Environmental Protection (CT DEEP) issue a Technical Plan Revision (TPR) to the above-referenced Water Quality Certification ("WQC") for the Interstate Reliability Project (Project). Specifically, CL&P requests that the CT DEEP concur with the USACE's findings that the substation drainage swale, located on the south and west sides of CL&P's Card Street Substation (Town of Lebanon) and initially delineated for the Project as part of Wetland W21-15, is not a jurisdictional water of the U.S. and therefore is not subject to the Project WQC.<sup>1</sup>

CL&P constructed the Card Street Substation in the 1960s and this man-made swale was part of the substation's drainage / stormwater management design. Attachment A includes a copy of the original substation plan, showing the location of the swale as part of the substation drainage system. Over the past decades, vegetation has grown along the swale and portions of the swale have filled in; as a result, the swale is not fully effective in carrying drainage flows from the developed substation.

Subsequent to CT DEEP's approval of this TPR, CL&P will perform maintenance in the swale to restore it as an effective component of the substation's drainage system.

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<sup>1</sup> Note: The drainage swale also extends outside part of the northern substation fence. However, this portion of the swale is located in an area previously identified as upland and therefore non-jurisdictional.



Interstate  
Reliability Project

Mr. Hoskins  
July 22, 2014  
Page 2

Additionally, as part of the Project and in accordance with our July 1 telephone conversation, CL&P installed temporary erosion and sedimentation controls within the portion of the swale along the southern substation fence. These controls (e.g., stone check dams, straw/hay bales, wattles) were installed to minimize the potential for down-gradient turbidity associated with Project construction activities. These temporary measures were installed successfully on July 3, 2014, and have functioned well during subsequent rain events.

Attachment B includes a copy of the Mapsheets 1 and 1A from Attachment G of the 401 WQC Application (as amended) showing the location of the non-jurisdictional drainage swale around the Card Street Substation fence in relation to Wetland W21-15.

Should you have any questions regarding this request, please do not hesitate to call at (860) 665-3695 or e-mail me at [robert.deptula@nu.com](mailto:robert.deptula@nu.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Deptula", with a long horizontal flourish extending to the right.

Robert Deptula  
Senior Environmental Specialist

Encl.

cc: Susan Lee, USACE



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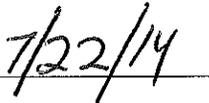
Interstate  
Reliability Project

## CERTIFICATION OF DOCUMENTS<sup>2</sup>

I have personally examined and am familiar with the information submitted in this document and all attachments and certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate, and complete to the best of my knowledge and belief, and I understand that any false statement made in this document or its attachments may be punishable as a criminal offense in accordance with Section 22a-6 under Section 53s-157b of the Connecticut General Statutes.



Signature



Date

<sup>2</sup> Certification pursuant to CT DEEP WQC-201205697, General Terms and Conditions, Condition 9.



**ATTACHMENT A**

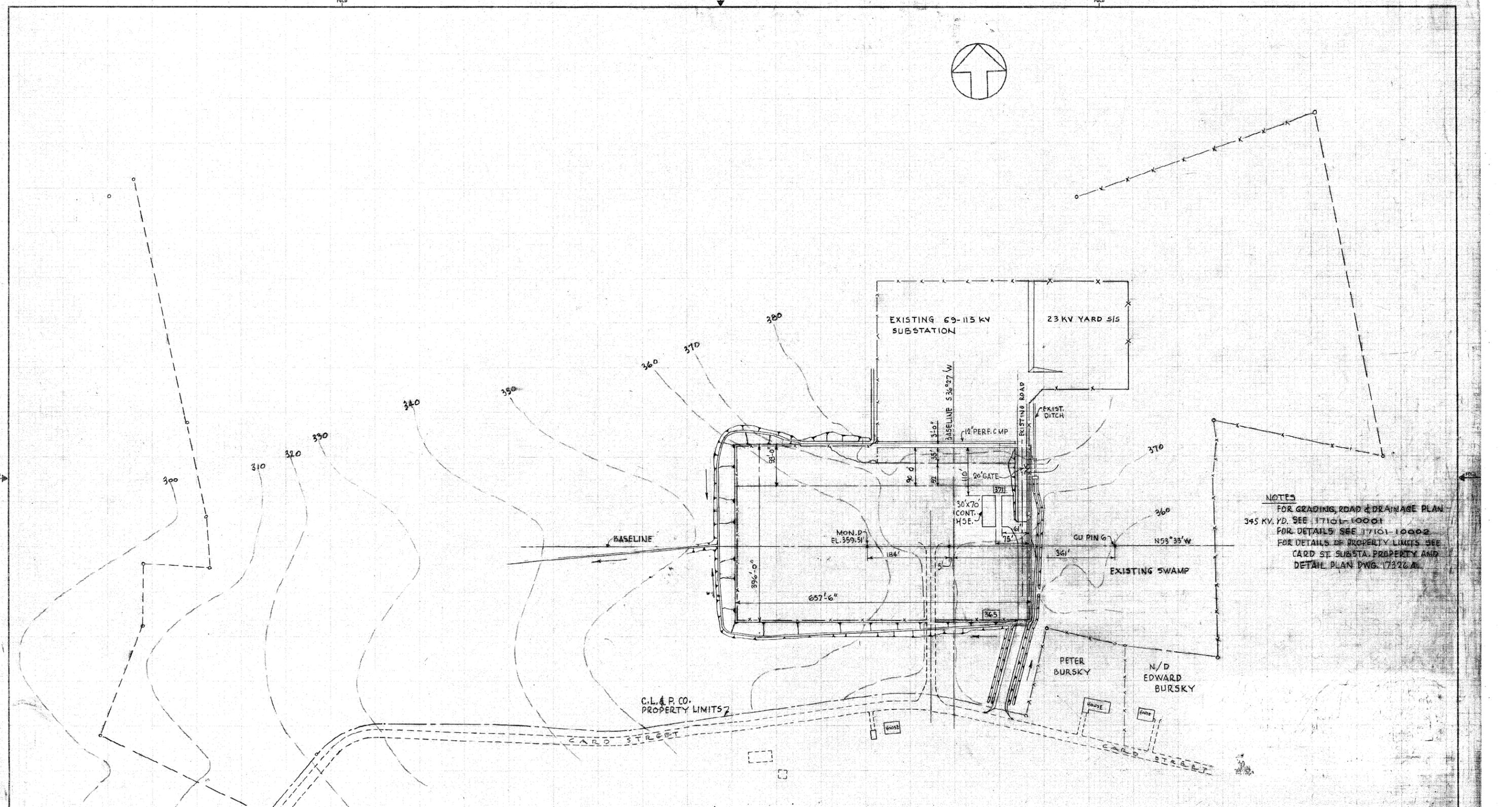
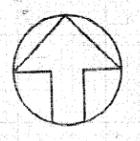
**ORIGINAL CARD STREET SUBSTATION PLAN**



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FOLD

FOLD



**NOTES**  
 FOR GRADING, ROAD & DRAINAGE PLAN  
 345 KV, YD. SEE 17101-10001  
 FOR DETAILS SEE 17101-10002  
 FOR DETAILS OF PROPERTY LIMITS SEE  
 CARD ST. SUBSTA. PROPERTY AND  
 DETAIL PLAN DWG. 17326.A

SCALE: 1" = 100'

|                                                               |      |     |         |                                    |      |     |         |                   |      |                                                                                                   |         |
|---------------------------------------------------------------|------|-----|---------|------------------------------------|------|-----|---------|-------------------|------|---------------------------------------------------------------------------------------------------|---------|
|                                                               |      |     |         |                                    |      |     |         |                   |      | <b>NORTHEAST UTILITIES SERVICE CO.</b><br>FOR<br><b>THE CONNECTICUT LIGHT &amp; POWER COMPANY</b> |         |
|                                                               |      |     |         |                                    |      |     |         |                   |      | <b>TITLE</b><br>CARD 11E<br>23KV YARD PROPERTY PLAN<br>LEADERS, CONNECTIONS                       |         |
| BY                                                            | CHKD | APP | DATE    | BY                                 | CHKD | APP | DATE    | BY                | CHKD | APP                                                                                               | DATE    |
| JM                                                            | MBP  | JRF | 3-21-68 | JM                                 | MBP  | JRF | 3-21-68 | JM                | MBP  | JRF                                                                                               | 3-21-68 |
| AS BUILT PER<br>W.O. 08000102<br>ISSUED FOR RA<br>No. 766-253 |      |     |         | REVISIONS<br>2 3/27/79<br>1 5/5/71 |      |     |         | SCALE<br>AS NOTED |      |                                                                                                   |         |
| ACCT #                                                        |      | NO. |         | DATE                               |      | BY  |         | CHKD              |      | APP                                                                                               |         |
|                                                               |      |     |         |                                    |      |     |         |                   |      | ADDY #<br>06-253                                                                                  |         |
|                                                               |      |     |         |                                    |      |     |         |                   |      | DWG. NO.<br>17101-10003                                                                           |         |

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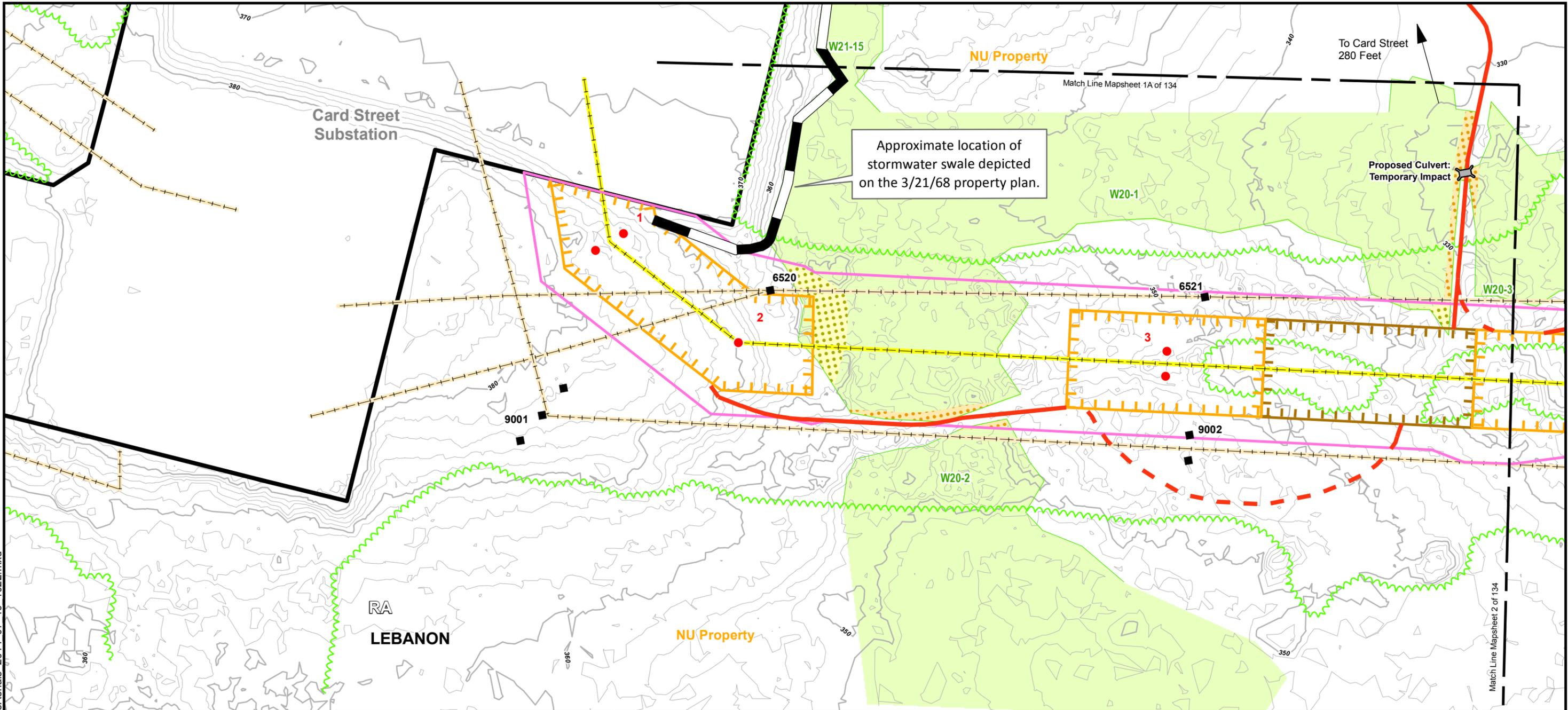
**ATTACHMENT B**

**CARD STREET SUBSTATION  
MAPSHEETS 1 AND 1A  
(ATTACHMENT G OF THE 401 WQC APPLICATION, AS AMENDED)**

**(Illustrating Location of Non-Jurisdictional Drainage Swale)**



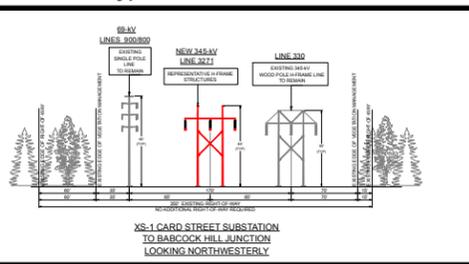
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**Map Location**



**Typical Cross Section**



**Existing Conditions**

- Existing Transmission Line
- Existing ROW
- Existing Transmission Structures
- Existing Access Road
- Wetland
- State Wetland
- Perennial Stream
- Intermittent Stream
- Vernal Pool
- Existing Tree Line
- Property Lines
- NDDB June 2012
- Zoning Description

**Proposed Conditions**

- Proposed Transmission Line
- Relocated Distribution Line
- Proposed Transmission Structure
- Relocated Distribution Structure
- Distribution Structure to be removed
- New Access Road
- New or Relocated Guy Wire & Anchor
- Temporary Work Pad
- Temporary Work Pad & Guard Structure
- Temporary Pulling Pad
- Temporary Road Flare
- Vegetation Removal Limit
- Mat Span

**Impacts**

- Permanent Road Impact
- Temporary Road Impact
- Temporary Work Area Grading Impact
- Forested Wetland (PFO) Clearing

**WATER RESOURCES: SUMMARY OF EXISTING CHARACTERISTICS AND POTENTIAL IMPACTS**

| Existing Water Resource Characteristics |                              |                            |             | Water Resource Impacts (sq ft)  |             |                |                      |             | Forested Wetland Vegetation Clearing Summary (Secondary Impacts) |              |
|-----------------------------------------|------------------------------|----------------------------|-------------|---------------------------------|-------------|----------------|----------------------|-------------|------------------------------------------------------------------|--------------|
|                                         |                              |                            |             | Temporary                       |             |                | Permanent            |             |                                                                  |              |
| Wetland (W) or Stream (S) No.           | Wetland or Stream Type/Class | Wetland Functions & Values | Vernal Pool | Work Pad (inc. Grading Impacts) | Access Road | Clearing Route | Structure Foundation | Access Road | Area (sq. ft)                                                    | Acres (est.) |
| W20-1                                   | PFO/PSS                      | Low                        | NO          | 4696                            | 2354        | 161            | -                    | -           | -                                                                | -            |
| W20-2                                   | PFO/PSS                      | Low                        | NO          | -                               | 231         | -              | -                    | -           | -                                                                | -            |
| W20-3                                   | PSS/PFO                      | Low                        | NO          | -                               | 772         | -              | -                    | -           | -                                                                | -            |
| W21-15                                  | PFO/PSS                      | Low                        | NO          | -                               | -           | -              | -                    | -           | -                                                                | -            |

CONNECTICUT LIGHT AND POWER

INTERSTATE RELIABILITY PROJECT

Date: 12/16/2013

DRAWN: LD

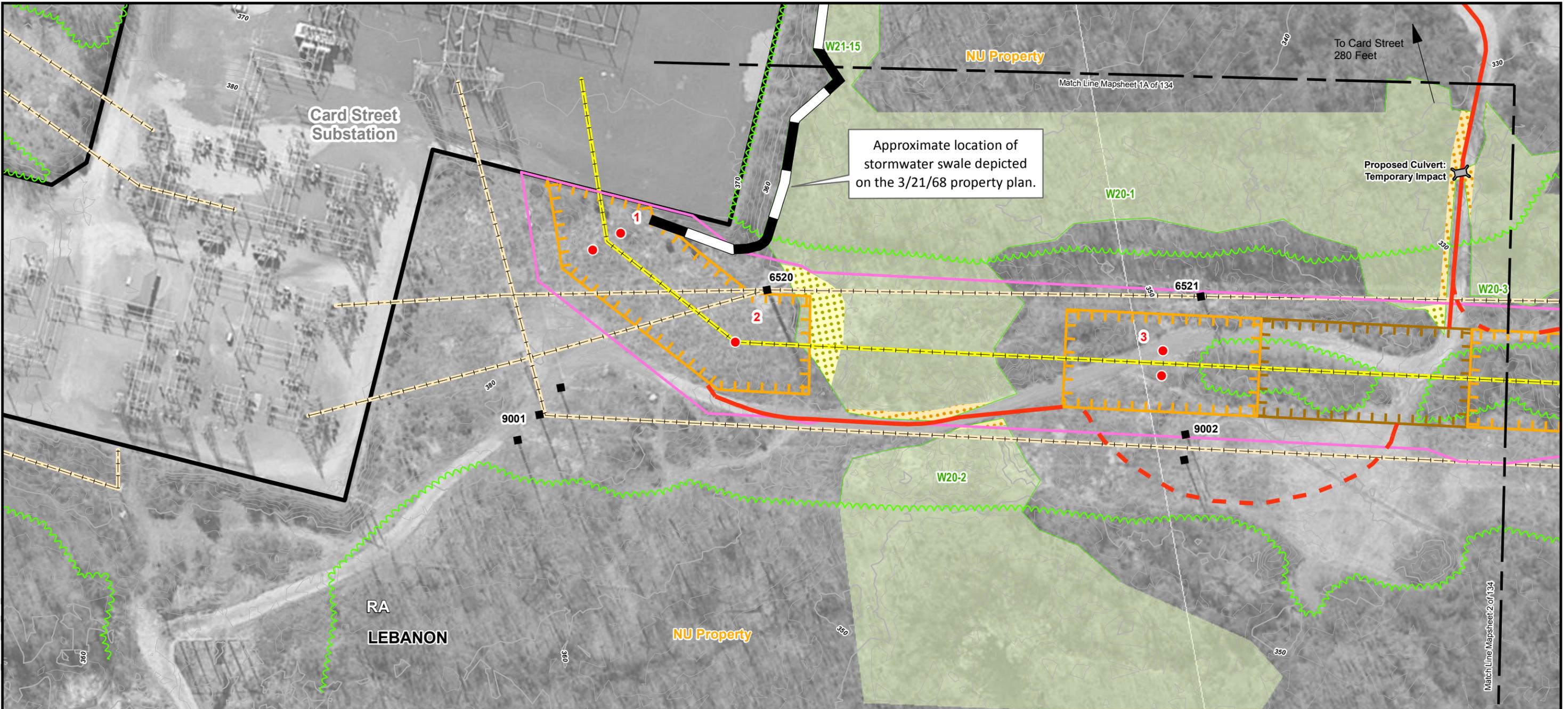
Revised: 07/10/2014

Mapsheet 1 of 134



FEMA Source: Floodway and 100-year and 500-year flood elevation boundaries derived from FEMA Flood Insurance Rate Maps and FEMA Insurance Studies (map dates range from 1982 to 1988). The boundaries are a best estimation from the source maps.  
Aerial Source: Aerial imagery captured in 2012 provided by USGS & State of Connecticut

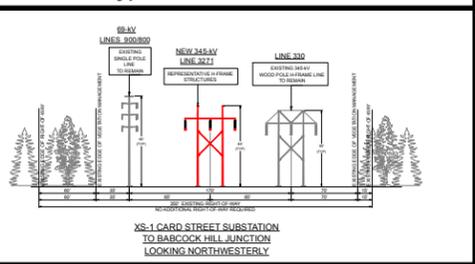
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Map Location



Typical Cross Section



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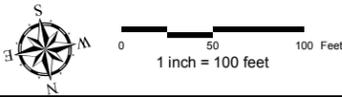
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| Wetland (W) or Stream (S) No.           | Wetland or Stream Type/Class | Wetland Functions & Values | Vernal Pool | Temporary                       |             |                | Permanent            |             | Area (sq. ft)                                                    | Acres (est.) |
|                                         |                              |                            |             | Work Pad (inc. Grading Impacts) | Access Road | Clearing Route | Structure Foundation | Access Road |                                                                  |              |
| W20-1                                   | PFO/PSS                      | Low                        | NO          | 4696                            | 2354        | 161            | -                    | -           | -                                                                | -            |
| W20-2                                   | PFO/PSS                      | Low                        | NO          | -                               | 231         | -              | -                    | -           | -                                                                | -            |
| W20-3                                   | PSS/PFO                      | Low                        | NO          | -                               | 772         | -              | -                    | -           | -                                                                | -            |
| W21-15                                  | PFO/PSS                      | Low                        | NO          | -                               | -           | -              | -                    | -           | -                                                                | -            |

**Connecticut Light & Power**  
A Northeast Utilities Company

Prepared by:  
**Burns & McDonnell**  
SINCE 1898



FEMA Source: Floodway and 100-year and 500-year flood elevation boundaries derived from FEMA Flood Insurance Rate Maps and FEMA Insurance Studies (map dates range from 1982 to 1988). The boundaries are a best estimation from the source maps.

Aerial Source: Aerial imagery captured in 2012 provided by USGS & State of Connecticut



