

Environmental Best Management Practices

Ash Creek

Ash Creek is a tidally influenced watercourse found within the Project area, in Fairfield, Connecticut. The rebuild 115-kV overhead transmission line connection from the UI's Ash Creek Substation to the Connecticut Department of Transportation (CT DOT) corridor will span over a 0.23-mile stretch along and over the creek. Work in this area will be conducted mostly in upland disturbed areas; however, temporary



Photo Credit: The United Illuminating Company

access across a small portion of Ash Creek wetlands and mud flats will be required to remove an existing lattice structure that is located on a small rocky island. While the lattice structure removal activities will result in small temporary impacts to this intertidal area, UI does not anticipate permanent impacts or negative effects to the overall environment.

To ensure appropriate development and application of best management practices (BMPs) for work in the wetlands and the intertidal zone, UI has worked with its consultants to conduct baseline research and to complete field inspections of the Project area to document existing ecological communities, wetland resources, watercourses, existing flora and fauna, and wildlife habitat types, including listed species identified by Connecticut Department of Energy and Environmental Protection (CT DEEP) Natural Diversity Data Base (NDDDB) and United States Fish and Wildlife Service (USFWS). UI also consulted with the CT DEEP, United States Army Corps of Engineers (USACE) and assessed soil resources based on a review of data maintained by the United States Natural Resources Conservation Service (NRCS). UI's efforts to minimize and mitigate environmental, visual, and community impacts associated with the Project are ongoing and include consultations and permitting approvals from Federal and State regulatory agencies, such as the Connecticut Siting Council, the USACE, CT DEEP, and the Connecticut State Historic Preservation Office (CT SHPO).

Additionally, during construction activities, UI will implement measures to protect Ash Creek's intertidal resources. Accordingly, UI will install erosion and sediment controls and will perform environmental inspections, pursuant to the Project Stormwater Pollution Control Plan (SWPCP) and CT DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. To minimize impacts to wetlands during the Project work, UI will:

- Assure that Project construction contractors conform to the requirements of USACE and CT DEEP permits, as well as the Connecticut Siting Council conditions.
- Install appropriate erosion controls as needed to prevent or minimize the potential for sedimentation into wetlands. Use straw bales instead of hay bales to prevent the spread of non-wetland plant seeds.
- Implement procedures for petroleum product management to avoid or minimize the potential for spills into wetlands (e.g., to the extent possible, store petroleum products in uplands more than 25 feet from wetlands, refuel construction equipment, except for equipment that cannot be practically moved, in upland areas only).
- Cut forested wetland vegetation without removing stumps except in areas where the intact stumps pose a concern for the installation of timber mat (or equivalent) access/workspace and the safety of construction personnel. To the extent practical, shrub and tree vegetation in wetlands will be removed manually.
- Install timber construction mats (or equivalent) for work in wetlands.
- Stabilize affected wetland areas with temporary seeding or an appropriate wetland seed mix. Do not apply woodchip mulch and fertilizer within wetlands. Use straw as mulch for stabilization near wetlands, as necessary.

Birds

Osprey

Osprey nests have been identified in the Transmission Line Rebuild Project area (Bridgeport and Fairfield) on two railroad catenary structures and on existing lattice steel towers near Ash Creek Substation, as well as north of the Pequonnock Substation.

UI will continue to coordinate with relevant agencies to develop a BMP plan, and to define and implement impact avoidance and mitigation measures during construction activities, which may include the following:



Photo Credit: National Geographic

- Considering restricting the timing of construction in the nesting areas to avoid critical periods in the birds' life cycles (e.g., nesting, fledgling of young birds).
- Removal of nests during the bird inactive period (pursuant to CT DEEP protocols)
- Installing permitted nesting platforms upon which the osprey can safely construct a nest.
- Training contractors to enhance awareness of the species and ensure contractor adherence to UI's BMPs
- Use of other pertinent BMPs.

Peregrine Falcon

UI's due diligence work during the planning phase of the Transmission Line Rebuild Project has identified a nest box for the state-threatened peregrine falcon in the vicinity of the Project area, located on the I-95 bridge over the Pequonnock River in Bridgeport. Peregrine falcon nests are highly susceptible to disturbance during the nesting season, which occurs from April through July.



Photo Credit: National Geographic

UI, in conjunction with its consultants, is working with the CT DEEP Wildlife Division to determine the degree of impact the proposed project may have, if any, on the nesting peregrine falcons that may utilize the nest box. To date, UI was able to find the exact location of the peregrine falcon's nest box by using coordinates provided by CT DEEP and by conducting visual and field reconnaissance surveys to determine whether the Project construction activities are within the visual buffer of the nest. UI will continue reviewing available data and visually surveying the Project construction location in this area to determine potential impacts to the peregrine falcon.

As the engineering design, constructability analysis, and permitting efforts are ongoing, UI will continue to work with CT DEEP's Wildlife Division, consultants, and bird experts to minimize and avoid impacts to bird species in the project area.