



DOCKET NO. 461

The Connecticut Siting Council (CSC) on the Proposed Eversource Greenwich Substation and Line Project

Comments submitted by Francia Alvarez Advocacy Chair and JoAnn Messina Executive Director
The Greenwich Tree Conservancy, Inc
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[The Greenwich Tree Conservancy](#) (GTC) was founded in January, 2007, because of a shared concern that there is insufficient recognition of the importance of trees in enhancing our community, our health and our quality of life. Our mission is to preserve and enhance our tree and forest resources in Greenwich. Therefore, we believe that it is important to comment on Docket #461, the proposed Eversource Greenwich Substation and Line Project. The GTC, 500 members and supporters strong, believes that Eversource has not met the basic requirement to forecast electric loads based on historical data for the subject area of Greenwich, CT. The Greenwich Tree Conservancy asks the CSC to review this deficit and the following points:

DEMAND

What documentation has Eversource provided to document increasing demand? Where is the multi-year study of local need? On what verifiable basis is Eversource claiming demand increases to the level requiring a new substation?

Despite the increased demand in South Stamford, Eversource has not proven an increase in demand for Western Greenwich. Most of the demand for power at the Cos Cob substation is from the Metro-North Rail line that runs just north of the substation. (Petition No. 950, Connecticut Light & Power Company, Greenwich, CT Staff Report, June 17, 2010)

Changes in consumption technologies and increased energy efficiency reduce average electric demand (e.g. more efficient refrigerators, light bulbs). "Energy efficiency remains the most cost effective means for reducing the demand for electricity." (p21) http://www.ctenergy.org/pdf/2007_Energy_Plan.pdf

How is Eversource meeting the challenges to find more efficient and less costly sources of energy and less need for expensive capital upgrades? Building a new substation is the old way. Wouldn't \$140 million be better invested in renewable sources of energy and conservation?

TREES AND THE ENVIRONMENTAL IMPACT

Will Eversource be replacing the mature trees along the I-95 northern edge with trees of the same size providing the same services, e.g., providing noise abatement, preventing soil erosion, filtering storm water, that these mature trees now provide? Will they post a 10 year bond to provide comparable trees if those planted and/or impacted as a result of construction fail to survive? Has Eversource provided any study of the aquatic life in the Bruce Park Ponds and the environmental impact of running a cable under these ponds?

Bruce Park, Greenwich's oldest public park, was established in 1908 through a bequest of Robert Moffat Bruce and is located on 60 acres along the south side of Interstate 95. Greenwich, CT has already experienced extensive loss of trees along the NHL rail corridor. These trees were taken down by Metro-North and CL&P in

2013 after a large storm. Now Eversource is proposing to remove additional trees in order to run a 25 foot wide trench through parts of Bruce Park, one of the environmental crown jewels of Greenwich, CT. The only noise abatement that exists along the northern edge of the park is the trees. In addition the trees provide carbon dioxide absorption for the 140,000 vehicles that pass by Bruce Park daily. One of the proposed routes for the Eversource cable is along this northern edge of the park abutting I-95. Digging a 25 foot wide trench to place the cable would require cutting down all of the trees along this border.

In addition, the historic Davis Mill Pond bisects the park's 60 acres, providing a prominent water feature that serves as the centerpiece of the Bruce Park landscape. Eversource is proposing to run lines under one of the ponds in Bruce Park, potentially disrupting the aquatic life as a result of the construction impacts. Also, potential corrosion of the proposed pressurized liquid filled cables is a grave concern. Is Eversource aware of the risk to Bruce Park by running cable under an area that is known to flood with salt water from Long Island Sound? Salt water has a hazardous effect on underground cables. Has Eversource reviewed the [Salt Marsh Advancement Zone Assessment of Greenwich, Connecticut 2014](#), and considered the consequences of running cable and building a substation in this area?

ConnDOT

On 10/8/15, Gov. Malloy and the CT Department of Transportation announced the proposed widening of I-95 starting in Greenwich. This widening would occur in the same area of town as the proposed Eversource project. In order to ensure that the interests of Greenwich residents are protected, we conclude that the Eversource proposal should be denied until the community has had opportunity to assess the ConnDOT plans. If Eversource can demonstrate that the 115kV electrical transmission lines are needed, a method of coordinating these two major construction projects should be instituted in order to minimize the disruptive impacts to the Town of Greenwich.

CONCLUSION

Do we really need a new substation and lines (the equivalent cost of \$20,000 each for the projected 7,000 homes and businesses)? Are there reasonable options, like conservation and/or a small clean power generator, with redundancy, that could solve the problem with less cost and less environmental impact? Greenwich, CT has a great deal to lose.

We urge the Connecticut Siting Council to not approve the proposed Eversource Substation and Line Project at this time for the following reasons:

- Increased demand in this area has not been proven with a multi-year study.
- Alternative means have not been examined.
- Irreparable damage to our trees and natural resources has not been weighed.
- Long-term potential risks to our environment have not been assessed.
- ConnDOT plans to widen I-95 impacting the same area are not available.

Bruce Park is over a century old, a crown jewel in our park system and part of our community's natural heritage. It is incumbent upon Eversource to provide the Siting Council with all the above documentation needed to make an informed decision.

Thank you,
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