



# ANCHOR

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March 27, 2008

Ms. Joyce R. Okonuk  
Office of the First Selectman  
Lebanon Town Hall  
579 Exeter Road  
Lebanon, Connecticut 06249



Re: CL&P Card Street Peaking Facility  
Location Review

Dear Ms. Okonuk:

Anchor Engineering completed a preliminary review of the information submitted for the proposed Card Street Peaking Facility on February 26, 2008. Since the submission of our review letter, we have not received any written response from the applicant. However we have attended the following meetings to obtain additional information:

- February 28, 2008 site walk of a Pennsylvania Light & Power Peak Generation Facility in Wallingford, CT
- March 3, 2008 Inland Wetland and Watercourses Meeting held at the Lebanon Town Hall.
- March 4, 2008 meeting with the Card Street Peaking Facility Team, which includes Connecticut Light & Power, Northeast Utilities and Vanasse Hangen & Brustlin, Inc. held at the Northeast Utilities office in Berlin.
- March 17, 2008 Planning & Zoning Commission Meeting held at the Lebanon Town Hall.
- March 18, 2007 Public Informational Meeting held at the Lebanon Fire Safety Complex.

Based on the information presented by the applicant at these meetings and responses to questions asked by the Board of Selectman, Town staff, Commission members, Anchor Engineering staff and the public, it is our opinion that the physical location of the facility on the Card Street property remains an unresolved issue. We recommend that the applicant consider the following and provide the Town with additional information to assist in conducting a proper "Location Review".

#### **Proximity to Adjacent Residential Properties**

The facility is proposed at the southeastern corner of the site along the northern side of Card Street. At least four (4) residential properties directly abut the southwestern corner of the

CL&P parcel. It appears that three (3) of these properties are within 200' of actual proposed facility operations. The applicant should consider the direct impact of the project on abutting residential properties and provide information for the record with regards to methods proposed to minimize this impact. These impacts include sound levels, visual impacts, proximity to construction and ongoing truck deliveries, etc. The approximate distances to the residents have been, at times, understated by the developer.

### **Visibility**

The proposed plan relies on topographic relief and existing vegetation along the northern side of Card Street to provide visual screening for the facility. It appears that the existing vegetation and grade from the easterly access drive to a point approximately 500' to the west will provide partial visual screening. The vegetation in this area will need to be supplemented with a variety of evergreen species to provide year round screening. It does not appear that the existing grade or vegetation south of this point will provide sufficient screening. Alternate methods of screening should be considered such as earthen berms with screening trees.

### **Noise/Acoustics**

The applicant has stated on a number of occasions that based on preliminary models, the noise levels from the facility will meet State of Connecticut Regulations. This response does not allow the Town or the surrounding residents to assess the impact of increased noise levels generated by the facility. We anticipate that noise will be generated by additional transformers, turbines, fans, and stacks. A comparison of existing noise levels with projected noise levels during facility operation is recommended. The Regulations of Connecticut State Agencies 22a-174 allows 45dBA of night-time sound level from a Class C emitter to a Class A receiver. It is likely that present "background" decibel levels are well below the maximum night-time level allowed by State Regulations. The frequency and decibel level of audible sounds that neighbors will hear should be available in consideration of this project.

Further, trucks that deliver fuel or ammonia are exempt from the Regulations of Connecticut State Agencies. Therefore, applicant has made no representation as to the level of sound that will result from trucks that will be delivering fuels and ammonia and may be idling during the unloading process. In addition, "back-up beepers" are exempt from the Regulations of Connecticut State Agencies, during construction and maintenance activities. During construction and operations these moving equipment may reasonably be expected to have potential sound level impacts.

### **Card Street Roadway Geometry**

Card Street has a roadway width of approximately 20' in the vicinity of the site and typically carries residential traffic. Additional information should be provided to verify that the existing roadway geometry and section can accommodate the additional traffic, specifically truck and heavy equipment, generated by the facility during both construction and operation activities.

### **Lighting**

Due to the proximity of the facility to residential properties, the proposed lighting plan should be provided. This plan should indicate the fixture types and quantities necessary to properly illuminate construction activities, facility operation activities, and when the facility is not in use. The impact of this lighting on a residential neighborhood with relatively low existing light levels should be considered.

### **Security**

Clarification should be provided with regards to the definition of a "manned" facility and whether or not this facility will be "manned". Additional detail should be provided with regards to proposed security measures including fence type and height, access controls, monitoring activities, etc. It is not readily apparent how the fuel delivery trucks will access the restricted site without potentially obstructing the Card Street travelway.

### **Inland Wetland Impacts**

The plans submitted for Location Review depict a large inland wetland and watercourse system that isolates the northern portion of the site. It was apparent that the inland wetlands depicted on the map presented to the Planning & Zoning Commission on March 17<sup>th</sup> did not match that originally provided for review. We recommend that the plan presented at this meeting be submitted for review. Also, additional information should be provided with regards to the location and size of necessary stormwater detention areas to accurately assess wetland impacts.

### **Water Supply**

It appears that the applicant is proposing to extend an existing water main from the Town of Windham to the site along Card Street. This will result in the disturbance of approximately 3,900 linear feet of Card Street within the Town of Lebanon. If access to the site is considered from the east, the water main construction within the Town Right-of-Way could be reduced to approximately 1,500 linear feet and it appears that the overall length of water main construction could be significantly reduced (1,000 linear feet +/-).

### **Spill Containment**

Due to the proximity of the fuel oil, oil waste water, and ammonia storage tanks to residential properties and inland wetlands and watercourses, additional information should be provided with regards to spill containment procedures during delivery, unloading and storage.

### **Air Quality**

Specific emissions information should be submitted for review along with the proposed monitoring activities. The impact of releasing additional pollutants in the vicinity of a residential neighborhood should be considered, including impacts on air quality, potable water supplies, etc.

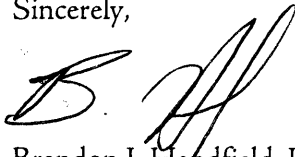
**Construction**

Due to the vicinity of the facility to residential properties, additional information should be provided in order to assess the temporary impacts of construction activities. Necessary information includes construction schedules, hours of construction, anticipated construction traffic, proposed access points to Card Street, description of blasting activities, large equipment delivery requirements, and any other information that may impact Card Street traffic and/or surrounding properties.

In summary, the applicant has submitted a "preliminary" plan and set of technical information, which makes it difficult to assess the potential impacts of the project and the effectiveness of potential mitigation measures. The submission of more detailed information in response to the above will allow the Town perform a review of the proposed location and determine if such a facility is suitable for the Town.

If you have any questions, please don't hesitate to contact us at (860) 633-8770. We are available to meet with you and/or CL&P if you prefer.

Sincerely,



Brandon J. Handfield, P.E.,  
Senior Civil Engineer



Mark M. Zessin, P.E.  
President

Enc.

cc: Mr. Philip Chester  
Mr. Richard Orłowski