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PUBLIC COMMENT RE:

**Notice of Tentative Determination to Approve
Structures, Dredging & Fill and Tidal Wetlands
And Intent to Waive Public Hearing
Applicant: The Connecticut Light and Power Company d/b/a
Eversource Energy
Application No. 202304621-SDFTW
City/Town: Norwalk**

I am writing concerning the above proposal to relocate two Eversource 115-kV transmission lines beneath the Norwalk River and portions of Norwalk's David S. Dunavan Boating Center.

Since this project has been in planning for so long, it is essential to reevaluate contemporary methods for putting these cables under the river and the nearby boating assets. CTDOT's recent decision to abandon horizontal drilling in favor of micro-tunneling under the river for relocation of the Walk Bridge's high-voltage and signaling cables prompts the question, is this also a better way to install Eversource's cables where they will be out of harm's way as well as being easily replaceable, serviceable, inspectable, and upgradeable for the foreseeable future?

When this project was planned, micro-tunneling was a relatively new method for undergrounding utilities. Today it is an accepted and widely-employed technology used for undergrounding utilities around the world. The City of Norwalk should be asking if it is possible that these cables could be micro-tunneled the entire .75 miles from East Norwalk, under Vet's Park, the Norwalk River, Eliabeth St., and Main St. to the NPD without excavation. That would be amazingly less disruptive to Norwalk..

Here's why I think this is important to Norwalk. The Norwalk Harbor represents approximately one third of the area of our City, yet water-dependent commerce in Norwalk has diminished, except, perhaps, for shell-fishing, in recent years. With the exception of the Norwalk Boat Club, the industries on the upper river approaching Wall Street, now are becoming incongruous with their neighborhoods. Norwalk has an opportunity to improve this situation with new activities and uses of this portion of the river.

With the reduction in marine services available in Stamford due to intense waterfront development, there is increasing demand for marine services in Norwalk. Norwalk's commercial waterfront, below the Walk Bridge, is underutilized with the disappearance of some non-water-dependent businesses and is well-positioned to pick up the marine business that Stamford has

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given up. With an increase in marine services, there will be demand for employees to perform the jobs associated with maintaining today's luxury recreational vessels which are becoming more technically complex. These are good jobs requiring a variety of technical skills.

The demand for places to dock vessels in Norwalk has increased and should continue that growth. Our David S. Dunavan Boating Center, which provides both ramp-launching facilities and transient docking is typically sold out on summer weekends. There are ongoing discussions about expanding this facility in order to accommodate more vessels visiting Norwalk and East Norwalk which comprise a growing waterside entertainment and dining district. The Community needs assurance that Eversource transmission cables, buried near the waterfront, will not impede waterfront economic development in SONO in the future.

There is an existing affidavit on file from Eversource's contracted Project Manager stating that, "Eversource's position is that to maintain reliable electric power and to ensure the safe operation of the transmission cables, any entity or person who is contemplating a project that could impact the safe operation of the cables, should discuss the design of the project with Eversource to confirm that the proposed project would not have any adverse impacts to the electric system facilities". And further, "In addition, Eversource's position is also that if a project would have or risk an adverse impact on Eversource's facilities, then Eversource and the project developer would work to identify necessary project modifications that would avoid such adverse impacts."

The question for the City of Norwalk becomes, "What will Eversource's position be once their Project Manager has completed the project and moved on?" These cables will be located beneath pilings and docks which are part of our existing public boat launch facility. Who will bear the increased project cost of oversight for working around or relocating these cables when the launch area requires modification? At what additional cost? Ultimately, any proposed change in use of the river in this area will be decided by Eversource.

There must be assurance that the proposed cable crossing will not be marked with giant billboards stating "DANGER – CABLE CROSSING" as they do in Bridgeport adjacent to a brand-new marina and restaurant.

Our community needs assurance that these cables will not require re-drilling and re-excavating when they require inspection, replacement, or service. How would one replace these cables which, apparently, are not enclosed in conduit, when repairs, changes, or upgrades are required?

I was pleased and I think it is significant to see that CTDOT has changed their Norwalk River Crossing to two 60" diameter micro-tunnels under the river. Essentially, these are concrete tunnels beneath the river. This approach allows visual inspection and upgrading of conductors with no future disturbance or disruption in the river.

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I hope we will find an alternative methodology for getting these cables across the river which is less-impactful on Norwalk's future development.

Who am I?

I am a 40-year resident of Norwalk, a past member and officer of Sprite Island Yacht Club, a current member, past board member, past officer and Commodore at The Shore and Country Club. My two sons attended Norwalk Public Schools prior to College and gainful employment. For full disclosure, I am currently Chairman of Norwalk's Harbor Management Commission, however I am not representing the Commission in this communication. I am also a lifelong boater (with a preference for sailing).

I completed my undergraduate studies at Dartmouth College and earned my graduate degree in Theatre Engineering at Yale University School of Drama. The bulk of my career has been spent in the design and construction of performing arts venues all over the world. My focus has been on the design of rigging, lighting, stage machinery and automation, audio and electrical systems.