

OCTOBER 14, 2025

Amesbury Conservation Commission  
Conservation Commission  
39 South Hunt Road  
Amesbury, MA 01913

**RE: Notice of Intent  
394 Transmission Line and B154/C155 King Street Tap Line  
Asset Condition Refurbishment Project  
Amesbury, Massachusetts  
New England Power Company**

Dear Members of the Amesbury Conservation Commission:

BSC Group, Inc. (BSC) is filing this Notice of Intent (NOI) on behalf of the New England Power Company (NEP) for maintenance and improvement activities associated with the Line 394 and B154/C155 King Street Tap Line Asset Condition Refurbishment (ACR) Project in Amesbury, Massachusetts (the Project). The Project will involve targeted structure replacements, installation of Optical Ground Wire (OPGW), and reconductoring of the B154 and C155 King Street Tap Lines. In order to support the work, NEP is proposing improvements to structure work pads and the existing access network, with access widening required in some locations and construction of temporary access in some locations. This NOI is being submitted in accordance with the Massachusetts Wetlands Protection Act (WPA) (*M.G.L. Ch.131, S.40*), its implementing regulations (*310 CMR 10.00*), and the Town of Amesbury Wetlands Bylaw and Regulations (*Chapter 460*).

Activities proposed as part of the Project in Amesbury include maintenance and improvement activities at 32 existing structures along the 394 line, 17 of which are located within jurisdictional Wetland Resource Areas or Buffer Zones. NEP is also proposing to maintain or improve structure work pads and the existing access network, with access widening and construction of temporary access in some locations. Work is proposed within Bordering Vegetated Wetlands (BVW), 100-ft Buffer Zone (BZ) to BVW and Inland Bank, Riverfront Area (RA), FEMA 100-Year Floodplain / Bordering Land Subject to Flooding (BLSF), and the locally regulated 100-ft BZ to BLSF.

Activities will include exempt utility maintenance<sup>1</sup> (structure replacements and overhead work), as well as ancillary activities subject to the Amesbury Conservation Commission's review (including access and work pad improvements/construction). The placement of temporary construction matting for access and work pads in BVW will also be necessary and will be permitted under an Individual Water Quality Certification (WQC) through the Massachusetts Department of Environmental Protection (MassDEP).

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<sup>1</sup> 310 CMR 10.02(2)(a)(2). Activities conducted to maintain, repair, or replace, but not substantially change or enlarge an existing lawfully located structure or facility used in the service of the public to provide electric...services...

This NOI serves as both notification of exempt utility maintenance activities (as described within the main narrative), and a request for an Order of Conditions (OOC) for non-exempt portions of the proposed work. NEP has designed the Project to meet all applicable General Performance Standards of the WPA and the Amesbury Wetlands Protection Bylaw through avoidance, minimization, and mitigation measures as described in further detail in the Project Narrative.

This Project also qualifies as a Limited Project in accordance with the WPA regulations (*310 CMR 10.53(3)(d)*), which allow for “*construction, reconstruction, operation and maintenance of... overhead public utilities...*” provided there are no alternatives, best available measures are used to minimize adverse effects during construction, and that vegetation and existing grades are restored. Best Management Practices (BMPs), including sediment and erosion controls, will be implemented during construction. NEP has performed an analysis of all possible alternatives, and the Project has been designed to avoid and minimize the potential for adverse impacts to wetland resource areas to the greatest extent practicable.

We respectfully request that this matter be heard at the next scheduled Conservation Commission hearing. A copy of this application has been sent to the Northeast Regional Office of the Department of Environmental Protection (NERO). Two (2) copies of this application have also been submitted to the Amesbury Conservation Department and a compiled digital copy of the application has been emailed the Conservation Commission at [freyr@amesburyma.gov](mailto:freyr@amesburyma.gov).

If you have any questions regarding the enclosed information, please contact me at 617-896-4584 or via email at [HRaddatz@bscgroup.com](mailto:HRaddatz@bscgroup.com) or Andrew Cole of NEP at 508-948-9376 or via email at [Andrew.Cole@nationalgrid.com](mailto:Andrew.Cole@nationalgrid.com). Thank you for your consideration in this matter.

Truly yours,



Hannah Raddatz  
BSC Group, Inc.

**Associate, Ecologist**

cc: Andrew Cole, NEP  
Timothy Sullivan, NEP  
DEP NERO

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|---------------------|---------------------------------------------------------|
| <b>WPA Form 3</b>   | Notice of Intent, NOI Fee Transmittal Form, Local Forms |
| <b>Attachment A</b> | Project Narrative                                       |
| <b>Attachment B</b> | USGS Locus Map, ER Map                                  |
| <b>Attachment C</b> | Representative Site Photographs                         |
| <b>Attachment D</b> | Certified List of Abutters, Copy of Abutters Notice     |
| <b>Attachment E</b> | National Grid's Best Management Practices (BMPs)        |
| <b>Attachment F</b> | Stormwater Report                                       |
| <b>Attachment G</b> | Wetland Replication Plan                                |