

NEW ENGLAND POWER COMPANY FY25 Pole Inspection Treatment (PIT) – WS1/WS2 Lines Request for Determination of Applicability

Worcester, MA Conservation Commission June 2024

Prepared for:
New England Power Electric Company
170 Data Drive
Waltham, MA 02451

BSC Project No. 89720.17





Engineers
Environmental Scientists
Software Developers
Landscape Architects
Planners
Surveyors

June 12, 2024

City of Worcester Conservation Commission 455 Main Street City Hall, Room 404 Worcester, MA 01608

Request for Determination of Applicability
PIT Maintenance Project – WS1/WS2 Transmission Line
Worcester, MA
New England Power Company (NEP)

Dear Members of the Worcester Conservation Commission:

BSC Group, Inc. (BSC) is filing this Request for Determination of Applicability (RDA) on behalf of the New England Power Company (NEP) for maintenance activities along the WS1/WS2 overhead electrical Transmission Line in Worcester, MA (the Project), located between 25 Havana Rd on the Leicester/Worcester City Line to Access on Heard Street where the ROW crosses the railroad. The purpose of this project is to protect and reinforce the wooden structures from weathering and structural degradation, allowing NEP to provide continuous, reliable delivery of electrical service to the region. Proposed maintenance activities are located within the 100-foot Buffer Zone to Bordering Vegetated Wetlands (BVW)/Inland Bank, Bordering Land Subject to Flooding (BLSF), 25-foot Riverfront Area (RFA) and locally regulated 100-foot Stormwater Protection Zone (SPZ). Please refer to the enclosed USGS Site Location Map and Environmental Resource Map for the Project location in Attachment B.

Specifically, NEP will be conducting Pole Inspection and Treatment (PIT) maintenance activities at thirty (30) structures, of which twelve (12) structures are located within the 100-foot Buffer Zone to BVW/ Inland Bank, 25-foot RFA, BLSF, and/or the locally regulated SPZ. Maintenance work at three (3) structures within the SPZ is considered exempt in accordance with the Worcester Wetlands Protection Ordinance (Section 3(a)) and is also considered exempt under the Massachusetts Wetlands Protection Act (MGL 131-40) and regulations 310 CMR 10.02 (2)(a)2. Eleven (11) structures do not meet the criteria for exemption under the Worcester Wetlands Protection Ordinance but do meet the criteria for exemption under the Massachusetts Wetlands Protection Act. Therefore, this RDA is being submitted under the Worcester Wetlands Protection Ordinance and associated Regulations for those nine (9) non-exempt structures.

Best management practices (BMPs) will be implemented to avoid any adverse impacts to resource areas. Disturbed areas will be restored to preexisting grades, contours, and surface conditions once the work is complete. Therefore, NEP is seeking a Negative Determination under the Worcester Wetlands Protection Ordinance and regulations to allow the work to proceed as described herein.

ENVIRONMENTAL RESOURCE AREAS

BSC Group performed a desktop analysis of environmental constraints using available Mass GIS data layers and other available mapping. BSC Group Wetland Scientists delineated wetlands along this Right-of-Way (ROW) in April and May 2024. Based on the desktop analysis and field surveys, maintenance activities are proposed within the 100-foot buffer zone to BVW/ Inland Bank, 25-foot RFA, BLSF, and/or the SPZ.

No other sensitive resource areas, including Certified and Potential Vernal Pools, Outstanding Resource Waters (ORW), Zone II Wellhead Protection Area, Natural Heritage, and Endangered Species Program (NHESP) Priority and Estimated Habitat, or Areas of Critical Environmental Concern (ACEC) were identified within proximity of the Project area.



PROPOSED WORK DESCRIPTION

NEP is proposing to perform PIT maintenance activities at nine (9) structures within jurisdictional resource areas along the WS1/WS2 Transmission Line in Worcester, MA. Crews will conduct maintenance work theg ROW spanning from 25 Havana Rd on the Leicester/Worcester City Line to Access on Heard Street where the ROW crosses the railroad.

Proposed activities include the inspection of the condition of each wood pole and the removal of any wood decay below the soil to a depth of 18 inches. To inspect these structures, crews will remove soil around the immediate base of the pole with hand tools. If decay is identified, NEP will remove the decayed segments using hand tools, and then treat the pole to preserve its integrity.

AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

NEP has established procedures that are to be followed by all employees and contractors accessing and performing construction and maintenance activities on transmission line rights-of-way (ROWs). These procedures, discussed in National Grid's *Environmental Guidance Document for ROW Access, Maintenance and Construction Best Management Practices* (EG-303NE), ensure that NEP's projects are completed in accordance with all applicable environmental laws and regulations as well as company policies and compliance objectives. Please refer to **Attachment D** for additional details on NEP's BMPs.

NEP will complete this maintenance Project using conventional overhead electric utility line construction and access techniques. Crews will access each structure along the ROW and may perform minor excavation at the base of each structure. Crews will employ the following BMPs to minimize wetland impacts:

Sediment Control

Soil excavated to conduct the inspection around the immediate base of the pole will be temporarily stored on filter fabric. Once the work is complete, the soil will be used to backfill the area. No soil will be staged overnight, as each structure is inspected and treated within a single visit. Additionally, sediment controls will be kept on hand in the event conditions warrant use of controls.

Access

Existing, historically utilized access roads within the ROW will be used to access the work areas. Disturbance to previously undisturbed areas is not anticipated. Structures located within wetlands will be accessed on foot to minimize impacts to resource areas. Within upland areas, access will be conducted via a pickup truck or UTV.

Restoration

Temporarily disturbed areas will be stabilized, and each site will be restored to pre-construction conditions to the extent practicable. All construction materials, vehicles, and non-biodegradable sediment controls will be removed from the site upon completion of work.

CONCLUSION

The proposed maintenance project is located along an existing ROW and the proposed activities will not result in changes to the existing infrastructure. Proposed ground disturbance required to perform the inspection and repair work is temporary in nature; NEP is not proposing permanent impacts to wetland resource areas. NEP will implement BMPs, as appropriate, to avoid impacts to resource areas. Crews will restore ground disturbance to meet existing conditions to the extent practicable following the completion of maintenance activities at each pole location. No change in ground surface conditions is proposed.

Since the Project is not expected to adversely impact resource areas, NEP is seeking a Negative Determination under the local ordinance and regulations from the Worcester Conservation Commission to allow the Project to proceed.

Enclosed, please find the electronic copy of the Request for Determination of Applicability and attachments. We respectfully request that this matter be heard at the next scheduled Conservation Commission hearing. The work may be scheduled to begin as soon as permissible.



If you have any questions regarding the enclosed information, please contact me at (617) 896-4454 or Kevin O'Brion of NEP at (781) 663-3137. Thank you for your consideration in this matter.

Sincerely,

BSC Group, Inc.

Hana Isihara Project Manager

cc: Kevin O'Brion, NEP

Hema L dahare

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ATTACHMENT C SITE PHOTOGRAPHS

ATTACHMENT D NATIONAL GRID'S BEST MANAGEMENT PRACTICES



Attachment A

FY25 PIT – WS1/WS2 Line Project Worcester, Massachusetts Request for Determination of Applicability

WPA FORM 1





Massachusetts Department of Environmental Protection Bureau of Water Resources - Wetlands

WPA Form 1- Request for Determination of Applicability Worcester

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Municipality

Important:

When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.





A.	General Information		
1.	Applicant:		
	New England Power Company		
	First Name	Last Name	
	170 Data Drive		
	Address		
	Waltham	MA	02451
	City/Town	State	Zip Code
	781-663-3137	kevin.obrion@nationalgrid.com	
	Phone Number	Email Address	
2.	Property Owner (if different from Applicant):		
	NEP has easement rights		
	First Name	Last Name	
	Address		
	City/Town	State	Zip Code
	Phone Number	Email Address (if k	known)
3.	Representative (if any)	·	
	Hana	Isihara	
	First Name	Last Name	
	BSC Group, Inc.	2001.100	
	Company Name		
	One Mercantile		
	Address		
	Worcester	MA	01608
	City/Town	State	Zip Code
	617-896-4454	hisihara@bscgroup.com	
	Phone Number	Email Address (if k	known)
B. 1.	Project Descriptiona. Project Location (use maps and plans to identify	the location of the a	area subject to this request):
	Multiple, see mapping	Worcester	
	Street Address	City/Town	
		-,	
	Latitude (Decimal Degrees Format with 5 digits after decimal	Longitude (Decima	al Degrees Format with 5 digits after
	e.g. XX.XXXXX)	decimal e.gXX.X	XXXX)
	Assessors' Map Number	Assessors' Lot/Pa	rcel Number
	b. Area Description (use additional paper, if necessary):		
	D. Area Description (use additional paper, if necessary). NEP is proposing to conduct Pole Inspection and Treatment (PIT) maintenance activities at 5 structures along the WS1/WS2 Transmission Line ROW located in Worcester, MA.		
	c. Plan and/or Map Reference(s): (use additional p Environmental Resources Map	aper ii necessary)	6/12/24
	Title		
	USGS Site Locus Map		6/12/24
	Title		Date

How to find Latitude and Longitude

and how to convert to decimal degrees



Massachusetts Department of Environmental Protection

Bureau of Water Resources - Wetlands

WPA Form 1- Request for Determination of Applicability Worcester

Municipality

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

В. **Project Description (cont.)**

2. a. Activity/Work Description (use additional paper and/or provide plan(s) of Activity, if necessary):

NEP is proposing to conduct PIT maintenance activities at 11 structures within BVW, 100-foot Buffer Zone to BVW/ Inland Bank, and/or 25-foot RFA along the WS1/WS2 Transmission Lines in Worcester, MA. Specifically the proposed work includes the inspection of the condition of each wood pole and the removal of any wood decay below the soil to a depth of 18 inches. Soil is removed around the immediate base of the pole with hand tools. If decay is identified, it is removed using hand tools, and the pole is treated to preserve its integrity.

b. Identify provisions of the Wetlands Protection Act or regulations which may exempt the applicant from having to file a Notice of Intent for all or part of the described work (use additional paper, if necessarv). 10.02 (2)(a)2 3. a. If this application is a Request for Determination of Scope of Alternatives for work in the Riverfront Area, indicate the one classification below that best describes the project. ☐ Single family house on a lot recorded on or before 8/1/96 ☐ Single family house on a lot recorded after 8/1/96 Expansion of an existing structure on a lot recorded after 8/1/96 Project, other than a single-family house or public project, where the applicant owned the lot before 8/7/96 New agriculture or aquaculture project Public project where funds were appropriated prior to 8/7/96 Project on a lot shown on an approved, definitive subdivision plan where there is a recorded deed restriction limiting total alteration of the Riverfront Area for the entire subdivision Residential subdivision; institutional, industrial, or commercial project Municipal project District, county, state, or federal government project Project required to evaluate off-site alternatives in more than one municipality in an Environmental Impact Report under MEPA or in an alternatives analysis pursuant to an application for a 404 permit from the U.S. Army Corps of Engineers or 401 Water Quality Certification from the Department of Environmental Protection.

b. Provide evidence (e.g., record of date subdivision lot was recorded) supporting the classification above (use additional paper and/or attach appropriate documents, if necessary.)



Massachusetts Department of Environmental ProtectionBureau of Water Resources - Wetlands

WPA Form 1- Request for Determination of Applicability Worcester Massachusetts Wetlands Protection Act M.G.L. c. 131, §40 Worcester

C.		Determinations	
1.	l re	equest the Worcester Conservation Commission	make the following determination(s). Check any that apply:
 a. whether the area depicted on plan(s) and/or map(s) referenced above is an area subjurisdiction of the Wetlands Protection Act. 			
		b. whether the boundaries of resource above are accurately delineated.	e area(s) depicted on plan(s) and/or map(s) referenced
 c. whether the Activities depicted on plan(s) referenced above is subject to the Wetlands Protection Act and its regulations. d. whether the area and/or Activities depicted on plan(s) referenced above is subject to the jurisdiction of any municipal wetlands' ordinance or bylaw of: 			plan(s) referenced above is subject to the Wetlands
		Worcester	
		Name of Municipality	
 e. whether the following scope of alternatives is adequate for Activities in the depicted on referenced plan(s). 			ernatives is adequate for Activities in the Riverfront Area as
D.		Signatures and Submitta	l Requirements
and	laco		that the foregoing Request for Determination of Applicability opporting data are true and complete to the best of my
Offi	ce v		rent from the applicant, and the appropriate DEP Regional lest (including all appropriate documentation) est to the Conservation Commission.
		by the applicant to send copies in a tin ination of Applicability.	nely manner may result in dismissal of the Request for
Sig	natu	ures:	
			est will be placed in a local newspaper at my expense ne Wetlands Protection Act regulations.
	/	mag	6/12/24
	- Uigi	iacai o oi , ippii cant	Date
	He	Ma L Owhere	6/12/24
	Sigr	nature of Representative (if any)	Date

Attachment B

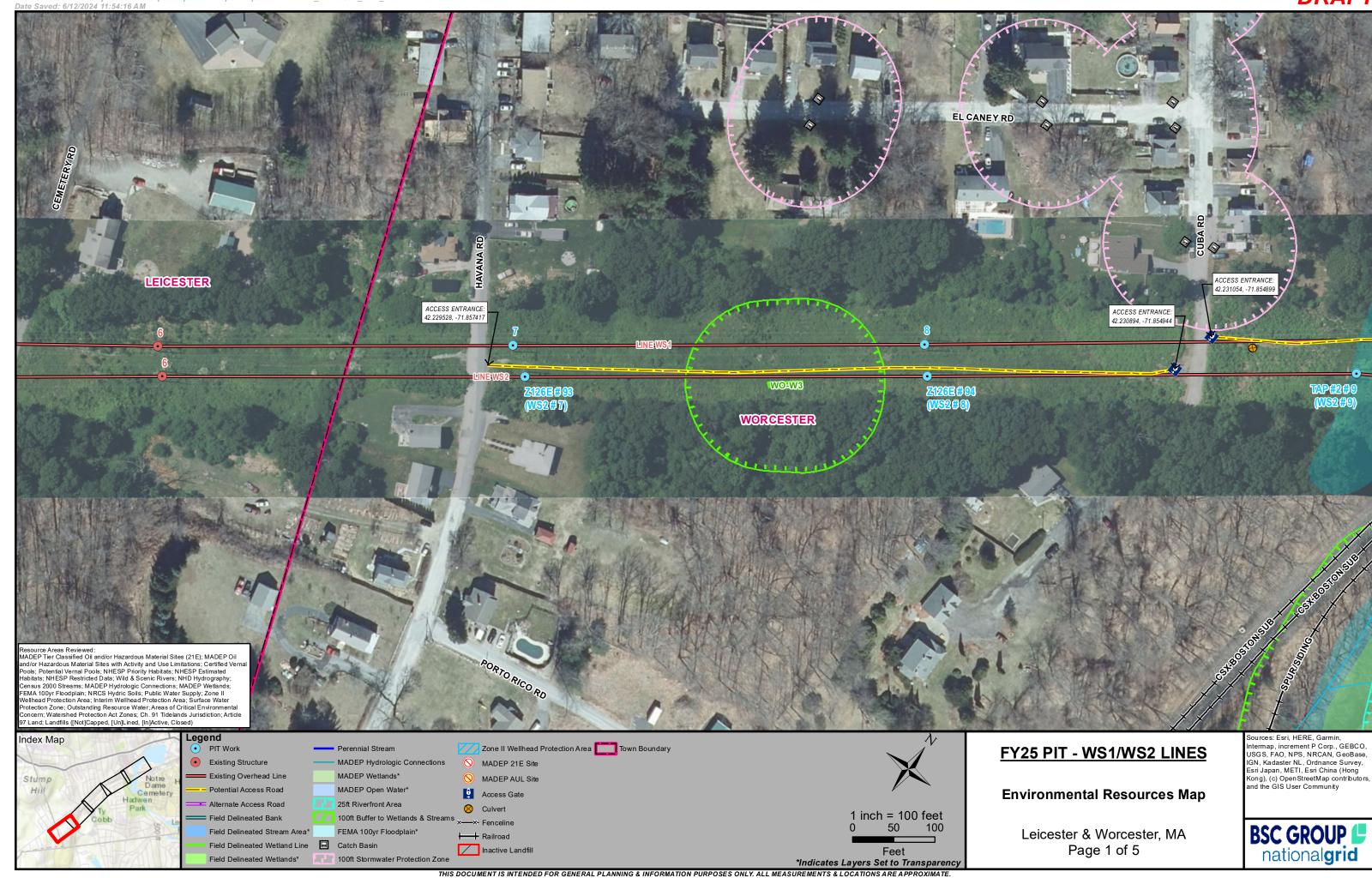
FY25 PIT – WS1/WS2 Line Project Worcester, Massachusetts Request for Determination of Applicability

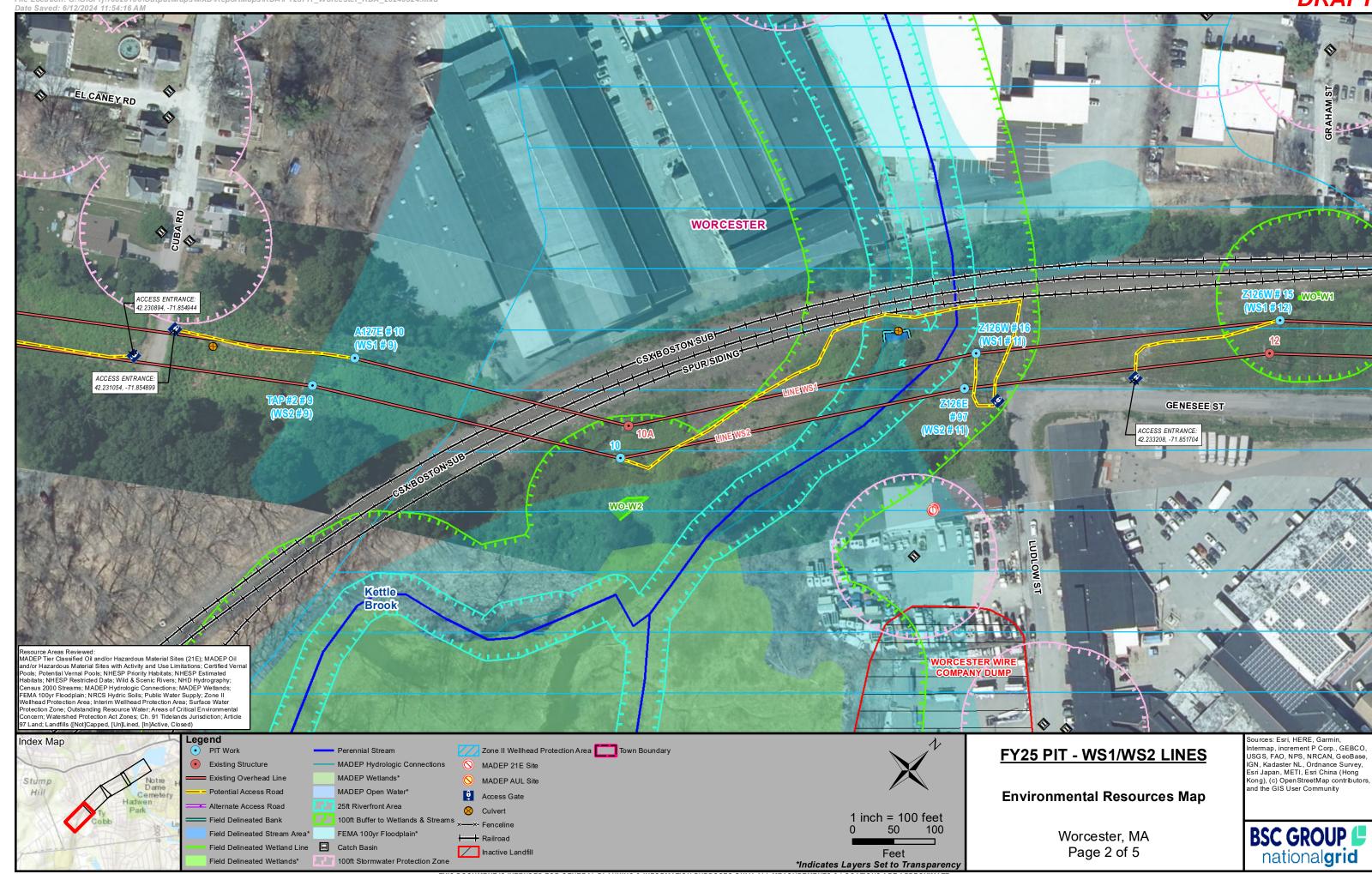
SITE LOCUS MAP ENVIRONMENTAL RESOURCES MAP

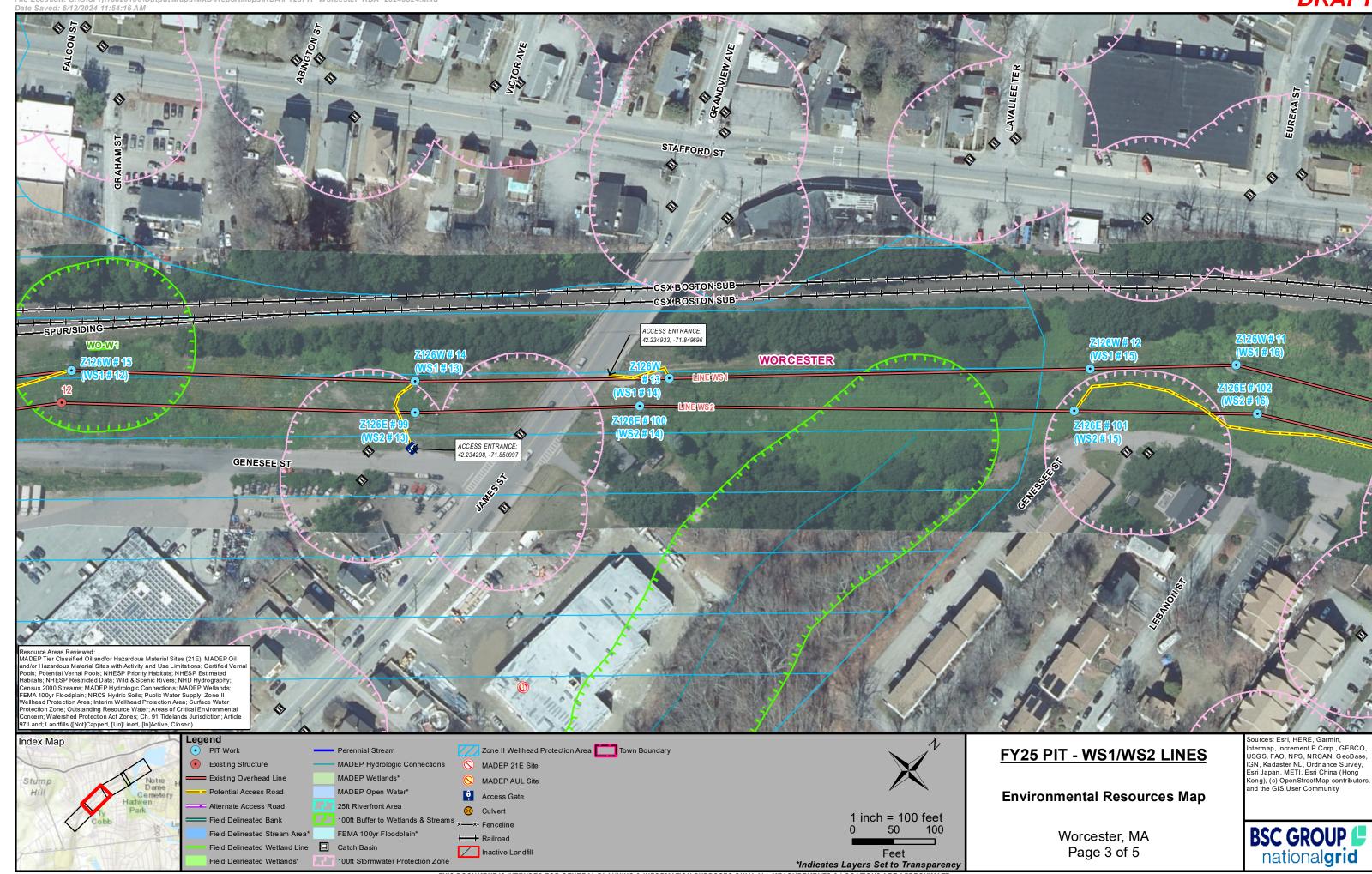


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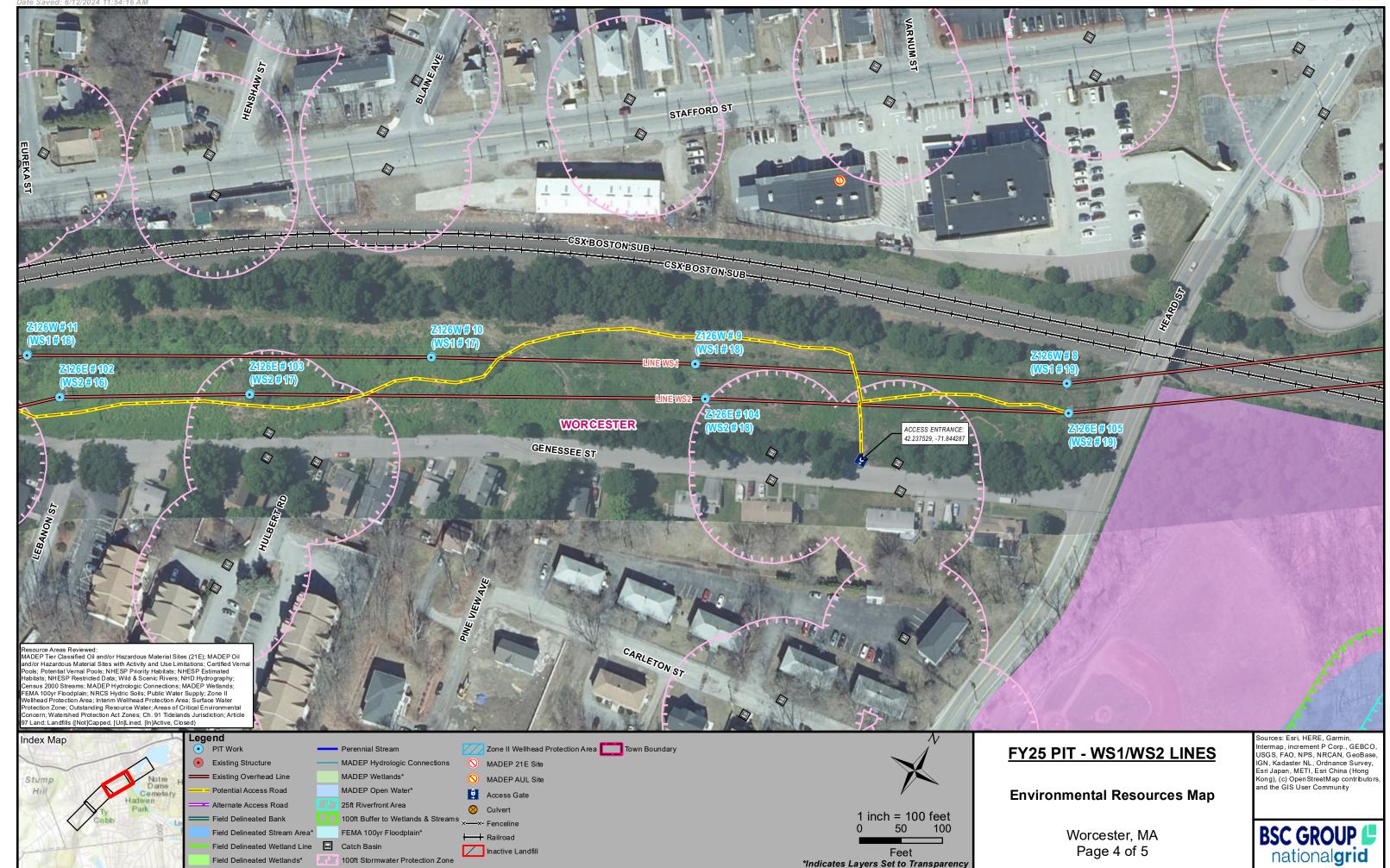


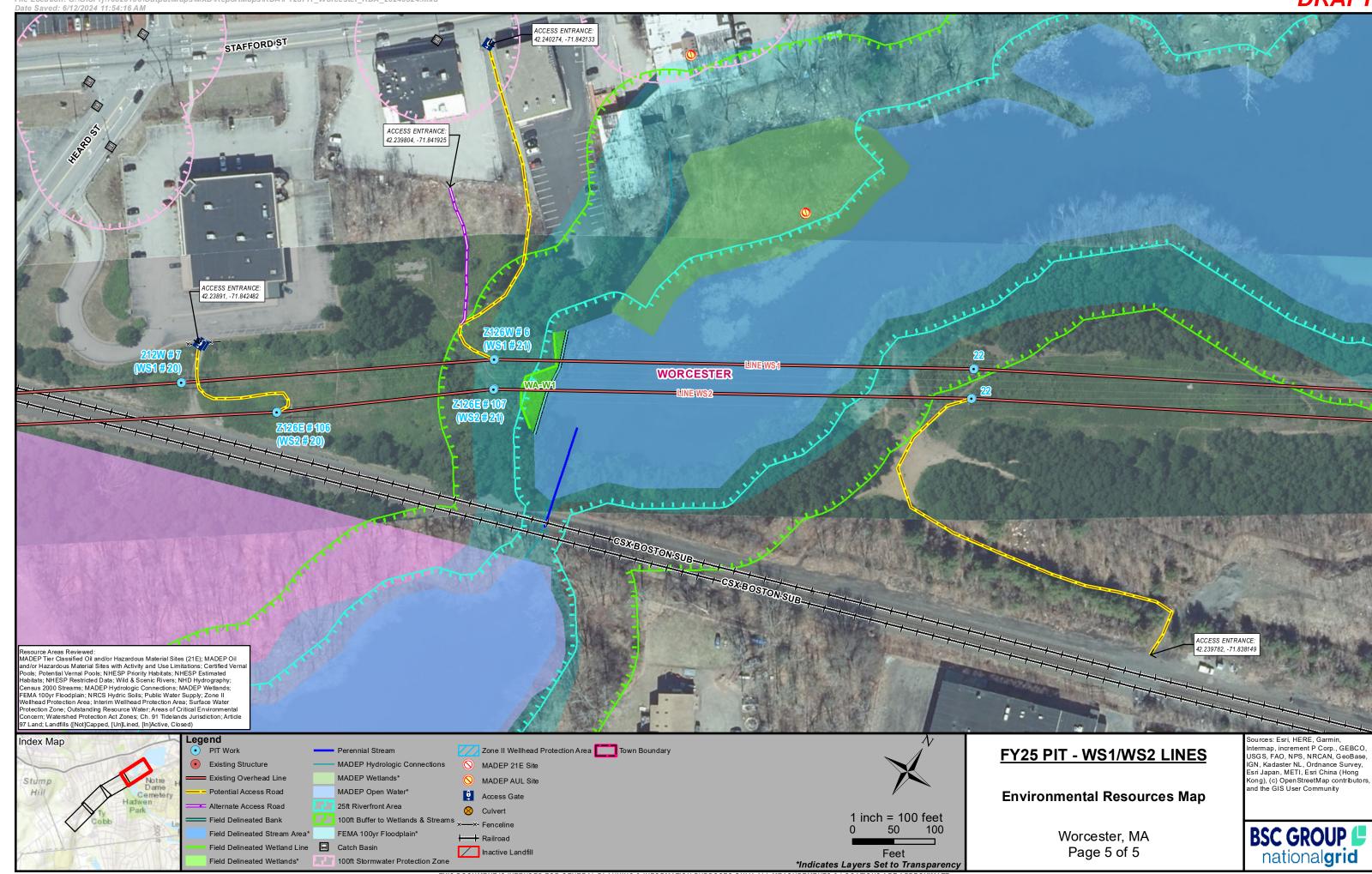












Attachment C

FY25 PIT – WS1/WS2 Line Project Worcester, Massachusetts Request for Determination of Applicability

SITE PHOTOGRAPHS





BSC GROUP

WORCESTER Site Photographs Request for Determination of Applicability Photos Taken May 2024



Photo #1: View of Pole 9 (A127E #10) on the WS1 Line, located within the Bordering Lands Subject to Flooding (BLSF). Facing East



Photo #2: View of Pole 11 (Z126W #16) on the WS1 Line located within the 100-ft Buffer Zone to Bordering Vegetated Wetlands (BVW). Facing south.





Photo #3: View of Pole 12 (Z126W #15) on the WS1 Line, located within the 100-ft Buffer Zone to BVW. Facing North



Photo #4: View of Pole 21 (Z126W #6) on the WS1 Line located within the 100-ft Buffer Zone to BVW and BLSF. *Facing northwest*.

Request for Determination of Applicability





Photo #5: View of Pole 22 on the WS1 Line, located within the 100-ft Buffer Zone to BVW. Facing North



Photo #6: Pole 9 (Tap 2 #9) on the WS2 Line, located within BLSF. Facing northeast





Photo #7: Pole 10 on the WS2 Line, located within 100-ft Buffer Zone to BVW. Facing east.



Photo #8: View of Pole 11 (Z126E #97) on the WS2 Line located within the 100-ft Buffer Zone to BVW. Facing west.



FY25 PIT PROJECT

WORCESTER Site Photographs Request for Determination of Applicability Photos Taken May 2024



Photo #9: View of Pole 21 (Z126E #107) on the WS2 Line, located within the 100-ft Buffer Zone to BVW and BLSF. *Facing southeast*.

Attachment D

FY25 PIT – WS1/WS2 Line Project Worcester, Massachusetts Request for Determination of Applicability

NATIONAL GRID'S BEST MANAGEMENT PRACTICES

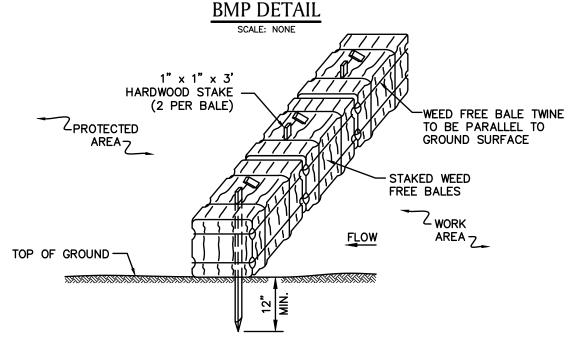


ENVIRONMENTAL GUIDANCE

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Date	02/20/18

SUBJECT

Access, Maintenance and Construction Best Management Practices Reference EP No. 3 - Natural Resource Protection (Chapter 6)



NOTES:

1. THE GROUND SHALL BE PREPARED TO PROVIDE COMPLETE CONTACT WITH THE BALES.

BMP PICTURE



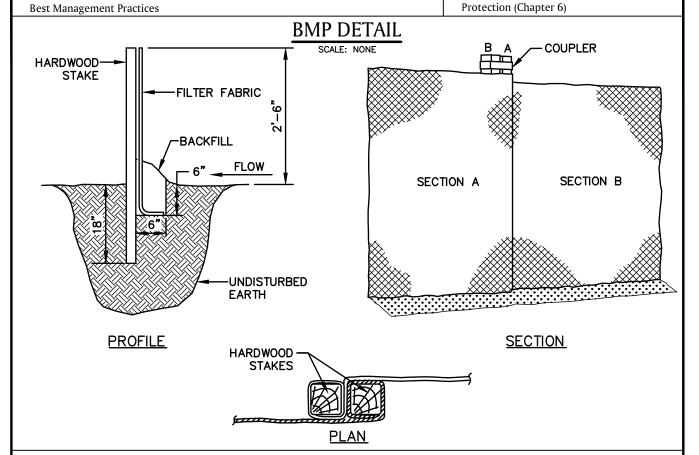
ENVIRONMENTAL GUIDANCE

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SUBJECT

Access, Maintenance and Construction **Best Management Practices**

Reference EP No. 3 - Natural Resource



BMP PICTURE



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SEC-2
SEDIMENT CONTROL FENCE

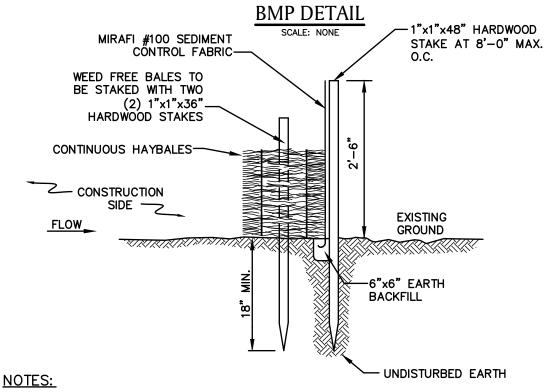
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SUBJECT

Access, Maintenance and Construction **Best Management Practices**

Reference EP No. 3 - Natural Resource Protection (Chapter 6)



- BALES SHALL BE PLACED IN A ROW WITH THE ENDS TIGHTLY ABUTTING THE ADJACENT BALES.
- BALES SHALL BE SECURELY ANCHORED IN PLACE BY TWO (2) 1"X1"X36" HARDWOOD STAKES 2. DRIVEN THROUGH THE BALES. THE FIRST STAKE IN EACH BALE SHALL BE ANGLED TOWARD PREVIOUSLY LAID BALE TO FORCE BALES TOGETHER.
- INSPECTION SHALL BE FREQUENT AND REPAIR OR REPLACEMENT SHALL BE MADE PROMPTLY 3. AS NEEDED.
- BALES SHALL BE REMOVED AND REPLACED WHEN THEY BECOME FILLED WITH SEDIMENT AND BLOCK OR IMPEDE STORM FLOW OR DRAINAGE.
- BALES SHALL BE REMOVED WHEN THE EMBANKMENTS STABILIZE. BALES TO BE TWINE BOUND. 5.

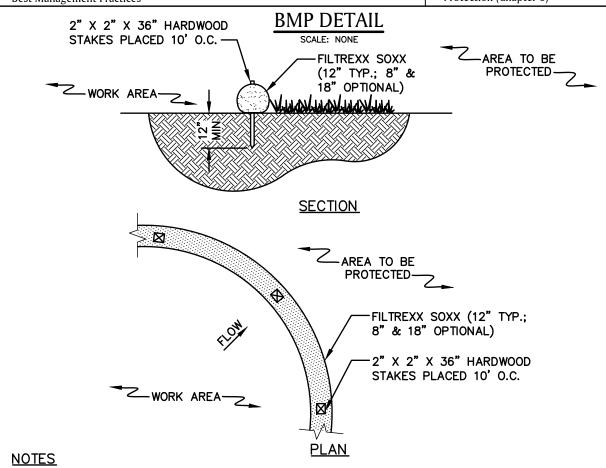
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SEC-3 SILT FENCE / WEED FREE BARRIER

Doc. No. EG-303NE nationalgrid Page: 7-4 Rev. No. 4 **ENVIRONMENTAL GUIDANCE** 02/20/18 Date SUBJECT Reference EP No. 3 - Natural Resource Access, Maintenance and Construction Protection (Chapter 6) **Best Management Practices**



- 1. PRODUCT TO BE FILTREXX SILT SOXX OR APPROVED EQUAL BY NATIONAL GRID ENVIRONMENTAL SCIENTIST.
- ALL MATERIAL TO MEET FILTREXX SPECIFICATIONS. FILTER MEDIA FILL TO MEET APPLICATION REQUIREMENTS.
- 4. MESH CONTAINMENT MATERIAL SHOULD BE KNITTED PHOTODEGRADABLE OR BIODEGRADABLE MATERIAL, WITH OPENING SIZES BETWEEN 1/8" - 3/8".
- 5. COMPOST MEDIA SHOULD HAVE PARTICLE SIZE WHERE 99% < 2", 50% > 1/2".
 6. COMPOST MATERIAL TO BE DISPERSED ON SITE, AS DETERMINED BY NATIONAL GRID ENVIRONMENTAL SCIENTIST.





* PICTURE AND DETAIL PROVIDED BY FILTREXX LAND IMPROVEMENT SYSTEMS

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SEC-4 SILT SOXX *

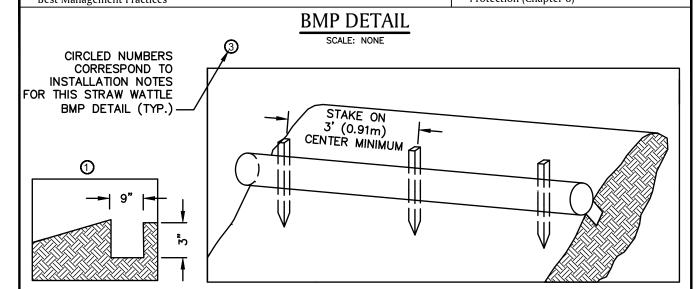
ENVIRONMENTAL GUIDANCE

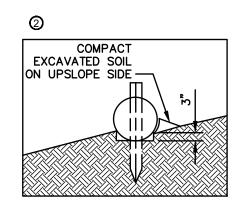
Doc. No.	EG-303NE
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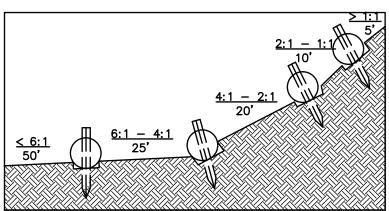
SUBJECT

Access, Maintenance and Construction **Best Management Practices**

Reference EP No. 3 - Natural Resource Protection (Chapter 6)







TYPICAL WATTLE SPACING DETAIL

NOTES:

- PRODUCT TO BE TENSAR NORTH AMERICAN GREEN STRAW WATTLE OR APPROVED EQUAL BY NATIONAL GRID ENVIRONMENTAL SCIENTIST.
- TYPICAL WATTLE SPACING BASED ON SLOPE GRADIENT. COORDINATE SPACING AND LOCATION WITH NATIONAL GRID ENVIRONMENTAL SCIENTIST.
- MINIMUM 12" DIAMETER WATTLES SHOULD BE USED FOR HIGHLY DISTURBED AREAS (I.E., HEAVILY USED ACCESS ROAD WITH ADJACENT WETLAND) AND MINIMUM 9-10" WATTLES SHOULD BE USED FOR LESS DISTURBED SOILS.

INSTALLATION NOTES:

- BEGIN AT THE LOCATION WHERE THE WATTLE IS TO BE INSTALLED BY EXCAVATING A 2-3" DEEP X 9" WIDE TRENCH ALONG THE CONTOUR OF THE SLOPE. EXCAVATED SOIL SHOULD BE PLACED UPSLOPE FROM THE ANCHOR TRENCH.
- PLACE THE WATTLE IN THE TRENCH SO THAT IT CONTOURS TO THE SOIL SURFACE. COMPACT SOIL FROM THE EXCAVATED TRENCH AGAINST THE WATTLE ON THE UPHILL SIDE. ADJACENT WATTLES SHOULD TIGHTLY ABUT.
- 3. SECURE THE WATTLE WITH 18-24" HARDWOOD STAKES EVERY 3-4' AND WITH A STAKE ON EACH END. STAKES SHOULD BE DRIVEN THROUGH THE MIDDLE OF THE WATTLE LEAVING AT LEAST 2-3" OF STAKE EXTENDING ABOVE THE WATTLE. STAKES SHOULD BE DRIVEN PERPENDICULAR TO THE SLOPE FACE.

* DETAIL AND PICTURE PROVIDED BY TENSAR NORTH AMERICAN GREEN

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SEC-5 STRAW WATTLE * (1 OF 2)

ENVIRONMENTAL GUIDANCE

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Access, Maintenance and Construction Best Management Practices Reference EP No. 3 - Natural Resource Protection (Chapter 6)

BMP PICTURE



STRAW WATTLE - SHALLOW SLOPE (≤4:1) (ALTERNATE STAKING)

ALTERNATE STAKING INSTALLATION NOTES:

- 1. ON SHALLOW SLOPES (≤4:1), STRAW WATTLE MAY BE SECURED WITH 18-24" HARDWOOD STAKES DRIVEN AGAINST THE SIDES OF THE WATTLE INSTEAD OF THROUGH. STAKES SHALL ALTERNATE SIDES. AND BE SPACED 3-4' MAX.
- SIDES, AND BE SPACED 3-4' MAX.

 2. TWINE SHALL BE TIED FROM STAKE TO STAKE, CRISS-CROSSING THE STRAW WATTLE. TIE TWINE TO STAKES BELOW THE HEIGHT OF THE WATTLE.

* DETAIL AND PICTURE PROVIDED BY TENSAR NORTH AMERICAN GREEN APPROVED BY: VICE PRESIDENT, ENVIRONMENTAL SERVICES
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SEC-5 STRAW WATTLE * (2 OF 2)