

May 22, 2026

VIA EMAIL

Town of Manheim
6356 State Rte. 167
PO Box 32
Dolgeville, NY 13329
Attn: Kenneth L. Ayers, Town Attorney

Re: *National Grid Transmission Line Rebuild
Inghams to St. Johnsville Transmission Line- Structure 440
Tax Map No.: 115.2-1-70*

Dear Mr. Ayers:

As you are aware, Niagara Mohawk Power Corporation d/b/a National Grid (“National Grid”) is upgrading the Inghams - St. Johnsville 115 kilovolt (“kV”) #6 Transmission Line (“Inghams Line”). The Inghams Line is a rebuild of the 115 kV overhead electric transmission line that will run from the existing Inghams Substation, located north of County Route 108 in the Town of Manheim (the “Town”) to the existing St. Johnsville Substation located south of State Route 5 at 44 Hough Street in the Village of St. Johnsville, for a distance of approximately 7.3 miles (the “Project”). See Attachment 1-Transmission Line Map & Erosion Control and Environmental Resource Map.

The Inghams Line traverses 0.12 miles in the Town of Manheim. The Project involves only one (1) existing transmission line structure (Structure 440) in the Town, located at 118 Inghams Mills Road (Tax Map No. 115.2-1-70), which is to be replaced. The structure is located within the Town’s Industrial Zoning District. See Attachment 2- Zoning Map of Town of Manheim and Attachment 1- Erosion Control and Environmental Resource Map.

Based on our recent discussions, Structure 440 would not trigger site plan review before the Town’s Planning Board, because the structure is not subject to a building permit, and accordingly is not subject to review by the Town’s Code and Zoning Enforcement Officer.

Public utility electric structures-including transmission line structures such as Structure 440- are regulated by the National Electric Safety Code and are not regulated by the 2025 New York State Uniform Fire Prevention and Building Code (the “Uniform Code”).

Chapter 1 (§101.2) of the 2025 NYS Fire Code provides that structures, such as radio and television transmission, communication and wind generation towers, and ground-mounted photovoltaic arrays that are neither a building appurtenance nor are attached to a building shall not be subject to this code. Further, Chapter 12 (§1201.1) of the 2025 NYS Fire Code which discusses energy systems, provides for the exemption for any equipment associated with the transmission or distribution of energy installation that is under the exclusive control of an electric utility.

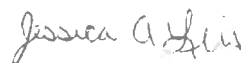
Chapter 1 (§101.2) of the 2025 NYS Building Code similarly provides that structures, such as radio and television transmission, communication and wind generation towers, and ground-mounted photovoltaic arrays that are neither a building appurtenance nor are attached to a building are subject to the code. Though transmission line structures are not specifically stated, the intent behind the Uniform Code is to only regulate tower structures when they are built in connection with an occupiable building or structure. This is supported by New York Executive Law §378(1), which provides that “[t]he uniform code shall address the following subjects: Standards for the construction of all buildings or classes of buildings, or the installation of equipment therein, including standards for materials to be used in connection therewith, and standards for safety and sanitary conditions. New York Executive Law §372.3 defines a “building” as “a combination of any materials, whether portable or fixed, having a roof, to form a structure affording shelter for persons, animals or property.” As such, transmission line structures that are not built as a building appurtenance or attached to a building do not fall under the regulations of the Uniform Code.

As additional support, please see the attached letter from the New York State Office of General Services (“NYS OGS”), dated March 14, 2002, which provides that electric substation equipment falls outside of the scope of the Uniform Code and does not require a construction permit. *See* Attachment 3. The letter cites outdated regulations; the current relevant sections are 19 NYCRR §1204.3 & 19 NYCRR §1201.2(d) (as LIPA is a government entity), and the appropriate regulation for the Town to reference would be 19 NYCRR §1201.1, which provides that towns administer the Uniform Code.

Accordingly, based on the above, I would respectfully submit that Structure 440 does not fall within the realm of the Uniform Code, and accordingly would not trigger review by the Code and Zoning Enforcement Officer, thereby not triggering site plan review.

Thank you for your time in considering this matter. If you have any questions or concerns, please do not hesitate to contact me by phone or email.

Regards,



Jessica A. Leis

Enclosures

cc: Bond, Schoeneck & King, PLLC

Herkimer County, NY

Property



Property Address: 118 Inghams Mills Rd
Municipality: Town of Manheim
Tax ID: 115.2-1-70

Summary

SWMIS	213689
Status	Re-Activated
Roll Section	Utility
Property Class	874 - Elec-hydro
Ownership Code	No
In Ag District	AG60
Zoning	1001 commercial vill
Neighborhood	O-E-SU Cent
School District	Location # 911020 874 Hydro Land 118 Powerhouse Rd-Inghams
Property Description	1.94
Total Acreage/Size	867
Deed Book	347
Deed Page	420467
Grid East	1540494
Grid North	

[View Map](#)

Owners

Erle Boulevard Power LP
 Damon Barclay,LLP
 125 East Jefferson St
 Syracuse, NY 13202

Valuation

Assessed Year	2026	2025
Equalization Rate	Tentative 47.00%	50.00%
Land Assessment	\$11,500	\$11,500
Total Assessment	\$761,500	\$761,500
Full Market Value	\$1,620,213	\$1,523,000

Special Districts

Year	Description	Type	Units	Percent	Value
2026 Tentative	FD155 - E Canada Creek FD		0	0%	\$0
2025	FD155 - E Canada Creek FD		0	0%	\$0

Land

Site	Land Type	Size
Com 1	Primary	1.94 acres

Historic Deed

Book/Page: 867 / 347
 Prior Printkey: NEW YELLOW BLD 92i

Inventory

Site: Com 1
 Overall EFF Year Built: Overall Grade
 Overall Condition: Overall Desirability Superior

Utilities

Site: Com 1
 Sewer Type: Private
 Water Supply: Private
 Utilities: Electric

Historical Tax Summary

Tax Year	Tax Type	Original Bill	Total Assessed Value	Full Market Value	Uniform %	Roll Section
2024	County	\$9,996.35	\$761,500.00	\$1,359,821.00	56.00%	6
2023	County	\$10,326.55	\$761,500.00	\$1,248,361.00	61.00%	6
2018	County	\$10,491.36	\$761,500.00	\$1,087,857.00	70.00%	6
2016	County	\$9,299.19	\$761,500.00	\$1,119,853.00	68.00%	6
2015	County	\$9,093.66	\$761,500.00	\$1,087,857.00	70.00%	6

Taxes reflect exemptions, but may not include recent changes in assessment.

Taxable Values

Tax Year	2026 Tentative	2025
County Taxable	\$761,500	\$761,500
County Taxable Exemptions	\$0	\$0
Municipality Taxable	\$761,500	\$761,500
Municipality Taxable Exemptions	\$0	\$0
Village Taxable		
Village Taxable Exemptions	\$761,500	\$761,500
School Taxable		
School Taxable Exemptions	\$0	\$0

GIS Map



