



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

State of New Hampshire, Department of Cultural Resources
19 Pillsbury Street, Concord, NH 03301-3570
TDD Access: Relay NH 1-800-735-2964
www.nh.gov/nhdhr

603-271-3483
603-271-3558
FAX 603-271-3433
preservation@dcr.nh.gov

October 28, 2010

Erika Mark
Project Manager
US Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742

Re: Groton Wind Farm Project, Grafton County, NH
RPR #1422

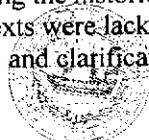
Dear Ms. Mark:

The New Hampshire Division of Historical Resources (DHR) has been consulting directly with the Project Applicant (Iberdrola Renewables) and its Cultural Resources Consultant (The Louis Berger Group) in the identification phase of the Section 106 process. An End-of-Field letter for the Phase IB Archaeological Survey was submitted and has been approved by DHR staff. A Project Area Form was submitted in July, 2010 and was reviewed by the DHR Determination of Eligibility Committee which requested substantive revisions. Revised text in support of the Project Area Form was submitted on October 21, 2010. I am writing to advise you of the problematic resubmission and to request your assistance in the resolution of the identification phase of the project.

As you know, the DHR worked closely with USACE and the Applicant to develop an appropriate scope of work for the above-ground resources early in the project planning phase. A meeting on March 16, 2010 with USACE, Iberdrola Renewables, The Louis Berger Group, and DHR staff outlined the Project Area Form process in detail. At that time an appropriate Area of Potential Effects (APE) was agreed upon by all parties to include a 3-mile radius with visible areas in leaf-on conditions. The Project Area Form is a planning document that is meant to provide a historic context that develops historical themes in the APE and outlines expected resource types and appropriate survey methodology to evaluate these resources. Specifically, a windshield survey was not required, as the Project Area Form is an overview that recommends additional survey based on well-researched contexts and themes documented through primary and secondary source documents.

The July 2010 submission of the Project Area Form failed to provide the documentation necessary to make informed decisions on the next phase in the identification process. More specifically, the form was deficient in the following manner:

1. The Project Area Form did not meet NHDHR guidelines, published at www.nh.gov/nhdhr and instead was a reconnaissance survey which was not required.
2. An overview of the region focused on individual towns rather than the Baker River Valley, which appears to have developed cohesively with agriculture, transportation, and recreation as its key developmental themes. These themes were not developed in the text and expected resource types were not identified.
3. Primary sources (such as US census information) were not used to provide an understanding of the economic drivers in the region during the historic period.
4. Agricultural and architectural contexts were lacking in the submission.
5. Mapping was not easily understood and clarification of the numbering system was requested.



The DHR Determination of Eligibility Committee requested a resubmission of the Project Area Form to address these deficiencies.

Soon after the July 2010 review of the Project Area Form, the DHR suggested a site visit would be an opportunity to discuss issues out in the field and work with the Lead Federal Agency, the Applicant, and its Consultant to come up with an appropriate survey methodology to move the project review forward. In addition, Elizabeth Muzzey, State Historic Preservation Officer, left a message with senior staff at The Louis Berger Group in August 2010 to discuss concerns with the project. No follow-up response about the proposed site visit has been received from USACE, the Applicant, or its Consultant.

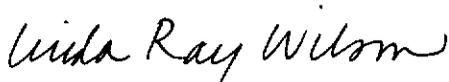
Iberdrola Renewables contacted DHR on September 15, 2010 to clarify what was needed to resubmit the Project Area Form. Iberdrola Renewables requested that DHR review the resubmitted text alone (without updated photographs and mapping) to confirm that it met published DHR standards. DHR agreed to this request as well as a request for a late submission. The resubmission was received on October 21, 2010. DHR staff compared the original submission to the revised text, and found minimal revisions to the new document. The DHR Determination of Eligibility Committee reviewed the text at its October 27, 2010 meeting and determined that it still does not meet the Project Area Form guidance provided by DHR and fails to provide cultural resources information in a substantive way that meets standards for identification of historic properties as promulgated by the National Park Service.

In reviewing the above-ground submissions for the project, DHR staff has spent a disproportionate amount of time compared to even the largest projects in the state. The recommendations for future study outlined in the Project Area Form lack solid historic or architectural context and are not substantiated. The DHR is returning the Project Area Form to the Applicant as a non-reviewable work product.

Knowing that the Groton Wind Farm project is important to the development of renewable energies in the state, the DHR is seeking ways to continue project review in order to move the project forward at both the state and federal levels. We are requesting the assistance of the USACE to discuss an appropriate resolution to the outstanding survey needs for this project. If resources have not been appropriately identified during this phase of the project, assessment of adverse effects can not be conducted in a manner consistent with 36 C.F.R. Part 800.5(a)(1).

Please contact Nadine Peterson, Preservation Planner, at 603-271-6628 to resolve this critical issue.

Sincerely,



Linda Ray Wilson
Deputy State Historic Preservation Officer

Cc: Iberdrola Renewables, Inc.
The Louis Berger Group, Inc.
New Hampshire Site Evaluation Committee