

THE STATE OF NEW HAMPSHIRE

BEFORE THE

SITE EVALUATION COMMITTEE

DOCKET NO. 2012-01

**APPLICATION OF ANTRIM WIND ENERGY, LLC
FOR A CERTIFICATE OF SITE AND FACILITY**

**FIRST SUPPLEMENTAL PREFILED TESTIMONY OF
RICHARD WILL AND RUSSELL STEVENSON**

ON BEHALF OF

ANTRIM WIND ENERGY, LLC

October 11, 2012

1 **Background and Qualifications of Richard Will**

2 **Q. Please state your name and business address.**

3 A. My name is Richard Will and my business address is 71 Oak Street, Ellworth,
4 Maine 04605.

5 **Q. Please identify your current employer and position, as well as your
6 qualifications.**

7 A. My current employer is TRC Companies and I hold the position of Manager,
8 Northeast Cultural Division. My qualifications have not changed from those presented in
9 my prefiled direct testimony filed January 31, 2012 in this docket.

10 **Background and Qualifications of Russell Stevenson**

11 **Q. Please state your name and business address.**

1 A. My name is Russell Stevenson, My business address is 375 East Elm Street,
2 Conshohocken, Pennsylvania 19428.

3 **Q. Please identify your current employer and position, as well as your**
4 **qualifications.**

5 A. I am employed by A.D. Marble & Company and hold the position of
6 Architectural Historian. My qualifications have not changed those stated in my prefiled
7 testimony filed January 31, 2012 in this docket.

8 **Purpose of Testimony**

9 **Q. What is the purpose of this testimony?**

10 A. The purpose of Mr. Stevenson's testimony is to update his initial prefiled
11 testimony regarding the status of activities of the New Hampshire Division of Historical
12 Resources "DHR" and the Section 106 process concerning the Antrim Wind Project's
13 potential impacts on architectural resources. The purpose of Mr. Wills's testimony is to
14 address Richard Block's testimony concerning the validity of the Project's
15 archaeological study.

16 **Q. Mr. Stevenson, please describe the current status of DHR's activities and the**
17 **Section 106 process concerning a review of the Project's potential impacts on**
18 **architectural resources.**

19 A. On July 3, 2012 I submitted an individual inventory form for the Dodge Family
20 Farm on Reed Carr Road and Pine Haven Cottages on Clinton Road. I also submitted
21 historic area forms for Clinton, Antrim Center, Gregg Lake and White Birch Point. DHR
22 reviewed the forms and responded with its comments in a letter dated July 30, 2012. *See*

1 Attachment RS-1 submitted herewith. DHR's letter indicated that the Dodge Family
2 Farm (ANT0010) was eligible for listing in the State Register and National Register of
3 Historic Places. In addition, DHR determined that the development along the north shore
4 of Gregg Lake (ANT-GL) was not eligible for listing in the State Register and National
5 Register of Historic Places. DHR requested additional information on the following
6 forms prior to making a decision on their eligibility: Pine Haven Cottages (ANT0011),
7 Antrim Center (ANT-AC), White Birch Point (ANT-WBP) and Clinton (ANT-CV). The
8 additional information was prepared and revised forms were submitted to NHDHR
9 by September 5, 2012 so that they could be reviewed at the September 12, 2012
10 Determination of Eligibility Committee meeting. In a response letter dated September
11 20, 2012, DHR determined that Clinton Village (ANT-CV) was not eligible for listing in
12 the State Register of Historic Places. *See* Attachment RW&RS-2. In addition, DHR
13 determined that Pine Haven (ANT0011), Antrim Center (ANT-AC) and White Birch
14 Point (ANT-WPB) were all eligible for listing in the State Register and National Register
15 of Historic Places. *Id.* I am now in the process of preparing assessment of effects
16 information for submittal to DHR on the four eligible properties: Dodge Family Farm
17 (ANT0010), Pine Haven (ANT0011), Antrim Center (ANT-AC) and White Birch Point
18 (ANT-WBP). If DHR, in consultation with the U.S. Army Corps of Engineers, finds that
19 any eligible property will suffer adverse effects from the project, then the mitigation
20 phase of Section 106 will proceed.

1 **Q. Mr. Will, are you familiar with the prefiled testimony of Richard Block in**
2 **this docket which, at page 8, questions the validity of the Project's archaeological**
3 **studies because they were conducted during snowy conditions?**

4 A. Yes, I am.

5 **Q. Do you agree with this portion of Mr. Block's testimony? If not, please state**
6 **the basis for your disagreement.**

7 A. I do not agree with Mr. Block's assertions concerning the validity of the
8 archaeological studies for this Project. Ms. Karen Mack, an archaeologist approved for
9 work in the State of New Hampshire, conducted field reconnaissance surveys of the
10 archaeological area of potential effect (APE) of the Antrim Wind Project on November
11 23- 26, 2011. The proposal to conduct this field work had been previously reviewed and
12 approved by NH DHR. The proposal noted that a walkover survey would be completed
13 and field testing accomplished as necessary. As discussed and illustrated in the
14 archaeological report contained in Appendix 9B of AWE's SEC Application, at the time
15 of the survey, the ground was not frozen and there was patchy snow cover in portions of
16 the Project area, but not enough to obscure ground conditions in any areas of the
17 archaeological APE. No subsurface testing was accomplished. Field testing was not
18 undertaken because there were no areas identified that were either sensitive for
19 archaeological resources or showed evidence that an archaeological site might be present
20 (for example, a cellarhole depression). A Phase I final report (contained in Appendix 9B
21 of the AWE Application) was submitted to NH DHR for review and comment and the
22 document was approved. NH DHR has indicated that there are no known properties of

1 archaeological significance in the area of the APE and no further identification or
2 evaluative studies are recommended. *See* Attachment RW & RS-3 (August 30, 2012
3 Memorandum from Nadine Peterson, Preservation Planner, NH DHR to Michael
4 Iacopino, Counsel NH Site Evaluation Committee.)

5 **Q. Do you have anything further to add to this testimony?**

6 A. No, not at this time.

7 925542_1



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

State of New Hampshire, Department of Cultural Resources
 19 Pillsbury Street, Concord, NH 03301-3570
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www.nh.gov/nhdhr

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preservation@dcr.nh.gov

July 30, 2012

Russell Stevenson
 A.D. Marble & Company
 375 East Elm Street, Suite 200
 Conshohocken, PA 19428

Re: ACOE, RPR 3291

Dear Mr. Stevenson;

Thank you for requesting a determination of National Register eligibility for the properties and areas listed below. As requested, the Division of Historical Resources' Determination of Eligibility Committee has reviewed the *DHR Inventory and Area Forms* prepared by your team; based on the information available, the DOE Committee's evaluations of National Register eligibility are:

TOWN/CITY	PROPERTY/AREA	DETERMINATION
Antrim	Dodge Family Farm, 15 Reed Carr Road, ANT0010	Eligible
Antrim	Pine Haven, 467 Clinton Road, ANT0011	Insufficient Info for Evaluation
Antrim	Antrim Center Historic District, ANT-AC	Incomplete Info or Evaluation
Antrim	White Birch Point Area Form, ANT-WBP	Incomplete Info or Evaluation
Antrim	Gregg Lake Area Form, ANT-GL	Not Eligible
Antrim	Clinton Village Area Form, ANT-CV	Incomplete Info or Evaluation

A copy of the DHR evaluation form is attached for your use. Please refer to the "Follow-up" sections for explanations of the additional data needed for the "more information" requests. The inventory data and the evaluations will also be added to the statewide survey database for historic properties in New Hampshire.

Please contact Mary Kate Ryan at 271-6435 or MaryKate.Ryan@dcr.nh.gov if you have questions.

Sincerely,

Christina St. Louis
 Program Specialist

Enclosure

cc: Elizabeth Muzzey, Director / State Historic Preservation Officer
 ACOE
 NH DES
 Site Evaluation Committee
 Drew Kenworthy, Antrim Wind Energy



Determination of Eligibility (DOE)

Inventory #: ANT0010

Review Date: 7/11/2012 DOE Date: 7/5/2012

Final DOE Approved

DHR Staff: MKR

Wendy Kate Ryan

Property Name: Dodge Family Farm

Area:

Address: 15 Reed Carr Road

Town: Antrim

County: Hillsborough

Reviewed For: R&C

DOE Program(s):
Army Corps of Engineers

DETERMINATION OF ELIGIBILITY:

National Register eligible, individual
State Register eligible, individually

Integrity: Yes

Level: Local

Criteria: A: Yes B: No C: Unknown
D: Unknown E: N

STATEMENT OF SIGNIFICANCE:

The Dodge Family Farm was started by Amos Dodge, who amassed land starting in 1816, reaching 150 acres, the size of a local farm in Antrim, by 1850. Between 1854 and 1858, his son, Amos Dodge, Jr., a carpenter by trade, erected this connected farmhouse, fronted by a Greek Revival detailed "big house."

Though the consultant argues that the property lacks significance because it represents average agricultural returns in the area and lacks integrity due to a decrease in acreage and reforestation, the DHR disagrees. The Dodge Family Farm is an excellent local example of an average farm, the changing focus of which reflects changes in agricultural practices and markets, including the decline and reforestation common to farm land in New Hampshire, and is eligible for listing under criterion A. It seems likely that the property is also eligible under criterion C as a modest version of the New England connected farm house, but the photos are too dark to confirm details, and the comparable examples are listed as notable only for their size. More information would be needed to confirm this determination.

AREAS OF SIGNIFICANCE(S)
Agriculture

Period of Significance: 1858
to 1945

Period not applicable

Boundary: TBD

Follow Up:

Notify appropriate parties.

A property map needs to be submitted to complete this form. The property map should show the entire parcel surveyed (34 acres, according to page 1), with all associated resources marked.

Comments:

Determination of Eligibility (DOE)

Inventory #: ANT0011

Review Date: 7/11/2012 DOE Date: 7/5/2012

Final DOE Approved

DHR Staff: LB

Wang Kate Dyer

Property Name: Pine Haven

Area:

Address: 467 Clinton Road

Town: Antrim

County: Hillsborough

Reviewed For: R&C

DOE Program(s):
Army Corps of Engineers

DETERMINATION OF ELIGIBILITY

Insufficient Information for Evaluat

Integrity:

Level:

Criteria:	A:	B:	C:
	D:	E:	

STATEMENT OF SIGNIFICANCE:

The property contains remnants of a nineteenth-century farm, but is most intact as a collection of tourist cabins called Pine Haven, located along Route 9. Pine Haven was established ca. 1939.

Prior to determining NR eligibility, three main discussions need to be provided.

--Firstly, the property was evaluated against a context of recreational cabin development, however based on the resource itself (i.e. services provided) and their location it seems more appropriate to evaluate the property within the context of motor lodge cabins and the development of automobile tourism. Context 88. Automobile highways and culture, 1900-present, may be considered appropriate.

--Secondly, related to above, please provide a comparative evaluation of similar resources with specific examples in the area.

--Thirdly, the discussion of integrity needs to be clarified. Demonstrate what materials the buildings originally had, when and what had been altered, and how that impacts the integrity of the overall complex.

AREAS OF SIGNIFICANCE(S)

Unknown

Period of Significance:

to

Period not applicable

Boundary: Parcel 213/3&64

Follow Up:

- Provide discussions as noted above.
- Property map must follow inventory form instructions, including showing entire parcel boundary.
- UTM coordinate needs to be supplied.
- Survey boundary needs to be delineated on map.

Comments:

- In descriptions, language should be used carefully. "Replacement" materials added within the historic period should be called out differently, as non-original materials may be historic in their own right.
- Integrity needs to be assessed on a district level, rather than just for individual properties, following NR bulletin 15, including the information on form and massing underneath changed exterior materials. An understanding of district character-defining features and relationships, as well as significance, need to be part of that analysis.

Specific

- Surveying completely from the public right-of-way results in inventory holes, often sizable holes. If you know nothing about a property how can you justify including it within a historic district or justify the appropriateness of a historic district boundary? It is very rare that access to a property is completely restricted. A simple knock on the door and introduction will allow you the opportunity to take a few notes and photographs.
- The form includes a lot of inconsistent information. Some are very specific, such as many switches between ca. 1900 and ca. 1940 as an end date for a Period of Significance. Others are less specific, but inconsistent nonetheless, appearing to result from changes in the consultant's understanding of property history or analysis that don't get revised in earlier sections of the form. Make sure that the information provided or arguments made are consistent throughout the whole form.
- As a clear understanding of what types of buildings existed and are still extant in Antrim Center is necessary to determine the village's eligibility as a district, it is important to do whatever field or deed research is needed to confirm whether the property at 217 Clinton Road is the original school. The assumption should not be left as a "suspicion" for the reader to determine at a later date. This is also an example of inconsistent language that makes the form's arguments less defensible. The architectural description of the property leaves the identity of the building in question, however the Statement of Significance states, "as evidenced through the conversion of the former schoolhouse at 217 Clinton Road in to a dwelling."
- The form includes language that can be misleading to the reader, such as calling 1832 windows "replacement" windows. While they might have replaced original windows in the Grange building the nomenclature of "replacement" conveys that they are modern and/or a hit on integrity. This similarly applies to the use of the term "addition." If these alterations were done during the historic period they would be part of the historic evolution of the property. This should be very clear in reading the form.
- It is unclear from the comparative statement just what is/remains of North Branch village and what is Flint Estate. It's not clear how it/they are comparable to Antrim Center. What is the comparison to Antrim South?
- The Antrim Congregational Church was determined National and State Register-eligible. Remove the word "potentially." Note that the resource number is ANT0005 not ANT005.
- The consultants' arguments regarding eligibility need to be clarified. In their current form the consultant's argument for eligibility under Criterion C seems to be more appropriate as an argument for eligibility under Criterion A, or A and C, and the argument against eligibility under Criterion A seems to be contradicted in the Integrity statement.
- Determine appropriate Period of Significance based upon the history of the village of Antrim Center.
- The boundary description/justification should clarify how the resources that are "geographically close and within the line of site [sic] of the village center" are historically associated with Antrim Center and included, and why "adjacent parcels of vacant land were not included" since farms were called out as part of the history of the village and included otherwise. What is different about these lands?

Final DOE approved by:

Katy Ryan (M)

NH Division of Historical Resources
Determination of Eligibility (DOE)

Date received: July 5, 2012 Inventory #: ANT-WBP
Date of group review: July 18, 2012 Area: White Birch Point
DHR staff: Peter Michaud
Property Name: White Birch Point Town/City: Antrim
Address: Trudeau Road County: Hillsborough
Reviewed for: R&C PTI NR SR Survey Other
Agency, if appropriate: ACOE

Individual Properties

NR SR
 Not evaluated for individual eligibility
 Eligible
 Eligible, also in district
 Eligible, in district
 Not eligible
 Incomplete information or evaluation

Districts

NR SR
 Not evaluated @ district
 Eligible
 Not eligible
 Incomplete information or evaluation

Integrity: ALL ASPECTS Location Design Setting Materials
 Workmanship Feeling Association

Criteria: A. Event B. Person C. Architecture/Engineering
 D. Archaeology E. Exception

Level: Local State National

IF THIS PROPERTY IS REVIEWED IN THE FUTURE, ADDITIONAL DOCUMENTATION IS NEEDED.

STATEMENT OF SIGNIFICANCE:

Paul & Helen Thayer of Pennsylvania purchased a sawmill and surrounding land on White Point in 1905. A house builder by trade, Paul Thayer built 15 to 20 cottages using the sawmill to mill the lumber. In 1911, the Thayers paid to have the property surveyed and subdivided into approximately 149 lots by 1914. The majority of lots were never developed. Approximately a third of the property was developed as private housing that shared a beach and boat landing at "The Grove" located at Lot 1. Development of the property continued up through the 1950s.

ENTERED INTO DATABASE

ACREAGE:

PERIOD OF SIGNIFICANCE:

AREA OF SIGNIFICANCE:

BOUNDARY:

SURVEYOR: Russell Stevenson, A.D. Marble & Company

FOLLOW-UP:

Sketch maps need to show all structures, buildings, sites, landscapes, roads, and natural features. Properties should be labeled (which will require showing street addresses and/or property tax maps) and contributing status shown visually.

The overall histories for all the area forms provide too much information for Antrim town, even when the context does not specifically relate to the area. History specific to the district should be better marked and supplied for EACH of the relevant contexts, with information for contexts not relevant (e.g. tourism for Clinton Village) removed.

When historic maps are heavily used as a basis for determinations of significance, they should be included where possible.

In descriptions, language should be used carefully. "Replacement" materials added within the historic period should be called out differently, as non-original materials may be historic in their own right.

Integrity needs to be assessed on a district level, rather than just for individual properties, following NR bulletin 15, including the information on form and massing underneath changed exterior materials. An understanding of district character-defining features and relationships, as well as significance, need to be part of that analysis.

On page 4 Section 19 early nineteenth-century community should be changed to early twentieth-century community.

An analysis of the development of the campground in the 20th century is needed. An excellent history of development of the pond for industrial use and its transfer to recreational use provides a solid background on why a camp was developed here in the early 20th century. The initial development by the Thayers is also well covered. The images and text hint at a development of property for privately owned camps that continued to develop and grow throughout the 20th century. More information is needed on what happened after 1914. The map comparison is a good start, but more analysis of the physical structures and deed research is needed to better understand development beyond pre-1929 or pre-1957. With an understanding of the 20th century history and the evolution of the historic character of White Birch Point, we can make determinations concerning its significance, better understand the integrity of the complex and discern what is lost integrity and what is historic change.

As part of the information on the 20th century development of the resource, clarification is needed on the role that Camp Greggmere/Birchmere played in the development of White Birch Point. Why did this camp have an ownership interest in "The Grove?" Is the camp part of White Birch Point or a separate entity?

In the Integrity statement, you list the loss of numerous cottages and outbuildings such as a stable, garage, infirmary, a dining and recreation building, and bunkhouses. More information on the extent of these losses needs to be provided. The development of an infirmary, dining and recreation building, and bunkhouses is not covered in the form and are unusual buildings for a development like White Birch Point. Clarification is needed.

Final DOE approved by:

Mary Kate Ryan (M)

NH Division of Historical Resources
Determination of Eligibility (DOE)

Date received: 7/5/12

Inventory #: ANT - GL

Date of group review: 7/18/12

Area: Gregg Lake

DHR staff: Nadine

Property Name: Gregg Lake

Town/City: Antrim

Address: north shore of Gregg Lake, 91-208 Gregg Lake Road County: Hillsborough

Reviewed for: R&C PTI NR SR Survey Other
Agency, if appropriate: CORPS

Individual Properties

NR SR
 Not evaluated for individual eligibility
 Eligible
 Eligible, also in district
 Eligible, in district
 Not eligible
 Incomplete information or evaluation

Districts

NR SR
 Not evaluated @ district
 Eligible
 Not eligible
 Incomplete information or evaluation

Integrity: ALL ASPECTS Location Design Setting Materials
Workmanship Feeling Association

Criteria: A. Event B. Person C. Architecture/Engineering
D. Archaeology E. Exception

Level: Local State National

IF THIS PROPERTY IS REVIEWED IN THE FUTURE, ADDITIONAL DOCUMENTATION IS NEEDED.

STATEMENT OF SIGNIFICANCE:

The Gregg Lake community is located on the northeast side of Gregg Lake and is an example of a late nineteenth and twentieth century residential development. By the late nineteenth century, the focus of land use around Gregg Lake was no longer industry but was instead summer recreation with a number of summer boarding houses and cottages constructed along the lakefront. The boarding houses are either demolished or only remnants of them remain and what characterizes the area now are a variety of cottages from differing periods and with differing architectural styles. Few of the cottages retain integrity of materials, workmanship, and design. This translates into a community with a lack of cohesion as a historic summer cottage community. Gregg Lake is not eligible for listing in the National Register of Historic Places.

ENTERED INTO DATABASE

ACREAGE: approximately 41 acres

PERIOD OF SIGNIFICANCE: N/A

AREA OF SIGNIFICANCE: N/A

BOUNDARY: The survey boundary was limited to cottages that were constructed along the north shore and generally have a view of the lake.

SURVEYOR: Russell Stevenson

FOLLOW-UP: Notify appropriate parties. Please provide a revised sketch map that clearly delineates the properties identified in the survey area through the use of overlaying a tax map on the aerial and outlining the surveyed properties.

Final DOE approved by:

Katherine Ryan (M)

NH Division of Historical Resources
Determination of Eligibility (DOE)

Date received: 5/July/2012 Inventory #: ANT-CV
Date of group review: 18/July/2012 Area: ANT-CV
DHR staff: Mary Kate Ryan
Property Name: Clinton Village Town/City: Antrim
Address: County: Hillsborough
Reviewed for: R&C PTI NR SR Survey Other
Agency, if appropriate: ACOE

Individual Properties

NR SR
 Not evaluated for individual eligibility
 Eligible
 Eligible, also in district
 Eligible, in district
 Not eligible
 Incomplete information or evaluation

Districts

NR SR
 Not evaluated @ district
 Eligible
 Not eligible
 Incomplete information or evaluation

Integrity: ALL ASPECTS Location Design Setting Materials
 Workmanship Feeling Association

Criteria: A. Event B. Person C. Architecture/Engineering
 D. Archaeology E. Exception

Level: Local State National

IF THIS PROPERTY IS REVIEWED IN THE FUTURE, ADDITIONAL DOCUMENTATION IS NEEDED.

STATEMENT OF SIGNIFICANCE:

Clinton Village, settled primarily between the construction of Imla Wright's cotton mill in 1828 and the early 20th century, was an industrial village within a primarily agricultural town. The village contained many mills by 1877, as well as housing, but had next to nothing in the way of services. The post office closed in 1900, the town suffered a major fire in 1908, and in 2012 it is a primarily residential area.

ENTERED INTO DATABASE

ACREAGE: 96

PERIOD OF SIGNIFICANCE:

AREA OF SIGNIFICANCE:

BOUNDARY: tax parcel

SURVEYOR: Russell Stevenson, A.D. Marble

FOLLOW-UP: Notify appropriate parties.

General:

Sketch maps need to show all structures, buildings; sites, landscapes, roads, and natural features. Properties should be labeled (which will require showing street addresses and/or property tax map lots) and contributing status shown visually. If the district is found eligible, the National Register boundary should be shown. Specific landmarks mentioned in the form should also be labeled.

The overall histories for all the area forms provide too much information for Antrim town, even when the context does not specifically relate to the area. History specific to the district should be

better marked and supplied for EACH of the relevant contexts, with information for contexts not relevant (e.g. tourism for Clinton Village) removed.

When historic maps are heavily used as a basis for determinations of significance, they should be included where possible.

In descriptions, language should be used carefully. "Replacement" materials added within the historic period should be called out differently, as non-original materials may be historic in their own right.

Integrity needs to be assessed on a district level, rather than just for individual properties, following NR bulletin 15, including the information on form and massing underneath changed exterior materials. An understanding of district character-defining features and relationships, as well as significance, need to be part of that analysis.

Specific to Clinton Village:

The form should address the overall nature and layout of Clinton Village in the architectural description section in order to eventually address integrity as a district. The impact of the fire and demolitions of the industrial area should be addressed specifically in this section as well as in the final analysis.

Because the analysis of integrity and significance focuses greatly on individual building integrity, and the actual effects of the 1908 fire aren't discussed, the DOE committee does not feel it can agree or disagree with the conclusions of the consultant at this time.

Final DOE approved by:

Marykate Ryan (MI)



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

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September 20, 2012

Russell Stevenson
 A.D. Marble & Company
 375 East Elm Street, Suite 200
 Conshohocken, PA 19428

Re: ACOE, RPR 3291

Dear Mr. Stevenson;

Thank you for requesting determinations of National Register eligibility for the properties and areas listed below. As requested, the Division of Historical Resources' Determination of Eligibility Committee has reviewed the *DHR Inventory and Area Forms* prepared by your team; based on the information available, the DOE Committee's evaluations of National Register eligibility are:

TOWN/CITY	PROPERTY/AREA	DETERMINATION
Antrim	Dodge Family Farm, 15 Reed Carr Road, ANT0010	Eligible
Antrim	Pine Haven, 467 Clinton Road, ANT0011	Eligible
Antrim	Antrim Center Historic District, ANT-AC	Eligible
Antrim	White Birch Point Area Form, ANT-WBP	Eligible
Antrim	Gregg Lake Area Form, ANT-GL	Not Eligible
Antrim	Clinton Village Area Form, ANT-CV	Not Eligible

Copies of the DHR evaluation forms are attached for your use. Please refer to the "Follow-up" sections for explanations of the additional data needed for the "more information" requests. The inventory data and the evaluations will also be added to the statewide survey database for historic properties in New Hampshire.

Please contact Mary Kate Ryan at 271-6435 or MaryKate.Ryan@dcr.nh.gov if you have questions.

Sincerely,

Christina St. Louis
 Program Specialist

Enclosure

cc: Elizabeth Muzzey, Director / State Historic Preservation Officer
 ACOE
 NH DES
 Site Evaluation Committee
 Drew Kenworthy, Antrim Wind Energy



NH Division of Historical Resources
 Determination of Eligibility (DOE)

Date received: July 5, 2012; Sept. 4, 2012 Inventory #: ANT-AC

Date of group review: July 18, 2012; Sept. 12, 2012 Area: Antrim Center Historic District

DHR staff: Laura Black

Property Name: Antrim Center Historic District Town/City: Antrim

Address: Around the intersection of Meetinghouse Hill Road and Clinton Road. County: Hillsborough

Reviewed for: R&C PTI NR SR Survey Other
 Agency, if appropriate: ACOE

Individual Properties		Districts	
NR	SR	NR	SR
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Not evaluated for individual eligibility	<input type="checkbox"/>	<input type="checkbox"/> Not evaluated @ district
<input type="checkbox"/>	<input type="checkbox"/> Eligible	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Eligible
<input type="checkbox"/>	<input type="checkbox"/> Eligible, also in district	<input type="checkbox"/>	<input type="checkbox"/> Not eligible
<input type="checkbox"/>	<input type="checkbox"/> Eligible, in district	<input type="checkbox"/>	<input type="checkbox"/> Incomplete information or evaluation
<input type="checkbox"/>	<input type="checkbox"/> Not eligible		
<input type="checkbox"/>	<input type="checkbox"/> Incomplete information or evaluation		
Integrity: <input checked="" type="checkbox"/> ALL ASPECTS <input type="checkbox"/> Location <input type="checkbox"/> Design <input type="checkbox"/> Setting <input type="checkbox"/> Materials			
<input type="checkbox"/> Workmanship <input type="checkbox"/> Feeling <input type="checkbox"/> Association			
Criteria: <input checked="" type="checkbox"/> A. Event <input type="checkbox"/> B. Person <input checked="" type="checkbox"/> C. Architecture/Engineering			
<input type="checkbox"/> D. Archaeology <input type="checkbox"/> E. Exception			
Level: <input checked="" type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> National			
<input type="checkbox"/> IF THIS PROPERTY IS REVIEWED IN THE FUTURE, ADDITIONAL DOCUMENTATION IS NEEDED.			

STATEMENT OF SIGNIFICANCE:

September 12, 2012 DOE:

Antrim Center is "eligible for listing in the National Register under Criterion A. The village is associated with community planning and development trends as a nineteenth-century village that served as the second town center of Antrim, from approximately 1830, when the meetinghouse was moved from the first settlement to the foot of Meetinghouse Hill, until 1894, when a new town hall was constructed in Antrim South. Antrim Center contains a notable collection of buildings that reflect development over time, from the nineteenth century through the early twentieth century. The buildings reflect the continual growth and stability of the community from its establishment ca. 1820 through the early twentieth century. As the center of government and politics in Antrim from approximately 1830 to 1894, Antrim Center includes a residential community that developed at the base of Meetinghouse Hill in direct response to the growth of the agricultural and political importance of Antrim."

Antrim Center is also eligible under Criterion C, as "a notable collection of buildings and sites that reflects distinct styles, types, forms, and periods of construction from the nineteenth to the early twentieth centuries . . . Character-defining features of Antrim Center include the range of nineteenth-century and early twentieth-century building types, which include dwellings, public and institutional buildings, and sites. Antrim Center retains its location and proximity to the original road through Antrim that was rerouted around Meetinghouse Hill in the 1820s. In addition, the setting of Antrim Center, on a rise at the base of Meetinghouse Hill, is important because of the numerous summer tourists that were drawn to the village due to its scenic views and vistas."

ENTERED INTO DATABASE
 ACREAGE: Approx. 88 acres

PERIOD OF SIGNIFICANCE: TBD
AREA OF SIGNIFICANCE: Community development, architecture
BOUNDARY: TBD
SURVEYOR: Russell Stevenson, A.D. Marble & Company

FOLLOW-UP: Notify appropriate parties.

Sept. 12, 2012 DOE:

- Clarify the Period of Significance to reflect the construction dates of resources that the form includes as significant contributing elements but fall outside of the consultant's chosen PofS between 1820 and 1900.
- Revise the National Register boundary to form an appropriate contiguous district. If there has always been undeveloped land between the intersection at the center of the village and the cluster of buildings south of the intersection then wouldn't that undeveloped land be a character-defining feature of the village's setting?
- Revise graphics accordingly.

July 5, 2012 DOE:

General

- Sketch maps need to show all structures, buildings, sites, landscapes, roads, and natural features. Properties should be labeled (which will require showing street addresses and/or property tax map lots) and contributing status shown visually. If the district is found eligible, the National Register boundary should be shown.
- Geographic or other landmarks that are mentioned as points of reference (such as Meetinghouse Hill or the kids' camp) should be labeled on some map included in the form.
- The overall histories for all the area forms provide too much information for Antrim town, even when the context does not specifically relate to the area. History specific to the district should be better marked/developed and supplied for EACH of the relevant contexts, with information for contexts not relevant (e.g. tourism for Clinton Village) removed.
- When historic maps are heavily used as a basis for determinations of significance, they should be included where possible.
- In descriptions, language should be used carefully. "Replacement" materials added within the historic period should be called out differently, as non-original materials may be historic in their own right.
- Integrity needs to be assessed on a district level, rather than just for individual properties, following NR bulletin 15, including the information on form and massing underneath changed exterior materials. An understanding of district character-defining features and relationships, as well as significance, need to be part of that analysis.

Specific

- Surveying completely from the public right-of-way results in inventory holes, often sizable holes. If you know nothing about a property how can you justify including it within a historic district or justify the appropriateness of a historic district boundary? It is very rare that access to a property is completely restricted. A simple knock-on-the-door and introduction will allow you the opportunity to take a few notes and photographs.
- The form includes a lot of inconsistent information. Some are very specific, such as many switches between ca. 1900 and ca. 1940 as an end date for a Period of Significance. Others are less specific, but inconsistent nonetheless, appearing to result from changes in the consultant's understanding of property history or analysis that don't get revised in earlier sections of the form. Make sure that the information provided or arguments made are consistent throughout the whole form.
- As a clear understanding of what types of buildings existed and are still extant in Antrim Center is necessary to determine the village's eligibility as a district, it is important to do whatever field or deed research is needed to confirm whether the property at 217 Clinton Road is the original school. The assumption should not be left as a "suspicion" for the reader to determine at a later date. This is also an example of inconsistent language that makes the form's arguments less defensible. The architectural description of the property leaves the identity of the building in question; however the Statement of Significance states, "as evidenced through the conversion of the former schoolhouse at 217 Clinton Road in to a dwelling."
- The form includes language that can be misleading to the reader, such as calling 1832 windows "replacement" windows. While they might have replaced original windows in the Grange building the nomenclature of "replacement" conveys that they are modern and/or a hit on integrity. This similarly applies to the use of the term "addition." If these alterations were done during the historic period they would be part of the historic evolution of the property. This should be very clear in reading the form.
- It is unclear from the comparative statement just what is/remains of North Branch village and what is Flint Estate. It's not clear how it/they are comparable to Antrim Center. What is the comparison to Antrim South?
- The Antrim Congregational Church was determined National and State Register eligible. Remove the word "potentially." Note that the resource number is ANT0005 not ANT005.
- The consultants' arguments regarding eligibility need to be clarified. In their current form the consultant's argument for eligibility under Criterion C seems to be more appropriate as an argument for eligibility under Criterion A, or A and C, and the argument against eligibility under Criterion A seems to be contradicted in the Integrity statement.
- Determine appropriate Period of Significance based upon the history of the village of Antrim Center.
- The boundary description/justification should clarify how the resources that are "geographically close and within the line of site [sic] of the village center" are historically associated with Antrim Center and included, and why "adjacent parcels of vacant land were not included" since farms were called out as part of the history of the village and included otherwise. What is different about these lands?

Final DOE approved by:

Kate Ryan (mi)

NH Division of Historical Resources
 Determination of Eligibility (DOE)

Date received: July 5, 2012
 Date of group review: July 18, 2012 *Sept 12, 2012*
 Inventory #: ANT-WBP
 Area: White Birch Point
 DHR staff: Peter Michaud
 Property Name: White Birch Point
 Town/City: Antrim
 Address: Trudeau Road
 County: Hillsborough
 Reviewed for: R&C PTI NR SR Survey Other
 Agency, if appropriate: ACOE

Individual Properties

NR SR
 Not evaluated for individual eligibility
 Eligible
 Eligible, also in district
 Eligible, in district
 Not eligible
 Incomplete information or evaluation

Districts

NR SR
 Not evaluated @ district
 Eligible
 Not eligible
 Incomplete information or evaluation

Integrity: ALL ASPECTS Location Design Setting Materials
 Workmanship Feeling Association

Criteria: A. Event B. Person C. Architecture/Engineering
 D. Archaeology E. Exception

Level: Local State National

IF THIS PROPERTY IS REVIEWED IN THE FUTURE, ADDITIONAL DOCUMENTATION IS NEEDED.

STATEMENT OF SIGNIFICANCE:

September 12, 2012 The DOE committee disagrees with the consultant's determination of the resource as not eligible. For purposes of this project the DOE committee agrees that the White Birch Point development appears to be a group of camp buildings united by their pattern of development and is eligible under Criterion A as a collection of camps that represent summer and vacation home tourism in New Hampshire in the early 20th century. The form as presented does not follow the guidelines for an historic district area form, specifically in that it continues to assess integrity and significance at an individual level.

July 5, 2012: Paul & Helen Thayer of Pennsylvania purchased a sawmill and surrounding land on White Point in 1905. A house builder by trade, Paul Thayer built 15 to 20 cottages using the sawmill to mill the lumber. In 1911, the Thayers paid to have the property surveyed and subdivided into approximately 149 lots by 1914. The majority of lots were never developed. Approximately a third of the property was developed as private housing that shared a beach and boat landing at "The Grove" located at Lot 1. Development of the property continued up through the 1950s.

ENTERED INTO DATABASE

ACREAGE: ~40

PERIOD OF SIGNIFICANCE: 1905-1962 (fifty year cut-off)

AREA OF SIGNIFICANCE: Summer & Vacation Home Tourism in NH

BOUNDARY: see maps, plotted in 1914.

SURVEYOR: Russell Stevenson, A.D. Marble & Company

FOLLOW-UP:

September 12, 2012: Notify Consultant

5, 2012: Sketch maps need to show all structures, buildings, sites, landscapes, roads, and natural features. Properties should be labeled (which will require showing street addresses and/or property tax map lots) and contributing status shown visually.

Overall histories for all the area forms provide too much information for Antrim town, even if the context does not specifically relate to the area. History specific to the district should be marked and supplied for EACH of the relevant contexts, with information for contexts not relevant (e.g. tourism for Clinton Village) removed.

When historic maps are heavily used as a basis for determinations of significance, they should be noted where possible.

Descriptions, language should be used carefully. "Replacement" materials added within the historic period should be called out differently, as non-original materials may be historic in their own right.

Integrity needs to be assessed on a district level, rather than just for individual properties, following Bulletin 15, including the information on form and massing underneath changed exterior materials. An understanding of district character defining features and relationships, as well as significance, need to be part of that analysis.

Page 4 Section 19 early nineteenth century community should be changed to early twentieth century community.

Analysis of the development of the campground in the 20th century is needed. An excellent history of development of the pond for industrial use and its transfer to recreational use provides a helpful background on why a camp was developed here in the early 20th century. The initial development by the Thayers is also well covered. The images and text hint at a development of property for privately owned camps that continued to develop and grow throughout the 20th century. More information is needed on what happened after 1914. The map comparison is a good start, but more analysis of the physical structures and deed research is needed to better understand development beyond pre-1929 or pre-1957. With an understanding of the 20th century history and the evolution of the historic character of White Birch Point, we can make determinations concerning its significance, better understand the integrity of the complex and discern what is lost integrity and what is historic change.

Part of the information on the 20th century development of the resource, clarification is needed on the role that Camp Greggmere/Birchmere played in the development of White Birch Point. Why do these camps have an ownership interest in "The Grove?" Is the camp part of White Birch Point or a separate entity?

In the integrity statement, you list the loss of numerous cottages and outbuildings such as a stable, garage, infirmary, a dining and recreation building, and bunkhouses. More information on the extent of these losses needs to be provided. The development of an infirmary, dining and recreation building, and bunkhouses is not covered in the form and are unusual buildings for a development like White Birch Point. Clarification is needed.

Final DOE approved by:



NH Division of Historical Resources
Determination of Eligibility (DOE)

Date received: 5/July/2012 Inventory #: ANT-CV

Date of group review: 18/July/2012 Area: ANT-CV

DHR staff: Mary Kate Ryan

Property Name: Clinton Village Town/City: Antrim

Address: County: Hillsborough

Reviewed for: R&C PTI NR SR Survey Other
Agency, if appropriate: ACOE

Individual Properties

NR SR
 Not evaluated for individual eligibility
 Eligible
 Eligible, also in district
 Eligible, in district
 Not eligible
 Incomplete information or evaluation

Districts

NR SR
 Not evaluated @ district
 Eligible
 Not eligible
 Incomplete information or evaluation

Integrity: ALL ASPECTS Location Design Setting Materials
 Workmanship Feeling Association

Criteria: A. Event B. Person C. Architecture/Engineering
 D. Archaeology E. Exception

Level: Local State National

IF THIS PROPERTY IS REVIEWED IN THE FUTURE, ADDITIONAL DOCUMENTATION IS NEEDED.

STATEMENT OF SIGNIFICANCE:

Clinton Village, settled primarily between the construction of Imla Wright's cotton mill in 1828 and the early 20th century, was an industrial village within a primarily agricultural town. The village contained many mills by 1877, as well as housing, but had next to nothing in the way of services. The post office closed in 1900, the town suffered a major fire in 1908, and in 2012 it is a primarily residential area.

9-12-12: Clinton Village has lost half of its resources, retaining only housing. All the industrial buildings from the south side of Clinton Road are gone. The village no longer retains integrity as a district.

Any future survey in this area should examine properties individually for potential significance; this was outside the scope of this project.

ENTERED INTO DATABASE

ACREAGE: 96

PERIOD OF SIGNIFICANCE:

AREA OF SIGNIFICANCE:

BOUNDARY: tax parcel

SURVEYOR: Russell Stevenson, A.D. Marble

FOLLOW-UP: New information provided and accepted 9/12/12.

Notify appropriate parties.

General:

~~Sketch maps need to show all structures, buildings, sites, landscapes, roads, and natural features. Properties should be labeled (which will require showing street addresses and/or property tax map lots) and contributing status shown visually. If the district is found eligible, the National Register boundary should be shown. Specific landmarks mentioned in the form should also be labeled.~~

~~The overall histories for all the area forms provide too much information for Antrim town, even when the context does not specifically relate to the area. History specific to the district should be better marked and supplied for EACH of the relevant contexts, with information for contexts not relevant (e.g. tourism for Clinton Village) removed.~~

~~When historic maps are heavily used as a basis for determinations of significance, they should be included where possible.~~

~~In descriptions, language should be used carefully. "Replacement" materials added within the historic period should be called out differently, as non-original materials may be historic in their own right.~~

~~Integrity needs to be assessed on a district level, rather than just for individual properties, following NR bulletin 15, including the information on form and massing underneath changed exterior materials. An understanding of district character defining features and relationships, as well as significance, need to be part of that analysis.~~

~~Specific to Clinton Village:~~

~~The form should address the overall nature and layout of Clinton Village in the architectural description section in order to eventually address integrity as a district. The impact of the fire and demolitions of the industrial area should be addressed specifically in this section as well as in the final analysis.~~

NH Division of Historical Resources
Determination of Eligibility (DOE)

Date received: 7/5/12; 9/5/12
Date of group review: 7/18/12; 9/12/12
DHR staff: Nadine
Property Name: Gregg Lake
Address: north shore of Gregg Lake, 91-208 Gregg Lake Road
Reviewed for: R&C PTI NR SR Survey Other
Agency, if appropriate: CORPS

Inventory #:
Area: ANT-GL (Gregg Lake)

Town/City: Antrim

County: Hillsborough

Individual Properties

NR SR
 Not evaluated for individual eligibility
 Eligible
 Eligible, also in district
 Eligible, in district
 Not eligible
 Incomplete information or evaluation

Districts

NR SR
 Not evaluated @ district
 Eligible
 Not eligible
 Incomplete information or evaluation

Integrity: ALL ASPECTS Location Design Setting Materials
 Workmanship Feeling Association

Criteria: A. Event B. Person C. Architecture/Engineering
 D. Archaeology E. Exception

Level: Local State National

IF THIS PROPERTY IS REVIEWED IN THE FUTURE, ADDITIONAL DOCUMENTATION IS NEEDED.

STATEMENT OF SIGNIFICANCE:

The Gregg Lake community is located on the northeast side of Gregg Lake and is an example of a late nineteenth and twentieth century residential development. By the late nineteenth century, the focus of land use around Gregg Lake was no longer industry but was instead summer recreation with a number of summer boarding houses and cottages constructed along the lakefront. The boarding houses are either demolished or only remnants of them remain and what characterizes the area now are a variety of cottages from differing periods and with differing architectural styles. Few of the cottages retain integrity of materials, workmanship, and design. This translates into a community with a lack of cohesion as a historic summer cottage community. Gregg Lake is not eligible for listing in the National Register of Historic Places.

ENTERED INTO DATABASE

ACREAGE: approximately 41 acres

PERIOD OF SIGNIFICANCE: N/A

AREA OF SIGNIFICANCE: N/A

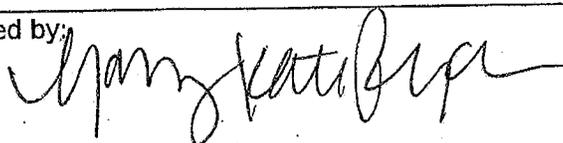
BOUNDARY: The survey boundary was limited to cottages that were constructed along the north shore and generally have a view of the lake.

SURVEYOR: Russell Stevenson

FOLLOW-UP: 9/12/12: Requested map received and approved by DOE Committee. Notify appropriate parties.

Please provide a revised sketch map that clearly delineates the properties identified in the survey area through the use of overlaying a tax map on the aerial and outlining the surveyed properties

Final DOE approved by:



Determination of Eligibility (DOE)

Inventory #: ANT0011

Review Date: 9/12/2012 DOE Date: 7/5/2012

Final DOE Approved

Property Name: Pine Haven

DHR Staff: LB



Area:

Address: 467 Clinton Road

Town: Antrim County: Hillsborough

Reviewed For: R&C

DOE Program(s):
Army Corps of Engineers

DETERMINATION OF ELIGIBILITY

National Register eligible, individu

Integrity: Partial

Level:

Criteria:	A: Yes	B:	C: Unknown
	D:	E:	

STATEMENT OF SIGNIFICANCE:

September 12, 2012 DOE:

For the purposes of this project, the property has been determined eligible for listing in the National Register under Criterion A in association with automobile tourism. It is an example of an increasingly rare resource type within the context of tourism in Antrim, as reflected by the necessity to look at comparable examples in other areas of the state. Located on Rt. 9, the property as a whole conveys its association.

Eligibility under Criterion C should be examined in any future survey.

7/11/2012:

The property contains remnants of a nineteenth-century farm, but is most intact as a collection of tourist cabins called Pine Haven, located along Route 9. Pine Haven was established ca. 1939.

Prior to determining NR eligibility, three main discussions need to be provided.

--Firstly, the property was evaluated against a context of recreational cabin development, however based on the resource itself (i.e. services provided) and their location it seems more appropriate to evaluate the property within the context of motor lodge cabins and the development of automobile tourism. Context 88. Automobile highways and culture, 1900-present, may be considered appropriate.

--Secondly, related to above, please provide a comparative evaluation of similar resources with specific examples in the area.

--Thirdly, the discussion of integrity needs to be clarified. Demonstrate what materials the buildings originally had, when and what had been altered, and how that impacts the integrity of the overall complex.

AREAS OF SIGNIFICANCE(S)

Unknown

Period of Significance:

to

Period not applicable

Boundary: Parcel 213/3&64

Follow Up:

9/12/12: completed

7/11/2012:

--Provide discussions as noted above.

--Property map must follow inventory form instructions, including showing entire parcel boundary.

--UTM coordinate needs to be supplied.

Determination of Eligibility (DOE)

Final DOE Approved

DHR Staff: MKR

Wynne Kate Ryan

Review Date: 7/11/2012 DOE Date: 7/5/2012

Property Name: Dodge Family Farm

Area:

Address: 15 Reed Carr Road

Town: Antrim

County: Hillsborough

Reviewed For: R&C

DOE Program(s): Army Corps of Engineers

DETERMINATION OF ELIGIBILITY

National Register eligible, individually
State Register eligible, individually

Integrity: Yes

Level: Local

Criteria:

A: Yes

B: No

C: Unknown

D: Unknown

E: N

STATEMENT OF SIGNIFICANCE:

The Dodge Family Farm was started by Amos Dodge, who amassed land starting in 1816, reaching 150 acres, the size of a local farm in Antrim, by 1850. Between 1854 and 1858, his son, Amos Dodge, Jr., a carpenter by trade, erected this connected farmhouse, fronted by a Greek Revival detailed "big house."

Though the consultant argues that the property lacks significance because it represents average agricultural returns in the area and lacks integrity due to a decrease in acreage and reforestation, the DHR disagrees. The Dodge Family Farm is an excellent local example of an average farm, the changing focus of which reflects changes in agricultural practices and markets, including the decline and reforestation common to farm land in New Hampshire, and is eligible for listing under criterion A. It seems likely that the property is also eligible under criterion C as a modest version of the New England connected farm house, but the photos are too dark to confirm details, and the comparable examples are listed as notable only for their size. More information would be needed to confirm this determination.

Period of Significance: 1858 to 1945

AREAS OF SIGNIFICANCE(S)

Agriculture

Period not applicable

Boundary: TBD

Follow Up:

Notify appropriate parties.

12 Sept 12 - New map received. MKR

A property map needs to be submitted to complete this form. The property map should show the entire parcel surveyed (34 acres, according to page 1), with all associated resources marked.

Comments:



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

MEMORANDUM

To: Michael Iacopino, Counsel NH Site Evaluation Committee

From: Nadine Peterson, Preservation Planner, NH Division of Historical Resources

Date: 8/30/12

Re: Final Report; Permitting progress reports and conditions with regard to Antrim Wind, LLC application (NHSEC No. 2012-01; DHR # 3291)

The New Hampshire Division of Historical (DHR) and the US Army Corps of Engineers (USACE) have been in consultation and discussion with Antrim Wind Energy since initiation of review occurred on 10/5/2011. The DHR and USACE have requested information from the project proponents in order to fulfill requirements set forth in Section 106 of the National Historic Preservation Act and New Hampshire RSA 227C:9.

To date, archaeological studies within the direct area of potential effects for the project have been submitted and approved including a Phase I Archaeological Survey. Based upon the information obtained from the Phase I Archaeological Survey, it has been determined that there are no known properties of archaeological significance within the area of the undertaking's potential impact and no further identification or evaluative studies are recommended. However, the DHR requests that the SEC condition approval to include a clause that requires if any archaeological resources are discovered or affected as a result of project planning or implementation, the DHR is to be consulted on the need for appropriate evaluative studies, determinations of National Register eligibility, and mitigative measures (redesign, resource protection, or data recovery) as required by federal law and regulation. Also, if plans change, the project Applicant must consult with the DHR.

The Section 106 review of above-ground resources has not been finalized. The status of the above-ground resource review remains unchanged from that outlined in our July 31, 2012 letter to the SEC. The DHR requests that the SEC condition approval to include completion of the Section 106 process. This will include the finalization of the identification of resources, assessment of effects, and avoidance, minimization, or mitigation of impacts to historic resources if adverse effects to historic properties result from the undertaking. USACE is working with the Consultant to expedite and complete the Section 106 process in consultation with the DHR.

Cc: Elizabeth Muzzey SHPO
 Jane Murray, SEC

