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William J. Quinlan
President, NH Electric Operations
NHPUC DEC 23 2016 1:27

December 23, 2016

Mr. Todd Selig
Durham Town Administrator
Town of Durham
8 Newmarket Road
Durham, NH 03824

RE: Durham Historic Association's questions about SRP's Preliminary Site Work

Dear Mr. Selig:

Thank you for sharing the concerns raised by the Durham Historic Association (DHA) and allowing us the opportunity to investigate and respond to the DHA's questions about possible damage to cultural resources during the soil boring work undertaken by Eversource to inform the subsurface design of its proposed transmission line, known as the Seacoast Reliability Project (SRP). This work was performed within the right of way corridor that passes through the Newmarket and Bennett Road Farms Historic District. We have thoroughly reviewed the concerns raised by the DHA, as explained below, and also propose a site walk with the regulatory agencies and the DHA to provide further assessment of the soil boring work.

First and foremost, please be assured the preservation of historic resources throughout all of our right of way corridors in New Hampshire is a priority for our company. For SRP, significant analysis by our cultural resources experts and consultation with state and federal agencies and organizations has taken place to ensure the proper identification and preservation of cultural resources. For example, an archaeological Phase IA investigation was completed by a team of professional archaeologists under the direction of an archaeologist meeting the Secretary of Interior Standards with over 30 years' work experience in New Hampshire. The Phase IA investigation consisted of in-depth archival research and records review of New Hampshire Division of Historical Resources (DHR) data as well as historical documents including, historical town maps and town histories. The archival research and records review identified the locations of known archaeological sites within the project's direct Area of Potential Effect (APE), defined for the SRP as the existing 100-foot-wide right of way corridor. It also identified archaeological sites previously recorded in the DHR site inventory files within 2.5 kilometers of the direct APE. It's our understanding that the primary concerns of the DHA relate to potential damage of wetlands, archaeological resources and stone walls within the 100 foot wide right of way corridor, although some resources identified in the town's letter are located outside of that corridor.

The Phase IA investigation included an archaeological reconnaissance (site walk) survey of the entire project's direct APE. This reconnaissance survey, in conjunction with the information derived from the archival research and records review, was used to identify archaeological sites exhibiting surficial evidence and identify areas having the potential to contain intact archaeological resources within the project's direct APE. A Phase IB archaeological investigation was then conducted to determine if intact subsurface archaeological deposits were present, at the locations identified during the Phase IA investigation.

Thus far, Eversource has undertaken preliminary application field work for the Seacoast Reliability Project ("SRP"), which included soil borings throughout the right of way. The soil boring work required the use of a tracked vehicle to take soil and rock samples near the proposed pole locations to help evaluate the subsurface conditions as part of our engineering design.

Prior to commencing field work, the contractor and our environmental consultant met to discuss sensitive resources within the right of way in order to avoid or minimize impacts associated with the field work. A desktop review of the project area mapping and access plans for each boring site was followed by a site walk with the contractor for further identification of resources in the field. In Durham, we sought alternate access routes to avoid wetland impacts to some soil boring locations from the University of New Hampshire, The Nature Conservancy and the New Hampshire Fish and Game Department. Following the development and review of the access plan, the contractor conducted the field work with oversight of an Eversource construction representative and in consultation with the Project's environmental consultant. The New Hampshire based soil boring contractor is fully aware of the historical significance of stone walls and the applicable wetland regulations.

The soil boring work and drilling work was performed in compliance with the New Hampshire Department of Environmental Services (NHDES), Wetland Bureau regulation; Env-Wt 303.05 (n). For SRP, the contractor used a metal track rig with low ground contact pressure and a rubber track rig that utilized matting to reduce ground contact pressure. In several locations on the SRP route, the contractor used additional mitigation methods to reduce impacts such as the use of lightweight matting and installing temporary bridges over streams. We do recognize that along the access routes the vegetation was compressed from the tracked vehicle. This impact is temporary as these locations will rapidly re-vegetate. Photographs of the drill rig, lightweight matting and a bridge are attached for your reference.

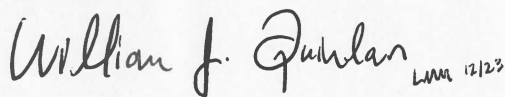
Eversource is committed to ensuring it is respectful of identified cultural resources, such as cellar holes and stone walls. The thorough and comprehensive archaeological investigations described above resulted in the identification of one archaeological site that may potentially meet the criteria for listing in the National Register of Historic Places (NRHP), the LaRoche Brook Wetlands Cellar Hole Site. The soil boring contractor was explicitly directed to access the corridor along the eastern edge of the right of way in this location. The contractor followed this direction and the Cellar Hole Site was not impacted. Additionally, the archeological consultant and DHR have recommended that this site be avoided during construction. This recommendation will be incorporated into the construction plans.

In addition, throughout years of accessing and maintaining the infrastructure within the corridor, well-established breaches in the existing stone walls have been used as the lowest impact

option for access. When conducting the soil boring work with the drill rig, existing breaches were used to avoid detrimental impacts to the stone walls. In a few locations, where breaches were not well established, there may have been unavoidable scratching or shifting of the rock. Based on visual assessments of the corridor in the fall, when the work was completed, we believe that this type of impact was minimal. In addition, after a Durham resident raised a question about potential damage to a stone wall on his property during the soil boring work, a site assessment was completed and our team consulted with the DHR on the issue. All were in agreement that accessing the stone wall through the existing breach did not damage the stone wall.

As mentioned above, we do believe a site walk would be beneficial. We have invited the DHA, DHR and the NHDES to join us for a review of each of the locations that are of concern to the DHA. Although the snow cover is currently delaying that assessment, we are prepared to coordinate this site walk expeditiously when site conditions allow. We are committed to addressing any issues that may be identified and, of course, will be employing protection measures to avoid any future impacts. We look forward to working with you, DHA, DHR and NH DES to ensure preservation of these important resources.

Sincerely,



William J. Quinlan
President, NH Electric Operations

cc: Ms. Elizabeth Muzzey, State of NHDHR
Mr. Dave Keddell, US Army Corps of Engineers
Attorney Christopher Aslin, Assistant Attorney General, & Counsel for the Public
Ms. Pamela Monroe, Administrator, New Hampshire Site Evaluation Committee
Durham Town Council
Ms. Nancy Sandberg, Durham Historical Association
Mr. Peter Stanhope, Chair, Durham Heritage Commission
Ms. Martha Roy, Town Administrator, Town of Newington
Mr. Christopher Clement, VP for Finance & Administration, UNH
Attorney Douglas Patch, Orr & Reno, Attorneys at Law

Drill Rig



Bridge



Lightweight Matting

