



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

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July 22, 2015

Brian Mills
US Department of Energy
1000 Independence Ave. SW, OE-20
Washington, DC 20585

Re: Northern Pass Transmission Project; Project Area Forms (RPR 4680)

Dear Mr. Mills,

Please find attached the New Hampshire Division of Historical Resources (DHR) comments on the Merrimack Valley Region Project Area Form, submitted by the SEARCH consultants in support of the Section 106 review of the Northern Pass Transmission Project. The DHR reviewed the Merrimack Region Project Area Form at the Determination of Eligibility Meeting on July 22, 2015. We recognize that significant time and effort went into the preparation and review of these documents and we appreciate your assistance during the identification phase of Section 106. However, the DHR cannot agree with the recommendations as set-forth in the document until such time that it is revised to address comments found within the attached Determination of Eligibility review sheet. As you may notice, many of these comments are similar to those found within previous Project Area Forms.

We appreciate your efforts in making these documents available to the public and consulting parties on your website.

Please contact me or Nadine Peterson, 603-271-6628 or Nadine.Peterson@dcr.nh.gov, if you have further questions. We look forward to reviewing the revised materials.

Sincerely,

Richard A. Boisvert, Ph.D.
Deputy State Historic Preservation Officer

RAB:nmp

Enclosures

cc: Jenna Higgins, SEARCH
Stefan Claesson, Ph.D., SEARCH
Sarah Jordan, White Mountain National Forest
Frank Delgiudice, US Army Corps of Engineers
Dave Keddell, US Army Corps of Engineers



**NH Division of Historical Resources
Determination of Eligibility (DOE)**

Date received: 4/30/15

Inventory #:

Date of group review: 7/22/15

Area: ZMT-NPMV

DHR staff: Nadine

Property Name: Northern Pass Merrimack Valley Town/City: Multi-town

Address: Canterbury, Boscawen, Concord County: Merrimack and Rockingham
Epsom, Pembroke, Allenstown, Nottingham, Deerfield

Reviewed for: ☒ R&C ☐ PTI ☐ NR ☐ SR ☒ Survey ☐ Other
Agency, if appropriate: US Dept. of Energy

Individual Properties

NR	SR
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Not evaluated for individual eligibility
<input type="checkbox"/>	<input type="checkbox"/> Eligible
<input type="checkbox"/>	<input type="checkbox"/> Eligible, also in district
<input type="checkbox"/>	<input type="checkbox"/> Eligible, in district
<input type="checkbox"/>	<input type="checkbox"/> Not eligible
<input type="checkbox"/>	<input type="checkbox"/> Incomplete information or evaluation

Districts

NR	SR
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Not evaluated @ district
<input type="checkbox"/>	<input type="checkbox"/> Eligible
<input type="checkbox"/>	<input type="checkbox"/> Not eligible
<input type="checkbox"/>	<input type="checkbox"/> 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 Project Area Form for the Northern Pass - Merrimack Valley region is centered on an Area of Potential Effects (APE) that follows the existing transmission line and encompasses a two-mile wide, 31.5 mile long corridor that originates at the Canterbury-Northfield border, south through Canterbury and Concord, and then easterly through the towns of Pembroke and Allenstown. The project corridor has its southern terminus in the town of Deerfield near its boundary with Nottingham. The Merrimack River is the prominent natural feature that parallels the project area from Canterbury to Concord. The area is dominated by semirural and rural woodlands within a landscape of scattered farms and single-family homes. Exceptions occur near Concord where more developed, suburban communities are found and characterized by planned developments. Europeans began exploring the Merrimack Valley region in the seventeenth century, when settlers from Massachusetts came up the Merrimack River looking for habitable areas. The economy in the region was initially focused on subsistence agriculture. Farms in and around Concord produced grain and potatoes, while Deerfield produced wheat, corn, oats, potatoes, apples, cheese and maple sugar. Shaker Village in Canterbury was known for its modern agricultural methods and produced wheat, oats, apples, pears, and dairy products. Increased access to other regional and national markets came with the construction of canals and railroads, which fostered the development of a dairy industry throughout the region. By the late nineteenth century, the region had shifted from a primarily agrarian economy to an industrial one, causing populations to shift from rural to urban areas such as Concord and Suncook Village where mills made use of available water power resources. While many of the communities in the region held small-scale industry including small grist and saw mills, shoe-making, and manufacturing both Concord and Suncook village took on a more robust industrial base. Page Belting and Abbot-Downing (Concord Coach) were two significant companies flourishing in the nineteenth century in Concord. Notable nineteenth century manufacturing in

Pembroke/Allenstown included axe and hammer handles, shingles, a tannery, granite works, a box factory, and textile mills.

While recreation was not a significant in this region compared to others in the study area, the Civilian Conservation Corps built a formal camping area at Bear Brook in 1935 which led to the establishment of Bear Brook State Park in Allenstown.

An architectural description section notes a wide variety of resource types and styles. The earliest examples from the Georgian and Federal period are noted along with resources designed in the Greek Revival, Gothic Revival, French Second Empire, Queen Anne, and Colonial Revival styles. Because of suburban development in the region, mid-century homes in the form of ranches/raised ranches are seen. As in other regions, many of the residential buildings take the form of Cape Cod residences and connected farmhouses. Meetinghouses, churches, schools, libraries, town halls, and other public buildings are centered within a number of historic village/town centers. Quintessential New England villages can be found throughout this region particularly in Canterbury and Deerfield. Cemeteries also dot the landscape.

☐ ENTERED INTO DATABASE

ACREAGE: 42234.1 acres

PERIOD OF SIGNIFICANCE: N/A

AREA OF SIGNIFICANCE: N/A

BOUNDARY: N/A

SURVEYOR: Jenna Higgins, Stefan Claesson, Jacob Freedman, Jessica Fish and Tricia Peone

FOLLOW-UP: Notify appropriate parties.

At this time, the New Hampshire Division of Historical Resources cannot concur on the recommendations of the Project Area Form until the following issues are addressed (please note that the majority of these issues are consistent with the White Mountains, Great North Woods, and Lakes Regions project area form):

Maps:

- 1) A map showing the location of all four Project Area forms is needed to show the proximity to each other and the overall extent of the project location.
- 2) The Location Map and corresponding Sketch Maps should note the towns in letters large enough to read.
- 3) All Sketch Maps should use the same terminology as the Location Map. For example, the Location Map notes them as 16A not Sketch Map A.
- 4) The Direct APE on the sketch maps is noted in the legend as white, but is shown in maroon and other colors on the maps to represent the number of "structures" visible from that location. A less confusing way to depict the Direct APE is needed.
- 5) The "Project Area" on the key should be called the Indirect APE (this should also be reflected in the written methodology).
- 6) All previously surveyed properties should be identified within the Indirect APE, not just those located within the Zone of Visual Influence.

Methods and Purpose (page 19):

- 1) Please provide an explanation as to how the direct/indirect Areas of Potential Effects were defined.
- 2) The DHR is aware that the Department of Energy solicited information from consulting parties early in the Section 106 process. This information included a request that consulting parties provide locational information of properties of local importance. Please explain how this information was utilized in the evaluation methodology. A table listing all properties provided by consulting parties placed in the body of the report or as an appendix would be useful.

Viewshed Analysis (pages 20-21):

- 1) How was the 50 m buffer zone arrived at?
- 2) Was the 50 m GPS point taken at the center of the developed area of a property?
- 3) How did the methodology account for large acreage properties such as farms and recreational areas at the edge of the indirect APE?

Flow Chart (page 22). The following methodology is based on the DHR's understanding of its discussions with the Department of Energy and its consultants:

- 1) The DHR agrees with the first three decision-making steps in the flow-chart.
- 2) Step 4 must consider whether aspects such as setting, landscape or viewshed are potentially character-defining features of the property.

- 3) Step 5 must recommend whether the property is sufficiently intact to warrant further inventory.
- 4) The 6th step is premature. Determinations as to whether or not the property retains historical significance is completed during the next inventory phase.
- 5) The final step highlighted in green, Visual Impact Assessments, are not part of the Project Area Form process. Project Area Forms recommend if additional inventory is required and in what type of format. Visual Impact Assessments may be used after resources have been identified during the assessment of effects phase of the undertaking.

Historical Background:

Transportation (page 28): A number of potentially significant transportation corridors are discussed in the background section. Please recommend whether any of these corridors retain integrity and should be evaluated during the next phase of the identification process.

Agriculture (page 29-30): A significant movement in New Hampshire at the turn of the twentieth century was the use of abandoned farms as second homes. This idea was promulgated by the New Hampshire Board of Agriculture in the document, "New Hampshire Farms for Summer Homes," published in 1910. Please utilize this document and expand on its relevance to the agricultural and recreational contexts.

Is there a potential for encountering rural historic districts under the agricultural context? Under the architectural context, please describe whether there are any distinctions to the layout or character of farms in this region compared to other areas.

Industry (page 30-32): This section points to specific examples of industrial resources in each of the community but does not provide a more holistic discussion in the region. Are there common industrial types? What are the character-defining features of this resource type? Are the scale and form consistent or varied throughout the region?

Architectural Description - Residential resources (page 38): Are there any common forms for the early-to-mid twentieth century suburban developments in regards to layout, orientation, size, infrastructure, style?

Section 22. Statement of Significance (page 46):

There are differences between identifying properties that should be inventoried due to the potential importance of setting, landscape or viewshed to their significance, and the later step of evaluating setting under the National Register's definition of integrity.

The second paragraph of this section ends with several statements that are premature and need to be clarified. Please refer back to the comments under the Flow Chart above to revise this paragraph.

In addition, it is premature within a Project Area Form to discuss the need for assessment of effects. Please remove any statements that refer to this phase of Section 106. **It is critical not to include the potential effects in your recommendation for future survey. If a property whose significance is derived from its setting, viewshed, or landscape is located in both the APE and the ZVI, then it should be recommended for evaluation. Preliminarily assessing effects during the identification phase to preclude survey of properties is not appropriate.**

Please be aware that the DHR has a 10 year cut-off for eligibility recommendations under Section 106. A resource evaluated more than 10 years ago may need to be looked at to determine whether setting, viewshed, or landscape is character defining to the resource. Table 1 may need to be revised under the Integrity Statement section for such resources.

For the reasons noted above, the DHR disagrees with evaluation methodologies and cannot concur with survey recommendations at this time. While a thorough review of pages 47-172 was not conducted due to the disagreement with evaluation methodologies, some overriding issues were identified that should be revised when re-submitting the document, including:

- 1) Dates of eligibility findings would be useful to include in the previously evaluated tables.
- 2) Table 2 is confusing.
- 3) A better description of why or why not existing historic districts should or should not be re-evaluated would be useful.
- 4) Please ensure that the numbers of resources you reference in the text are consistent with the numbers shown in the forms.

Final DOE approved by: