



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

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July 9, 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 Lakes 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 Lakes Region Project Area Form at the Determination of Eligibility Meeting on July 8, 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 both the White Mountains Region and Great North Woods Region 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](mailto: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: 7/8/15

Area: ZMT-NPLR

DHR staff: Nadine

Property Name: Northern Pass Lakes Region      Town/City: Multi-town

Address: Holderness, Ashland, Bridgewater      County: Coos  
New Hampton, Bristol, Sanbornton, Hill, Franklin, Andover, Northfield, Salisbury

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

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**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.

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**STATEMENT OF SIGNIFICANCE:**

The Project Area Form for the Northern Pass - Lakes region is centered on an Area of Potential Effects (APE) that follows the existing transmission line and encompasses a two-mile wide, 32.6 mile long corridor that originates at the Campton-Holderness border and extends south through Holderness, Ashland, New Hampton, Bridgewater, Bristol, Hill, and Franklin, as well as small sections of Andover and Salisbury. The majority of the corridor runs parallel to the Pemigewasset River, which bisects the project area north to south until it meets the Winnepesaukee in Franklin and forms the Merrimack River.

The area under study is situated in a section of New Hampshire which has been dramatically shaped by the last glacial maximum, which allowed glacial retreat to scour the area, leaving depressions which would become the multitude of lakes from which this region derives its name. The topography of this region is predominately hilly and rising to mountains in the north, with settlement concentrating in the valleys near major water sources and floodplains.

European settlement in the Lakes Region was slow until rapid population increases took place during the Industrial Revolution. Agriculture, industry, and tourism (along with transportation to enable such development) have been the economic foundation of the region for much of its history. Improvements to transportation included the establishment of turnpikes in 1800. Railroads opened up the area to new development when the Boston, Concord, & Montreal Railroad reached Plymouth by 1850 and the Franklin and Bristol Railroad began operation in 1848. By 1895, the region's two main railroads (the Concord & Montreal and the Boston & Maine) merged to become the Boston, Concord & Montreal which ran freight and passengers until 1967. The rise of automobile transportation helped maintain the growth of many towns as train travel became obsolete.

The early development of the Lakes Region was focused on agricultural production with corn, potatoes, hay, wool, and maple sugar as standard crops. Sheep herding and dairying were prominent in less fertile, upland areas. Various types of industry emerged with the numerous rapids and falls offering excellent sites for water-powered mills. Large-scale industry occurred in Franklin with a variety of mills from as early as 1822 (Granite Mill) through the late nineteenth century (Franklin Needle Mill 1874).

Recreation was a significant theme in the development of the Lakes Region. The shorelines of the area's lakes and ponds were ripe for development and many hotels, boarding houses, summer homes and camps were constructed during the mid-nineteenth century to the present day. Public and Educational Institutions is the final context to be discussed in the document mentioning the development of the Holderness School, Plymouth State University, Proctor Academy, and New Hampton Academy as well as the many local schools that operated in the region.

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. 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. Modest seasonal summer cottages were constructed near lakes or on promontories with scenic vistas. Automobile related roadside commercial architecture includes motor courts and motels and small cabins, restaurants, gas stations, and other related resources.

ENTERED INTO DATABASE

ACREAGE: 41799 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

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**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 and Great North Woods 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 25):**

- 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 26-27):**

- 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 28). 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 34): 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 36-37): 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 37-40): 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?

Recreation (page 40): The Recreation context is weak. The discussion appears to be based strictly on town development, rather than looking at the big picture of the region. Are there any summer camps in the area? Given that this area has been and continues to be one of the leading tourist destinations in the state, please expand on this context where appropriate.

**Section 22. Statement of Significance (page 53):**

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.

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 55-110 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.

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**Final DOE approved by:**