



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

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May 17, 2016

Pamela Monroe, Administrator
NH Site Evaluation Committee
21 Fruit South Fruit Street, Suite 10
Concord, NH 03301

Re: Application of Northern Pass Transmission, NHSEC Docket No. 2015-06, 150 day review

Dear Ms. Monroe:

In accordance with NH RSA 162-H:7, the New Hampshire Division of Historical Resources (DHR) is reporting progress in its review of the above-referenced project.

The DHR has a responsibility to review this project under NH RSA 227-C:9 and under Section 106 of the National Historic Preservation Act (NHPA), as amended. NH RSA 227-C:9 directs all state agencies, departments, commissions and institutions to fully cooperate with the DHR in identifying historical resources and addressing adverse effects during state-assisted projects, activities and programs. Section 106 requires federal agencies to work with State Historic Preservation Officers and the public to consider the effects of agency actions on historic properties and to provide the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on them prior to implementation. For the Northern Pass Transmission Project, the US Department of Energy (DOE) has been designated as the Section 106 lead federal agency.

The DHR's comments address progress on the Section 106 review of the proposed project and on the applicant's progress in completing stipulations in a Memorandum of Understanding executed by the DHR and the applicant on December 4, 2015. The MOU reflects the applicant's commitment to conduct Section 106 historical and archaeological resources surveys in addition to those supplied in the SEC application and to address other DHR concerns. In light of the MOU commitments, DHR agreed to find that the SEC application contained sufficient information for its purposes. Progress on resource identification since December 4, 2015 includes:

Archaeological / below-ground resources:

- The applicant has submitted all Phase IA reports, identifying roughly 250 areas of archaeological sensitivity within the area of potential effect (APE). DHR and DOE have reviewed and approved these reports.
- Although the applicant has reported that Phase IB archaeological surveys are ongoing this field season, DHR and DOE have not received or reviewed any written reports summarizing results and recommendations for Phase II surveys.



- Many of the above-noted archaeological reports were submitted to the DHR as appendices to the SEC application filing. The DHR has requested that the applicant instead submit the reports according to state standards and guidelines: bound copies on archival paper, as well as in an electronic format. These have not been submitted.

Architectural / above-ground resources:

- The applicant has not submitted NHDHR survey forms for the 76 individual properties and 54 potential historic districts recommended for further evaluation within the project's area of potential effect (APE) and zone of visual influence (ZVI). Potential historic districts range from small clusters of historic buildings or properties, to historic trails or railroad corridors, to large acreages (100+) that combine historic buildings, landscapes and natural features. Survey recommendations were prepared by DOE's cultural resources consultants in four Project Area Forms; DOE and DHR concurred on the recommendations.
- Additionally, the project area forms identified 20 individual historic properties and three historic districts already listed or eligible for listing on the National Register of Historic Places within the APE/ZVI. Section 106 consultation will also continue with these resources.
- The project area forms also identified two large cultural landscapes that require further evaluation within the APE/ZVI: the Pemigewasset River Valley and the Suncook River Valley. The DHR continues to work with DOE and its cultural resources consultants to define an identification and evaluation methodology for these resources.
- DOE's cultural resources consultants also continue to finalize survey recommendations to reflect the most recent change to project plans, undergrounding through the White Mountains. Survey recommendations may change based on the direct effect of undergrounding rather than the visual impact of overhead transmission.

Other progress relating to the Section 106 review includes continued consultation on a draft Programmatic Agreement and the drafting of a work plan as part of that agreement. DOE is leading the effort to draft the Programmatic Agreement and held a number of meetings and conference calls throughout the winter and spring to gather consulting party comment. As of April 4, 2016, DOE had granted 66 individuals and organizations Section 106 consulting party status.

As noted in previous correspondence, pursuant to NH RSA 162-H:7-a, the DHR has designated two staff liaisons to assist the Committee if it has further questions: Edna Feighner, Review & Compliance Coordinator and Archaeologist, edna.feighner@dcr.nh.gov, and Nadine Peterson, Preservation Project Review, nadine.peterson@dcr.nh.gov.

Thank you for providing the DHR an opportunity to comment; if you have any questions please contact Edna or me at 603-271-3483.

Sincerely,



Nadine Miller
Preservation Project Reviewer

c.c C. Callaghan, DOE