



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

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December 21, 2017

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Ms. Pamela Monroe, Administrator
NH Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Northern Pass Transmission, LLC
SEC Subcommittee Docket No. 2015-06 (RPR 1448)
Findings of Effect

Dear Ms. Monroe,

The purpose of this letter is to transmit to the NH Site Evaluation Committee (SEC)/Northern Pass Transmission Subcommittee the DHR's determinations of effect on historic and archaeological properties for the above referenced project and to outline possible conditions that could be imposed by the Subcommittee regarding these resources. The NH Division of Historical Resources (DHR) submits this letter under its responsibilities as defined by NH RSA 162-H:7 and 7-a, NH RSA 227-C:9, and Section 106 of the National Historic Preservation Act, 54 U.S.C. §306108.

The Section 106 review process is ongoing and is not yet complete. In particular, archaeological investigations on a four-mile segment in the towns of Stewartstown and Clarksville have not been initiated due to a lack of permission to do so by the boards of selectmen in those communities. Further, the Section 106 consultation process has not been implemented to determine the project's effects on historic and archaeological resources and to resolve adverse effects. These steps shall be completed according to the Programmatic Agreement signed by the US Department of Energy (DOE), the Advisory Council on Historic Preservation, the NH State Historic Preservation Office/NH Division of Historical Resources, the White Mountains National Forest, the US Army Corps of Engineers and the applicant, Northern Pass Transmission, LLC. Further, the various consulting parties have not had the opportunity to offer their comments on these steps in the process. Consequently the findings and determinations offered here must be considered preliminary and subject to revision as the Section 106 process moves forward.



Archaeological/Below-Ground Resources:

The reconnaissance survey to identify archaeological sites began in 2010 and has continued through 2017. This reconnaissance included documentation of previously identified sites and sites discovered through field surveys. A total of 85 archaeological sites, including post-Contact structures, foundations or quarries and pre-Contact Native American habitations, have been documented. Of these, 73 sites were determined to be not eligible for listing on the National Register of Historic Places. Lacking this status during a Section 106 review, a property is not considered historic (i.e. significant), and a finding of “No Historic Properties Affected” is typically made. The DHR determined 12 sites to be either eligible or potentially eligible for listing on the National Register of Historic Places. However, the applicant committed to shifting the right-of-way away from the archaeological sites in five instances and redesigns of the project were carried out in five other instances. Consequently the DHR made the determination of “No Historic Properties Affected” for these ten sites.

The applicant has indicated that it is not possible to avoid impacts on the remaining two sites, the Cold Brook Site (27-MR-399) in Canterbury and the Turtle Town Pond Site (27-MR-352) in Concord. The DHR finds that there will be adverse effects on these two sites, and that the applicant will need to implement minimization or mitigation of the adverse effects under the Programmatic Agreement as referenced above. Table 1 summarizes the findings of effect for the 12 sites.

Architectural/Above-Ground Resources:

Identification for above-ground resources is complete for the Northern Pass Transmission project. Through the use of Project Area Forms, Cultural Landscape Reports, Historic District Area Forms, and Individual Inventory Forms, a total of 114 architectural/above-ground resources are considered historic – eligible and/or listed on the National Register of Historic Places – for the purposes of the Section 106 review of this project. Each property was assessed to determine the potential effects of the Northern Pass Transmission project. The applicant prepared Determination of Effect Tables to provide technical information on each property, including an explanation of the relationship of project construction to the resource, an effect/adverse effect evaluation, project mapping, photographs, and in some cases, photo-simulations. Although the information provided was helpful in describing the project’s potential impacts, the DHR did not consistently agree with the applicant’s recommendations of effect or the reasons provided to support effect recommendations.

The DHR’s effect findings for Architectural/Above-Ground Resources found in Table 1 are based on currently-available information provided by the applicant in the Effect Tables. As the Section 106 review of this project continues additional information and comment provided by the applicant, participating agencies, consulting parties, Native American groups and the public will further inform these determinations and may result in changes in the determinations or recommendations.

Underground Section of the Proposed Project:

Architectural/above-ground resources located within the underground section of the project may have character defining features that are located within the project’s right-of-way. Examples of these features include trees and landscape features, stairs/steps, signs, stone walls and fences, and even parts of buildings (porches, barns etc.). The applicant has committed to avoid these features and to restore the areas to existing conditions once the project is complete. Because these project plans are not available, have not been reviewed by the DHR and US Department of Energy

(DOE), and the above-noted commitments are not yet codified through the Programmatic Agreement's Historic Properties Treatment Plan, the DHR has currently noted a finding of Adverse Effect for resources under this category. These preliminary findings may change once plans become available and the scope of work for the underground portion of the project is reviewed by DOE and DHR to ensure consistency with the *US Secretary of the Interior Standards for the Treatment of Historic Properties*.

Cultural Landscapes:

DOE and DHR have determined that eleven cultural landscapes are eligible for listing on the National Register of Historic Places in the project's area of potential effect. The DHR's letter dated December 11, 2017 to the SEC provides an overview of the characteristics and historic features found within these areas as well as a presentation of what makes them significant. Cultural landscapes are often large in acreage, encompassing both the natural and built environment. The landscapes identified for this project are primarily rural in character with viewsheds being an integral component. Introducing additional and taller tower structures, electrical lines, and new clearing in rights-of-way may adversely impact the landscape's rural character, resulting in an Adverse Effect finding. Of the 11 cultural landscapes assessed, two resulted in a DHR finding of No Historic Properties Affected, one in a No Adverse Effect finding, and eight in an Adverse Effect finding. Of the eight cultural landscapes with Adverse Effect findings, three are located within or partially within the underground section of the project; these findings may change once detailed project plans and formalized commitments to protecting character defining features become available.

Historic Districts:

Historic districts are located throughout the area of potential effect. Often characterized by a grouping of farm complexes and their surrounding landscape features or camps and associated lake frontage or wooded areas, these districts are illustrative of New Hampshire's historic landscape. Other districts focus on historically-significant town or village centers. Many of these districts will be adversely affected by the project due to the introduction of modern visual elements out of keeping with the historic setting of the districts. The DHR disagrees with a number of the applicant's effect assessments for historic districts. This disagreement is primarily due to the applicant using limited directional views versus the DHR using a holistic visual analysis of the district.

In other cases the DHR disagrees with the applicant's recommendations due to heightened public concerns and sensitivity of a particular resource. As an example, the Weeks Estate is located on the summit of Mount Prospect within Weeks State Park and the Mount Prospect-Martin Meadow Pond Cultural Landscape. The Weeks Estate was the summer estate of John Wingate Weeks and has the potential to retain significance at the National Level for this association. The site is known for its 360 degree views of the Presidential Range and Pliny Range of the White Mountains, the Pilot Range, Percy Peaks, the Connecticut River Valley and the Green Mountains in Vermont. A historic stone tower on the property takes advantage of these views. The view from the observation tower is an important character defining feature of the National Register listed property, and the project is visible from this feature. While the applicant recommended a finding of No Adverse Effect for the Weeks Estate, the DHR is concerned that iconic views from the property will be impacted by the project. Therefore, with the information currently available, the DHR is recommending an Adverse Effect finding.

Historic Agricultural Properties:

A number of affected properties in the project are agricultural in nature; these historic farms are individual resources or are located within historic districts or cultural landscapes. Farms with connected farmhouses, outbuildings, fields and woodlots are significant to New Hampshire's rural character. The applicant has indicated in several effect assessments that farm fields and woodlots are not character defining, and therefore the project will result in a No Adverse Effect to that farm. However, the DHR assumes that all fields, woodlots and other agricultural landscapes contribute to a historic farm's significance, unless otherwise indicated that a loss of integrity has occurred at that location. Therefore, the DHR cannot agree with the applicant's methodology and in many cases the DHR made a finding of Adverse Effect.

Railroads:

Six historic railroads eligible for listing on the National Register of Historic Places were identified and assessed within the area of potential effect. The applicant made a recommendation that all the railroads would not be affected by the project because visibility of the project would not alter their significance in the areas of transportation or engineering. However limited information was provided to support this recommendation in the Effect Tables in the form of project mapping, a discussion of the physical relationship of the project to the property, or an Adverse Effect evaluation. A review of the inventories and evaluations prepared for the railroads noted that many if not all also have significance under tourism. Some railroads marketed the "Grandeur of the Scenery" to Lakes Region and North Country tourists, and scenic views were important features along their paths. Without information to understand how the project may impact the railroads, DHR recommends a finding of Adverse Effect, pending additional information and assessment.

Certificate Conditions:

Under the Section 106 consultation process, adverse effects to historic properties are typically resolved through a commitment by the lead federal agency to ensure that appropriate mitigation measures are implemented. These measures are codified in a Memorandum of Agreement. As noted in the DHR's August 25, 2017 letter to the SEC, the adverse effects presented by the proposed Northern Pass project will be resolved instead through the implementation of a Programmatic Agreement. These types of Section 106 agreements are used for a number of reasons, including for complex projects involving large land areas where the federal agency cannot fully determine the project's effects to historic properties prior to its final approval of the project (36 CFR § 800.14(b)(1)).

Following the assessment of effects (36 CFR § 800.5), the Northern Pass Programmatic Agreement anticipates resolving adverse effects through the preparation and implementation of a number of plans. Resolution of adverse effects will be considered in the preferred order of avoidance, minimization and mitigation. Treatments, methodologies and mitigation measures will address the project's direct, indirect, cumulative, and reasonably foreseeable adverse effects, including reasonably foreseeable effects arising from ongoing operation and maintenance of the project. The Programmatic Agreement also lays out a process for gathering and considering comments by the public and the Section 106 consulting parties on the mitigation package prior to finalizing and implementing the plans. The plans are:

1. Historic Properties Treatment Plan
2. Native American Graves Protection and Repatriation Plan of Action, if needed
3. Monitoring Plan

4. Unanticipated Discovery Plan
5. Training Plan for Northern Pass Transmission Personnel
6. Curation Plan
7. Repatriation Plan, in the event Native American remains are found in the White Mountains National Forest.

If the Site Evaluation Committee approves this project's application for certificate, the DHR requests that the successful preparation and implementation of these plans be among the conditions placed on the certificate.

Although the Section 106 review of this project has not yet reached the point of enumerating specific treatments and measures to mitigate adverse effects presented by the project, to date the DHR has identified through consultation the following objectives that will inform its decision-making on appropriate mitigation. As noted above, as the Section 106 consultation on project effects and appropriate mitigation measures continues, additional objectives and specific treatments and measures for adversely-affected resources will be developed. Comment by the Section 106 consulting parties and the public in particular will inform the development of appropriate mitigation for the proposed project. The examples listed after each objective below do not represent the DHR's final or definitive list of mitigation recommendations.

1. The large amount of data and evaluation gathered during the identification and evaluation phase of the Section 106 review should inform the development of mitigation measures. Mitigation measures should incorporate and build upon identification and evaluation efforts completed.

Examples of possible mitigation measures that would meet this objective include, but are not limited to:

- a. Compilation and publication of historic context reports on significant archaeological, historical and architecture patterns of development in the project area, including, but not limited to, the ceramic tradition in the Late Woodland archaeological period, the history of agriculture from European settlement through the Bicentennial period, and the history of recreational camps and vacation homes in New Hampshire.
 - b. Creation and distribution of school curriculum focusing on New Hampshire historical resources and place-based education on topics not currently covered, such as New Hampshire Native American history.
 - c. Distribution of survey and inventory reporting to relevant towns and cities, accompanied by public programming that explains the value and potential uses of the materials.
2. Mitigation should provide lasting and meaningful value to the affected communities and consider local preservation planning and goals already in place, rather than rely on standard or boilerplate mitigation measures.

Examples of preservation planning efforts include, but are not limited to:

- a. Historical resources chapters in community master plans.

- b. *My New Hampshire: New Hampshire's Five-Year Preservation Plan 2016-2020*, published by the DHR.
 - c. *Granite State Future*, a planning initiative by the state's nine regional planning commissions.
3. For historic property types adversely affected by visual impacts caused by the proposed project, mitigation measures should enhance and protect character defining features of the property, as identified through identification and evaluation by DOE and DHR.

Examples of possible mitigation measures that would meet this objective include, but are not limited to:

- a. Funding opportunities that maintain and repair historic properties – such as homes, barns, other agricultural outbuildings, burial grounds, historic mill sites and other landscape features – in a manner that meets the *US Secretary of the Interior's Standards for the Rehabilitation of Historic Properties*.
 - b. Measures that enhance the historic setting and appearance of adversely-affected historic districts, such as streetscape improvements, façade repair programs, or the removal of non-historic visual intrusions, such as distribution utility lines.
 - c. Public educational programming and opportunities focusing on preservation programs and tools and the care and stewardship of historic places.
4. A majority of the historic properties adversely affected by visual impacts are in rural areas and often relate to agricultural, conservation or recreational themes. If adverse effects to individual properties cannot be mitigated onsite, mitigation measures should focus on rural preservation programs and tools that will protect and enhance the historic resources found in these areas.

Examples of possible mitigation measures that would meet this objective include, but are not limited to:

- a. For interested property owners, preparation of National Register nominations or other public recognition designations.
 - b. Exploration of the use of easements and other innovative land management tools to protect historic landscapes in perpetuity.
 - c. Interpretative signage in public areas – such as village commons, hiking trails and state reservations – that explains in text and images the history and significance of rural historic places in New Hampshire.
5. For above-ground historic properties directly and adversely affected by the proposed project – direct impacts are defined as the physical destruction of or damage to all or part of the property – measures that avoid or minimize the adverse effect should first be considered. Treatments that the lead federal agency and State Historic Preservation Office determine adhere to the *US Secretary of the Interior's Standards for the Treatment of Historic Properties* are considered avoidance or minimization measures and may result in a finding of no adverse effect for the specific historic property.

6. For archaeological sites adversely affected by the project's construction, operations or maintenance, mitigation measures that avoid or minimize effects should first be considered, followed by data recovery, if avoidance or minimizations are not feasible.

If the Site Evaluation Committee approves this project's application for certificate, the DHR requests that these six mitigation objectives, or a version of them, be among the conditions placed on the certificate.

Thank you for this opportunity to provide comment on the proposed Northern Pass Transmission project. As always, please feel free to be in touch if you have any further questions.

Sincerely,



Richard A. Boisvert, PhD
Deputy State Historic Preservation Officer
State Archaeologist

Attachment: Table 1

Re: Northern Pass Transmission, LLC
 SEC Subcommittee Docket No. 2015-06 (RPR 1448)
 Findings of Effect
 December 21, 2017

Table 1
Northern Pass Transmission Project
New Hampshire Division of Historical Resources Findings of Effect

Archaeological Resources: Pre-Contact		
Town	Resource Name	DHR Finding
Candia	27-RK-126 Critchett Road Site	NHPA
Canterbury	27-MR-399 Cold Brook Site	AE
Canterbury	27-MR-427 Cold Brook South Site	NHPA
Concord	27-MR-352 Turtle Town Pond Site	AE
Clarksville	27-CO-138 Pond Brook Tributary Site	NHPA
Deerfield	27-RK-495 Two Herons Site	NHPA
Lancaster	27-CO-98 Israel River Lancaster Site	NHPA
Archaeological Resources: Post-Contact		
Town	Resource Name	DHR Finding
Bridgewater	27-GR-246 River Road Cellar Hole Site	NHPA
Deerfield	27-RK-483-Hobbs House Site	NHPA
Deerfield	27-RK-485 School House No. 6 Site	NHPA
Franklin	27-MR-401 Salisbury Road Foundation Site	NHPA
Woodstock	27-GR-283 Beaver Pond Foundations Site	NHPA
Architectural:		
Town	Resource Name	DHR Finding
Allentown	Bear Brook State Park/Campground	NAE
Allentown	Bear Brook State Park CCC Camp Historic District	NHPA
Ashland	Ashland Village Historic District	NAE
Ashland	Ashland Junior High School	NHPA
Ashland	Ashland Railroad Station	NHPA
Ashland	First Free Will Baptist Church	NHPA
Ashland	Green Grove Cemetery	NAE
Bethlehem	Burt-Blaney Farm	NAE

AE – Adverse Effect
 NAE – No Adverse Effect
 NHPA – No Historic Properties Affected

Bethlehem	Scott-Wallace Farm	NAE
Bethlehem	Rocks Estate	AE
Boscawen	Jacob Gerrish Farmhouse/NH State Nursery	NAE
Bristol	Peaked Hill Road Rural Historic District	AE
Bristol	Emmons Worthen Farm	NAE
Campton	Blair Covered Bridge	NHPA
Campton	Campton Town House	NHPA
Campton	Colonel Spencer Inn	NAE
Campton	NH DOT Bridge 124/129	NHPA
Canterbury	Carter Hill School	NHPA
Canterbury	French-Pillsbury Farm	NAE
Canterbury	Gibson Farm	NAE
Canterbury	Windswept Farm	AE
Clarksville	Keysar House	NAE
Concord	Concord Armory	NHPA
Concord	Farnum Homestead	NHPA
Concord	Goodwin-Stevens Farm	NAE
Concord	Harriet P Dame School	NHPA
Concord	Leavitt Farm	NAE
Concord	Maple View Farm	AE
Concord	Oak Hill Agricultural District	AE
Concord	Potter Homestead Farm/Appleton Farm	NHPA
Deerfield	170 Nottingham Road	NAE
Deerfield	47 Candia Road	AE
Deerfield	Deerfield Town Hall	NHPA
Deerfield	Deerfield Center Historic District	AE
Deerfield	Lindsay-Menard Cabin	AE
Deerfield	Nottingham Road Historic District	AE
Dummer	Dummer Pond Sporting Club	AE
Dummer	Plain Road Historic District	NAE
Easton	Bendtzen-Fitch-Ingalls Camp	NAE
Easton	Wildwood Picnic Area	NAE
Epsom	Samuel Davis Homestead	NAE
Epsom	Short Falls Cultural Landscape	NHPA
Franklin	Aiken Family Webster Lake Complex	NAE
Franklin	Webster Avenue Historic District	AE
Franklin	Webster Farm Historic District	NAE
Franklin	Daniel Webster Family Home/The Elms (NHL)	NAE
Franklin	Moses B. Gove House	NAE
Franklin	Alpert Property	NAE
Franklin	Sylvanus T. Sargent House	NAE
Franklin	Webster E. Colby Cottage	NAE

AE – Adverse Effect

NAE – No Adverse Effect

NHPA – No Historic Properties Affected

Franklin	Robert M. Leach House	NAE
Hill	Hill Village	NAE
Jefferson	Howe Farm	NAE
Lancaster	Gotham House	NHPA
Lancaster	North Road Agricultural District	NAE
Lancaster	The Weeks Estate	AE
Lancaster	Mount Prospect/Martin Meadow Pond Cultural Landscape	AE
Millsfield	Signal Mountain Fire Lookout Tower	NAE
New Hampton	Dana Hill Road Rural Historic District	NAE
New Hampton	Morse Clay Farm	NAE
Northumberland	Groveton Village	NAE
Pembroke	Norris Cochran Homestead	NAE
Pittsburg	S.W. Swain Farm	NHPA
Plymouth	Benjamin Teele Barn	AE
Plymouth	Foster Peg Mill Area Factory Housing	NHPA
Plymouth	Frederick Philbrick Weeks House	AE
Plymouth	George Rice Foster House	NAE
Plymouth	Hazen N. Cross Farm	AE
Plymouth	Plymouth Downtown Commercial Historic District	AE
Plymouth	Robert E. Sutherland House	NAE
Plymouth	Plymouth Theater	AE
Plymouth	Lower Intervale Grange #321	AE
Stark	Nehemiah Cole Farm	NAE
Stark	Percy Summer Club	NAE
Stark	Pike Pond Historic District	NAE
Stewartstown	Keazer-Flanders Farm	NHPA
Stewartstown	North Hill Church	NAE
Stewartstown	Poore Family Homestead	NHPA
Sugar Hill	Lemuel Aldrich House	NAE
Whitefield	Betz Farm Historic District	NAE
Whitefield	Burns Farm	NAE
Whitefield	Chase Farm Historic District	NAE
Whitefield	George W. Libbey House	NHPA
Whitefield	King's Square Historic District	NAE
Whitefield	Morrison Nursing Home	NHPA
Whitefield	Mountain View Grand	NAE
Whitefield	NH DOT Bridge 110/105	NHPA
Whitefield	Page Hill Agricultural Historic District	NAE
Whitefield	Winch House	NAE
Woodstock	Clarence I. Bradley House	NAE
Woodstock	Jesse R. Matson House	NAE
Woodstock	Maple Haven Campground	AE
Woodstock	Meadow Lark Motor Court	NAE

AE – Adverse Effect

NAE – No Adverse Effect

NHPA – No Historic Properties Affected

Woodstock	Montaup Cabins	AE
Woodstock	NH DOT Bridge 177/148	NHPA
Woodstock	North Woodstock Village Historic District	AE
Woodstock	Woodstock Cemetery	AE
Woodstock	Woodstown Town Hall	AE
Multiple Town	Appalachian National Scenic Trail	NAE
Multiple Town	Northern Railroad	AE
Multiple Town	Boston, Concord, & Montreal Railroad (BC&M)	AE
Multiple Town	Maine Central Railroad (Mountain Division)	AE
Multiple Town	Pemigewasset Valley Branch Railroad	AE
Multiple Town	Grand Trunk Railroad (Atlantic & St. Lawrence)	AE
Multiple Town	White Mountain Railroad (Division of BC&M)	AE
Multiple Town	Franklin Falls Dam-Hill Village Cultural Landscape	NAE
Multiple Town	Gale River Cultural Landscape	AE
Multiple Town	Ham Branch River Cultural Landscape	AE
Multiple Town	Harvey Swell Cultural Landscape	AE
Multiple Town	North Road-Lost Nation Road Cultural Landscape	AE
Multiple Town	Upper Ammonoosuc River Cultural Landscape	AE
Multiple Town	Buck Street-Bachelor Road Cultural Landscape	AE
Multiple Town	Route 3 Tourism Development Cultural Landscape	AE
Multiple Town	Franconia Notch Cultural Landscape	NHPA

AE – Adverse Effect

NAE – No Adverse Effect

NHPA – No Historic Properties Affected