Appendix 33

Communications with NHDHR and USACE

Pursuant to RSA 227-C:11 the information in these reports must be kept confidential and is not subject to disclosure under the Right to Know Law

Please mail the completed form and required material to:

New Hampshire Division of Historical Resources State Historic Preservation Office Attention: Review & Compliance 19 Pillsbury Street, Concord, NH 03301-3570 RECEIVED
MAR 0 4 2015

DHR Use Only	1110	,
R&C# _	6528	
Log In Date	3,6,15	-
Response Date _	_//_	
Sent Date _	_11_	

Request for Project Review by the New Hampshire Division of Historical Resources

This is a new submittal This is additional information relating to DHR Review & Co	Compliance (R&C) #:
GENERAL PROJECT INFORMATION	
Project Title EverSource Seacoast Reliability Project	
Project Location Existing electric corridor, Madbury Substation	n to Portsmouth Substation
City/Town Madbury, Durham, Newington, Portsmouth	Tax Map Lot#
NH State Plane - Feet Geographic Coordinates: Easting 118 (See RPR Instructions and R&C FAQs for guidance.)	80450 Northing 241523
Lead Federal Agency and Contact (if applicable) ACOE (Agency providing funds, licenses, or permits) Permit Type and Permit or Job Reference #	
State Agency and Contact (if applicable)	
Permit Type and Permit or Job Reference #	
APPLICANT INFORMATION	
Applicant Name Normandeau Associates	
Mailing Address 25 Nashua Road Phone Number 603-6	637-1158
City Bedford State NH Zip 03110 Email sallen@r	normandeau.com
CONTACT PERSON TO RECEIVE RESPONSE	
Name/Company Sarah Allen, Normandeau Associates	
Mailing Address 25 Nashua Road Phone Number 637	7-1158
	@normandeau.com

This form is updated periodically. Please download the current form at www.nh.gov/nhdhr/review. Please refer to the Request for Project Review Instructions for direction on completing this form. Submit one copy of this project review form for each project for which review is requested include a self-addressed stamped envelope to expedite review response. Project submissions will not be accepted via facsimile or e-mail. This form is required. Review request form must be complete for review to begin. Incomplete forms will be sent back to the applicant without comment. Please be aware that this form may only initiate consultation. For some projects, additional information will be needed to complete the Section 106 review. All items and supporting documentation submitted with a review request, including photographs and publications, will be retained by the DHR as part of its review records. Items to be kept confidential should be clearly identified. For questions regarding the DHR review process and the DHR's role in it, please visit our website at: www.nh.gov/nhdhr/review or contact the R&C Specialist at christina.st.louis@dcr.nh.gov or 603.271.3558.

	PROJECTS CANNOT BE PROCESSED WITHOUT THIS INFORMATION
Project	t Boundaries and Description
	Attach the relevant portion of a 7.5' USGS Map (photocopied or computer-generated) indicating the defined project boundary. (See RPR Instructions and R&C FAQs for guidance.) Attach a detailed narrative description of the proposed project. Attach a site plan. The site plan should include the project boundaries and areas of proposed excavation. Attach photos of the project area (overview of project location and area adjacent to project location, and specific areas of proposed impacts and disturbances.) (Informative photo captions are requested.) A DHR file review must be conducted to identify properties within or adjacent to the project area. Provide file review results in Table 1 or within project narrative description. (Blank table forms are available on the DHR website.) File review conducted on / / .
Arch	hitecture
Are	there any buildings, structures (bridges, walls, culverts, etc.) objects, districts or landscapes within the project area? 🔀 Yes 🗌 No If no, skip to Archaeology section. If yes, submit all of the following information:
App	roximate age(s):
	Photographs of <i>each</i> resource or streetscape located within the project area, with captions, along with a photo key. (Digital photographs are accepted. All photographs must be clear, crisp and focused.) If the project involves rehabilitation, demolition, additions, or alterations to existing buildings or
	structures, provide additional photographs showing detailed project work locations. (i.e. Detail photo of windows if window replacement is proposed.)
Arch	naeology
Does	s the proposed undertaking involve ground-disturbing activity? 🛛 Yes 🗌 No If yes, submit all of the following information:
\boxtimes	Description of current and previous land use and disturbances. Available information concerning known or suspected archaeological resources within the project area (such as cellar holes, wells, foundations, dams, etc.)
	Please note that for many projects an architectural and/or archaeological survey or other additional information may be needed to complete the Section 106 process.
DH	IR Comment/Finding Recommendation This Space for Division of Historical Resources Use Only
□ No :	ufficient information to initiate review. Additional information is needed in order to complete review. Potential to cause Effects No Historic Properties Affected No Adverse Effect Adverse Effect
	The second of th
offic	sucerned community members have contacted this e to will request consulting party status. s change or resources are discovered in the course of this project, you must contact the Division of Historical
Resour	ces as required by federal law and regulation. Date: 3/19/15



RECEIVED MAR 0 4 2015

NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

State of New Hampshire, Department of Cultural Resources 603-271-3483 19 Pillsbury Street, Concord, NH 03301-3570 603-271-3558 TDD Access Relay NH 1-800-735-296 www.nh.gov/nhdhr

FAX 603-271-3433 preservation@dcr.nh.gov

Request for Project Review by the New Hampshire Division of Historical Resources

INSTRUCTIONS

The Division of Historic Resources (DHR) is New Hampshire's State Historic Preservation Office (SHPO). Under state and federal laws, the DHR works with other governmental agencies to

review publicly-assisted projects that may affect historical or archeological resources. Historic preservation "Review & Compliance" (R&C) is a consultation process to identify significant historic properties in the planning stage of a project, so that any harm to them can be avoided. minimized or mitigated. It is intended to be a conflict-resolution and problem-solving process that balances the public benefit in historic preservation with the public benefit from a variety

of governmental initiatives.

The RPR is not simply a checklist. It is a framework to facilitate a clear and accurate exchange of information. Compiling data for the RPR can strengthen your recognition and understanding of cultural resources and their relationship to your project. Clear and accurate information will support federal and state agencies, including the DHR, in making informed recommendations and comments. By following these instructions, you can help facilitate an efficient, productive consultation process.

Laws and regulations protecting historical resources and guiding the DHR's review and consultation are listed below, with citations for additional information noted:

National Historic Preservation Act of 1966, as amended:

www.achp.gov/nhpa.html

ACOE NH Programmatic General Permit:

www.des.state.nh.us/wmb/Section40 1/reviewProcess.html

NH RSA 227-C:9:

www.gencourt.state.nh.us/rsa/html/XIX/227 -C/227-C-9.htm

Federal Highway Administration: Section 4(f):

www.environment.fhwa.dot.gov/strmlng/ne wsletters/mar08nl.asp

If your project has anything to do with transportation (type of project or funding source etc.) please see the RPR for Transportation Projects and related Instructions.

Before You Submit the Request for Project Review Form

- Check the DHR's Review & Compliance website at <u>www.nh.gov/nhdhr/review/</u> to be sure you have downloaded the most current form.
- Determine the entire geographical area in which changes may occur (project area). The boundaries of the
 project area should be clearly described and indicated on a 7.5 minute USGS topographic quadrangle (clear
 copy or computer generated).
- 3. As soon as you've determined your project area, and before initiating the review process, you should determine the presence/absence of standing structures, whether or not there are any previously surveyed properties, and if and when any properties have been determined eligible or not eligible for listing in the National Register of Historic Places within or adjacent to the project area. Information on recorded historic properties is available at the DHR, and this information must be collected prior to submitting project review materials. The DHR records are open to the public by appointment by calling the DHR Records Coordinator at 603.271.6568 or email at tanya.krajcik@dcr.nh.gov. Include findings in Table 1 or within the project narrative description. Please be aware that survey in New Hampshire is far from complete, and the absence of historic resources in DHR records does not mean that no historic properties are present.
- 4. Complete a field review of the project area, taking photographs as directed in the form and instructions.
- 5. Following the records check and field review, project proponents should complete the Request for Project Review Form and any needed attachments in their entirety by referring to these instructions. Enclose the required additional information and submit your application packet to the DHR in paper. Please include a self-addressed stamped envelope in order to expedite the review process. Incomplete materials will be returned without review.
- 6. Be aware that, in the event historical resources are affected by your project, you may need to speak with your lead federal agency about developing a plan for public involvement.
- 7. There is no need to submit the copy of these instructions that print out with the RPR form. It is there for your information and use.

Photograph Submittals

Photographs submitted for project review may be either 35mm black/white, color or digital prints. All photographs must be clear, crisp and focused. Digital images should not be pixilated. Photographs must be sized 3" x 5" or larger and their subject locations keyed to an accompanied map. They may be embedded in printed Word® documents. All photos must be printed. No CDs, flashdrives, or other storage media with digital images will be accepted.

How to Complete the Request for Project Review (RPR) Form

GENERAL PROJECT INFORMATION

New Submittal or Additional Information – Indicate if the project, or any part thereof, has been previously reviewed by DHR and if so, insert the DHR review number (R&C #). If we know that a project has been previously reviewed, we can often avoid asking for duplicate information.

Project Title - Provide a descriptive name of the project. The name should clearly but concisely indicate what the project involves.

Project Address/Location - Provide the geographical location of the project. If your project involves work on a specific building, please include the street address of the building.

City or Town - Provide the city or town in which your project is located. Provide the tax map and lot numbers of the property(s).

Geographic Coordinates - NH State Plane-Feet is the required coordinate system.

An example of State Plane coordinates for the State House in Concord are: Easting 1018526 Northing 257678.

Access to State Plane coordinate data can be found at: http://granitview.unh.edu. Please refer to the R&C FAQs at www.nh.gov/nhdhr/review/rc_faq.htm on help accessing this data. It is helpful to print the specific instructions provided at www.nh.gov/nhdhr/review/documents/granitview_geotopo.pdf prior to clicking the http://granitview.unh.edu link.

Lead Federal Agency – Indicate the federal agency and contact person (if applicable) that is responsible for Section 106 compliance and that agency's permit type and permit or job reference number (if known). If you do not know the federal agency involved in your project, please contact the party requiring you to apply for Section 106 review, not the DHR, for this information.

State Agency – Indicate the state agency and contact person (if applicable) that is involved in the project and that agency's permit or job reference number (if known). Also note the type of permit.

APPLICANT INFORMATION

Applicant Name - Provide the name and contact information of the applicant (project sponsor).

Contact Person to Receive Response – Provide the name and contact information of the person to receive the DHR's response. The address provided should be a mailing address. Be sure to include a self-addressed stamped envelope with your application packet to expedite the review process.

PROJECT BOUNDARIES AND DESCRIPTION

Project Map – A clear computer generated or photocopy of the 7.5 minute USGS topographic quadrangle map, or a clearly labeled portion thereof, showing the exact boundaries of the project location (project area) <u>must</u> be attached to this application. Do <u>not</u> reduce or enlarge the map. Color copies are helpful. Label the map with the name of the USGS quadrangle. Topographic maps may be printed or downloaded free of charge at: http://granitview.unh.edu. Please refer to the R&C FAQ's at www.nh.gov/nhdhr/review/rc_fag.htm for help on accessing this data.

Narrative Project Description – Attach a detailed written description of the project area and the proposed undertaking. The narrative should describe the project's area of potential effects including areas of potential physical and visual impacts, secondary areas or impacts, such as staging areas or borrow pits, and alterations to a structure, a building, or its landscape. Describe any known past disturbances or alterations to the project area such as grading, filling, paving, excavation and demolition, along with an approximate date. The narrative should clearly describe the proposed action, in as much detail as currently known.

Site Plan – Attach a large-scale map, diagram, or site plan(s), showing the project area's existing conditions and proposed changes (If this type of plan is not yet available for the project, explain why and give a date as to when it will be submitted). The drawing should indicate compass orientation, contours, general soil types, and presence of wetlands (if available). If any existing buildings, structures, cemeteries, dams, canals, bridges, foundations, ruins, old wells, cellar holes, stone walls, trails, or specialized uses such as dump sites, etc., are present, their locations should be shown.

Photos of Project Area — Provide photographs showing the overall project area and the area adjacent to the project location, as well as specific areas of proposed ground impacts and disturbances. These photographs should provide general visuals of the landscape(s), streetscape(s), and relationships between buildings and structures within and adjacent to the area of proposed impact. They should also include views of areas where there might be ground impacts and disturbances, such as digging or staging areas. Informative photo captions explaining each image will facilitate efficient project review. Photos should be keyed to project mapping.

DHR File Review — During the identification stage of the review process you should determine the presence/absence of standing structures. Be sure to include the results of the DHR Records search for historic properties with your submittal packet and indicate the date the file review occurred on the RPR form. Indicate if the records search revealed any historic properties in the project area and if the site inspection revealed any properties more than 50 years of age within or adjacent to the project area which may or may not be recorded at the DHR. Provide results within the project narrative or using Table 1 (available on the DHR website).

ARCHITECTURE

Buildings, Structures, and Landscapes in Project Area – Based on the results of your DHR file review and your field review, are there any properties more than 50 years of age within or adjacent to the project area? The types of properties to note include buildings, structures (such as bridges, stone walls, culverts, railroad corridors, dams, etc.), objects (such as monuments and mileposts), historic districts, and landscapes (could include designed gardens, scenic roadways, campuses, or a collection of farms across a rural agricultural landscape).

If none of these are located in your project area, please note that he your project narrative and then skip to the Archaeology section of the RPR.

If any of these are located in your project area you must submit the following information:

Age – Provide an approximate age for the resources in your project area and the source for that information. Sources to determine approximate age could include owner information, visual inspection, municipal records, etc.

Photos of Buildings, Structures, and Landscapes – Photographs of all buildings and structures within the project area must be included with the application materials. These photos should show at least the full front side, however an angled shot showing the front and one side is typically very helpful. Neighborhood streetscape images should be included if applicable, such as when the project is located within an established or possible historic district. Photos should include informative captions and be keyed to project mapping.

Detail Photos, if applicable – If your project work involves physical impacts to existing buildings or structures, such as rehabilitation, demolition, additions, or alterations, detail photos of the area(s) of work must be submitted. For example, if you propose window replacement, then provide a photo of the window to be replaced. If you propose building an addition, then provide a photo of the existing building where the addition will be appended.

ARCHAEOLOGY

Ground-Disturbing Activity in Project Area – While ground-disturbing activities are generally self-explanatory, be aware that they include activities such as construction or modification of drainage ditches and retention ponds, and temporary areas used for staging and access.

If there is no ground-disturbing activity in your project area, please note that in your project narrative.

If any ground-disturbing activity is anticipated, submit the following information:

Description of Previous Land Use – Attach a detailed descriptive narrative of current and previous land use and any known disturbances within the project area as described in project narrative.

Known or Suspected Archaeological Resources – Please note to the best of your knowledge whether the land owner/developer is aware of any archaeological resources within the project area (i.e. cemeteries/grave markers, stone walls, cellar holes, wells, foundations, dams, etc.).

TYPE AND MEANING OF DHR's RESPONSE

Insufficient information to initiate review – RPR packages will be returned to the applicant without review if, upon receipt, the DHR determines that the RPR package has not been completed sufficiently to review the project efficiently. The purpose of this policy is to avoid excessive waste of time and money resulting from efforts to interpret or track down unclear or missing materials.

Additional information is needed in order to complete review - Depending on the presence or types of resources in a project area, there may be multiple steps to the cultural resources consultation process. The necessity of progressing to the next step depends on the result of each preceding step. (See the DHR website for a flowchart National 1966 explaining Section 106 the Historic Preservation Act of www.nh.gov/nhdhr/review/documents/106flowchart.pdf.) Consultation for some projects may end with the RPR response, while others require continued consultation and fulfillment of additional steps in the process, such as surveys by qualified consultants and findings of effect by the lead federal agency and the DHR.

RPR comment response v. letter response – Depending on the project, the lead federal agency, and the DHR's response, you may receive either comments written on the RPR form or in a separate letter. Both types of responses may be considered the DHR's response.

Your Request for Project Review is ready to be submitted to the DHR if you've:

- ✓ Determined the entire geographical area of the proposed project and of the project's potential impacts
- ✓ Conducted a DHR file review for already-identified historic properties within or adjacent to the project area
- ✓ Conducted a field review for other resources 50 years old or older within or adjacent to the project area
- ✓ Completed the Request for Project Review Form in its entirety including all requested information and attachments
- ✓ Included a self-addressed stamped envelope

Mail the completed RPR form, a self-addressed stamped envelope and required materials to:

NH Division of Historical Resources State Historic Preservation Office Attention: Review & Compliance 19 Pillsbury Street Concord, NH 03301-3570

RPRs cannot be accepted via facsimile or e-mail. Please provide a completed form even in cases where project information is included in a separate document, such as DES permit applications and other environmental reports and applications. Environmental documents may be submitted as attachments to the form, only if they provide an important part of the project description. The DHR has a different focus from other agencies. In order to reduce costs and be as environmentally friendly as possible please do not submit entire permit applications. The DHR will retain all items and supporting documentation submitted with a review request, including photographs and publications. Items to be kept confidential should be clearly identified. For questions regarding project review please visit www.nh.gov/nhdhr/review or contact R&C Specialist christina.st.louis@dcr.nh.gov or 603.271.3558.



March 20, 2015

Mr. David Keddell Regulatory Division U.S. Army Corps of Engineers, New England District 696 Virginia Road Concord, Massachusetts 01742-2751

Re: Eversource Energy – Seacoast Reliability Project, Permit Area Request – Madbury to Portsmouth, NH

Dear Mr. Keddell:

This letter is being submitted by Normandeau Associates, Inc. on behalf of Eversource Energy (Eversource) to request a determination of the permit area for the proposed Seacoast Reliability Project (SRP) transmission line in Madbury, Durham, Newington and Portsmouth, NH.

Normandeau is filing a wetlands permit application with the New Hampshire Department of Environmental Services (DES), which triggers Army Corps of Engineers (ACOE) action and project review under the Section 106 process. Normandeau's archeological sub-consultant, Victoria Bunker Inc. (VBI) has conducted a Phase I-A Archeological Survey of the SRP corridor, and our historical sub-consultant, Archeological and Historical Services (AHS), has performed a historical review. Normandeau has submitted a Request for Project Review Form to the New Hampshire Division of Historical Resources (DHR). A draft plan set identifying wetland resources and areas of potential archeological and historical sensitivity is also attached (Attachment A). We are requesting your assistance in determining the project permit area prior to our Phase I-B archeologic and historic surveys.

PROJECT OVERVIEW

Eversource is proposing to construct the SRP, a new 115kV transmission line between existing substations in Madbury and Portsmouth. The approximately 13-mile-long line will predominantly be constructed using an existing transmission right-of-way that already has overhead power lines. Approximately 1 mile will be a submarine cable under Little Bay between Durham and Newington. The overhead structures will be monopoles ranging from 85 – 115 feet in height, with the exception of H-structures approximately 65 feet in height around the Newington Historic District.



PROJECT SETTING

The SRP project area consists of a portion of an existing electric distribution corridor which carries a single 34 kv line in most locations (the Little Bay corridor contains decommissioned cable). The proposed SRP is approximately 13 miles in length and is located in a corridor 100 feet in width, with the exception of a section along the PanAm railroad that narrows to 40 feet. The Little Bay cable crossing which will occur in a 1000-foot wide cable corridor shown on nautical charts. The footprint of the Little Bay crossing is approximately 150 feet and will consist of 6 cables spaced 30 feet apart.

From the Madbury Substation to the Packers Falls Substation in Durham, the proposed SRP route runs south and parallels the PanAm railroad, with crossings of the Oyster River (a NH-designated river) and several town and state roads. At Packers Falls, the corridor turns east, crosses Little Bay and enters Newington. It passes through the village of Newington, crosses the Spaulding Turnpike, runs through the parking lot of the Crossings at Fox Run mall, before turning southward and entering the Portsmouth Substation in Portsmouth.

Mixed land use occurs along the corridor including:

- Undeveloped, wooded or open land
- Agricultural land
- Residential development
- Large-scale commercial development
- Streets, roads, state highways, and railroads
- Surface water features including streams including the Oyster River, other streams, wetlands, and Little Bay.

Areas of prior impact along the corridor include:

- Residential development
- Commercial development
- The active PanAm railroad
- The Madbury, Packers Falls, Newington and Portsmouth Substations
- University of New Hampshire
- Crossings of local and state roads

DHR FILE REVIEW

An archeological file review was conducted on October 10, 2013, at the DHR in Concord, NH. Files indicated that three archeological sites had been previously recorded within or near the ROW. These include the LaRoche cellar hole (27-ST-105), the Valentine Hill Canal (27-ST-66) and located well outside the corridor is the Joshua Point Native American site (NH 40-30, 27-RK-415).



The review of DHR files for already-identified historic resources was conducted on November 26, 2013 by Bruce Clouette, Ph.D., Senior Historian with Archaeological and Historical Services, Inc., of Storrs, Connecticut. Information was obtained from National Register of Historic Places listings, project and historic-district Area Forms, and Individual Forms from all four towns. In addition, multi-town files, particularly the file for the Spaulding Turnpike, were reviewed. The proposed route passes through an eligible historic district/historic rural landscape in Durham and a National Register-listed district in Newington.

ARCHEOLOGICAL RESOURCES

HISTORIC RESOURCES

Field review and photography of potentially affected resources were undertaken by Bruce Clouette on December 4-5, 2013. All points at which the transmission-line route crossed public roads were examined, as were the two points on private property where the line will go underwater so as to cross



Little Bay. In addition, roads paralleling the proposed route were driven so as to identify historic resources from which the existing overhead power lines were visible. The results of the field review are summarized in Table 1. The properties that are included in Table 1 include additional former farmsteads; buildings at the University of New Hampshire; railroad-related bridges; and two small brick switch houses associated with the decommissioned 1902 underwater transmission line between Newington and Durham.

Several recent highway bridges over the former Boston and Maine railroad right-of-way were observed to have retained portions of earlier stone or concrete abutments. Because these are essentially modern bridges built to provide greater overhead clearance for trains, they were not inleuded in Table 1.

PROJECT WORK ACTIVITIES

Eversource is proposing to construct the SRP starting in early 2016, with a planned completion date of early 2018. The overhead transmission structures are all located within an existing right-of-way. In addition, one mile of underwater cable will be buried in Little Bay using jetplow technology. All construction vehicle access roads and workpads in sensitive resource areas will be covered with timber matting during construction with appropriate erosion controls as needed. Therefore, rutting and surface-level impacts within the areas of archeological sensitivity, or near known historic or archeological sites, will be largely avoided. Sensitive areas crossed by access roads will be subjected only to well-distributed ground pressures exerted by vehicles driving on mats.

Excavation for the new structures will be required near or within some sensitive areas, so some Phase I-B archeological survey will likely be required. Normandeau Associates has been retained to monitor construction activities and ensure that the contractors comply with permit requirements and conditions.



Map Sheet Number	Feature	Historic/Archeologic	Status	Location	Proposed Work Activity
Multiple	Zones of post-contact European-American resource sensitivity, particularly in areas of historic period agrarian land use in Durham	Archeologic	Expected Resource	Project-wide	Various
4	Durham RR Station	Historic	Not Yet Surveyed	Durham	Off ROW
4-5	2 UNH Buildings	Historic	Not Yet Surveyed	Durham	Off ROW
4-6	3 RR Bridges	Historic	Not Yet Surveyed	Durham	Matted Vehicle Access and Structure Replacement; Oyster River Bridge off ROW
9-10	Newmarket & Bennett Rd Farms Historic District	Historic	National Register Eligible	Durham	Matted Vehicle Access and Structure Replacement
17,19	2 PSNH Cable Houses	Historic	Not Yet Surveyed	Little Bay	Matted Vehicle Access and Structure Replacement; Adjacent to Underground Line Installation
21-22	Newington Center Historic District	Historic	National Register Listed	Newmarket	Matted Vehicle Access and Structure Replacement
23	Benjamin S. Hoyt House	Historic	National Register Eligible	Newington	Matted Vehicle Access and Structure Replacement
23	Potential Historic District	Historic	Not Yet Surveyed	Newington	Matted Vehicle Access and Structure Replacement
Multiple	8 Houses & outbuildings	Historic	Not Yet Surveyed	1 Madbury, 3 Durham, 4 Newington	Various



Thank you for your assistance in this matter. We look forward to the results of the consultation process. Please feel free to contact Sarah Allen at (603) 637-1158 if you have any questions.

Sincerely,

NORMANDEAU ASSOCIATES, INC

SARAH ALLEN

Normandeau Project Manager



ATTACHMENT A

Draft Project Maps of Wetland Resources and Areas of Potential Archeological and Historical Sensitivity

From: laura.games@eversource.com [mailto:laura.games@eversource.com

Sent: Wednesday, April 22, 2015 11:19 AM To: Feighner, Edna; Peterson, Nadine Subject: Eversource Consultation

Edna and Nadine

I wanted to thank you both for accommodating our consultation last week. It was a very enlightening discussion and we really appreciate all the information that you gave us. We now believe we have everything we need with regard to our discussions with DHR to file the Application for A Certificate For Site and Facility for the Seacoast Reliability Project next month. If there is anything else you would like to discuss with us, or any other information you need before we file, please let me know. Otherwise, we look forward to continuing consultation and to developing the Project Area Form for this project during the SEC process. Again, thank you for your assistance and consideration.

Laura

Laura V. Games
Senior Licensing and Permitting Specialist
PSNH dba Eversouce Energy
13 Legends Drive, Hooksett, NH 03106
P.O. Box 330, Manchester, NH 03105-0330
T: (603)634-2906, E-mail: laura.games@eversource.com
F:(603)669-4239

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To: Laura V. Games/NUS@NU, "Peterson, Nadine" < Nadine.Peterson@dcr.nh.gov>

From: "Feighner, Edna" < Edna.Feighner@dcr.nh.gov>

Date: 04/22/2015 12:03PM

Subject: RE: Eversource Consultation

Thanks Laura,

I know it doesn't always seem like it but we try to be as helpful as possible without compromising resources...continuing our meetings/consultation will only help all of us to identify resources at risk and work to protect them or may help managers to be more thoughtful in the design of Eversource projects...also our discussion can only ease some issues that might arise with communities concerned about their cultural resources...

Talk with you soon...and again...thanks

Edna

Edna Feighner

Review and Compliance Coordinator/Historical Archaeologist

NH Division of Historical Resources

19 Pillsbury Street, Second Floor

Concord, NH 03301

603-271-2813

Participate in shaping your preservation plan!

Share your vision: http://survey.constantcontact.com/survey/a07eaqj074yi7hv6p80/start

Find out more: http://www.nh.gov/nhdhr/programs/plan.htm

About the New Hampshire Division of Historical Resources:

The New Hampshire Division of Historical Resources was established in 1974 as the "State Historic Preservation Office." The historical, archaeological, architectural and cultural resources of New Hampshire are among its most important environmental assets. Historic preservation promotes the use, understanding and conservation of such resources for the education, inspiration, pleasure and enrichment of New Hampshire's citizens. For more information, visit us online at www.nh.gov/nhdhr or by calling (603)271-3483.

From: <u>laura.games@eversource.com</u> [<u>mailto:laura.games@eversource.com</u>]

Sent: Thursday, May 14, 2015 8:54 AM **To:** Feighner, Edna; Peterson, Nadine

Subject: Continued Consultation - SRP and MVRP

Good Morning

I understand that the USACE sent out the APE determinations for both the Seacoast Reliability Project and the Merrimack Valley Reliability Project. We would like to discuss these with you and wondered what your availability might be next week for a meeting. As always, we appreciate your continued assistance.

Laura

Laura V. Games
Senior Licensing and Permitting Specialist
PSNH dba Eversouce Energy
13 Legends Drive, Hooksett, NH 03106
P.O. Box 330, Manchester, NH 03105-0330
T: (603)634-2906, E-mail: laura.games@eversource.com

F:(603)669-4239

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From: "Feighner, Edna" < Edna. Feighner@dcr.nh.gov >

To: Laura V. Games/NUS@NU, "Peterson, Nadine" < Nadine.Peterson@dcr.nh.gov>,

Date: 05/14/2015 12:29 PM

Subject: RE: Continued Consultation - SRP and MVRP

Laura,

What is it that you wish to discuss? If you are doing your due diligence then you will address all of the identified archaeologically sensitive areas, I know that Newmarket has requested Consulting Party Status from the Corp and copied their letter to the Advisory Council for the Seacoast Project regarding impacts to their NR listed Historic District.

I will be responding to the Corp letter shortly and again expressing our disagreement with their determinations by use of their Appendix C, on both projects.

I have not discussed this with Nadine yet concerning any above ground issues remaining.

Edna

Edna Feighner Review and Compliance Coordinator/Historical Archaeologist NH Division of Historical Resources 19 Pillsbury Street, Second Floor Concord, NH 03301 603-271-2813

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From: laura.games@eversource.com [mailto:laura.games@eversource.com]

Sent: Thursday, May 14, 2015 1:23 PM

To: Feighner, Edna **Cc:** Peterson, Nadine

Subject: RE: Continued Consultation - SRP and MVRP

Edna

We will certainly address all of the Corps identified archeologically sensitive areas covered by the APE. However, we are also concerned with areas where NHDHR disagrees with the Corps and what measures we might take to address NHDHR's concerns.

Laura

Laura V. Games
Senior Licensing and Permitting Specialist
PSNH dba Eversouce Energy
13 Legends Drive, Hooksett, NH 03106
P.O. Box 330, Manchester, NH 03105-0330
T: (603)634-2906, E-mail: laura.games@eversource.com
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From: "Feighner, Edna" < Edna.Feighner@dcr.nh.gov >

To: Laura V. Games/NUS@NU,

Cc: "Peterson, Nadine" < Nadine. Peterson@dcr.nh.gov >, "Muzzey, Elizabeth" < Elizabeth. Muzzey@dcr.nh.gov >, "Boisvert,

Richard A" < Richard. Boisvert@dcr.nh.gov >

Date: 05/14/2015 01:33 PM

Subject: RE: Continued Consultation - SRP and MVRP

Laura,

My suggestion would be to complete Phase IBs on all archaeologically sensitive areas that have been identified in the Phase IA reports, then if sites are identified we can discuss your concerns.

And to be clear, the DHR does not believe that timber matting over sensitive areas is a form of avoidance or protection.

Edna

Edna Feighner

Review and Compliance Coordinator/Historical Archaeologist NH Division of Historical Resources 19 Pillsbury Street, Second Floor Concord, NH 03301 603-271-2813

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From: laura.games@eversource.com [mailto:laura.games@eversource.com]

Sent: Thursday, May 14, 2015 1:54 PM

To: Feighner, Edna

Subject: RE: Continued Consultation - SRP and MVRP

Edna

As far as IB sampling is concerned, do you mean all the archeologically sensitive areas that will be potentially impacted by the project? For example, areas that will be traversed, areas where pole structures will be installed, etc.?

Laura

Laura V. Games
Senior Licensing and Permitting Specialist
PSNH dba Eversouce Energy
13 Legends Drive, Hooksett, NH 03106
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"Feighner, Edna" < Edna. Feighner@dcr.nh.gov>

To: Laura V. Games/NUS@NU,
Date: 05/14/2015 01:56 PM
Subject: RE: Continued Consultation - SRP and MVRP

Correct...

Edna Feighner Review and Compliance Coordinator/Historical Archaeologist NH Division of Historical Resources 19 Pillsbury Street, Second Floor Concord, NH 03301 603-271-2813

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About the New Hampshire Division of Historical Resources:

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DEPARTMENT OF THE ARMY NEW ENGLAND DISTRICT, CORPS OF ENGINEERS 696 VIRGINIA ROAD

CONCORD, MASSACHUSETTS 01742-2751

May 4, 2015

Regulatory Division CENAE-R-PEC

File Number: **NAE-2015-665**

Elizabeth Muzzey, Director and State Historic Preservation Officer NH Division of Historical Resources 19 Pillsbury Street Concord NH 03301-3570

Dear Ms. Muzzey:

This regards the construction of the new Seacoast Reliability Line (SRP) 115kV transmission line within the existing Right-of-Way (ROW) connecting Eversource's Madbury Substation to Eversource's Portsmouth substation in Portsmouth NH. The overhead transmission structures are all located within an existing right-of-way. In addition, one mile of underwater cable will be buried in Little Bay using jetplow technology. All construction vehicle access roads and workpads in sensitive resource areas will be covered with timber matting during construction with appropriate erosion controls as needed.

The application for a Section 404 and section 10 permit for the SRP project has been assigned file number NAE 2015-665. For purposes of our permit review, the Corps is evaluating the entire SRP project as one permit application and providing the permit area plans for each state to the appropriate state historic preservation office.

This Corps response letter is in answer to the March 20, 2015 letter request by Eversource's consultant Normandeau Environmental Consultants requesting a permit area determination for their project. Project plans were submitted by Normandeau identifying the sensitive areas, timber mat, and permanent fill for access and new pole placements for the project. A plan set is enclosed with this mailing for your use.

Corps jurisdictional areas are limited to wetlands or waters of the US. The Corps has determined their federal permit area for this project to be where the timber mat access way is established within wetlands and waters of the US along the right of way (ROW) for accessing the new transmission line pole locations. The undertaking consists of the use of timber mats on existing ATV trails which traverse wetlands along the ROW to access the new utility pole locations would have no potential to cause effects on resources. Work which does not involve the discharge of dredged or fill material in wetlands is not regulated by the Corps.

Section 106 of the National Historic Preservation Act states "The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into

account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register."

We have reviewed and enclosed Normandeau's archeological sub-consultant, Victoria Bunker Inc. (VBI) Phase I-A Archeological Survey of the SRP corridor, and the historical sub-consultant, Archeological and Historical Services (AHS), historical review report for potential resource finds for the SRP line sensitivity assessment within the F 107 ROW. The SRP project is approximately 13-mile-long line utilizing an existing transmission right-of-way that already has overhead power lines. Approximately 1 mile will be a submarine cable under Little Bay between Durham and Newington.

A summary of Corps permit areas within the ROW and potential work efforts are:

Plan page 1, 2, 3, 4,

No Corps permit is required. No ground disturbing activities in Corps permit areas are proposed within a sensitive area.

Plan page 5

Sensitive area Durham 4 is access through uplands. No Corps permit is required. No ground disturbing activities in Corps permit areas are proposed within the sensitive area.

Plan Page 6

Plan page 7			
Plan Page 8		,	
Plan page 9			

Plan page 10
Plan page 11
No Corps permit is required. No ground disturbing activities in Corps permit areas are proposed within a sensitive area.
Plan pages 12
Plan page 13
Plan Page 14
Plan page 15
Plan page 16
No Corps permit is required in sensitive areas Durham 19. No ground disturbing activities in wetlands are proposed within the sensitive area.
Plan page 17

Plan page 18, 19

A phase 1B is not required for the jetplowing area. In a meeting between Eversource and the DHR on April 4, 2015, the DHR did not express any concern for resources in this area and agrees with the Bunker report stating that "no further archeological survey is recommended".

Plan Page 20

Plan Page 21

Plan Page 22

No Corps permit areas are found within sensitive area New 5.

Plan Page 23

Plan pages 24, 25, 26, 27, 28

No ground disturbing activities in sensitive areas are proposed. 1B is not required

Enclosed for your use are the phase 1A reports associated with this project. Please contact us if there are any resources which have not been reported to the Corps.

Please either contact me or have a member of your staff contact David Keddell of my staff at 978-318-8692 with your resource determination or if you have any questions or comments concerning the Corps permit areas.

Sincerely,

rank J. Delgiudice

Chief, Regulatory Division Branch C

Attachments

Copy Furnished:

Laura V. Games, Esq., Project Siting and Permitting Specialist Transmission Group, PSNH Energy Park, 780 North Commercial Street, Manchester, NH 03101

Sarah Allen, Principal Wetland Scientist, Normandeau Associates, Inc, 25 Nashua Road, Bedford, New Hampshire 03110



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

 State of New Hampshire, Department of Cultural Resources
 603-271-3483

 19 Pillsbury Street, Concord, NH 03301-3570
 603-271-3558

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 www.nh.gov/nhdhr
 preservation@dcr.nh.gov

May 26, 2015

Frank Delguidice Regulatory Branch NE Division of Corps of Engineers Department of the Army 696 Virginia Rd Concord, MA 01742-2751

Re: Seacoast Reliability Line (SRP) 115 kV Transmission Line, Madbury to Portsmouth, NH.

Eversource Project, NAE-2015-665

Dear Mr. Delguidice,

We have received your letter of May 4, 2015 regarding the above referenced project. The letter appears to constitute a review of the archaeologically sensitive areas identified in a Phase IA report prepared by Victoria Bunker Inc. (VBI) and the historical review report prepared by Archeological and Historical Services (AHS) and the determination by your office of the Areas of Potential Effect (APE).

To date, in our consultative role under Section 106, this office had concurred with the archaeological consultants' identification of 28 archaeologically sensitive areas (ASA) and with the recommendation that each should be further identified through Phase IB survey. The Corps', however, appears to have continued its review without further consultation with our office, including the determination of an APE that is far smaller, both in terms of the number of ASAs included and the extent of the identification efforts within each ASA to be surveyed. Also, for your information, the Division of Historical Resources (Division) has yet to receive the historical review report prepared by AHS that you cite in your correspondence.

Had the NH SPHO been offered the opportunity to further consult on this project prior to the Corps' May 4, 2015 letter, we would have made it clear that we cannot concur with the Corps' findings in a number of areas. First and foremost the SHPO disagrees with the use of the Corps' Appendix C to determine the APEs. We believe that this undertaking will have the potential to cause direct as well as indirect effects on unidentified historical resources. Additionally, these include the elimination of 10 of the ASAs from the Phase IB survey and the limitation or elimination of ASAs that may include staging and access areas. Specifically, only certain identified pole locations are recommended for Phase IB investigations rather than the extent of the archaeologically sensitive areas within the project right-of-way. The effects within these areas are not limited to pole replacements, but also include the access roads and associated work areas. These have the clear potential to effect archaeological resources.



In closing I would like to make these points. It is the opinion of the SHPO that the Corps' use of Appendix C is not consistent with the Advisory Council's regulations pursuant to 36 CFR PART 800.14(a) Section 110(a)(2)(E) of the National Historic Preservation Act. There has been no consultative process between the SHPO and the Corp on the development of the APE for the Eversource SRP 115kV Line, which does not meet the requirements for consultation in the Section 106 process. It is also the opinion of the SHPO that with the issuance of the permit for the Eversource SRP 115kV Line, there is a potential for adverse effects on unevaluated or unidentified historical resources that may occur through project implementation.

Currently, the SHPO is also unaware if there has been consultation or coordination with the Town of Newington, NH that has formally requested consulting party status, pursuant to 36 CFR PART 800.2(3). Lack of consultation would also appear to constitute non-compliance with the Section 106 process.

We also have similar objections with regard to APE determinations on several other recent permit issuances, including NAE 2015-454 dated May 4, 2015. This project is a combined Eversource project and National Grid (NEP) called the Merrimack Valley Reliability Project (MVR). The Division also has similar objections on APE determinations without consultation on other National Grid projects identified as NAE 2015-442 and 2014-441.

Sincerely,

Elizabeth H. Muzzey,

State Historic Preservation Officer NH Division of Historical Resources

ES Muyzun

EHM:emf

Cc:

John Eddins, ACHP Susan Geiger, Orr & Reno Laura Games, Eversource Town of Newington



DEPARTMENT OF THE ARMY
NEW ENGLAND DISTRICT, CORPS OF ENGINEERS
696 VIRGINIA ROAD
CONCORD, MASSACHUSETTS 01742-2751

May 8, 2015

Regulatory Division CENAE-R-PEC

Elizabeth Muzzey, Director and State Historic Preservation Officer NH Division of Historical Resources 19 Pillsbury Street Concord NH 03301-3570

Dear Ms. Muzzey:

Thank you for your letters, all dated May 26, 2015, concerning the Seacoast Reliability Project (SRP) (2015-665), the Merrimack Valley Reliability Project (MVRP) (2015-454), the Monroe and Littleton Project (2015-441) and the W-149 project (2015-442). A common concern you expressed in all of the letters is the Corps use of Appendix C and impacts to unknown resources. As you might recall in our meeting with you, your staff and ACHP (by teleconference) in 2014, ACHP stated that the Corps is bound to use the Appendix C process until such time as there is a new directive from Corps headquarters in Washington. Our permits all have conditions for work to stop if there are accidental finds during construction and best management practices are instituted to help avoid impacts on all projects. Unless we are directed to use a different set of protocols, Appendix C is how Corps headquarters has directed all subordinate district offices to review projects to satisfy the federal agency responsibilities described in Section 106.

As for the individual issues expressed in the three letters, here are my thoughts.

In the letter for the Seacoast Reliability Project, a concern was expressed over the Town of Newington participation. In our discussion with the town, the town informed us that the DHR referred them to contact the Corps to become a consulting party. Since your referral, a couple of phone conversations were exchanged with their representative Ms. Susan Geiger Esq., their formal request was made and you should have received a copy of our formal letter to them for consultation. Our coordination has been directly with the town. They should also have all the same information for the SRP which you have now.

The letter for the Merrimack Valley Reliability Project stated that there was not enough information submitted for segment 3 and 4 to comment. Segments 3 and 4 were part of the Phase 1A ROW review for the PSNH 326 line project. The NH DHR reviewed the 326 line Phase 1A report in 2013. Enclosed is a copy of the request from the NH DHR office for the short form filing, the NH DHR short form submitted and reviewed in March of 2015 and Mr. Boisvert's response after receiving the short form for the MVRP.

To summarize, the letters appear to be responding to our permit area determination letters for files 2015-441, 2015-442, 2015-454, and 2015-665. The NH DHR is requesting more research in areas outside the influence of a Corps permit. Our letters requested comments/consul for any additional information concerning historical resources within the Corps permit areas from the NH DHR. From the advice offered, at a minimum, it appears as if NH DHR concurs with our analysis within Corps permit areas.

Any additional information may be sent to me or have a member of your staff contact David Keddell of my staff at 978-318-8692 with the information concerning those historical resources. Thank you for your patience in this matter.

Sincerely,

Frank J. Delgiudice Chief, Regulatory Division Branch C

Attachments

Copy Furnished:

Mr. John Eddins, PhD, Historic Preservation Specialist, Advisory Council on Historic Preservation, 401 F Street NW, Suite 308, Washington DC 20001-2637

Laura V. Games, Esq., Project Siting and Permitting Specialist Transmission Group, PSNH Energy Park, 780 North Commercial Street, Manchester, NH 03101

National Grid, Attn: Josh Holden, Lead Sr. Environmental Engineer, 3rd floor, East Wing, 40 Sylvan Rd, Waltham, MA 02451-1120

Ms. Susan S. Geiger Esq., 45 S Main Street, PO Box 3550, Concord, New Hampshire 03302-3550

From: "Peterson, Nadine" < Nadine. Peterson@dcr.nh.gov>

To: Laura V. Games/NUS@NU, "Keddell, David M NAE (David.M.Keddell@usace.army.mil)

<David.M.Keddell@usace.army.mil>, "Frank.J.Delgiudice@usace.army.mil" <Frank.J.Delgiudice@usace.army.mil>,
Cc: "Feighner, Edna" <<u>Edna.Feighner@dcr.nh.gov</u>>, "St.Louis, Christina" <<u>Christina.St.Louis@dcr.nh.gov</u>>

Date: 06/09/2015 01:36 PM

Subject: Seacoast Reliability Project Madbury-Portsmouth

Dear All:

The New Hampshire Division of Historical Resources is in receipt as of May 29, 2015 of a Preliminary Report of Historic Resources dated February 13, 2015 prepared by Bruce Clouette. We have no information regarding the purposes of this report. We can only assume that this product was developed for internal use only as it was submitted without consultation with the New Hampshire Division of Historical Resources.

On April 10, 2015, the DHR worked with Eversource and its Architectural History Consultant to develop a scope of work to complete a New Hampshire Project Area Form in order to begin assessing above-ground historic resources. This in-house Preliminary Report appears to have been completed prior to our consultation as it does not meet the scope of work agreed to at our meeting on April 10th.

Please confirm this is the case and advise as to the status of the submission of the Project Area Form. Once the DHR receives the Project Area Form, we will provide formal comment on the above-ground resources under Section 106 of the National Historic Preservation Act.

Sincerely, Nadine Peterson

Nadine Peterson Preservation Project Reviewer NH Division of Historical Resources 603-271-6628

Find out more about the 2016-2020 5-Year Statewide Preservation Plan at http://www.nh.gov/nhdhr/programs/plan.htm and submit a photograph of your favorite New Hampshire place under our "Quick Links" section.

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From: laura.games@eversource.com [mailto:laura.games@eversource.com]

Sent: Monday, June 15, 2015 1:08 PM

To: Peterson, Nadine

Cc: Keddell, David M NAE (David.M.Keddell@usace.army.mil); Frank.J.Delgiudice@usace.army.mil;

Feighner, Edna; St.Louis, Christina; Sarah Allen

Subject: Re: Seacoast Reliability Project Madbury-Portsmouth

Nadine,

Your assumption about the Bruce Clouette document dated Feb 13, 2015 is correct in that this is intended to be an internal preliminary draft document at this time. The document was provided to your office, for informational purposes only, on two occasions. The first on May 29, 2015 in response to a request to Sarah Allen of Normandeau Associates by Edna Feighner of NHDHR. The second was sent by Dave Keddell of the US Army Corps of Engineers as part of the Area of Potential effect (APE) determination.

At this time, Eversource is continuing to work on the Project Area Form (PAF) and intends to incorporate the scope discussed with you during the April 10, 2015 meeting. As previously stated and acknowledged by NHDHR, Eversource plans to submit the PAF soon after the project NHSEC filing. It is also anticipated that consultation with NHDHR will continue throughout this process.

If you have any further questions, or require more information, please do not hesitate to email or to call me.

Laura

Laura V. Games
Senior Licensing and Permitting Specialist
PSNH dba Eversouce Energy
13 Legends Drive, Hooksett, NH 03106
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DEPARTMENT OF THE ARMY

NEW ENGLAND DISTRICT, CORPS OF ENGINEERS 696 VIRGINIA ROAD CONCORD, MASSACHUSETTS 01742-2751

September 15, 2015

Regulatory Division CENAE-R-PEC

File Number: **NAE-2015-665**

Elizabeth Muzzey, Director and State Historic Preservation Officer NH Division of Historical Resources 19 Pillsbury Street Concord NH 03301-3570

Dear Ms. Muzzey:

This regards the construction of the new Seacoast Reliability Line (SRP) 115kV transmission line within the existing Right-of-Way (ROW) connecting Eversource's Madbury Substation to Eversource's Portsmouth substation in Portsmouth NH. The overhead transmission structures are all located within an existing right-of-way. In addition, one mile of underwater cable will be buried in Little Bay using jetplow technology. All construction vehicle access roads and workpads in sensitive resource areas will be covered with timber matting during construction with appropriate erosion controls as needed. The permit area determination letter dated May 4, 2015 is no longer valid as the project has been redesigned in some areas.

The application for a Section 404 and section 10 permit for the SRP project has been assigned file number NAE 2015-665. For purposes of our permit review, the Corps is evaluating the entire SRP project as one permit application.

This Corps response letter is in answer to the September 9, 2015 email request by Eversource's consultant Normandeau Environmental Consultants requesting a permit area determination for their redesigned project. Project plans were submitted by Normandeau identifying the sensitive areas, timber mat, and permanent fill for access and new pole placements for the project. A plan set is enclosed with this mailing for your use.

Corps jurisdictional areas are limited to wetlands or waters of the US. The Corps has determined their federal permit area for this project to be where the timber mat access way is established within wetlands and waters of the US along the right of way (ROW) for accessing the new transmission line pole locations. The undertaking consists of the use of timber mats on existing ATV trails which traverse wetlands along the ROW to access the new utility pole locations would have no potential to cause effects on resources. Work which does not involve the discharge of dredged or fill material in wetlands is not regulated by the Corps.

Section 106 of the National Historic Preservation Act states "The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into

account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register."

We have reviewed Normandeau's archeological sub-consultant, Victoria Bunker Inc. (VBI) Phase I-A Archeological Survey of the SRP corridor, and the historical sub-consultant, Archeological and Historical Services (AHS), historical review report for potential resource finds for the SRP line sensitivity assessment within the F 107 ROW. This report still applies and was sent to your office with the May 4, 2015 permit area determination letter. The SRP project is approximately 13-mile-long line utilizing an existing transmission right-of-way that already has overhead power lines. Approximately 1 mile will be a submarine cable under Little Bay between Durham and Newington along with approximately 2600 linear feet of cable will be buried in the overland route previously identified.

A summary of Corps permit areas within the ROW and potential work efforts are:

Plan page 1, 2, 3, 4,

Plan page 5

Sensitive area Durham 4 is accessed through uplands. No Corps permit is required since no ground disturbing activities in Corps permit areas are proposed within Durham 4 sensitive area.

Plan Page 6

Plan page 7

Plan Page 8

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Plan page 10	
Plan page 11	
Plan pages 12	
Plan page 13	
Plan Page 14	
Plan page 15	
Dlan naga 16	

Plan page 16

No Corps permit is required in sensitive areas Durham 19. No ground disturbing activities in wetlands are proposed within the sensitive area.

Plan page 17



Plan page 18, 19

A phase 1B is not required for the jetplowing area. In a meeting between Eversource and the DHR on April 4, 2015, the DHR did not express any concern for resources in this area and agrees with the Bunker report stating that "no further archeological survey is recommended".

Plan Page 20



Plan Page 21



Plan Page 22



Plan Page 23



Plan pages 24, 25, 26, 27, 28

No ground disturbing activities in sensitive areas are proposed. 1B is not required.

Please either contact me or have a member of your staff contact David Keddell of my staff at 978-318-8692 with your resource determination or if you have any questions or comments concerning the Corps permit areas.

Sincerely,

Frank J. Delgiudice Chief, Regulatory Division Branch C

Attachments

Copy Furnished:

Sarah Allen, Principal Wetland Scientist, Normandeau Associates, Inc, 25 Nashua Road, Bedford, New Hampshire 03110

On March 3, 2015 Edna Feighner requested consultation with the applicant concerning the National Register listed Newington District. The undertaking to be authorized by the Corps within the Newington District for the SRP consists of discharges of dredged or fill material in wetlands and where the timber mat access way is established within wetlands and waters of the US.

Are there any other national register listed resources or other resources that your office has nominated as a potentially eligible historic property for the National Register which the Corps may not be aware of in Corps permit areas and require consultation concerning possible effects? Please let us know if there are any resources which have not been reported to the Corps.

Please either contact me or have a member of your staff contact David Keddell of my staff at 978-318-8692 with your resource determination or if you have any questions or comments concerning the Corps permit areas.

Sincerely,

TrankU. Delgiudice

Chief, Regulatory Division Branch C

Attachments

Copy Furnished:

Sarah Allen, Principal Wetland Scientist, Normandeau Associates, Inc, 25 Nashua Road, Bedford, New Hampshire 03110



February 17, 2016

Edna Feighner NH Division of Historical Resources 19 Pillsbury Street, #2 Concord, NH 03301

RE: Seacoast Reliability Project – Project Area Form and Phase I-A Archeological Survey Addenda

Dear Ms. Feighner:

On behalf of Eversource Energy, please find attached a hard copy of the Project Area Form for the Seacoast Reliability Project, and three addenda to Vicky Bunker's Phase I-A report dated April 2015: Underground Shift, Durham, NH; Access Roads and Corridor Adjustments; and Underground Route and ROW Shift, Durham and Newington, NH.

Please feel free to contact Kurt Nelson (603-634-3256) or me (603-637-1158) if you have any questions or require additional information.

Sincerely,

Sarah Allen

Normandeau Associates, Inc.

Sarah All

Cc: Catherine Finneran (Eversource)

Beth Maldonado (Eversource)

Kevin McCune Eversource)

Kurt Nelson (Eversource)

Dena Champy (Project Manager)

Dana Bisbee (Devine, Millimet & Branch)



DEPARTMENT OF THE ARMY

NEW ENGLAND DISTRICT, CORPS OF ENGINEERS 696 VIRGINIA ROAD CONCORD, MASSACHUSETTS 01742-2751

March 10, 2016

Regulatory Division CENAE-R-PEC

File Number: **NAE-2015-665**

Elizabeth Muzzey, Director and State Historic Preservation Officer NH Division of Historical Resources 19 Pillsbury Street Concord NH 03301-3570

Dear Ms. Muzzey:

This regards the construction of the new Seacoast Reliability Line (SRP) 115kV transmission line within the existing Right-of-Way (ROW) connecting Eversource's Madbury Substation to Eversource's Portsmouth substation in Portsmouth NH. The overhead transmission structures are all located within an existing right-of-way. In addition, one mile of underwater cable will be buried in Little Bay using jetplow technology. All construction vehicle access roads and workpads in sensitive resource areas will be covered with timber matting during construction with appropriate erosion controls as needed. The permit area determination letters dated May 4, 2015 and September 15, 2015 are no longer valid as the project has been redesigned in some areas and the poles have been renumbered as a result.

The application for a Section 404 and section 10 permit for the SRP project has been assigned file number NAE 2015-665. For purposes of our permit review, the Corps is evaluating the entire SRP project as one permit application.

This Corps response letter is in answer to the February 29, 2016 email request by Eversource's consultant Normandeau Environmental Consultants requesting a permit area determination for their redesigned project. Project plans were submitted by Normandeau identifying the sensitive areas, timber mat, and permanent fill for access and new pole placements for the project. A plan set is enclosed with this mailing for your use.

Section 106 of the National Historic Preservation Act states "The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register."

Corps jurisdictional permit areas requiring a 106 review are limited to wetlands or waters of the US. The Corps has determined their federal permit area for this project to be where discharges of dredged or fill material in wetlands and where the timber mat access way is established within wetlands and waters of the US along the right of way (ROW). The

undertaking consists of the use of timber mats on existing ATV trails which traverse wetlands along the ROW to access the new utility pole locations. The temporary use of timber mats would have no potential to cause effects on historic resources.

We have reviewed Normandeau's archeological sub-consultant, Victoria Bunker Inc. (VBI) Phase I-A Archeological Survey of the SRP corridor, and the historical sub-consultant, Archeological and Historical Services (AHS), historical review report for potential resource finds for the SRP line sensitivity assessment within the F 107 ROW. This report still applies and was sent to your office with the May 4, 2015 permit area determination letter. The specific project details for the SRP are attached in a separate document.

A summary of Corps permit areas within the ROW and potential work efforts are:

Plan page 1, 2, 3, 4,

No ground disturbing activities in Corps permit areas are proposed within a sensitive areas. The cable shall be buried between poles F107-23 and F107-24.

Plan page 5

Sensitive area Durham 1 is accessed through uplands. No Corps permit is required since no ground disturbing activities in Corps permit areas are proposed within the Durham 1 sensitive area.

Plan Page 6

Plan page 7			
Plan Page 8			

Plan page 9		
Plan page 10	· .	
Plan page 11		
Plan page 12		
Plan page 13		
No Corps permit is required it disturbing activities in wetlands are p		No ground
Plan Page 14		
Plan page 15		
		,

Plan page 16

No Corps permit is required in sensitive areas Durham 19. No ground disturbing activities in wetlands are proposed within the sensitive area.

Plan page 17

Plan page 18, 19

A phase 1B is not required for the jetplowing area. In a meeting between Eversource and the DHR on April 4, 2015, the DHR agrees with the Bunker report stating that "no further archeological survey is recommended".

Plan Page 20

Plan Page 21

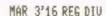
Plan Page 22

No Corps permit is required in sensitive areas New 5. No ground disturbing activities in wetlands are proposed within the sensitive area.

Plan Page 23

Plan pages 24, 25, 26, 27, 28

No ground disturbing activities in sensitive areas are proposed. 1B is not required.





March 1, 2016

Frank Delguidice
Chief, Permits & Enforcement Branch C
Regulatory Division
New England District, Corps of Engineers
696 Concord, MA 01742-2751

Re: Eversource Seacoast Reliability Project Impact on Town of Newington Historic Resources

Dear Mr. Delguidice,

This letter is in response to your request that the Town of Newington review the Corps' second permit area determination letter and comment on whether the Town has reason to believe that additional historic properties may be affected by the above referenced project. After careful review of the project area, the Town submits the following properties that may be eligible for inclusion on the National Register and which may be directly or indirectly affected by the project. All properties are identified by their respective street address.

In addition, to the following list, you should be aware that the Pickering Farm, located at 339 Little Bay Road and adjacent to the listed Frink Farm located at 272 Nimble Hill Road, has been deemed eligible and therefore the route for the transmission line will have a direct and immediate impact on these two historic sites.

Properties that are eligible in addition to those previously identified include:

Nimble Hill Road: 97, 148, 72, 62, 241,248, 249, and 272

Little Bay Road: 195, 224, 251, 271, 275, 339

Old Post Road: 32, 46, 50

Fox Point Road: 7, 8, 11, 16, 27, 28

We also raise for further consideration and do not agree with the assessment in Mr. Clouette's Preliminary Report dated February 13, 2015 that the project would not impact or have minimal impact on properties at the following locations and that the transmission lines visibility from the road is the only assessable impact:

Fox Point Road: 7-11 and 16-18

Nimble Hill Road: 97, 249 Little Bay Road: 339





The Town of Newington looks forward to contributing further in the Section 106 process to ensure protection of its historic resources.

Very truly yours,

RECH

Elizabeth A. Boepple, Esq.

Licensed in Maine, New Hampshire, & Vermont

Cc: Denis Hebert via email

Susan Geiger, Esq. via email John Ratigan, Esq. via email

Gail Pare via email Martha Roy via email

Nadine Peterson, NH Div. of Historical Resources via email

¹ Some of these properties are also included in Mr. Clouette's Preliminary Report but all are included here for completeness.

From: Dana Bisbee

Sent: Tuesday, March 08, 2016 3:20 PM

To: Peterson, Nadine

Cc: Boisvert, Richard A (Richard.Boisvert@dcr.nh.gov); preservationcompany@comcast.net; dena.champy@eversource.com; Catherine Finneran (catherine.finneran@eversource.com)

Subject: Seacoast Reliability Project -- Additional Preservation Company

Nadine,

With many apologies for getting this to you late on the eve of the DOE Committee meeting on the Seacoast Project PAF, I am sending along comments from Preservation Company on the properties listed in the March 1, 2016 letter that the Town of Newington sent to the Army Corps and you. We certainly understand if you can't review this before the DOE Committee meeting, but we wanted you to have it in case it is of any help.

Dana
George Dana Bisbee
Devine, Millimet & Branch P.A.
Manchester, Concord, Portsmouth NH and Boston MA
603.695.8626
dbisbee@devinemillimet.com

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Town of Newington

From: Sarah Allen

03/09/2016 09:24 AM

To: david.m.keddell@usace.army.mil Cc: Dena M. Champy, Kurt I. Nelson

A	Sarah Allen	Town of Newington

1 attachment



Comments on Town Letter re Historic Sites (M3111384x9DD8D).docx

Dave,

Please find attached a response from Preservation Company re the letter from BCM for the Town of Newington. As always, email with questions (I left my phone at home today – yikes)
Sarah

SARAH ALLEN, *Sr. Principal Wetland Scientist*Normandeau Associates, Inc.
25 Nashua Road, Bedford, NH 03110
603-637-1158 (direct), 603-714-3085 (cell)
sallen@normandeau.com www.normandeau.com

Please consider the environment before printing this e-mail.



PRESERVATION COMPANY

Eversource Seacoast Reliability Project Resources – Preservation Company Comments on Town of Newington Letter of March 1, 2016

The Town of Newington's letter of March 1, 2016 lists properties that may be both eligible for listing on the National Register of Historic Places ("National Register") and affected by the Seacoast Reliability Project. We agree that the properties mentioned in the Town of Newington's March 1, 2016 letter meet the 50-year age-eligibility criterion for listing on the National Register. In the Project Area Form that we submitted to the New Hampshire Division of Historical Resources (NHDHR), we recommended that several of them should be evaluated further to determine whether they meet the other eligibility criteria. Preservation Company's methodology for recommending properties for further survey for the purposes of this Project and evaluating potential effects is described on page 184 of the SRP Project Area Form and pages 5-6 of the Historic Resources Assessment for NHSEC Application.

Both 339 Little Bay Road individually and 272 Nimble Hill Road as part of the Newington Center Historic District are identified by Preservation Company as potentially affected and will be documented as needed on NHDHR and National Register forms following NHDHR review of the Project Area Form. File searches at NHDHR did not locate a previous Determination of Eligibility for 339 Little Bay Road.

All properties in Newington were individually inventoried in 1979-81 and reevaluated for the Newington Townwide Area Form in 2005. Those properties in the Project Area for which NHDHR determinations of National Register eligibility are already in the NHDHR files are discussed in the Project Area Form and in the list below.

The properties mentioned in the Town of Newington letter are addressed below in the order they were listed.

97 Nimble Hill Road: The B.S. Hoyt House and Barn were determined National Register eligible in 2005. However, due to recent subdivision of land and new construction, the boundaries of the eligible property would need to be reassessed. The new house that has been constructed directly behind the Hoyt buildings is prominently in view and impacts the integrity of setting. The formerly associated fields nearby are no longer in agricultural use and have been subdivided for home construction. The buildings retain significance for their architecture, but the Project will not alter the character defining features of those buildings; only the current house lot and yard would be part of the eligible resource. The view from the house in any direction is not an historical characteristic and the new house blocks any view from the back of the old house toward the Project. (Project Area Form P-155; Historic Resources Assessment pp. 102-103)

Newington – page 2 8 March 2016

- **148 Nimble Hill Rd**: Adams Homestead. This property would be National Register eligible under Criteria A and C and possibly B. The Project will not be visible in the public view of the buildings from the road. The view from the house toward the Project is of the 1950s town buildings, school and fire station, (discussed in the PAF and Assessment Report) across the road where historically there were open fields. (Project Area Form P-154; Historic Resources Assessment p. 101)
- **72 Nimble Hill Rd**: This ca. 1962 house with gambrel roof appears unlikely to be individually eligible for the National Register of Historic Places because it does not display architectural integrity as it appears to have been a ranch that was modified with the gambrel roof. Also, the Project will not be visible in the views of the house. The view from the property across the road toward the Project is not a characteristic of its 1960s architecture. (Project Area Form P-157)
- **62 Nimble Hill Rd**: This ca. 1940 one-story house with new siding and other changes does not appear to have historic architectural integrity or significance sufficient to be National Register eligible and a historic view from the property is not a character defining feature. (Project Area Form P-157)
- **241 Nimble Hill Rd**: The original appearance of this reported nineteenth century house is unclear. It has all new siding and windows and is unlikely to possess sufficient integrity for its original appearance to be National Register eligible. Setting and views are not historically significant or character defining features of this property. (Project Area Form P-153)
- **248 Nimble Hill Rd**: The James Coleman House built ca. 1868 may be eligible under National Register Criterion C as a connected farm complex. The Italianate period architecture noted in the town-wide survey has since been altered by replacement siding and windows, and changes to windows and doors of ell and barn. The view from the property is not a significant component of its architecture. The Project will not be seen in the view of the buildings from the road. The altered building with apartments immediately south of the house also impacts integrity of its setting. (Project Area Form P-152; Historic Resources Assessment pp. 99-100)
- **249 Nimble Hill Road**: The Hammond House built ca. 1934 is an early twentieth century house with minimal Colonial Revival style elements, updated with new siding and windows. It has a slight potential for individual National Register eligibility under Criterion C. The setting is not a character defining feature, and a view from the house was not historically part of its design intent. The setting includes several new houses nearby on Hannah Lane. This property includes the old Bickford House, which may be individually eligible as an early 1700s structure. Any historical or architectural significance would be confined to the building itself. The original integrity of setting was lost when it was moved in the mid-1800s. (Project Area Form P-151; Historic Resources Assessment pp. 99-100)
- **272 Nimble Hill Rd**: The Frink Farm is a contributing resource in the Newington Center Historic District, for which an updated National Register documentation will be completed if requested by NHDHR. The individual significance of the Frink Farm has not been assessed

Newington – page 3 8 March 2016

although it is also clearly individually eligible; the impact of the Project is the same on the individual property as it is on the district as a whole. (Project Area Form P-135-137; Historic Resources Assessment pp. 87-93)

195 Little Bay Road: This ca. 1850 Greek Revival style Cape is in close proximity to the Project, but the intervening woods will screen it from view as ascertained using 3-D modeling. The house may be National Register eligible under Criterion C as an example of a Greek Revival cape, but it does not have agricultural land or outbuildings to suggest significance under Criterion A. The Project will be behind the tree line when the house is viewed from the road. The house is oriented toward the road and a view from the property is not a historically character defining feature of its architecture. (Project Area Form P-129; Historic Resources Assessment p. 78)

224 Little Bay Road: The Dame House appears likely to be eligible for the National Register as a mid-nineteenth century connected farm complex. However, it lacks integrity of setting and agricultural associations due to land subdivision and surrounding modern housing development. The house is oriented south away from the Project. The Project to the north is separated by woods and a new house. The property is viewed from the road facing in the opposite direction. (Project Area Form P-130; Historic Resources Assessment p. 78)

251 Little Bay Road: The Cyrus Frink House built ca. 1905 and its outbuildings have integrity from the time after they were relocated ca. 1952 as part of the construction of Pease Air Force Base. The property may be eligible under Criterion C for architecture or under Criterion A for associations with mid-twentieth century themes. The immediate setting of the yard is intact, but the property is surrounded by new homes. The view of the property from the road is facing away from the Project. A view from the house is not a character defining feature of its early 1900s architecture or 1950s relocation. The view from the house north toward the Project includes woods and a late-twentieth-century residence. (Project Area Form P-130; Historic Resources Assessment p. 79)

271 Little Bay Road: If this is an older house, it retains no historical integrity; its appearance is that of a 1980s modern house.

275 Little Bay Road: This two-story house dated ca. 1947 has been updated with all new siding, windows and doors, so that it has little historical integrity and is unlikely to be eligible for the National Register of Historic Places. Therefore, it is not recommended for further evaluation. (Project Area Form P-131)

339 Little Bay Road: The Pickering Farm is recommended for further survey in the PAF. File search did not reveal documentation other than the ca. 1981 survey form, and 2005 Townwide Area Form which did not determine National Register eligibility. This property is potentially affected because the Project will be visible in the view of the historic buildings from the road. The view from the buildings is towards the road (away from the Project) and will not be affected. (Project Area Form P-132; Historic Resources Assessment pp. 80-85)

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- **32 Old Post Road**: This one-story house built ca. 1940, has a large addition, new siding and new windows. It, therefore, does not appear retain sufficient integrity to be eligible for the National Register. Also, it does not have a view of the Project. (Project Area Form P-150)
- **46 Old Post Road**: The J.A. Pickering House built ca. 1840 is a significant Greek Revival style house with a large New England barn. The agricultural land has been subdivided. The property would likely be eligible under Criterion C for the architecture of the buildings. The Project is located to the south of the buildings and will not be in view when the buildings are viewed from the road facing west. The buildings are oriented toward the road. The view from the side and back of the property toward the Project is not a historically significant view. Views from the property are not a character defining feature of its architectural significance. (Project Area Form P-150; Historic Resources Assessment p. 98)
- 50 Old Post Road: This farmhouse likely has architectural significance under Criterion C and potentially significance under Criterion A or B as well. The building originated ca. 1710 and was enlarged several times in the eighteenth and nineteenth centuries according to the ca. 1981 survey form. From the 1930s, it was the home of John Frink Rowe who was a local historian and artist. If investigation indicates that remodeling took place during his residency, the property is likely significant for that period as well. The buildings appear to have been remodeled to take advantage of the view towards Newington town center, in which case the view has historical significance and is a character defining feature. One transmission structure will be in view from the house in front of the Frink Farm with the cemetery and meetinghouse in the background. The Project will not be in the view of the buildings when viewed publicly from the road. (Project Area Form P-150-151; Historic Resources Assessment pp. 98-99)
- **7 Fox Point Road**: This ca. 1805 center chimney house may be eligible under Criterion C for architecture. It has no historic outbuildings, land or other features to suggest eligibility under Criterion A. A view from the property is not historically character defining and the house is oriented southeast away from Project. The view of the building from the road is in the opposite direction from the Project. (Project Area Form P-149; Historic Resources Assessment pp. 100-101)
- **8 Fox Point Road**: This 1950s house updated with a wing, apartment and garage appears unlikely to be eligible for the National Register of Historic Places for architecture or historic associations. It does not have a significant historic view or setting. In the rear, the land toward the Project has been subdivided with a large new house set back from the road. (Project Area Form P-148)
- 11 Fox Point Road: This 1½-story house built ca. 1875 was moved ca. 1952 as part of the relocation of buildings for the construction of Pease Air Force Base. It has possible significance under Criterion C for architecture, but a view from the house since 1952 is not character defining and the building lacks integrity of setting from the earlier period. Therefore, only the building itself could potentially be eligible for the National Register, and the view of the house from the

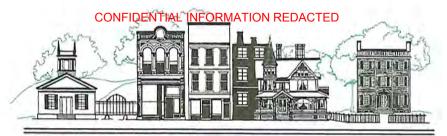
Newington – page 5 8 March 2016

road is away from the Project and would not be disturbed. (Project Area Form P-148; Historic Resources Assessment pp. 100-101)

16 Fox Point Road: The Packard House is a mid-nineteenth century farmhouse in the Gothic Revival style. It could be eligible for the National Register under Criterion C for architecture, but the property has no integrity of setting or association as a farm to be eligible under Criterion A. The yard has trees to the back and side, which will screen the Project from view when the house is seen from the road. A view north toward the Project from the back of the property is not a historically character defining feature. The house is oriented toward the road and surrounded by homes of varying dates. It does not have integrity of setting. (Project Area Form P-147; Historic Resources Assessment pp. 100-101)

27 Fox Point Road: This is a ca. 1961 ranch house with outbuildings. None of the design characteristics of the house suggest that it was constructed to take advantage of a scenic vista. If it were found eligible as an example of the Ranch style under Criterion C for architecture, a view from the property would not be considered a character defining feature, and the Project will not be in the public view of the building from the road. (Project Area Form P-147)

28 Fox Point Road: This bungalow type house was built ca. 1930 and has been updated with all new windows and a 1970s garage, so it does not appear likely to have retained sufficient integrity for its historical appearance to be National Register eligible for its architecture. This property is in close proximity to the Project and it will be visible in the view of the house from the road. (Project Area Form P-146; Historic Resources pp. 100-101)



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCE

State of New Hampshire, Department of Cultural Resources 19 Pillsbury Street, Concord, NH 03301-3570 TDD Access: Relay NH 1-800-735-2964 www.nh.gov/nhdhr

603-271-3483 603-271-3558 FAX 603-271-3433 preservation@dcr.nh.gov

March 15, 2016

Sarah Allen Normandeau Associates, Inc. 25 Nashua Road Bedford, NH 03301

Re:

Report Reviews: Phase IA Preliminary Archaeological Survey Addendum, Access Roads and Corridor Adjustments; Underground Route and ROW Shift; Underground Route Shift. Prepared by Victoria Bunker, Inc. (R&C 6528)

Dear Ms. Allen:

The Division of Historical Resources (Division) is in receipt of your request for review for the 3 Addenda reports prepared by Dr. Victoria Bunker of Victoria Bunker, Inc. for the project cited above. The Division concurs with the recommendations provided and finds the information acceptable as written. The Phase IA underground route and ROW shift identified four areas of sensitivity in Newington and archaeological testing was recommended.

In accordance with the National Historic Preservation Act of 1966 (P.L. 89-655), as amended, and as implemented by regulations of the Federal Advisory Council on Historic Preservation ("36 CFR Part 800: Protection of Historic Properties"), the New Hampshire Division of Historical Resources/State Historic Preservation Office has reviewed the undertaking referenced above to identify potential effects on properties listed, or potentially eligible for listing, in the National Register of Historic Places.

Based upon the information provided in the above cited reports, it has been determined that additional testing will be needed. Please be aware that the hard copies should be a bound original produced by the consultant in order to ensure high quality images, maps, and photographs. The Division requests that bound originals be submitted for our files.

Sincerely,

Edna Feighner

Review and Compliance Coordinator, Archaeologist

Ce: Catherine Finneran, Eversource Dena Champy, Project Manager

Kurt Nelson, Eversource



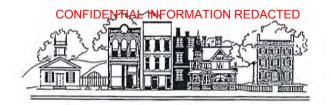
NH DIVISION OF HISTORICAL RESOURCES

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NH DIVISION OF HISTORICAL RESOURCES

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NORMANDEAU ASSOCIATES, INC. ENVIRONMENTAL CONSULTANTS

25 Nashua Road, Bedford, NH 03110 (603) 472-5191

LETTER OF TRANSMITTAL

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DEPARTMENT OF THE ARMY NEW ENGLAND DISTRICT, CORPS OF ENGINEERS 696 VIRGINIA ROAD

CONCORD, MASSACHUSETTS 01742-2751

March 29, 2016

Regulatory Division CENAE-R-PEC

File Number: NAE-2015-665

Elizabeth Muzzey, Director and State Historic Preservation Officer NH Division of Historical Resources 19 Pillsbury Street Concord NH 03301-3570

Dear Ms. Muzzey:

This regards the construction of the new Seacoast Reliability Line (SRP) 115kV transmission line within the existing Right-of-Way (ROW) connecting Eversource's Madbury Substation to Eversource's Portsmouth substation in Portsmouth NH. The overhead transmission structures are all located within an existing right-of-way. In addition, one mile of underwater cable will be buried in Little Bay using jetplow technology. All construction vehicle access roads and workpads in sensitive resource areas will be covered with timber matting during construction with appropriate erosion controls as needed.

This Corps response letter is in answer to the Town of Newington consulting party historic resource information letter sent to this office.

We have reviewed Normandeau's sub-contractor Archeological and Historical Services (AHS), SRP preliminary report for historic resources written by Bruce Clouette and the SRP Historic Resource Assessment for NHSEC application prepared by Preservation Company in consultation with Cherilyn Widell of Widell Preservation Services, LLC. These reports are attached for your use.

Section 106 of the National Historic Preservation Act states "The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register."

Corps jurisdictional permit areas requiring a 106 review are limited to wetlands or waters of the US. The Corps has determined their federal permit area for this project to be where discharges of dredged or fill material in wetlands and where the timber mat access way is established within wetlands and waters of the US along the right of way (ROW). The

undertaking for SRP consists of the use of timber mats on existing ATV trails which traverse wetlands along the ROW to access existing distribution line poles being replaced by the new transmission poles in uplands. The temporary use of timber mats would have no potential to cause effects on historic resources.

The Town of Newington letter identified the Pickering Farm, located at 339 Little Bay Road and adjacent to the listed Frink Farm located at 272 Nimble Hill Road, as being eligible for listing on the National Register. The existing power distribution line crosses both properties. The Frink Farm, which is part of the Newington Historic District was listed on the National Register with the existing distribution line as part of its viewshed. Neither property has a permanent fill proposed within a Corps permit area. The undertaking on the Frink Farm and the Pickering Farm consists of using timber mats as temporary fill for access.

On March 3, 2015 Edna Feighner requested consultation with the applicant concerning the National Register listed Newington Historic District. Eversource has consulted with the owner and the town on a number of occasions. Eversource offered to avoid visual effects by placing the line underground through the Frink Farm however, the Frinks have refused to grant the property rights to the applicant to underground the line. The Frink Farm is the only part of Newington Historic District the SRP will cross. The undertaking to be authorized by the Corps within the Newington Historic District for the SRP consists of discharges of dredged or fill material in the existing ROW where the timber mat access way is established within wetlands and waters of the US.

The Town of Newington letter also indicated that there were a number of properties which they felt were eligible for listing in addition to the properties listed in the attached reports. Those properties were Nimble Hill Road 97, 148, 72, 62, 241,248, 249, 272; Little Bay Road 195, 224, 251, 271, 275, 339; Old Post Road 32, 46, 50, and Fox Point Road 7, 8, 11, 16, 27, 28. Do you wish to consult about these properties? These properties are outside of Corps permit areas and it would appear that the chance of disturbance by the undertaking (temporary use of timber mats) to any potentially eligible historic property outside of the Corps permit area is remote. If not, then no further investigation is recommended by the Corps for these properties for 106.

Do you wish to consult about the Frink or Pickering Farms? Are there any other national register listed resources or other resources that your office has nominated as a potentially eligible historic property for the National Register which the Corps may not be aware of in Corps permit areas and require consultation concerning possible effects? Please let us know if there are any resources which have not been reported to the Corps.

Please either contact me or have a member of your staff contact David Keddell of my staff at 978-318-8692 with your resource determination or if you have any questions or comments concerning the Corps permit areas.

Sincerely,

Frank J. Delgiudice Chief, Regulatory Division Branch C

Copy Furnished:

Sarah Allen, Principal Wetland Scientist, Normandeau Associates, Inc, 25 Nashua Road, Bedford, New Hampshire 03110