

**THE STATE OF NEW HAMPSHIRE
BEFORE THE
SITE EVALUATION COMMITTEE
DOCKET NO. 2015-04**

PRE-FILED DIRECT TESTIMONY OF CHERILYN E. WIDELL

**APPLICATION OF PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
FOR A CERTIFICATE OF SITE AND FACILITY FOR CONSTRUCTION OF A
NEW 115 kV TRANSMISSION LINE**

THE SEACOAST RELIABILITY PROJECT

April 12, 2016

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Qualifications and Purpose of Testimony

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Q. Please state your name and business address.

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A. My name is Cherilyn E. Widell. My consulting business is Widell

4

Preservation Services LLC. It is located at 105 North Water Street, Chestertown,

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Maryland 21620.

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Q. Please describe your background and qualifications?

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A. I have a Bachelor's degree in History from Hood College in Frederick,

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Maryland. I have worked in the field of historic preservation throughout the United

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States and internationally for 40 years. I am a former state historic preservation officer

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("SHPO") and federal preservation officer. My background and training meets the

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Secretary of the Interior's professional qualification standards, 36 C.F.R. Part 61, for

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both historian and architectural historian. I was named a Senior Fulbright Scholar to

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Japan in historic preservation and have been nominated to the Board of the United

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States Committee of the International Council on Monuments and Sites ("ICOMOS").

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I began my career documenting hundreds of historic buildings and landscapes

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through field surveys in Maryland. I was appointed by the Governor of California to

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serve as State Historic Preservation Officer with oversight for all aspects of historic

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resource protection throughout California. In this capacity, I was responsible under

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Section 106 of the National Historic Preservation Act for consulting with all federal

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agencies with undertakings which may have an effect on historic properties in the state.

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Specifically, federal agencies consulted with me on the identification of historic

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properties in Areas of Potential Effect, determinations of eligibility for the National

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Register of Historic Places (the "National Register"), assessment of effects and

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resolution of adverse effects through avoidance, minimization and mitigation and

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preparation of agreement documents as needed. Among those federal actions were the

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repair and seismic retrofit of the Los Angeles Memorial Coliseum and Los Angeles

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City Hall following the Northridge Earthquake, the closure of 29 military installations

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caused by the Base Realignment and Closure Act ("BRAC") and numerous Department

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of Energy ("DOE") and FERC projects. I was also responsible for compliance of all

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state undertakings under the California Environmental Quality Act ("CEQA") which

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might have an adverse impact on historic resources.

1 I also served as the federal preservation officer for the Presidio Trust, the federal
2 agency responsible for the conversion of the Presidio of San Francisco from an Army
3 post to a National Park. In this capacity, I was responsible for agency compliance with
4 NEPA and NHPA for over 450 historic buildings and the archeological resources
5 located in a National Historic Landmark district.

6 A copy of my résumé is attached to this pre-filed testimony as Attachment A. It
7 contains further information regarding my education, training, background and
8 qualifications.

9 **Q. What is the purpose of your testimony?**

10 A. The purpose of my testimony is to discuss my assessment of the potential
11 effects that the Seacoast Reliability Project (“SRP” or the “Project”) may have on
12 above ground historic properties. Based on this assessment, I offer the opinion that the
13 Project will not have an unreasonable adverse effect on historic resources.

14 **Q: Have you testified before the New Hampshire Site Evaluation**
15 **Committee previously?**

16 A. No, I have not. I have, however, submitted pre-filed testimony to the Site
17 Evaluation Committee in support of the Northern Pass Transmission Project
18 Application.

19 **Q. How are you familiar with the Project?**

20 A. I received information on the Project’s components and location of the
21 transmission lines and facilities. I have spent considerable time reviewing that
22 information and online tools in specific locations. I have also viewed much of the route
23 and visited many individual historical resources in person.

24 **Q. What documents have you reviewed relating to the assessment of the**
25 **Project’s potential effects on historic properties?**

26 A. I have reviewed the February, 2015 *Seacoast Reliability Project*
27 *Preliminary Report: Historic Resources* prepared by Archaeological and Historical
28 Services, Inc. (AHS). See Appendix 11. I have also reviewed the *Seacoast Reliability*
29 *Project New Hampshire Division of Historical Resources Project Area Form* completed
30 by Preservation Company in February, and amended in April 2016. I have also reviewed
31 the National Register nomination form for the Newington Center Historic District and

1 numerous other New Hampshire Division of Historic Resources (“DHR”) forms for
2 Durham, Newington and Portsmouth that provide additional contextual and survey
3 information for the area. I have also reviewed historic resources eligibility and
4 assessment documentation to help in the preparation of the individual and large area
5 inventory forms for purposes of the Section 106 review being done by DHR and the lead
6 federal agency, the US Army Corps of Engineers (“USACE”).

Historic Resources

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8 **Q. Please describe the Project Area Form.**

9 A. The Applicant has prepared a Project Area Form (“PAF”) for the study
10 area known as the Area of Potential Effect (“APE”). For SRP, the APE includes the
11 electric utility corridor itself and one-half mile on each side of the corridor. The PAF was
12 completed by Preservation Company in February 2016 and amended in April 2016 for
13 DHR’s review as part of the National Historic Preservation Act (“NHPA”) Section 106
14 review process. The PAF describes the historic, geographic and architectural contexts
15 used to evaluate historic resources potentially affected by the Project. The PAF also
16 recommends resources for further evaluation of eligibility for listing on the National
17 Register.

18 **Q. Please describe the assessment of historic resources completed for the**
19 **Project.**

20 A. The first assessment completed by the Project is the *Seacoast Reliability*
21 *Project Preliminary Report: Historic Resources* dated February 13, 2015, prepared by
22 AHS. This report identified historic resources in preparation for filing a Request for
23 Project Review (RPR) with DHR on behalf of the Applicant. It focused on the area
24 immediately around the Project site. As part of this review, AHS conducted a site file
25 check at DHR in November 2013 to gather information on already-identified historic
26 resources. AHS also undertook a field review of the route in December 2013 that
27 identified additional potential historic resources, examined all points where the
28 transmission-line route will cross public roads, and reviewed two points on private
29 property where the line will travel underwater and cross Little Bay.

30 Subsequently, Preservation Company undertook a survey to identify all of the
31 identified historic sites in the one-mile APE. This assessment started with a

1 comprehensive review of DHR files for the towns within the APE for above ground
2 historic resources. It included a review of documented historic resources from the
3 National Register and New Hampshire State Register of Historic Places listed properties,
4 DHR individual, project area and town-wide area forms, planning surveys and town
5 master plans. Other important sources consulted were town tax assessments and tax
6 maps, online digital aerial mapping and University of New Hampshire (“UNH”) maps
7 and materials. Field survey of the Project transmission route was completed between May
8 2015, and February 2016.

9 In the field, viewshed mapping along with actual sight analysis was used to
10 preliminarily assess the properties’ historic settings and their visual relation to the
11 Project. Further refinement of this assessment was done using aerial mapping (Google
12 Maps, Bing Maps), Google Street View (where available) and Google Ground-level
13 View (which models the topography of a given area). These served as “checks” on the
14 actual site analysis and viewshed mapping. The combination of these methods allowed
15 Preservation Company to better identify those properties that warranted further analysis.
16 For some properties where visibility was considered to be likely, LandWorks, the visual
17 assessment consultant, created visual simulations of the affected view. This information
18 provided a more complete understanding of historic resources within the APE.

19 **Q. Please describe how SRP has coordinated with DHR.**

20 A. PSNH filed a Request for Project Review (“RPR”) with the DHR for the
21 Project on March 4, 2015. DHR responded with comments on the RPR and concurred
22 with the findings presented in the Phase I-A archeological report on March 19, 2015.
23 Those comments included a specific requested consultation on the National Register
24 listed Newington Center Historic District.

25 From the documentation that included in Appendix 33 of this Application, I know
26 that Project representatives met with DHR on April 10, 2015 and discussed in part the
27 historic resources review process. DHR indicated that it concurred in the establishment
28 of a one mile Area of Potential Effects (“APE”) for indirect visual effects. That meeting
29 was followed by e-mail exchanges between Laura Games of PSNH and Edna Feighner
30 at DHR that addressed the planned SRP application. SRP and DHR again exchanged e-

1 mails on May 14, 2015 in response to the May 4, 2015 letter from the USACE to DHR
2 on the permit area for archeological survey.

3 SRP next communicated with DHR by phone on October 20, 2015. That call dealt
4 mostly with the status of work on cultural resources review, including Phase 1-B
5 archeological survey and the need for a PAF prior to filing the SEC application. The
6 Project's efforts to address concerns regarding the Newington Center Historic District
7 were also discussed.

8 Two meetings between DHR and SRP were held in January 2016. The first
9 included a brief discussion on the impending SRP application to the SEC on January 12
10 and the second on January 20 to discuss cultural resource survey work and SEC
11 application requirements. A follow up meeting was held with DHR on February 23,
12 2016 to discuss the PAF, inventory forms to follow, SEC application requirements and
13 the schedule for NHDHR review. See Appendix 33 for copies of communications with
14 DHR.

15 **Q. Is the Project's potential effect on historical resources also being**
16 **reviewed under Section 106 of the National Historic Preservation Act?**

17 A. Yes.

18 **Q. Please describe that process.**

19 A. The Section 106 Process requires federal agencies to take into account the
20 effects of their undertakings on historic properties. It is a consultative process that
21 requires a federal agency to identify historic properties potentially affected by the
22 undertaking, assess its effects and seek ways to avoid, minimize or mitigate adverse
23 effects on historic properties. As is typical in the Section 106 process, SRP will be
24 required to provide mitigation for any unavoidable effects. The required mitigation
25 elements will likely be memorialized in an agreement that will continue beyond the
26 SEC timeframe. These mitigation elements will be determined through consultation
27 among USACE, DHR, PSNH and the consulting parties. The Section 106 process is
28 triggered in this case by the application for a Clean Water Act Section 404 permit that
29 has been filed by PSNH with the USACE.

30 **Q. What are the next steps in the Section 106 process?**

1 A. The first step is to complete the identification of historic resources likely
2 to be affected by the Project. For this, DHR will review and comment on the PAF, and
3 then PSNH will complete individual or district inventory forms. USACE, as the lead
4 federal agency, in consultation with DHR and any consulting parties, will apply the
5 criteria for determining National Register eligibility of properties within the APE.
6 USACE will then determine the potential effects of the Project on these identified
7 historic properties, again in consultation with DHR and consulting parties. The final
8 step of the Section 106 process is to explore additional alternatives to avoid and
9 minimize adverse effects on historic properties and to establish appropriate mitigation
10 for adverse effects, also in consultation with DHR and consulting parties.

11 **Q. Please explain the results of the historical resources assessment.**

12 A. Preservation Company identified a total of 162 historic resources,
13 including both individual resources and groupings of resources, within the APE. Of
14 these, four historic districts and seven individual properties, as well as one former
15 historic district, are either listed on the National Register or already determined eligible
16 for it on an individual basis.

17 I have concluded that the Project is likely to have an indirect (visual) adverse
18 effect on the following three resources:

19 • The Project could affect the Newington Center Historic District listed on
20 the National Register in 1987 (district expanded 1991). Here three new taller structures
21 will replace the existing five single wooden poles of the distribution line installed in
22 1952 in an open field behind the Frink Farm. (As discussed below, an existing
23 distribution line will be relocated to public roadways to allow the new transmission line
24 to be installed on H-frame structures that are shorter than single monopole structures.
25 Undergrounding of the line in this area was also proposed by the Project, but the
26 required land rights could not be obtained.)

27 • At the Pickering-Rowe House, 50 Old Post Road, Newington, one
28 structure located in the Frink Farm field in the Newington Center Historic District may
29 be a focal point affecting the view from the house.

30 • At the Pickering Farm on 339 Little Bay Road, Newington, a weathering
31 steel H-frame structure has been moved as close as possible to existing vegetation to

1 reduce visibility. It will not be substantially visible in the primary view from Little Bay
2 Road, but it will still be seen in some views of the house and barn.

3 In addition, the Project will have a direct effect on the Cable Terminal House¹ in
4 Durham. It will need to be moved for construction of the submarine cable. PSNH will
5 use best practical measures to move and stabilize the terminal house during the
6 construction of the Project and relocate it on its current site or on a nearby site.
7 Selecting the best practicable measures to minimize impact to the building and
8 determining whether the impact can be minimized sufficiently to avoid an adverse
9 effect will be done in the Section 106 review process.

10 **Q. What steps has SRP taken to avoid and minimize impact?**

11 A. The Applicant has taken substantial meaningful measures to avoid and
12 minimize potential adverse effects of the Project on historic resources. The design
13 engineers have reviewed and revised the design of the transmission line to avoid adverse
14 effects on historic resources. Key examples are as follows:

15 • The Applicant has modified the design to place the Project underground in
16 the Main Street area of Durham, reducing visibility of the Project from the 1936 Main
17 Street Bridge/Railroad Overpass, the 1911-12 Library Way Railroad Underpass and the
18 B&M Depot/ UNH Dairy Bar and from historic resources in the UNH area. Further, the
19 Project has contracted to procure additional easements that will lower structure heights to
20 or below tree height and reduce the number of new structures in the B&M Railroad
21 Western Division Historic District in the area of the UNH campus.

22 • Construction constraints require that the Cable Terminal House in Durham
23 be removed during the Project's construction. Selecting the best practicable measures to
24 minimize impact to the building and determining whether the impact can be minimized
25 sufficiently to avoid an adverse effect will be done in the Section 106 review process.

26 • The Project has been modified to reduce visibility at the Pickering Farm,
27 339 Little Bay Road in Newington, by using weathering steel H-frame structures. This
28 design modification reduced visual contrast with the background vegetation, provided

¹ This is part of what is identified in the PAF as the Little Bay Underwater Cable Terminal Houses District, which is recommended to be evaluated for eligibility as a historic district.

1 longer span widths to reduce the number of visible structures, and placed those structures
2 behind or as close as possible to existing vegetation.

3 • PSNH proposed placing the line underground and removing the
4 distribution line on the Frink Farm, a historic property at 272 Nimble Hill Road in the
5 Newington Center Historic District. After meeting with Newington Town officials, and
6 the landowners on numerous occasions, the necessary rights for undergrounding the line
7 could not be obtained. Consequently, an alternative overhead design with H-frame
8 structures was designed that allowed for the combination of the longest possible spans,
9 fewest number of structures, and shortest possible corresponding structure heights. The
10 new design reduces the number of structures in the Frink Farm field from five to three.
11 The structures will be placed in wooded areas, an area not under cultivation in the field,
12 and where one structure currently exists. The existing distribution line in the right-of-way
13 will be removed and replaced by upgraded lines on public roadways.

14 • The Project has also been modified to reduce or eliminate visibility in the
15 Newmarket-Bennett Roads Historic District in Durham through the use of reduced
16 structure heights, use of weathering steel H-frames, and moving structure locations.

17 **Q. What plans does the Project have to mitigate any potential**
18 **unavoidable effects of the Project on historic properties?**

19 A. As is typical in the Section 106 process, SRP will be required to provide
20 mitigation for any unavoidable effects. It is expected that the required mitigation
21 elements will be memorialized in an agreement with the USACE and DHR, an
22 agreement that will continue beyond the SEC timeframe. These mitigation elements will
23 be determined through consultation among USACE, DHR, SRP, and the consulting
24 parties. For this reason, it is premature to identify specific mitigation measures for
25 unavoidable potential adverse effects but they likely will take the form of preservation
26 and education measures. The efforts to preserve the Cable Switch House in Durham also
27 provide substantial mitigation for unavoidable impact during construction.

28 **Q. In your opinion will the Project have an unreasonable adverse effect**
29 **on historic sites? Please explain.**

30 A. No. With the assistance of Preservation Company and LandWorks, I
31 reviewed potentially affected historic properties, districts and cultural landscapes by

1 conducting site visits and by reviewing viewshed mapping, 3-D modeling tools, and
2 photosimulations. This effort helped me understand the relationship and potential
3 effects of the Project on eligible or potentially eligible historic resources. Based on the
4 research and analysis done by the Applicant's consultants and my professional
5 experience, coupled with the measures taken by the Applicant to avoid, minimize and
6 mitigate, it is my opinion that the Project will not have an unreasonable adverse effect
7 on historic resources.

8 I base this conclusion on the following:

9 • The Project will be located within an existing electric utility corridor in a
10 largely suburban setting. Also, for much of the length of the Project, there will only be
11 the incremental effect of replacing the existing poles with taller structures to
12 accommodate the Project.

13 • The Project will be built underground between A Lot on the UNH campus
14 to south of the intersection of Colovos Road and Waterworks Drive, eliminating and
15 reducing visibility concerns in the UNH area and the B&M Western Division Railroad
16 Corridor.

17 • In the Newmarket-Bennett Roads Historic District in Durham, redesigning
18 structure placement enabled fewer structures spread farther apart so that the visibility of
19 the Project will be minimized in relation to views from historic resources.

20 • There are no long views of the Project within the APE due to the area's
21 topography, tree cover and density. Views are limited to an area close to the transmission
22 line corridor.

23 • There are no National Historic Landmarks located in the APE.

24 • The indirect visual effects on historic properties will not prevent them
25 from being determined eligible for listing on the National Register or, if already listed,
26 will not cause them to be removed from the National Register because of a loss of
27 integrity.

28 • While I believe that three properties may be indirectly adversely affected
29 by the Project, the adverse effects to those sites are not substantial. These adverse effects
30 are not of an unusual or disproportionate degree.

- 1 • The Cable Terminal House in Durham is the only resource directly
2 affected by the Project, which will be moved to construct the submarine cable. PSNH will
3 use best practical measures to avoid an adverse effect in relocating and stabilizing the
4 cable house to a location to be determined in the Section 106 review process.
- 5 • PSNH has taken substantial steps to design the Project to avoid and
6 minimize the Project's effect.
- 7 • Also, in consultation with the Town of Newington, the Applicant proposed
8 to place the Project underground in the vicinity of the Newington Center Historic District.
9 Although all the necessary rights for undergrounding the line could not be obtained,
10 PSNH remains willing to consider that alternative. Even if this underground alternative
11 were not possible, the Project will not have an unreasonable adverse effect on historic
12 resources.
- 13 • As a matter of practice, the identification, evaluation and mitigation of
14 historic resources under the federal Section 106 process is an iterative process that will
15 continue beyond the time frames set forth in RSA Chapter 162-H, and any remaining
16 requirements will be memorialized in an agreement between the USACE, DHR, and
17 PSNH and consulting parties. This comprehensive identification and evaluation process
18 provides assurance that any adverse effect on historic sites will be addressed, and that
19 DHR will have a continuing role in the Project until its completion. I expect that USACE
20 in consultation with DHR will determine at the end of the Section 106 process, as I have,
21 that there will be some adverse effects from the Project. The Section 106 process will
22 require that any adverse effects be mitigated.
- 23 • It is my understanding that it is customary in SEC proceedings and may be
24 appropriate here for the SEC to require the applicant (1) to continue to consult with DHR
25 with respect to effects on historical resources, (2) to comply with any agreements and
26 memoranda of understanding with DHR, and (3) to report to the SEC and DHR any new
27 information or evidence about aboveground historical resources in the APE. Based on
28 prior precedent, it is also reasonable to expect that the SEC will delegate to DHR
29 monitoring and compliance authority with respect to historic resources. These expected
30 conditions provide an additional level of assurance that PSNH will fully execute any and

1 all requirements imposed on it with respect to the identification, avoidance and
2 minimization, and mitigation of impacts on historical resources.

3 **Q. Does this conclude your pre-filed testimony?**

4 A. Yes.