

VIGGO C. FISH
Direct Dial: 603.226.4412
Email: viggo.fish@mclane.com
Admitted in NH
11 South Main Street, Suite 500
Concord, NH 03301
T 603.226.0400
F 603.230.4448

VIA E-MAIL

March 26, 2020

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

Re: SEC Docket No. 2015-04: Public Service Company of New Hampshire d/b/a
Eversource Energy for a New 115k Transmission Line from Madbury Substation to
Portsmouth Substation
Eversource's Request for a Minor Modification - Structure F107-83

Dear Ms. Monroe:

On April 12, 2016, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") filed an Application for a Certificate of Site and Facility ("Application") to the New Hampshire Site Evaluation Committee ("SEC") to construct and operate the Seacoast Reliability Project ("SRP" or the "Project"). On January 31, 2019, the SEC issued an Order and Certificate of Site and Facility with Conditions to construct the Project.

For the reasons discussed herein, Eversource requests that the SEC Administrator approve a minor, non-material modification to the location of Structure F107-83 ("Structure 83") to avoid construction-related impacts to a rock outcropping. Specifically, Eversource requests approval to shift the location of Structure 83 16.5 feet to the west.

A. Background on Minor Modification

As part of its Application filed in April 2016, Eversource sought permission from the SEC to construct an aboveground transmission line. This design was amended and was approved by the SEC as shown on Drawing F10743001, sheet 7 of 13, in the Revised Engineering Drawings, App. Ex. 149, and on map 17 of the Revised Environmental Maps, App. Ex. 148.

The proposed location of Structure 83, as approved by the SEC, is situated directly on a rock outcropping that was not visible in prior reviews due to existing brush in the area. The structure could be installed as designed; however, the contractor would need to mechanically remove the surface boulders and ledge prior to starting the structure excavation. In an effort to minimize construction impacts to the rock outcropping, Eversource field representatives and its

McLane Middleton, Professional Association Manchester, Concord, Portsmouth, NH | Woburn, Boston, MA

contractors conducted an additional site review. Based on the review, it was determined that moving structure 83 ahead span towards 84 was eliminated as an option since it would place the structure closer to or in a wetland. Alternatively, it was determined that moving structure 83 approximately 16.5 feet back span towards Structure 82 was the preferred option. Moving the pole 16.5 feet will place the structure in the same location as the existing distribution pole which will minimize excavation in the shallow ledge. It also places the pole further from the wetland and approximately 12 feet from the flagged cultural area. The structure type and size will not be changed.

B. Description of Minor Modification

With the exception of the location, the proposed design of Structure 83 remains unchanged. This requested modification simply shifts the location of Structure 83, 16.5 feet to the west. Eversource will also shift the work pad for the structure accordingly to correspond to the new structure location. The proposed reconfiguration is shown in Attachment 1 to this letter at page 4.

C. Potential Impacts Relative to Criteria Under RSA 162-H:16

As described by Eversource in the original Project Application and all supplemental filings, and as determined by the Subcommittee, the Project will not have an unreasonable adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety. The Subcommittee also determined that the Project will not have an undue interference on the orderly development of the region. Eversource and its experts have reviewed the proposed design modification and has concluded that this minor modification will not have any further adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety, nor will the requested modification have an undue interference on orderly development.

1. Aesthetics

Eversource consulted with its visual assessment expert, David Raphael, who concluded that the minor modification will not materially alter his conclusion that the Project will not have an unreasonable adverse effect on aesthetics or create an adverse effect on any one scenic resource in the area. The minor modification will not affect the Subcommittee's conclusions on aesthetics. The revised design only slightly modifies the location of Structure 83. Indeed, Mr. Raphael has concluded that the change is minimal and will not be readily visible from any public roads or adjacent residences. Mr. Rafael further concludes that any visibility from Longmarsh Road will not substantively diminish the character or features of the area. Further, as discussed in the *Revised Effects Table*, Attachment 1, pages 12, "[t]he proposed change will not have a direct or indirect adverse effect on the Durham Point Historic District."

2. Historic Sites

Eversource's historic resources consultant has concluded that the minor modification will not have any adverse effects on above-ground resources and would not affect her original

SRP – Applicant's Request for a Minor Modification to Structure F107-83 Page 3

conclusion that the Project will not have an unreasonable adverse effect on historic resources. *See* Attachment 1, page 7.

Additionally, Eversource's archaeological experts have conducted extensive field work in the vicinity of the relocation to identify archaeological resources and assess whether they may be impacted by the construction of the Project. Based on this work, Eversource and its consultants concluded that there are no below-ground historic resources that may be affected by this minor modification. No additional test pits or surveys are recommended.

Eversource is contemporaneously submitting a request to the New Hampshire Division of Historical Resources and the United States Army Corps of Engineers for their concurrence.

3. Water Quality and the Natural Environment

There will be no change in temporary or permanent wetland impacts associated with this modification. The minor modification does not include additional tree clearing.

4. Public Health and Safety

The requested modification will not impact public health and safety. The structure location shift will not materially alter the calculated electric and magnetic fields in the area. The revised design will not alter construction methods or increase traffic impacts. Eversource will comply with all terms and conditions of the Certificate.

5. Orderly Development of the Region

The relocation of Structure 83 is specifically being made to avoid construction-related impacts. The Natural Conservancy, the underlying property owner, has been notified of the requested minor adjustment. The revised alignment will have no effect on any of the criteria pertaining to orderly development.

D. Conclusion

Eversource requests to revise the location of Structure 83 to avoid construction-related impacts. After careful analysis, Eversource has determined that the structure revision will result in reduced potential impacts. In addition, Eversource has confirmed that the proposed modification will not impact any matters within the jurisdiction of NHDES and, therefore, it is not necessary to seek review and approval from NHDES.

Eversource respectfully requests that the SEC Administrator approve this minor modification.

 $\ensuremath{\mathsf{SRP}}-\ensuremath{\mathsf{Applicant}}\xspace$'s Request for a Minor Modification to Structure F107-83 Page 4

Sincerely,

Viggo C. Fish

VCF:amd Enclosure

Cc: SEC Distribution List

Nadine Miller, NHDHR



13 Legends Drive

Hooksett, NH 03106

March 26, 2020

Nadine Miller New Hampshire Division of Historical Resources 19 Pillsbury Street Concord, NH 03301

Re: Seacoast Reliability Project (RPR# 6528) Construction Change in Vicinity of Historic Property Structure 83 Modification – Durham, New Hampshire

Dear Ms. Miller-

Eversource Energy (Eversource) is proposing a minor construction change in the vicinity of a historic property to avoid possible current and future impacts to cultural resources as part of the Seacoast Reliability Project (the "Project"). The original proposed location of Structure 83 is situated on surface ledge, directly beside a large historic quarry feature consisting of rock outcrop with evidence of historic quarrying activity associated with the Langmaid Granite Quarry (27-ST-119) within the Durham Point Road Historic District (DUR-0DPR). This location is within the Town of Durham on property owned by The Nature Conservancy (Figure 1). The new proposed construction change would move Structure 83 sixteen and a half feet west to avoid potential impacts to the historic quarry feature during current construction or future maintenance activities (Figure 2). The structure type and size will not be changed.

Both the original and newly proposed location of Structure 83, are situated within the boundaries of Durham Point Road Historic District, as shown on New Hampshire Division of Historical Resource's Enhanced Mapping & Management Information Tool (EMMIT). The district spans approximately 350 acres with contributing resources including agricultural fields, stone walls, roads, clusters of nineteenth century houses and barns, as well as the Langmaid granite quarry archaeological site (27-ST-119). The Durham Point Road Historic District was determined eligible for listing on the National Register of Historic Places in 2016 under Criterion A, C, and D. As the new structure location is situated within the existing right-of-way in a low-lying, highly wooded area that is not visible from any historic buildings or public roads, the proposed change will not have any adverse impacts to the above-ground resources associated with the historic district (see Appendix A - Widell Letter).

As mentioned previously, both the original and newly proposed Structure 83 locations are situated within the Langmaid Granite Quarry (27-ST-119), an archaeological resource that although is not considered individually eligible for the National Register as an archaeological site, it is considered a contributing resource to the historic district. In the Project Phase IB intensive survey report, it was noted that the site "is considered typical of a mid to late nineteenth century rural quarry. Like many other New Hampshire quarries, it is interpreted as a surface manifestation of stone extraction, linked to diversified farmstead activity" (Bunker 2016). Split stone slabs are scattered across the 100-foot cleared corridor and along the tree line for approximately 1,400 feet. Some of the slabs have been laid flat on the ground, while others have been clustered and irregularly stacked or propped against one another. Many of the slabs and bedrock ledge faces display a series of round holes, associated with stone splitting. "All features observed at the site are related to stone extraction; no foundations or other activity areas were observed. Except for the fragmented metal wedges stuck in the stone, no artifacts were observed or collected. It is not expected that any subsurface resources are associated with this site" (Bunker 2016).



13 Legends Drive

Hooksett, NH 03106

The original proposed location of Structure 83 is situated adjacent to a large, above-ground historic quarry feature. Although it was not apparent during prior reviews due to the dense vegetation cover, the original proposed location is also situated atop ledge and surface boulders, which would require removal prior to structure installation. The new proposed shift will move the structure away from historic quarry features eliminating the need to remove any surface boulders or ledge, minimizing any potential impacts during current construction or future maintenance activities to the archaeological site and the district. Protective measures already proposed will continue to be implemented. As such, the proposed change is not expected to adversely affect any of the above-ground or archaeological resources associated with the historic district as it will not alter, either directly or indirectly, any of the significant characteristics that qualify the historic district for inclusion in the National Register (see Appendix A – Widell Letter).

A revised Effects Table for the Durham Point Road Historic District is also provided in Appendix A.

If you have any questions, please feel free to call me at 603-717-5198 or email me at brooke.kenlinenyman@eversource.com.

Sincerely,

Brooke Kenline-Nyman Eversource Energy

Cultural Resource Specialist

Enclosure

Cc: David Trubey, DHR

Lindsey Lefebvre, USACE Pamela Monroe, SEC

Todd Selig, Town of Durham Phil Barthel, Eversource Matt Cardin, Eversource

References Cited

Bunker, Victoria

2016 Seacoast Reliability Project: Results of Phase I-B Archeological Survey Madbury, Durham, Newington and Portsmouth, NH. Report Prepared for Normandeau Associates, Inc. on File at NH DHR, Concord, NH.

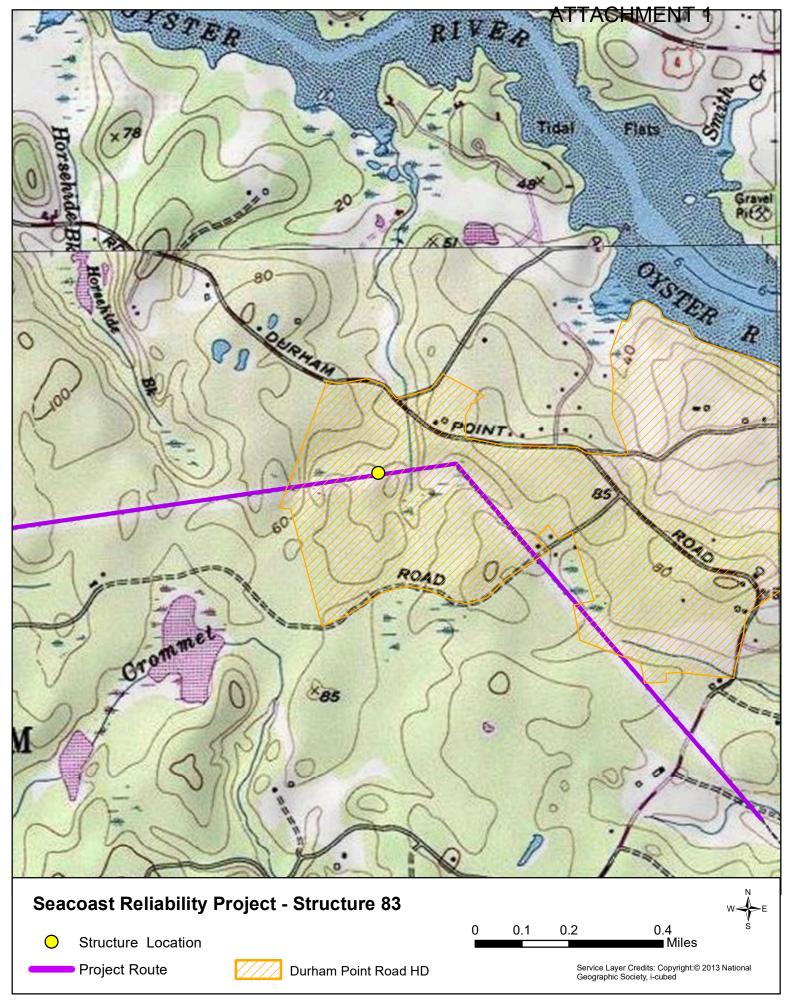
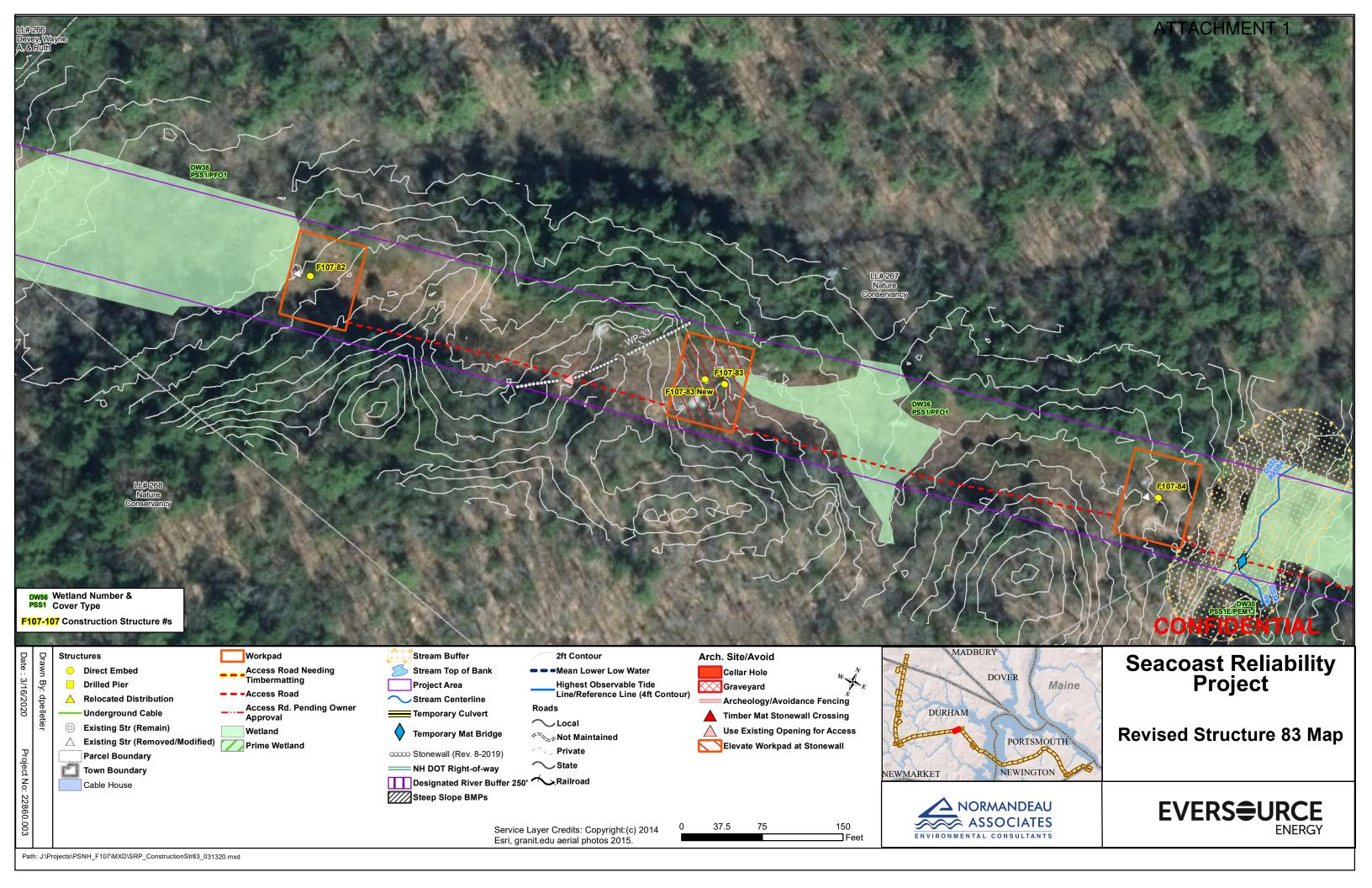


Figure 1. Structure Location on Topographical Map



Attachment A
Cherilyn Widell Letter
and
Revised Effects Table for the Durham
Point Road Historic District



Widell Preservation Services, LLC

March 23, 2020 Ms. Nadine Miller, Deputy State Historic Preservation Officer New Hampshire Director of Historical Resources 19 Pillsbury Street Concord, NH 03301- 3570

Re: Seacoast Reliability Project (RPR#6528) Construction Change in the Vicinity of Historic Property due to Modification in the Placement of Structure 83, Durham, New Hampshire

Dear Ms. Miller,

As the expert witness in cultural resources for Eversource Energy (Eversource) for the Seacoast Reliability Project, I wanted to inform you that Eversource is proposing a minor construction change in the placement of Structure 83. The change of structure location will be a move of sixteen and a half feet to the west from its current location but still within the right of way of the Seacoast Reliability Project within the Town of Durham on property owned by The Nature Conservancy.

The original proposed location for **Structure 83** was directly beside a large rock outcropping with evidence of historic quarrying activity. The historic quarrying activity was associated with the Langmaid Granite Quarry (27-ST-119). The Langmaid Granite Quarry is located within the Durham Point Historic District (DUR-0DPR). The Durham Point Road Historic District was determined eligible for listing on the National Register of Historic Places in 2016 under Criterion A, C, and D. This historic resource is classified as an archaeological resource which has been determined not individually eligible for the National Register. It is considered a contributing resource to the Durham Point Road Historic District and is documented in the Project Phase IB intensive survey archaeological report (Bunker 2016).

The proposed construction change would move Structure 83 sixteen and a half feet west to avoid potential impacts to the historic quarry feature during current construction or future maintenance activities. The type of structure and size will not change. Both the original and newly proposed location of Structure 83 are situated within the boundaries of the Durham Point Road Historic District as shown on the New Hampshire Division of Historical Resource's Enhanced Mapping & Management Information Tool (EMMIT).

The proposed shift of the location is due to the discovery of ledge and surface boulders which would require removal prior to construction of Structure 83 in its



original location. This cluster of outcroppings and surface boulders were not apparent because of dense vegetation cover prior to construction.

The change in location of Structure 83 will move the structure away from historic quarry features eliminating the need to remove any surface builders or ledge, minimizing any potential impacts during current construction or future maintenance activities to the archaeological site and the district. Protective measures already in use will continue to be implemented.

I have reviewed this change to the original project. In my expert opinion, the proposed change will not adversely affect the Durham Point Road Historic District directly or indirectly, as it will not alter any of the significant characteristics that qualify it for inclusion in the National Register of Historic Places. Furthermore, it is my opinion that the proposed change will reduce the chance of any potential impacts to the historic quarry feature during current construction or future maintenance activities.

Should you have any questions, please call me at 443-480-2862 or email me at cherilyn809@yahoo.com.

Sincerely,

Cherilyn Widell, Principal

Cherilyn Widell

Widell Preservation Services, LLC

Reference Cited

Bunker, Victoria

2016 Seacoast Reliability Project: Results of Phase I-B Archaeological Survey Madbury, Durham, Newington and Portsmouth, NH. Report Prepared for Normandeau Associates, Inc. on File at NH DHR, Concord, NH

HISTORIC PROPERTIES AFFECTED TABLE RESULTS OF EFFECT EVALUATION FOR

Durham Point Historic District, Durham (DUR-DPR) Seacoast Reliability Project, 2020

Significance (including Criteria):

The Durham Point Historic District was determined eligible for the National Register of Historic Places in 2016. Under Criterion A, the Durham Point Historic District has significance in the Area of Agriculture. The historic district also relates to the settlement context, granite quarrying, maritime history and transportation as a landing place and ferry crossing. The district is located in one of the earliest settled areas in town, with agricultural development and use that continues to the present day. Extensive fields and reforested pastures represent some of the largest parcels of intact, undeveloped historic farmland in town. A total of about 350 acres are included in the eligible district. The area was shaped by human activity including crop cultivation, livestock grazing and forestry. There is evidence of the response to the natural environment in the ongoing use of the waterfront and prime agricultural land and in the extensive network of stone walls. The Durham Point Historic District also has significance under Criterion C in the Area of Architecture and Criterion D for archaeology. The rural neighborhood includes six historic farmhouses and outbuildings, a brick schoolhouse and a family cemetery. Character-defining features include extensive acreage, open fields, stone walls, roads and the clusters and complexes of nineteenth century houses and barns. Stone walls line the roadsides and mark the outer boundaries of most properties. Large tracts of woodland and reforested pasture were under the same ownership. River frontage on the Oyster River and Little Bay is also an important feature. There are seven non-contributing houses within the boundary, which affect integrity of setting in some places. The electric utility corridor dates from 1902 and was widened ca. 1948, but it does not relate to the agricultural significance or associations of the district. Thus, the existing electrical distribution line in the right of way is not a contributing feature

NR Boundary (description/justification):

The boundary of the Durham Point Historic District is defined by historic and current legal lot lines of the group of related properties, indicated by stone walls, roads and natural features. Large parcels of contiguous land under the historic ownership of area farmers are included in the district. These parcels now encompass a number of newer homes which are non-contributing buildings. The edges of the eligible district are defined by subdivisions of smaller residential house lots. Other outlying discontiguous parcels of pasture and woodlot no longer convey associations with these farms due to intervening subdivision and new construction.

Individual Properties		Districts	
NR	SR	NR	SR
[]	[] Eligible (district N/A)	[X]	[X] Eligible
[]	[] Eligible, also in district	[]	[] Not eligible
[]	[] Eligible, only in district	[]	[] Listed in the NRHP
[]	[] Listed in the NRHP	[]	[] Not evaluated as a district
[X]	[X] Not evaluated for individual		
	eligibility		

RELATIONSHIP OF PROPOSED ACTION TO HISTORIC RESOURCE

Project Description: The Seacoast Reliability Project is located within the Durham Point Historic District in the existing 100' wide electric utility corridor for approximately three-quarters of a mile west and south of Durham Point Road. A single pole in the historic district, Structure 83, is located within the historic Langmaid granite quarry, adjacent to a historic quarry feature. In order to avoid any potential impacts to the quarry feature, it is proposed to be moved sixteen and a half feet west. This new location is not visible from any public roads or historic farmsteads, outbuildings, or cemeteries associated with the historic district.

DEFINITION OF EFFECT	EVALUATION
An effect may occur when there is alteration	The proposed change in structure location could
to the characteristics of a historic property	potentially have an effect on the Durham Point
qualifying it for inclusion in or eligible for the	Historic District, because it
National Register as defined in Section	has the potential to directly or indirectly alter
800.16(1).	characteristics that qualify the district for the
	National Register of Historic Places, which
	include setting and landscape. The structure
	proposed to be moved is located in an existing
	electric utility right-of-way that runs through the
	historic district in mostly wooded land and will not be
	visible from public roads, farmhouses,
	outbuildings, or agricultural fields.
RECOMMENDED FINDING	Historic properties affected.

APPLICATION OF THE CRITERIA OF ADVERSE EFFECT FOR

Durham Point Road Historic District, Durham (DUR-DPR) Seacoast Reliability Project, 2020

CRITERIA OF ADVERSE EFFECT

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register of Historic Places in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse Effects may include reasonably foreseeable effects caused by the undertaking that may occur late in time, be farther removed in distance or be cumulative.

Example of Adverse Effects, pursuant to Section 800.5(a)(2)	Evaluation
Adverse effects on historic properties include, but are not limited to:	
(i) Physical destruction of or damage to all or part of the property;	Construction will be confined to the existing electric utility corridor which does not contribute to the district's National Register significance.
	There are six stone walls that intersect the right of way within the district, none of which will be affected by the structure location shift.
	A single archeological site was identified by the project archeologists with evidence of stone quarrying apparent both within and adjacent to the right of way. Although not considered individually eligible for the National Register as an archaeological site, the area is considered a contributing site in the historic district, which was determined to have significance under Criterion D. Granite quarrying is also an identified context in the history of the area, closely related to agriculture and contributing to the district under Criterion A. According to the archaeological Phase I-B report by Victoria Bunker, Inc., "This location is considered typical of a mid to late nineteenth century rural quarry. Like many other New Hampshire quarries, it is interpreted as a surface manifestation of stone extraction, linked to diversified farmstead activity. All features observed at the site are related to stone extraction; no foundations or other activity areas were observed. Except for the fragmented metal wedges stuck in the stone, no artifacts were observed or collected. It is not expected that any subsurface resources are

Durham Point – Page 3

ATTACHMENT 1 associated with this site and site components continue beyond the corridor limits. Salient details for the portion of the site which is transected by the corridor have been thoroughly recorded during Phase I-B archeological survey." The quarry site was recorded on a New Hampshire Post Contact Archaeological Inventory Form (27-ST-119). Split stone slabs are scattered across the 100-foot cleared corridor and along the tree line for approximately 1,400 feet. Some of the slabs have been laid flat on the ground, while others have been clustered and irregularly stacked or propped against one another. Many of the slabs and bedrock ledge faces display a series of round holes, associated with stone splitting. The proposed shift will move the structure away from historic quarry features, minimizing any potential impacts during current construction or future maintenance activities. Protective measures already proposed including the use of timber matting to protect the quarry features from damage from construction vehicles and barrier fencing around the historic stone quarry features will continue to be implemented. Any physical impacts of this proposed shift would be so minimal they would not be detrimental to this large historic district and the walls and quarry site will continue to contribute to the significance of the district. (ii) Alteration of a property, including None restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR§68) and applicable guidelines; (iii) Removal of the property from its historic None location; (iv) change of the character of the property's The proposed shift will not change the character of the district's use or of physical features within the property's use. The new proposed location of Structure 83 is surrounded setting that contribute to its historic features; by wooded land well away from areas of historic development in an existing electric utility corridor which dates as early as 1902. Changes to contributing physical features including the historic quarry features within the district's setting will be minimal. In an isolated location, not visible from road or trails, the setting of these features is already defined by the existing cleared utility corridor. The overall integrity of setting of the large district will not be changed. The shift will introduce visual elements in locations where they (v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of will have minimal impact on the district's setting, feeling and the property's significant historic features; associations.

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	Due to the surrounding wooded land, the new structure location
	is completely blocked from view and the shift will not change
	any National Register qualifying features of the district or
	diminish one's appreciation and understanding of the district.
	There will be no adverse visual effect on the historically
	significant setting or on the overall ability of the district to
	convey its historic associations.
(vi) Neglect of a property which causes its	None
deterioration, except where such neglect and	
deterioration are recognized qualities of a	
property or religious and cultural significance to	
an Indian tribe or Native Hawaiian	
organization; and	
(vii) Transfer, lease, or sale of property out of	Not Applicable
Federal ownership or control without adequate	
and legally enforceable restrictions or	
conditions to ensure long-term preservation of	
the property's historic significance.	N.
(viii) OTHER:	None
RECOMMENDED FINDING	No Adverse Effect - The proposed change will not have a
	physical or visual adverse effect, directly or indirectly, on the
	Durham Point Historic District. It will not alter the significant
	characteristics that qualify the district for inclusion in the
	National Register in a manner that would diminish the integrity
	of the district and its ability to convey significance under
	Criteria A, C or D.

Sources:

Preservation Company

2016 Durham Point Historic District Area Form, on file at New Hampshire Division of Historical Resources, Concord.

Victoria Bunker, Inc.

2015 "Seacoast Reliability Project Phase I-A Preliminary Archeological Survey Madbury, Durham, Newington and Portsmouth, NH."

Victoria Bunker, Inc.

2016 "Seacoast Reliability Project Results of Phase I-B Archeological Survey Madbury, Durham, Newington and Portsmouth, NH."