

**THE STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

Docket No. 2015-04

**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 115kV TRANSMISSION LINE**

THE SEACOAST RELIABILITY PROJECT

**PRE-FILED SUPPLEMENTAL TESTIMONY OF
PATRICIA M. O'DONNELL, FASLA AICP, ICOMOS, IFLA
HERITAGE LANDSCAPES, LLC**

**ON BEHALF OF
COUNSEL FOR THE PUBLIC**

JULY 20, 2018

1 **Q. Please state your name, position and your employer.**

2 A. My name is Patricia O'Donnell, Principal, Heritage Landscapes LLC ("Heritage
3 Landscapes"), certified planner, landscape architect and an expert in historic places and
4 cultural landscapes.

5 **Q. Have you testified previously in this docket?**

6 A. Yes. I submitted prefiled direct testimony and an accompanying Assessment Report on
7 July 31, 2017.

8 **Q. Do you have any corrections to make to your July 31, 2017 prefiled direct
9 testimony?**

10 A. Yes. There is one mapping error in the HL-5 map attached to our Assessment Report that
11 was identified after submittal. Due to an error in the digital files layering, only some of
12 the scenic roads on the HL-5 map were shown. The error was caused by positioning of
13 the ground plane and road layer above the scenic road layer for a portion of the map. A
14 corrected version of the HL-5 map with the layering error corrected is attached to this
15 Supplemental Testimony with a revised date of May 30, 2018. The corrected map shows
16 all the designated scenic roads within the four towns that are crossed by the Project
17 corridor. The originally submitted HL-5 map dated July 31, 2017 should be replaced with
18 the corrected HL-5 map dated May 30, 2018.

19 **Q. Since you filed your pre-filed direct testimony, has any additional information
20 relevant to historic resources been submitted to the record?**

21 A. Yes. The Applicant has continued to submit new information regarding its identification
22 and analysis of potential effects on historic resources, including additional inventory
23 forms, determinations of eligibility, effects tables, archeological reports, proposed
24 avoidance measures, and updated communications with the New Hampshire Division of
25 Historic Resources ("DHR"). In addition, the Durham Historic Association submitted
26 pre-filed direct testimony and the DHR submitted a final report dated Aug. 1, 2017.

1 **Q. Please provide Heritage Landscapes' evaluation of the Durham Historic**
2 **Association's Pre-filed Direct Testimony.**

3 A. The Durham Historic Association provided Historic Resources Testimony on July 31,
4 2017. That testimony calls into question the windshield survey technique used by the
5 Applicant to identify historic resources in Durham by enumerating a series of historic
6 resources that occur within the project corridor and adjacent to it that were not identified
7 by the Applicant. Bringing forward local knowledge of Durham history, they describe
8 and show on maps a series of stone walls, gravesites and markers, mills, landings, bridge
9 abutments, cellar holes, schoolhouse sites, and remaining evidence from historic stone
10 quarrying operations. This collection of local resources supports Heritage Landscapes
11 claim that the Applicant failed to enumerate and asses for potential Project impacts, all
12 the historic resources relevant to the people of New Hampshire.

13 **Q. Please provide Heritage Landscapes' evaluation of the DHR final report dated Aug.**
14 **1, 2017.**

15 The DHR report indicates that 11 historic properties have been identified and four have
16 an adverse effect, based on the Applicants materials. With the intent to continue efforts to
17 mitigate these effects, DHR approves the application for certificate with four conditions
18 addressing: 1. Mitigation; 2. Consultation with DHR should Project changes that may
19 lead to new resource discoveries by the Applicant, 3. Discovery of unanticipated
20 resources; and 4. Applicant authorization of DHR to specify techniques and procedures to
21 address historic resources. These conditions are fully appropriate but only address
22 Applicant and DHR identified resources.

23 However, DHR appears not to have considered many potentially important historic
24 resources in these communities. For example, DHR does not reference or address the
25 Durham Historical Association testimony that enumerates a large number of sites of
26 historic and archaeological importance in that town. Heritage Landscapes suggests that
27 the other three towns may also include historic resources that have not been identified.

1 **Q. Does the DHR final report reach the same conclusion of adverse effects as Ms.**
2 **Widell?**

3 A. No. DHR identified adverse effects for two historic districts – the Durham Point Historic
4 District and the Newmarket & Bennett Roads Farms Historic District. Ms. Widell, by
5 contrast, found that there would be no adverse effects for these two historic districts.
6 This discrepancy exemplifies one of the flaws in Ms. Widell's analysis, which
7 consistently overlooks or minimizes the potential effect to the broader historic character
8 of landscape level sites.

9 **Q. Has the Applicant's new submissions adequately addressed potential impacts to**
10 **stone walls?**

11 A. No. As noted in my direct testimony, the Applicant's report on impacts to historic
12 resources failed to address stone walls as an important historic resource and included no
13 analysis of potential impacts to stone walls. At the urging of DHR, which "expressed
14 particular concern regarding physical impacts to historic stone walls and features that
15 contribute to the rural character of the Durham Point Historic District and Newmarket
16 and Bennett, Roads Farms Historic District. . .," July 26, 2017 Memo to Nadine Miller,
17 NH DHR at 1 (submitted with Applicant's September 19, 2017 Response to NHDES
18 Status Letter at pdf page 171), the Applicant offered a brief proposal of avoidance,
19 minimization, and mitigation measures ("AMMs"). Identifying particular crossing points
20 in these town, the Applicant outlined the proposed approach to protect stone walls in the
21 Newmarket & Bennett Roads Historic District and the Durham Point Historic District,
22 including using existing openings, widening existing openings, placing timber matting
23 over walls, and in some cases not crossing the particular wall.

24 While the Applicant's AMMs provide more details about stone wall protection than prior
25 submittals, additional details should be provided to both inventory stone walls that will be
26 impacted and fully describe the proposed AMMs for each affected stone wall.

1 **Q. Do the Applicant's additional submissions alter your Prefiled Testimony conclusion**
2 **regarding an unreasonable adverse effect?**

3 A. No. While the Applicant has provided additional detail, the fundamental problems
4 remain: the Applicant did not fully capture the potentially impacted historic sites under
5 the broader New Hampshire definition, the Applicant did not prove an accurate
6 assessment of potential impacts to historic sites from the Project, and the Applicant's
7 assessment of no unreasonable adverse effect to historic sites is unsupported by the
8 incomplete record.

9 **Q. Does this conclude your supplemental testimony?**

10 A. Yes.