

Appendix 49

NHDHR Request for Project
Review and NHDHR and Correspondence



May 12, 2015

Ms. Edna Feighner
NH Division of Historical Resources
State Historic Preservation Office
19 Pillsbury Street
Concord, NH 03301-3570

Re: Northern Pass Transmission Project Request for Project Review (RPR) Form

Dear Ms. Feighner:

On behalf of Northern Pass Transmission (NPT), Normandeau Associates, Inc. is submitting this Request for Project Review (RPR) form for the Northern Pass project. The review of this Project began several years ago, with both Department of Energy (DOE) and its contractors and NPT seeking guidance from DHR, and DHR assigning a project number to the NPT team (RPR # 1448), and to the DOE team (RPR # 4680). Of course, since then, substantial review of the Project has already occurred. We are submitting the NPT RPR form to keep the administrative record complete. I believe it includes the information you suggested in your recent conversation with Vicky Bunker. Thank you for your continued review of project-related documents and your availability for consultation. If you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lee E. Carbonneau".

Lee E. Carbonneau, PWS, NHCWS
Senior Principal Scientist

Attach.

Cc: Jerry Fortier
Marvin Bellis, Esq



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 FAX 603-271-3433
www.nh.gov/nhdhr 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/Section401/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/newsletters/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

1. Check the DHR's Review & Compliance website at www.nh.gov/nhdhr/review/ to be sure you have downloaded the most current form.
2. 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

Access to State Plane coordinate data can be found at: <http://granitviewii.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) **must** be attached to this application. Do **not** 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://granitviewii.unh.edu>. Please refer to the R&C FAQ's at www.nh.gov/nhdhr/review/rc_faq.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

If *none* of these are located in your project area, please note that in 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 area 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 explaining Section 106 of the National Historic Preservation Act of 1966 at 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 the R&C Specialist at christina.st.louis@dcr.nh.gov or 603.271.3558.

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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

DHR Use Only

R&C # _____

Log In Date ____ / ____ / ____

Response Date ____ / ____ / ____

Sent Date ____ / ____ / ____

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 & Compliance (R&C) #: 1448

GENERAL PROJECT INFORMATION

Project Title Northern Pass Transmission Line Project

Project Location Londonderry to Pittsburg, NH

City/Town Londonderry to Pittsburg, NH

Tax Map

Lot #

NH State Plane - Feet Geographic Coordinates: Easting 1027472 Northing 917848 Pittsburg
(See RPR Instructions and R&C FAQs for guidance) Easting 1071239 Northing 147624 Londonderry

Lead Federal Agency and Contact (if applicable) Department of Energy (DOE)
(Agency providing funds, licenses, or permits)

Permit Type and Permit or Job Reference # Presidential Permit Docket # PP-371, Brian Mills

State Agency and Contact (if applicable) Site Evaluation Committee

Permit Type and Permit or Job Reference # Multiple

APPLICANT INFORMATION

Applicant Name Northern Pass Transmission, LLC c/o Jerry Fortier

Mailing Address 780 N. Commercial Street

Phone Number

City Manchester

State NH

Zip 03101

Email jerry.fortier@eversource.com

CONTACT PERSON TO RECEIVE RESPONSE

Name/Company Lee Carbonneau, Normandeau Associates, Inc.

Mailing Address 25 Nashua Road

Phone Number -4725191

City Bedford

State NH

Zip 03110

Email lcarbonneau@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

PROJECTS CANNOT BE PROCESSED WITHOUT THIS INFORMATION

Project 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.** (Blank table forms are available on the DHR website.)
File review conducted on / / .

Architecture

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:

Approximate age(s):

- ☐ Photographs of **each** resource or streetscape located within the project area, with captions, along with a mapped 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.)

Archaeology

Does the proposed undertaking involve ground-disturbing activity? ☐ Yes ☐ No

If yes, submit all of the following information:

- ☐ 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.

DHR Comment/Finding Recommendation *This Space for Division of Historical Resources Use Only*

- ☐ Insufficient information to initiate review. ☐ Additional information is needed in order to complete review.
- ☐ No Potential to cause Effects ☐ No Historic Properties Affected ☐ No Adverse Effect ☐ Adverse Effect

Comments: _____

Attachment for DHR RPR Form - Northern Pass Transmission Project

RPR # 1448

Applicant/Owner – Northern Pass Transmission, LLC.

Archeologist - Victoria Bunker

Environmental Consultant – Normandeau Associates, Inc.

Project Description

Northern Pass is a proposed transmission project that will carry renewable hydroelectric power from Canada to New Hampshire (NH) and greater New England. The project includes direct current line from the Canadian border to a converter terminal to be built in Franklin, NH. There it will be converted to alternating current (AC) and sent via an AC transmission line to a substation in Deerfield. There, it will connect to the New England power grid, which serves all customers in the region. Over 80% of the project will be constructed within either existing transmission line ROW, or within road ROW. In these locations, there will be earthwork to install overhead structure foundations or underground cables, as well as temporary disturbance for access paths and crane pads. Some of the existing transmission lines of various voltages that share the existing ROW will be relocated within the existing ROW to make room for the new line. Approximately 32 miles of the project in northern New Hampshire would also require the clearing of new ROW, and forest clearing along the edges of existing ROW will be necessary in other locations. For the most part, stumping of these cleared areas will not be required, except where structure foundations or underground lines are installed. In all locations, existing herbaceous and shrub cover will be left in place wherever possible.

There are several sites where more substantial construction is required. The Deerfield Substation in Deerfield and the Scobie Pond Substation in Londonderry will require expansions; a new converter terminal will be constructed in Franklin; and several new transition stations, resembling small substations, will be constructed where underground line converts to overhead line (and vice versa). These sites will each require several acres of clearing, stumping and grading. In addition, the two existing 345kV lines between the Deerfield and Scobie Pond Substations will require upgrades, which will involve minor temporary land disturbance.



Archeological information submitted to DHR by Victoria Bunker, Inc. to date includes:

Year	Report*	DHR Status
2013	Results of Phase I-A Archeological Survey, Existing ROW Corridor and Franklin Converter Terminal.	Approved 2-12-13, DHR requested clarification on first submittal 2-20,21-13, VBI provided clarification & NAI responded 6-13-13, DHR approval letter
2013	Results of Phase I-A Archeological Survey Proposed Northern Route Northumberland, Stark, Dummer, Millsfield, Dixville, Stewartstown, Clarksville and Pittsburg, Coos County, NH	Approved 12-3-13, DHR approval letter with a few questions 12-8-13, VB provided requested info 1-10-14, NAI responded
2014	Results of Phase I-B Archeological Survey Existing ROW Corridor Deerfield, Allenstown, Pembroke, Concord and Canterbury, NH	Approved 7-8-14, DHR approval letter with request for additional efforts 7-21-14, VBI provided information in response 7-21-14, NAI responded
2014	Results of Phase I-A Archeological Survey AC System Transmission Line Upgrades (PSNH 373 Line) Deerfield, Candia, Raymond, Chester, Auburn, Derry and Londonderry, NH	Approved 6-5-14, DHR approval letter, no additional requests
2013-2015	NH DHR Site Recording forms for project components as completed	

*Note that all archeological reports have included representative maps, plans and photographs and have been accompanied by project aerials.

A separate Phase I-A report was also submitted for the project as follows:

Claesson, Stefan, Jacob Freedman and Christopher Clement. 2014. Phase IA Archaeological Investigations for the Proposed Northern Pass Transmission Project, Coos, Grafton, Belknap, Merrimack and Rockingham Counties, New Hampshire. NHDHR RPR Number 4680. Prepared for United States Department of Energy.

Architectural information submitted to DHR by Preservation Company to date includes:

Preservation Company. March 2015. Northern Pass Transmission Project, Methodology for Assessment of Historic Properties *DRAFT*; Prepared for the New Hampshire Site Evaluation Committee Application.

Preservation Company. March 2015. Historic Resource Assessment Town Summary - Lancaster. (Including Individual Property Analysis forms and database).

Meeting Notes



Meeting Subject: DHR Consultation Meeting
Meeting Date: March 5, 2015
Start Time: 1:00 PM
End Time: 2:45 PM
Location: DHR Offices, 19 Pillsbury St, Concord, NH

Project Name: Northern Pass Transmission Project
Project No.: 58467

<u>Attendees</u>	<u>Organization</u>	<u>Title</u>
Dick Boisvert	DHR	Deputy SHPO
Edna Feigner	DHR	Archeologist/Review Comp.
Tanya Krajcik	DHR	Archeologist/Records Coord.
Nadine Peterson	DHR	Preservation Planner
Christina St. Louis	DHR	R&C Program Specialist
Lynne Monroe	Preservation Company, Inc.	Principal
Vicky Bunker (<i>via phone</i>)	Vicky Bunker, Inc.	Principal
Dana Bisbee	Devine, Millimet & Branch	Attorney
Cherilyn Widell	WPS, LLC	Principal
Lee Carbonneau	Normandeau Associates, Inc.	Senior Principal Scientist
Rob Young	Burns & McDonnell	Regional Manager, ES&P
Jake Tinus	Burns & McDonnell	Project Manager, Permitting

Notes Prepared By: Jake Tinus
Date Notes Issued: [Click here to enter issue date of notes](#)

Meeting Notes:

Dana Bisbee opened the meeting by reviewing our purpose and goals. Attendees then introduced themselves. Dana then described the current project route as the same as described in previous meetings. He explained that NPT is also looking at the alternate routes that were proposed by DOE, and indicated that NPT is anticipating the Draft EIS issuance by the end of April 2015 (earliest date expected) with NPT expected to file its application with the SEC approximately two months later. (Edna pointed out that the draft EIS would be released in April according to a posting on the DOE website.)

Vicky Bunker described her progress with respect to archeological surveys and reporting. She stated that Phase IA studies are complete for the following:

- overhead sections between the Canadian border and Pittsburg;
- underground sections in Stewartstown and Clarksville; and,
- transition stations and adjacent areas, except for one of the transition stations (#T3 in Clarksville) where there may be redesign due to aesthetic concerns.

Meeting Notes *(continued)*



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Vicky indicated that reports will be filed with DHR for the remaining areas after fieldwork is done in the spring. Additional fieldwork is also required for some of the off-right-of-way (ORAR) access roads (approximately 22 miles) which they were not able to complete in 2014 due to the onset of winter. In the meantime, in-house Phase IA report preparation and editing continues. Edna remarked that it would be acceptable to DHR to receive materials as they are made available. In fact that would be helpful. However, Edna requested that even though we may submit materials piecemeal, DHR would like a single compiled report, likely of many volumes, when available. The Northern Pass participants thought that would be a good idea.

With respect to the Deerfield Substation to Scobie Substation portion of the project, Vicky indicated that Phase IB fieldwork was completed in 2014. Reports are being worked on in-house though she is aware that potential design changes could necessitate additional study. Vicky also noted that her firm has just finished digitizing the SEARCH data with the intention to define areas that will require additional study, *i.e.* areas identified by SEARCH that were previously not included in VBI's study areas.

Dana inquired about the status of DOE efforts. Dick indicated that Project Area Forms (PAFs) are currently being reviewed by SE Group which will then be submitted to DOE possibly by March 31, 2015. With respect to archeological resources, Dick indicated that Phase IA studies are complete on the "main line" and that DOE contractors are still working on alternatives. With respect to above ground resources, Nadine indicated that DOE submitted a draft example PAF last year and DHR provided comments, but they have not received any other PAFs.

Dana indicated that NPT had been made aware that a Request for Project Review (RPR) had not been submitted by NPT or DOE, although DHR did establish a file number when Phase IA reports were submitted. Nevertheless, in the interest of completeness, NPT will submit an RPR.

Dana introduced the topic of the Programmatic Agreement (PA). Dick indicated that DHR had received a draft PA to which it provided comments to DOE. DHR expressed concern that the PA was introduced prematurely, as to date, DHR has only received limited information with respect to identification of significant properties and assessment of potential effects. Referring to Dick's letter to ACHP in February, Dana suggested that in fact DHR does have a lot of information on archeological and above ground resources. On the latter category, Dana brought up the fact that Northern Pass submitted within the last few days an initial set of documents developed by the Preservation Company, and that the full report of above ground resources is nearing completion.

Dick indicated that DHR has discussed review of those documents internally and with their counsel, and has determined that it wants to stay within the usual Section 106 review process of the SEC rules. Dana suggested that there is no legal prohibition for reviewing documents ahead of a filing with SEC, and asked whether DHR's response is a function of limited staff resources.

Meeting Notes *(continued)*



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NPT is not asking for a full formal review, *i.e.*, effects determination. Rather, the applicant is seeking input on the SEC filing process. Further, this request is no different than how DHR has engaged with Northern Pass on archeological resources assessment methods. Dana explained that NPT is seeking similar input from DHR on the above ground reports so that NPT can avoid a major flaw in its approach. Dana concluded by explaining that this is no different than other pre-application meetings that it is engaged with, such as with DES, with whom it just met this morning on three different DES program issues. Dick again stated that DHR would not be providing feedback to Northern Pass on the above ground resource assessment reports that had been submitted, stressing his point that DHR does not want to deviate from the review process it follows (and has followed for many years) in the Section 106 process.

Next, Lynne explained the work her company has done. She indicated that she has been working for 38 years in the state and that her firm has done very good work over the years and on this project has used a “fine comb” to avoid overlooking anything. Lynne explained that Preservation Company, Inc. has been educated on the use of modeling by the visual impact consultants. In addition, her firm has incorporated data from DHR file searches. They have acknowledged previous comments from DHR and are also looking at trails, railroad corridors and also transmission lines themselves for potential sensitivity. Lynne acknowledged that they still need to review the Deerfield Substation to Scobie Pond Substation portion of the project as that was not completed in 2014 due to the onset of winter. In summary, Lynne explained that she felt that the work completed by her firm would be very helpful to DHR in conducting their Section 106 review.

Cherilyn spoke to the efforts of Preservation Company, Inc. She indicated that she is happy to acknowledge the quality and thoroughness of Lynne’s work on the project. Cherilyn said that given the size of the project and complexity of resources that need to be assessed, it would be extremely helpful to DHR to review their work.

Dick stated that DHR is not unhappy that the Preservation Company, Inc. is doing the work and is not suggesting that its work isn’t thorough or of good quality. He stated that DHR has “35 years of collective experience using, crafting and amending the Section 106 process.” DHR is worried that what NPT is proposing is “one agency using one process for one project.” Dick reiterated his position that DHR has discussed the issue at length internally and has decided that it does not want to invent a new process. Dana reiterated the position of NPT that it is just asking for commonsense feedback. Cherilyn added that the design elements of the project are still changing as more information is made available to NPT. The project is reviewing the information to determine how resources can be avoided. Further, what NPT is really asking is for DHR to have a role in this process to effect change now rather than after the applications and SEC filing are submitted.

Meeting Notes *(continued)*



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Dick commented further about the PA and stated that DHR needs to wait for DOE to submit a revised PA. The Advisory Counsel of Historic Preservation (ACHP) has been invited into the process which should help move things along. But, Dick suggested that the primary focus may be on the Environmental Impact Statement (EIS) so it may take some time after the EIS is released before the PA is circulated. Dick said that DHR is not opposed to a PA, and reminded the group that DHR had recommended a PA for this project a few years ago, even.

Dana questioned if the Section 106 process would undergo a name change given the recodification of the statute. Dick said that it would remain the same for DHR, so that Section 106 reference materials, which are many, do not require modification.

On the topic of names, Dana indicated that the new name of Northeast Utilities is Eversource Energy. The project name has not changed and it is still known as Northern Pass Transmission.

The next topic introduced by Dana was tribal concerns. Dick indicated that DHR was just contacted the day before (via voicemail) by the Nulhegan Band (part of the Abenaki Tribal Group) requesting that DHR maintain confidentiality of sensitive sites. Dick explained that this is not a federally recognized tribe in New Hampshire, but nevertheless, DHR treats all inquiries by tribes as though they are submitted by federally recognized tribes. The Abenaki tribe is federally recognized in Vermont. Dana inquired if there are any other tribes that have indicated an interest in projects in New Hampshire. Edna mentioned that another group, perhaps the Micmac, along the Maine-New Hampshire border was in consultation with the US Border Patrol.

Vicky discussed the topic of landscape/settings as important approach that has been used for the entire project. She said that based on prior discussions with DHR, VBI had consulted with Chester Price's trail maps as well as other areas of potential interactions such as at high elevations, river confluences, i.e. King's Chair, or as suggested by stone materials, botanicals, etc. Dick suggested to his knowledge, there were not a lot of documented indigenous cultural properties. Edna indicated that she can think of only one example in New Hampshire that was contested. It involved a proposed cellular tower which was to be located near a burial site for the daughter of a member of the Sioux Nation. Ultimately, the cellular tower was proposed for another location. Another example was mentioned by Edna, the upper Connecticut River where FERC does dam relicensing, and for which DHR expects the Tribal Historic Properties Officer (THPO) will get involved but they haven't to date.

Dana inquired as to how confidential information is factored into the review process. Dick replied that the federal agency (DOE) is charged with contacting the tribes regarding Native American concerns. Edna suggested that the Sarah Jordan at the US Forest Service might be a good contact for NPT to look into cultural sites such as mountain tops or other features. Nadine

Meeting Notes *(continued)*



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commented that she is expecting that whoever ultimately looks at these issues should be also considering aspect from the sensitive properties outward.

The meeting adjourned with an agreement that another meeting would be held at an appropriate time and place.

Meeting Notes



Meeting Subject: DHR/DOE Coordination Meeting
Meeting Date: November 20, 2014
Start Time: 11 AM
End Time: 12:15 PM
Location: DHR Offices, 19 Pillsbury St., Concord, NH

Project Name: Northern Pass Transmission Project
Project No.: 58467

<u>Attendees</u>	<u>Organization</u>	<u>Title</u>
Dick Boisvert	NHDHR	Deputy SHPO
Edna Feigner	NHDHR	Archeologist/Review & Compliance
Tanya Krajcik	NHDHR	Archeologist/Records Coordinator
Nadine Peterson	NHDHR	Preservation Planner
Christina St. Louis	NHDHR	R&C Program Specialist
Brian Mills (phone)	US Department of Energy	Senior Planning Advisor
Caitlin Callaghan (phone)	US Department of Energy	Engineer
Mary Anne Sullivan (ph)	Hogan Lovells	Partner
Kent Sharp (phone)	SE Group	Principal
Travis Beck	SE Group	Senior Project Manager
Stephan Claesson	SEARCH, Inc.	Project Manager
Natasha Snyder (phone)	Ecology & Environment, Inc.	Sr. Cultural Resources Specialist
Vicky Bunker (phone)	Vicky Bunker, Inc.	Principal
Lynne Monroe	Preservation Company	Principal
Dana Bisbee	Devine, Millimet & Branch	Attorney
Lee Carbonneau	Normandeau Associates Inc.	Senior Principal Scientist
Rob Young	Burns & McDonnell	Regional Manager, ES&P
Jake Tinus	Burns & McDonnell	Project Manager, Permitting

Notes Prepared By: Jake Tinus
Date Notes Issued: December 1, 2014

Meeting Notes:

Dana Bisbee opened the meeting by reviewing our purpose and goals. Attendees then introduced themselves. Dana then described the current project route as the same as described in previous meetings. He explained that NPT is also looking at the alternate routes that were proposed by DOE, and indicated that NPT is anticipating the Draft EIS issuance by the end of March 2015, with NPT expected to file its application with the SEC in late May 2015.

1. Natasha Snyder provided a progress report on archeological research conducted to date. She indicated that all Phase IA activities have been completed for the proposed route (DOE Alternative #2). This includes background research and walkovers for the existing line,

Meeting Notes *(continued)*



December 1, 2014

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new corridor, access roads, substations and transition stations. In addition, DOE has completed Phase IA studies for Alternatives #3 through #6B. Reports are presently in production. For the Deerfield Substation to Scobie Pond Substation in Londonderry, Phase IA activities are limited and include only a background site file search.

2. Vicky Bunker provided a progress report on NPT's archeological research conducted to date. She indicated that most Phase IA and IB activities have been completed for the Deerfield to Londonderry corridor. This includes literature searches and walkover surveys including the substations at each end. Phase IA reports were submitted and accepted by NHDHR. Phase IB testing was conducted; reports have been drafted and are currently undergoing internal review. Draft reports should be available by the end of December 2014. For the proposed route, all Phase IA fieldwork has been conducted except for the North Country access roads. This work is ongoing but is weather dependent. Phase IB work has been completed for a large portion of the ±140-mile, except where access could not be obtained from landowners. Phase IB work has not been performed for the underground section, along roadways or off-right-of-way (ORAR) access roads. Draft reports should be available by the end of December 2014.
3. Stephan Claesson provided a progress report on research conducted for above ground (architectural) resources. He distributed and read from a handout summarizing SEARCH, Inc. efforts to date. (Copy attached.) He indicated that SEARCH, Inc. is currently drafting Project Area Forms (PAFs) for the NPT project broken into four (4) sections. Stephan indicated that SEARCH expects to complete drafts by March 1, 2015 for internal review. They will then be forwarded to DOE for review and then to NHDHR for review. Stephan indicated that DOE and its contractors are currently focusing their effort on preparing the Draft EIS so this has delayed delivery of the PAFs.
4. Nadine Peterson stated that, as previously agreed to with NHDHR, DOE will provide a "letter report" for the alternate routes that involve the underground/roadway locations for the project. She explained that NHDHR felt that it wasn't necessary for DOE to prepare PAFs for these "roadway properties". NHDHR is expecting the letter reports to contain maps and professional opinions regarding potential impacts to properties in or adjacent to the proposed project route. Dana Bisbee inquired if NPT could obtain minutes from the meeting (phone conversation) that occurred between NHDHR and DOE. Nadine indicated that minutes will be provided to NPT. Rob Young asked Nadine if the PAFs could be released in a staggered fashion as they are received and reviewed by NHDHR. Nadine indicated that this could be possible but that it is dependent on the timing of the receipt of the PAFs by NHDHR and their review, which is limited to a couple hours per week during a regularly scheduled meeting.

Meeting Notes *(continued)*



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5. Stephan Claesson referred to page 2 of the handout and indicated that the data provided is preliminary and subject to revision. He stated that DOE and NHDHR are still deliberating on the Area of Potential Effect (APE) for the alternate underground routes. Presently, the direct APE extends 20 feet from the edge of roadways. The indirect APE covers the parcels that intersect or abut the ROW and includes a 200-foot wide area. A memorandum describing the APE methodology was developed and submitted to DOE by DHR. DOE indicated that the remaining open items related to the APE should be resolved within 2-3 weeks. Lee Carbonneau asked about the source of the parcel data being used by SEARCH, Inc. Travis Beck indicated that DOE has an interagency cooperative agreement with the NH Office of Energy and Planning (NHOEP) but that DOE and its contractors have not yet received the data from NHOEP. Nadine Peterson said that NHDHR is also considering comments received from the Consulting Parties with respect to the APE.
6. Natasha Snyder asked about the status of NPT's analysis with respect to above ground resources. Dana Bisbee explained the process being used by NPT and said that NPT is not developing PAFs; rather NPT is relying on DOE to complete the PAFs. Further, Dana explained that NPT is conducting an analysis of the potential effects of the project for its Site Evaluation Committee (SEC) application, and that the assessment being performed by Preservation Company follows a method that is very similar to the Section 106 review. Lynne Monroe indicated that Preservation Company anticipates completing a draft report for internal review by November 25, 2014. With respect to the underground portions of the line, Preservation Company expects that a draft report will be available by the end of the year. Lynne then presented preliminary data from Preservation Company broken into three segments. The first segment includes 510 entries, with 58 properties (individual parcels and clusters of parcels) requiring further analysis to determine if there is an effect. The second segment includes 257 entries, with 49 properties requiring further analysis. Results from the third segment are not yet available. Stephan Claesson asked if the results presented by Lynne include the alternate routes. Lynne indicated that just the proposed route is included. Stephan also asked about the viewshed analysis. Dana Bisbee described the coordination efforts between the Preservation Company and the aesthetics expert (Terry DeWan). With respect to aesthetics concern, Lynne confirmed that NPT is using a one mile APE for the proposed route, except for any resources where a further distance is warranted.
7. Nadine Peterson inquired about who will perform further evaluation work with respect to above ground resources. Caitlin Callaghan said that DOE will address this in context of development of a Programmatic Agreement (PA). Brian Mills indicated that once DOE has what they need for data for the NEPA-level analysis, i.e. the draft Environmental Impact Statement (DEIS), the Applicant will then take on responsibility for finishing the work. DOE does not have a preference for whom, i.e., DOE's contractors or NPT's

Meeting Notes *(continued)*



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contractors, perform further analysis beyond the PAFs and Phase 1As. Further, Brian indicated that the scope of the PA will provide information on "who does what". Brian explained that the PA needs to be completed before the Record of Decision (ROD) can be issued by DOE and ROD is not expected to be issued until the SEC process is completed. Caitlin explained that the draft PA should be available for review by NHDHR and the Consulting Parties in approximately 6 weeks (i.e., January 9, 2015) and DOE intends to finalize it in the spring before the DEIS is issued. Dana Bisbee asked if the Advisory Council on Historic Preservation (ACHP) is participating. Caitlin affirmed that ACHP is participating in development of the PA. Dick Boisvert stated that NHDHR is waiting for information from DOE. He indicated that NHDHR's role is really to comment and respond to information. Further, he explained that many Consulting Parties don't understand their roles in the Section 106 process, so that needs to be considered in the review timeline.

8. Dana Bisbee asked Dick Boisvert about the status of the Native Americans. He stated that there are no Federally recognized tribes in New Hampshire. Dick stated that NHDHR is aware that New Hampshire Commission on Native American Affairs has requested Consulting Party status but they do not know if the status has been granted. Further, Dick suggested that DOE should be asked this question. Caitlin Callaghan responded that DOE has reached out to the tribes in neighboring states who have provided a few comments but they have not been "overly engaged" so DOE is performing a second round of outreach.
9. Dana Bisbee asked if the Consulting Party list can be made available or whether it is already posted on a website. Caitlin explained that the list is not published. There are approximately 30 names on the list and many of the people provided personal contact information and had indicated that they did not want their contact information published. As part of the second contact attempt by DOE, they will try to obtain a business or professional addresses from the Consulting Parties (to maintain confidentiality of personal contact information) and ascertain whether they might be agreeable to allowing their professional contact information to be made available. Rob Young asked if it is possible to obtain a list of the Tribal Nations that have requested consulting party status ahead of publishing the list. Caitlin indicated that this would be possible but she first wanted to make sure that DOE has professional contact information rather than personal contact information.
10. Dana Bisbee brought up the topic of the Cultural Resources Management Plan (CRMP). Brian Mills responded by say that DOE had recently produced a CRMP for the Champlain-Hudson project. Brian said that the Champlain-Hudson project is much simpler in that there is only one route for the project that is primarily underground and the state siting board had approved the project prior to development of the CRMP. In light of this point, Dana stated that the development of the PA will benefit from all the work that has been

Meeting Notes *(continued)*



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done up to this point by the DOE contractors and by NPT. Brian indicated that he is hopeful that the PA will be available by the first week of January. Nadine Peterson indicated that the key to developing a good PA is that it not just "copy and paste" from the Champlain-Hudson project, rather it must reflect the specificity of the NPT project.

11. Dana Bisbee inquired if there were any other questions or issues moving forward through the Section 106 process. Referring to the meeting agenda, Nadine Peterson indicated that she didn't understand why there is a question about methodology with respect to the underground route. Nadine said that NHDHR would not review work products for NPT that are outside of the Section 106 process. Further, NHDHR doesn't feel the need to look at this in the context of the SEC process. Nadine elaborated that the SEC process allows for a dialogue and feedback from the individual agencies at an appropriate time. Dana said that NHDHR has been helpful in the past engaging in dialogue about methodology and NPT wanted to be sure that its efforts reflected the ability to provide information useful to NHDHR. He said that he would like to raise that issue later on with NHDHR. Natasha Snyder indicated that Ecology and Environment, Inc. will circulate to NHDHR notes from its meetings with NHDHR. Dana requested that NPT be provided with copies of the notes. Nadine explained that first NHDHR will receive the notes and review/approve them before they are provided to NPT. With respect to the APE (discussed earlier in the meeting) conference call minutes, revisions would not be sent to the Consulting Parties until after NHDHR has reviewed them.
12. Edna Feighner then raised a separate issue of concern to NHDHR. She said that ongoing PSNH work along a ROW that is to be shared by the NPT project appears to be impacting potential Phase II archeological sites identified by NPT subcontractors. In particular, she said that cellar holes and potential Native American sites appear to be compromised by the ongoing PSNH activities. Dick Boisvert elaborated that the Corps of Engineers indicated that these locations did not require review under Section 106 because no wetlands are being crossed or impacted, however the integrity of the sites is possibly being affected by the ongoing construction activities. He indicated that, while PSNH was performing the work legally, it was not demonstrating stewardship of the potential resources. Further, Dick explained that because of this potential disturbance, NHDHR could find it challenging to assess the value of the sites and potential impacts to these sites by the NPT project. Dana replied that NPT wants to work immediately with NHDHR to look into those issues of concern.
13. Stephan Claesson questioned if DOE expected SEARCH, Inc. to provide follow-up services after submission of the PAFs as they are concerned that they would need to start planning soon for quick mobilization in spring 2015. Brian Mills indicated that the PA

Meeting Notes *(continued)*



December 1, 2014

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would address this issue.

14. Meeting adjourned at approximately 12:15 PM.

Attachments: Meeting Agenda
DOE/SEARCH Status and Timeline Update

Northern Pass Section 106 Process Meeting –Agenda

- A. Introductions
- B. Meeting purposes
 - 1. Share information on status of cultural resources assessment work
 - 2. Develop plan for completing all remaining steps in the Section 106 process
- C. Brief update on the project status
- D. Reports on work accomplished to date
 - 1. Archeological resources
 - a. DOE (SEARCH) EIS studies: Phase 1A report
 - b. NPT – Phase 1A and 1B reports
 - 2. Architectural, built resources
 - a. DOE (SEARCH) EIS studies – status of PAFs
 - b. NPT above-ground resource assessment, including discussion NH Site Evaluation Committee application requirements
- E. Discussion of Phase 1B requirements, approach and schedule
- F. Discussion of methodology questions for archeological and above-ground resources work (underground segments; other questions)
- G. Resolution of open issues (if any) concerning APEs
- H. Discussion of contents, responsibilities and schedule for completion of a Programmatic Agreement
- I. Discussion of process and schedule for developing a Cultural Resources Management Plan
- J. Consideration of scope of involvement of consulting parties; confirm no Indian tribes involved in consultation
- K. Any other issues or questions

SEARCH
November 2014
New Hampshire Division of Historical Resources
Concord, NH

SEARCH Status of Fieldwork:

SURVEY PHASE	STATUS
Phase IA Archaeology (Proposed Action)	Complete
Phase IA Archaeology (Alternative Routes)	Complete
Architectural History Identification (Proposed Action)	Complete
Architectural History Identification (Alternative Routes)	Complete
Section 106 Consulting Parties (Proposed & Alternatives)	Incomplete
Phase IB Archaeology	Incomplete
Architectural History Inventory	Incomplete

SEARCH Timeline for Reporting:

REPORT	DATE
Phase IA Archaeological Survey (Proposed Action)	September 2014
Phase IA Archaeological Survey (Alternative Routes)	January 201 4 ⁵
Architectural History Identification Survey (PAFs for Proposed Action)	March 2015
Architectural History Identification Survey (Letter Report for Alternative Routes)	March 2015

Archaeology (below-ground) Phase IB Recommendations:

	Total # of Previously Identified Sites:	Total # of Newly Identified Sites:	Total # of Sites:	Total # of Sensitive Areas:
Alternative 2	23	26	49	252
Alternative 3	23	26	49	252
Alternative 4a	8	22	30	174
Alternative 4b	8	27	35	215
Alternative 5a	23	19	42	207
Alternative 5b	23	19	42	225
Alternative 6a	16	20	36	194
Alternative 6b	16	25	41	236

Architecture (above-ground) Inventory Recommendations*:

	Total # of Previously Identified Sites:	Total # of Newly Identified Sites:	TOTAL
Alternative 2	26	132	158
Alternative 3	1	0	1
Alternative 4a	58	171	229
Alternative 4b	60	198	258
Alternative 5a	23	116	139
Alternative 5b	24	134	158
Alternative 6a	34	184	218
Alternative 6b	36	211	247

***Note:** These results are preliminary. Parcel data is not yet available and analysis is incomplete for the Indirect APE of buried alternatives.

Meeting between DHR & NPT Team

10/14/14

DHR - Dick, Nadine, Mary Kate, Tanya, Chris, NPT – Dana, Jake, Lee, Vickie, Lynn

Dana – We have similar goals to get Cultural Resource Assessments done well and in a timely manner although we have different rolls. The NPT route is unchanged now for over a year. Dealing with the Department of Energy's (DOEn) schedule is challenging. The EIS is expected late March 2015 at the earliest. This means the SEC application would be submitted in late May 2015 at the earliest.

DHR received and reviewed one draft Project Area Form (PAF) and is waiting for the PAFs to be submitted. SEARCH is scheduled to do archaeological research tomorrow. DHR has no control of when material is received. When received, material is reviewed efficiently and expeditiously.

On 5/1/14 DOEn published alternatives. DHR believes their consultants have started Phase IA studies for alternatives. It is assumed that DOEn is looking at "reasonable" alternatives.

Dana - This is a big task for the NPT group. DHR has the "benefit" of two Phase IAs. A year or so ago it was decided to have the DOEn group do the PAFs. NPT needs the draft EIS & PAFs in order to proceed with the SEC process. Timing is not working well for NPT. There is the scheduling challenge and the challenge for the NPT expert to testify at the SEC using DOEn data. They have an approach idea, Lynn's methodology, not a substitute for 106 but for their SEC goals.

Vickie – The Phase IA for lower 140 miles was done last year, and the Phase IB for five towns (rec. at DHR 6/13/14). Working on the 373 Line, treating it the same as NP. Phase IA done and IB written, will finish soon. Northumberland to Pittsburg – Above & below ground and transitions. The Phase IB for the above ground transmission line portions was finished this summer. Phase IA for the buried and transition a portion was submitted two weeks ago to Edna (but is not yet entered in the database). VBI is poised to start Phase IB on buried portion to be completed before 11/11/14 (rifle season) hopefully but waiting for IA response from Edna. DHR reminds NPT group that Route 145 is a scenic byway. Depending on design, Vickie will adjust transects as previously discussed with Edna. NPT requires consultants stay ONLY on ROW. Property owner permission is not attempted.

Discussion of methods used for buried portion. Dick – For proper data gathering should get owner permission and record entire site. Cemeteries are often thought to be archaeological resources but this is not true. State laws are specific in avoidance. Cemeteries can be significant as above ground resources if they meet certain National Register criteria considerations.

Dana – The plan may now be to build in the roadway. The underground APE for the northern route is 8' to 10' wide by 6' deep plus access roads, etc. Need IA concurrence to continue this fall.

Dick - heavy equipment can be quite large, Use common sense.

Nadine - DHR has not yet concurred with the APE for alternatives.

Dana - "Heard" that DOEn will not do 106 beyond Phase IA and PAFs. What about the areas SEARCH reported sensitive for Phase IB? DHR staff has not heard anything to that effect.

Dick - DOEn agreed to do Phase IB on locations that only their crew found sensitive. It is important to avoid the appearance of bias. To be resolved.

Lynne - This is an unusual task, a new position. She thought they would be working from PAFs. She must address the SEC question; does the project have an unreasonable adverse effect? She has devised a new method. Usually start with file search, then PAF. May still need to conduct file search. Using "wind farm" method for determining visual effect area. Recon field survey done. Working with viewshed maps began with 1300 properties in database over 50 (1965 cut off). Lynn is not good at mid-1960s era construction so she is using assessor information.

Dana - Money & time mentioned again.

Nadine - How would the information Lynne pulled together be "integrated" with PAFs?

Lynne - It might add to list of properties recommended for further survey.

SEC discussion.

Nadine - DHR will discuss the new method and get back to NPT.
The DHR understood that the DOEn team would do the PAFs and individual inventory forms.
There is unusually high public interest.

Lynne - For the first (south?) 1/3 of project 510 properties including districts and areas were identified. With her method it was reduced to 58 and now down to 8 properties recommended for survey because of potential effects of the project.

Dana - The draft PA from a recent NY project is a starting point.

Dick - The PA discussion is premature for this project at this time.

Dana would like a part in the conversation. He doesn't believe there would be any tribal involvement.

Dick - Tribes as well as Native American organizations must be offered the opportunity to participate. He recommends contacting the NH Commission on Native American Affairs, they are a consulting party.

G. Other Issues – If stone walls are impacted (will follow stone wall policy) replace/rebuild. Nadine reminds us that they can be part of an agricultural complex. There is one ski area in the ROW and one in the APE. One is overgrown and derelict. One has a potential adverse effect.

Nadine – These resources are part of a recreation theme (context) and inventory should be completed for entire ski area. Trails are similar.

Mary Kate – These are part of the built environment and should be considered as above ground resources.

Dick asked if the trails coincide with Chester Price Map/Native American trails. Vickie said her research does not indicate a connection.

Dana – Actions/Issues

- They need the underground Phase IA concurrence.
- Resolve the Phase IB issue with DOEn
- Keep talking about the PA
- Approval of above ground approach/DOEn doing all?
- Plan a meeting with DOEn, DHR, and NPT

NAI PROJECT 21812

NORTHERN PASS HVDC TRANSMISSION PROJECT

VICTORIA BUNKER, INC.

October 15, 2014

Meeting Notes

The following notes summarize archeological information discussed during a meeting held on Tuesday, October 14, 2014, at 9 a.m.

The meeting was held at NH Division of Historical Resources, Concord, NH for the purpose of discussing details on archeological and architectural surveys. DHR personnel included Dick Boisvert, Tanya Krajck, Christina St Louis, Nadine Petersen and Mary-Kate x.

These notes only summarize archeological topics.

- VB presented a progress summary of efforts conducted to date re: AC “373” Line, Northern Overhead, Transition Stations & Northern Underground components at Phase I-A and I-B levels
- AC “373” Line: Line between, and including, Deerfield & Scobie S/S’s complete at I-B level. Report in editing stage, with submittal to follow for DHR review. Dick pointed out that the ACOE approach of location-specific assessment would not be accepted. Lee & VB informed him that this was not the case, that archeological study was conducted at both I-A and I-B levels for entire ROW width. No further discussion
- Northern Overhead: Phase I-B survey complete for sensitivity areas along proposed overhead northern route component. Draft report is written and will be prepared for DHR submittal. General concurrence.
- Northern Transition Stations: Phase I-B survey complete for parcels, a few sampling areas remain on connecting “tails.” These will be addressed at the same time as the sampling for Northern Underground. Draft report I-A and I-B effort at Transition Stations is complete, except for continued I-B work on “tails.” General concurrence.

- Northern Underground: Phase I-A survey report for proposed underground route on roadways in Stewartstown and Clarksville has been submitted to DHR. No news re DHR comments, acceptance, etc.
- Northern Underground: Discussion re methods for Phase I-B in Stewartstown & Clarksville. Dick emphasized the need to do survey for entire road ROW width, due to likelihood of impacts from such activities as vehicle turning, staging, potential for damage to subsurface conditions by equipment usage & zooming about, noting that actual impact would exceed the measurements of the trench. Nadine said that DHR would have to review the DOE definitions of the APE and at this point she is not certain that they would be acceptable to DHR anyway— thus survey should address the entire road ROW. As such, we discussed use of multiple transects for subsurface sampling (as was also discussed in June 2014 DHR meeting). Due to Edna's absence, we will follow up on this to confirm the method. Dick further emphasized that survey of historic period cellar hole components & site areas should be completed BEYOND the road ROW in order to fully understand the archeological resource. VB will submit LL#s to NAI so landowner contact can be addressed.
- SEARCH: We opened up the discussion about the I-B effort for additional locations that SEARCH recognized. Dana mentioned that the DOE position is that I-A would be enough for the EIS, so that we could continue the I-B efforts. Dick said he wants to hear this from DOE, as he maintains his belief that SEARCH would do I-B for areas they identified over & above areas VBI identified per the original arrangement.
- Programmatic Agreement: Dick brought up the subject of Tribal input for Traditional Cultural Properties (TCPs). It seems that it is the DOE's obligation to address this, noting that the Governor's Commission on Native American Affairs would have consulting status.
- Other elements:
 - Ski areas and hiking trails: Nadine said that these are considered landscape features, would be addressed viz a viz the view shed analysis, and are considered within the recreational context for above-ground resources.
 - Cemeteries: We confirmed that cemeteries would largely fit into the above-ground component, but that the potential for unmarked graves outside cemetery walls would be archeological in the sense of their treatment
 - Stone walls: We discussed that VBI will include info on stone wall locations in sensitive areas on underground routes

Meeting Notes



Meeting Subject: NHDHR Coordination Meeting
Meeting Date: 10/14/14
Start Time: 9 AM
End Time: 11 AM
Location: NHDHR Offices, 19 Pillsbury St., Concord, NH

Project Name: Northern Pass Transmission Project
Project No.: 58467

<u>Attendees</u>	<u>Organization</u>	<u>Title</u>
Dick Boisvert	NHDHR	Deputy SHPO
Tanya Krajcik	NHDHR	Archeologist/Records Coord.
Nadine Peterson	NHDHR	Preservation Planner
Christina St. Louis	NHDHR	R&C Program Specialist
Mary Kate Ryan	NHDHR	State Survey Coordinator
Vicky Bunker	Vicky Bunker, Inc.	Principal
Lynne Monroe	Preservation Company	Principal
Dana Bisbee	Devine, Millimet & Branch	Attorney
Lee Carbonneau	Normandeau Associates Inc.	Senior Principal Scientist
Jake Tinus	Burns & McDonnell	Project Manager, Permitting

Notes Prepared By: Jake Tinus
Notes Reviewed By: Dana Bisbee, Lee Carbonneau
Date Notes Issued: 10/29/14

Meeting Notes:

Dana Bisbee opened the meeting by reviewing our purpose and goals for meeting. He then described the project route as currently proposed, including the 8 miles of underground and 187 miles in total length. He explained that NPT is looking at the alternate routes that were proposed by DOE in May 2014, and indicated that it is expected that DOE will issue the Draft EIS by the end of March 2015, with NPT expected to file its application with the SEC in late May 2015.

1. Dana Bisbee asked about the status of the PAFs; i.e., has SE Group indicated a submittal date for these to NHDHR? Nadine Peterson indicated that NHDHR has only received a draft PAF template thus far. Further she understood that SEARCH had submitted a draft PAF to SE Group about six weeks ago and that the information was organized in a manner corresponding to four DRED economic development units (Merrimack River Valley, Lakes Region, Great North Woods, and White Mountains).
2. Dana Bisbee inquired if NHDHR knew what analysis SEARCH is performing for the DOE alternate routes. Nadine Peterson indicated that DOE has an appointment scheduled for later in the week to review above ground and below ground files.

Meeting Notes *(continued)*



10/29/14

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3. With respect to below ground, Dick Boisvert commented that he does not know if DOE is performing Phase IAs for archeology at this time. Further, he understood that about six “realistic” alternatives were to be considered by SEARCH.
4. Dick Boisvert expressed concern that the re-conductoring work on the 373 line from Scobie Substation to Deerfield would not follow the NPT APE since the Corps of Engineers might take the lead on that portion of the project. Vicky Bunker explained that she has already performed Phase IA and IB analysis on that portion of the project. Lee Carbonneau added that NPT natural and cultural resources on the 373 line are being handled the same as for the rest of the NPT project.
5. Dana Bisbee described the reasons that NPT needs its own experts for the SEC process and its requirements even though the Section 106 process is ongoing. He added that information obtained by NPT’s consultants will enhance SEARCH’s efforts and work. Dana reiterated that the work being carried by NPT is not a substitute for, or in derogation of Section 106, and that it is simply necessary for our filing with the SEC. Dana added that Vicky Bunker’s work is in good shape as NHDHR has been reviewing and approving Phase IA and IB reports and Lynne Monroe is doing a lot of preliminary analysis that NPT feels NHDHR will find beneficial to their work in the Section 106 process.
6. Vicky Bunker described her progress to date and ongoing work. In 2013, VBI completed the Phase IA and IB for 5 towns up north. VBI is now working on the 373 line. The Phase IA report was reviewed by Edna Feighner and VBI is now preparing the Phase IB report which will be provided to NHDHR very soon. For the northern route overhead line, the Phase IB field survey was completed; the report is nearly complete and will be submitted soon. For the northern route underground line, the Phase IA field survey and report were completed and submitted to NHDHR about 3 weeks ago. Once approved, VBI will perform Phase IB. Vicky Bunker indicated that they would like to complete the Phase IB work prior to November 11, as that is the beginning of rifle season for deer.
7. With respect to potential archeological sites along the underground route, Dick Boisvert stated that he is concerned about NPT not completely documenting each site if it extends beyond the road ROW. He said that NPT needs to ask permission of private landowners in order to describe and document entire sites. If a landowner refuses that’s fine, but NPT needs to attempt to contact owners and document the permission status.
8. Dick Boisvert indicated that cemeteries are not automatically considered historical or archeological resources under Section 106. Rather they are regulated under RSA 289 which governs setbacks, among other things. With respect to the project, Dick pointed out that any visual impacts to cemeteries would need to be considered. Further, he indicated that it

Meeting Notes *(continued)*



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is important to document unmarked graves. Though archeological site forms are not necessary, unmarked graves would need to be carefully documented in the Phase IA report.

9. With respect to the Phase IB survey for the underground portion of the project, Dick Boisvert stated that he believes the potential direct impact by the project is larger than the 8 to 10 foot wide trench and that the equipment footprint needs to be accounted for. He stated that NPT should use the same approach as pipeline projects in the state, which is a "common sense" approach. When asked about the number of archeological sites that have been documented, Vicky Bunker indicated that 20 such areas are located in Stewartstown and 6 are located in Clarksville.
10. Nadine Peterson stated that NPT should be aware that NHDHR has not concurred with the APE proposed by DOE for the alternative routes. As such, she indicated that NHDHR may request changes to the APE.
11. Vicky Bunker queried who is testing the Phase IB areas that SEARCH identified that NPT did not identify. Dick Boisvert indicated that VBI should continue to follow the matrix that was agreed upon in the last meeting with DHR one year ago. Dana said that he had the impression that DOE may not be doing any work beyond the Determination of Eligibility phase. Dick stated that NHDHR needs to have a discussion with DOE with respect to the previously agreed to approach. Further, the last that NHDHR had heard, SEARCH was doing all above ground work through the Section 106 process and that DOE may be concentrating on visual impacts to historical properties as visual impacts are a very important concern with the public. With respect to underground portions, Dick opined that the NPT project is similar to other previous projects; it is larger, but it is not different.
12. When asked about how the SEC rules changes might affect cultural resources work, Dick Boisvert and Nadine Peterson said they are not sure of the impact of the changes. Dick stated that it's hard to tell how the statutory changes might affect reviews, i.e. membership of the SEC, demonstrations of public interest, etc. He stated that NHDHR would rather "play by the old rules". Nadine Peterson was more non-committal indicating that they would meet internally to discuss how this might affect NHDHR and how they will proceed.
13. Lynne Monroe described the process that Preservation Company is undertaking. Lynne stated that it differs from Section 106 in that NPT needs to get to bottom of the question, "is there an unreasonable adverse effect?" Lynne further described the linkage and utility of data collected by NPT as it relates to the Section 106 process. She described that the methodology used by Preservation Company is modeled after the methods approved by NHDHR for review of wind farm projects.

Meeting Notes *(continued)*



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14. Lynne Monroe expressed concern that the PAFs are not presently available to Preservation Company and that she may need to perform a file search herself at NHDHR in order to stay on schedule with our SEC application filing. Lynne explained that thus far, Preservation Company has done reconnaissance field survey using project maps to assess properties. She stated that Preservation Company has been doing this type of work for a long time and is proficient. Thus far, some 1,300 properties have been identified that are 50 years old or greater. Preservation Company used assessor's maps as a starting point and built upon these with other data and maps. Lynne explained that their process is "conservative to the max" so that nothing "slips through the cracks".
15. Nadine Peterson asked how Preservation Company is planning to work with DOE. Dana Bisbee stated that NPT cannot work directly with DOE as its analysis needs to be conducted independently. Lynne Monroe added that NPT would make its data and information available to NHDHR to help the agency with its Section 106 analyses. Nadine Peterson stated that she is uncertain how the two can be married together.
16. Dick Boisvert offered to explain the distinction. With respect to wind farm projects, for any "unreasonable adverse effects", the process is to refer these to the Section 106 process. Dana Bisbee added that NPT efforts could be viewed as a contingency to determine unreasonable adverse effect, only if DOE doesn't progress through the Section 106 process. Further, Dana explained the context of recent SEC decisions and how the Section 106 process has been carried out through Programmatic Agreements. Dana reiterated that through its diligent efforts, NPT is simply being cautious so as to be able to arrive at a completeness determination with the SEC filing.
17. Lynne Monroe questioned whether the NPT project would play out as previous projects have, i.e. with Programmatic Agreements in place. Nadine Peterson responded, "Everything is in flux right now" because of the proposed changes with the SEC. Dick Boisvert indicated that he has interpreted that many members of the public believe that the new SEC legislation has broadened the review requirements with respect to the public interest component. Dick added that it's not only that the rules are changing, it's how they will be applied. Dana Bisbee said that NPT is confident that through the described approach, the project will finish enough work to arrive at a completeness determination. Nadine Peterson indicated that she will check internally on the right approach for the next meeting to continue discussions. When pressed by Dana Bisbee, Nadine would not agree to schedule a meeting with NPT and DOE to discuss this issue.
18. Dana Bisbee asked about the status of DOE and their archeology work. Is SEARCH doing everything? Dick Boisvert stated "archeology is not a big deal." Further, he said that the big issue with the project is the visual impacts to above ground resources.

Meeting Notes *(continued)*



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19. Lynne Monroe stated again that Preservation Company has done a lot of work to support the Section 106 process. So far, about one third of the project area has been reviewed and thus far from an initial 510 properties, these were narrowed down to 58 and with further analysis, 8 potentially eligible properties remain. Lynne reiterated this is a work in progress and is meant to assist NHDHR with their determination not replace it.
20. Dana Bisbee raised the topic of the Programmatic Agreement. Dick Boisvert responded that the Champlain-Hudson project in New York State was the basis for the PA that DOE proposed for the NPT project. NHDHR reviewed the Programmatic Agreement and indicated the DOE draft was too far ahead of the current status of the Northern Pass project. Dick explained that the process to develop a Programmatic Agreement will play out. Dana requested that NPT be a part of the development process for the Programmatic Agreement and suggest a joint meeting with NHDHR and DOE. Dick thought that DOE should be amenable to this request.
21. Dick Boisvert raised the topic of Native American Tribes weighing in on the project. Ultimately they will decide if they want to get involved, but federal process dictates that DOE should invite them into the process. Further, Dick explained that part of the Section 106 process requires that NHDHR consider traditional cultural properties, e.g. certain mountain tops and waterfalls, and archeological sites and whether the project would have any impacts (visual or otherwise) to them. Dick indicated that the Governor's Commission on Native American Affairs has requested Consulting Party Status. This is not a tribe per se, but they represent the interests of the tribes. Should the tribes want to get involved in the project, they would coordinate with NHDHR and the applicant through the Tribal Historic Preservation Officer.
22. Vicky Bunker raised "other issues" that VBI and Preservation Company have been collaborating on to confirm understanding with the larger group. With respect to stone walls, Vicky indicated that VBI is taking the lead on the analysis of these resources. She stated that NPT would follow the stone wall policy and that the stone walls might be part of a larger agricultural historic property. The bottom line is that if any stone walls are disturbed by the project, NPT would be required to rebuild them. With respect to ski areas, two such areas have been identified within the APE. Vicky stated that these are being handled as above ground resources. Preliminary analysis suggests that the integrity of one site has been lost, while the project may have a potential adverse effect on the other site. Nadine Peterson stated that the PAFs should address recreation, including trails and ski areas, usually as above ground resources. Dick Boisvert indicated that the PAFs need to address the question "how did the trail system evolve?" Further, the analysis should show whether any of the trails coincide with historic trails used by Native Americans. To this end, Dick recommends that NPT consult with maps produced by Chester Price who

Meeting Notes *(continued)*



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mapped historic Native American trails throughout New Hampshire.

23. Meeting adjourned, NHDHR staff excused themselves. NPT team conducted post-meeting review.

Notes re: Phone call from Edna Feighner to Victoria Bunker

Phase I-B Deerfield - Canterbury

June 27, 2014

During her review of the Phase I-B Deerfield-Canterbury report, Edna called me this morning to ask a question about sampling at Con-4, which resulted in discovery of the “Concord Isolated Ceramic” site.

Her question was regarding why the sampling terminated on the southern side of the positive test pits where ceramics were found. The answer: due to slope; tests were placed approx. 1 m from edge of sloping terrain.

Her finding is that discovery of ceramic sherds in 4 tests is not considered “isolated” so she will be recommending continued I-B sampling there to be sure the site is a very small occurrence and to discover if the site warrants Phase 2 study. In addition, she would like information on the site form edited.

Otherwise, she is in agreement with the I-B findings and will be recommending Phase 2 study at sites.

The discussion was friendly & cordial.

NAI PROJECT 21812

NORTHERN PASS HVDC TRANSMISSION PROJECT

VICTORIA BUNKER, INC.

June 19, 2014

Meeting Notes

The following notes summarize archeological information discussed during a meeting held on Wednesday, June 18, 2014, at 1 pm.

The meeting was held at NH Division of Historical Resources, Concord, NH for the purpose of discussing details on archeological and architectural surveys. DHR personnel included Dick Boisvert, Edna Feighner, Tanya Krajek and Christina St Louis.

These notes only summarize archeological topics. The following items were discussed:

- General I-B info

Edna has not yet read the I-B report we submitted, including towns of Deerfield, Allenstown, Pembroke, Concord & Canterbury.

Edna said that she will be able to review the report despite 2 un-surveyed zones in Canterbury – and said that she can review these separately when access is permitted & work is done.

Upon completion of her review, Edna will make recommendations for any Phase 2 study based on the Phase I-B findings. This is in fulfillment of the S 106 process.

- For the Northern Route

Edna will accept I-A Underground (Clarksville & Stewartstown) report as an Addendum to the Northern Route Report (no need to write a new, full stand-alone report).

Edna said to follow the same I-B methodology & test placement strategy for sensitivity areas in the Overhead Northern Route & at Transition Stations as we used for the 140-mile r-o-w.

Edna pointed out that identification of zones with prior impact within and along roads for proposed Underground route is important – could be useful to guide route placement decisions to avoid archeological sites or sensitivity areas – especially if line is placed right in the road grade. For I-B, she suggested that continuing a strategy similar to that already in use would be appropriate for the Underground roadway margins.

- SEARCH topics

To date, DHR has received only a draft submittal of I-A study in towns of Deerfield, Allenstown, Pembroke, Concord & Canterbury. SEARCH intends to compile all I-A work and submit in entirety in the future. As such, the draft has not been formally reviewed by DHR but Edna considers findings “OK”

We learned that the SEARCH I-A sensitivity assessment was done “blind” – SEARCH did not have access to the VBI I-A report at the time of survey. Thus areas of overlap were included in their report. SEARCH has compiled a new table in which they removed overlapping areas from their future consideration. Edna said we could copy this table.

We learned that the SEARCH methodology and the VBI methodology are essentially the same at the I-A level. While their findings vary from ours, the reports are considered by DHR as “different” and no one report is considered as “right or wrong.” Edna has “no problem” with the VBI work. She stated that she found no deficiencies and has no criticism of the VBI report. Edna welcomes the “fresh eyes” SEARCH is bringing to the State.

It appears likely that SEARCH will be doing I-A survey on some 4-6 alternatives, including I-93. It is also likely they will be doing I-B on several major underground alternatives, although DHR does not yet have info on which areas.

Discussion is to be continued on sequencing and overlap of I-B sampling area identifications for assignment to VBI or SEARCH. DHR will raise the question with DOE.

- SEC Archeology Topics

The question came up regarding what constitutes a complete SEC application for archeological resources.

Dick acknowledged that there is a mixed history for completeness, but that the process logically follows the S 106 process

Typically in the past the I-A report was considered sufficient for the application, with agreement on the next level of work effort. Dick and Edna both noted that completion of the I-B archeological effort would definitely be enough for the SEC application.

Nadine commented on above-ground SEC application separately

DEPARTMENT OF THE ARMY
APPLICATION FOR A FEDERAL PERMIT
UNDER THE ARCHEOLOGICAL RESOURCES PROTECTION ACT
approved October 31, 1979
(Public Law 96-95; 93 Stat 721; 16 U.S.C. 470aa-II; 32 CFR 229)

NAME OF PROJECT OR INSTALLATION: Northern Pass HVDC Transmission Line

All information requested must be completed before application will be considered. Use separate sheets of paper if more space is needed to complete a section.

1. Name of Institution or Individual 2. Date of Application October 30, 2013

Victoria Bunker, PhD, Victoria Bunker, Inc.
sub-consultant to Normandeau Associates, Inc.

3. Address (Include Zip Code)
Victoria Bunker Normandeau Associates, Inc.
PO Box 16 25 Nashua Road
New Durham, NH 03855 Bedford, NH 03110

4. Type of Permit Requested:

- [a] Surveys, limited testing/limited collections of lands identified in No.5.
b. To excavate, collect, and make extensive collections on specific sites described below in No.5.

5. Lands of the United States for which permit is requested:

- a. Description: Specify military installation or civil works project. If on surveyed lands, description must be by subdivisions of the Public Land Surveys. If on unsurveyed lands, description must be by metes and bounds with ties to some topographic feature. Portions of Franklin Falls, New Hampshire within existing transmission line Right of Way in towns of Hill and New Hampton, New Hampshire
- b. Appropriate map(s), sketch, or plan showing specific sites or areas for which permit is desired:
(Use separate sheets, if necessary, and attach a copy of the application).
- Each sensitivity area is summarized in Attachment Item 5b.

6. Nature and extent of the work proposed, including how and why it is proposed to be conducted:
See Attachment Item 6.

7. Name, address, and institutional affiliation, if any, of persons in "a" and "b" below:

- a. Individual(s) proposed to be responsible for carrying out the terms and conditions of the permit, (in general charge): Victoria Bunker, PhD, Victoria Bunker, Inc.
- b. Individual(s) proposed to be responsible for conducting the work, (in direct charge of field work): Include as part of the application, evidence of qualifications (vitae), in accordance with 32 CFR 229.8 of the Final Uniform Regulations. Victoria Bunker, PhD, Victoria Bunker, Inc. – see Attachment Item 12

8. Proposed date field work will begin:
November 1, 2013

9. Proposed time of performance:
Field work within 1 month, report writing within 1 year

10. University, museum, or other scientific or educational institution in which the applicant proposes to store all collections, and copies of records, data, photographs, and other documents derived from the proposed work. (The application must include a written certification, signed by an authorized official of the institution, of willingness to assume curatorial responsibility, and to safeguard and preserve these materials as property of the United States, or in the case of an application on Indian lands, in the event the Indian owners do not wish to take custody.)

NH Division of Historical Resources, Concord, NH

Attached: Letter of concurrence from NH DHR (Attachment Item 10)

11. Proposed outlet for public written dissemination of the results.

NH Archeological Society publications, dependent on nature of finds and confidentiality. Reports in support of State and Federal 401/404 applications.

12. Evidence of the applicants' ability to initiate, conduct, and complete the proposed work, including evidence of logistic support and laboratory facilities.

Victoria Bunker, Inc. is a woman owned business approved by the NH Division of Historical Resources to conduct cultural resources surveys in the State of New Hampshire. Victoria Bunker, PhD has 30 years of experience in archeological consulting and cultural resources management throughout the State of New Hampshire. This archeological survey will be completed in compliance with Section 106 of the National Historic Preservation Act for projects which involve federal permits, licensing or funding. Victoria Bunker is certified by the Advisory Council on Historic Preservation to conduct Section 106 projects. See Attachment item 12.

13. Certification:

I hereby certify that all materials will be curated within 90 days after completion of the final report in accordance with 32 CFR 229.8 of the final regulations.

SIGNATURE (Individual in General Charge)



14. Complete and return two (2) copies to the District Commander.

ATTACHMENTS TO ENG FORM 4922-R for Northern Pass HVDC Transmission Line

Item # 5b

Hill-3

Hill-3 is assigned sensitivity for historic period archeological resources. Sensitive area Hill-3 is located on the southwestern side of River Road in Hill. It consists of sloping and rocky terrain primarily composed of soils associated with the Adams-Lyman complex (190D). Hill-3 measures approximately 150 feet in length along the existing Right of Way transmission corridor.

This area is positioned high above the Pemigewasset River and exhibits rocky terrain on sloping surfaces which drop to River Road and an abandoned rail grade. Sensitivity is assigned on the basis of a previously recorded historic period site (NH Division of Historical Resources site files) located outside the corridor to the south. This site is known as the Housesite Site (27-MR-291). Recorded features at this site include collapsed and poured concrete walls. The site is located in a wooded area, consisting of pine, oaks and shrubs as well as grasses. Although no features related to this site were observed during walkover inspection in the corridor, components may occur.

Hill-4

Hill-4 is assigned sensitivity for Native American archeological resources.

Sensitive area Hill-4 is located between the Pemigewasset River and the grade of River Road in Hill. It consists of a flat terrace above the river, primarily composed of Podunk fine sandy loam (104A) deposited during periods of extreme flooding. Hill-4 measures approximately 150 feet in length along the existing corridor. The area exhibits minimal disturbance and is considered sensitive for Native American resources due to its location directly above the river, the presence of sandy soils and topography. In addition, the location is similar to that of the previously recorded Sunning Snake site (located approximately 1000 feet [305 meters] to the north) and the Sumner site (located approximately one-half mile [0.8 km] to the north).

New H-1

New H-1 is assigned sensitivity for Native American archeological resources.

Sensitive area New H-1 is located between the Pemigewasset River and a gravel pit to the north in New Hampton. It is characterized as a series of terraces dropping southwest towards the river. The area is composed of Adams loamy sand (36E) with smaller areas of till based Adams-Lyman complex (190C,D). Both of these soil types were formed from glacial outwash. NewH-1 measures approximately 1700 feet in length along the existing corridor.

The area exhibits minimal disturbance in the form of access trails and is considered sensitive for Native American resources due to its terrace configuration, sandy soils and location above the Pemigewasset River.

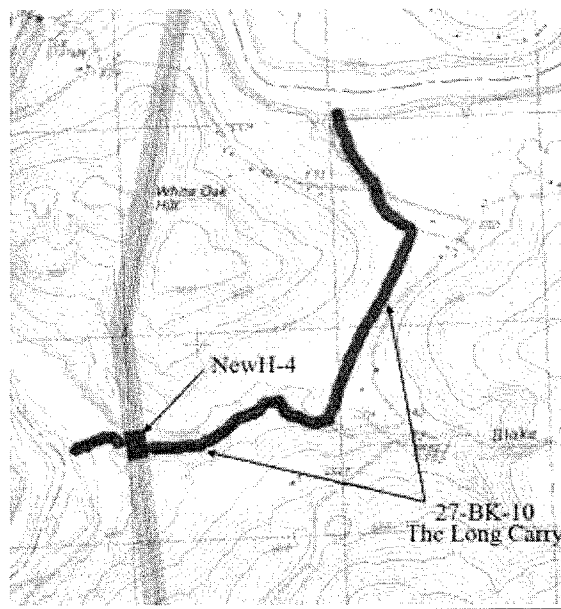
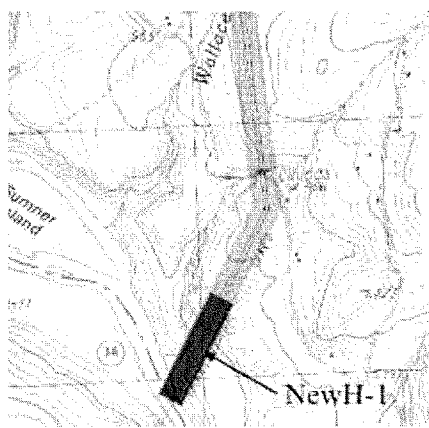
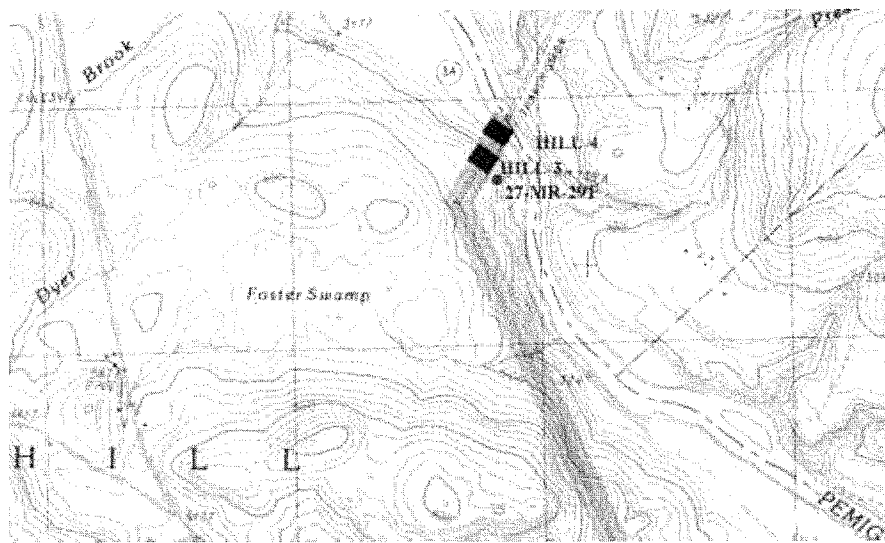
New H-4

New H-4 is assigned is assigned sensitivity for Native American and early Historic period archeological resources.

Sensitive area New H-4 is a small terrace north of Brook Road in New Hampton on the east side of the corridor. Soils for this location, overlooking Blake Brook to the north, have been mapped as Moosilauke fine sandy loam (415B) formed from glacial outwash with some stony areas noted. NewH-4 measures approximately 100 feet along the existing corridor.

Although New H-4 exhibits disturbance, it is considered sensitive for Native American resources based on its proximity to and elevation above Blake Brook, the occurrence of fine sandy loams, and its position on the margin of 27-BK-10, the Long Carry site, a trail utilized by both Native Americans and European-Americans.

See below for copies of USGS Topographic Maps with locations of Archeological Sensitivity Areas Hill-3, Hill-4, NewHampton-1 and NewHampton-4:



Item # 6

Phase I-B archeological subsurface sampling is proposed within zones assigned sensitivity for archeological site occurrence during Phase I-A study. Zones Hill-4, NewHampton-1 and NewHampton-4 are expected to include evidence of Native American habitation in the form of artifacts or features. Zone NewHampton-4 may also exhibit early historic period cultural associations. Zone Hill-3 is expected to include evidence of historic European-American habitation or land use in association with previously recorded site known as the Housesite Site (27-MR-291).

Phase I-B survey will consider the entire right of way within sensitive areas for archeological resource occurrence as follows:

- Tests are arranged in a grid pattern within an area of archeological resource sensitivity. This strategy enables coverage on the entire ROW width within recognized sampling zones and provides a systematic strategy for field work. The grid is established using compass and tape. Sampling intervals range from 8 m to 24 m.
- Shovel tests will measure 50 x 50 cm square and will be excavated by hand, using shovel & trowel. Tests rarely exceed 1 m in depth. Soils will be screened through one-quarter inch mesh. Tests will be backfilled upon completion.
- If artifacts are encountered, 10 cm arbitrary excavation levels will be used within natural soil strata to provide vertical control. Artifacts will be collected by levels within strata. Excavation will continue 20 cm below any finds to confirm stratigraphic depth.
- If encountered, features (e.g., hearths, pits) will be recorded and photographed but not fully excavated.
- If encountered, state requirements for addressing discovery of human remains, burials, grave goods etc. will be implemented.
- Scaled sketches are made of the sampling areas and representative photographs are taken.
- Aerial photos will provide base layer for field sketching.
- Artifacts will be cleaned, sorted, identified and inventoried upon completion of sampling.
- Data will be integrated and interpreted.
- Site recording forms will be completed for newly discovered sites and updated for previously recorded sites.
- Additional site-specific and contextual research will be completed as needed when sites are discovered (e.g., cultural traditions, occupation history & chronology, artifact typology).
- Results and findings will be interpreted, and presented in a Technical Report, to be reviewed by NH Division of Historical Resources and other agencies as identified during the course of the project.
- Any off-ROW or new alignments will entail Phase I-A survey and reporting followed by Phase I-B efforts as needed.
- All discoveries are kept confidential.
- All methods have been approved by the NH Division of Historical Resources for the project.

Item #10 – Following Page (DHR Agreement)

Item # 12 – Following Item #10 Attachment (Resume)



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

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

October 29, 2013

Victoria Bunker, PhD
Victoria Bunker, Inc.
PO Box 16
New Durham, NH 03855

Dear Dr. Bunker,

I have received your request regarding confirmation that the NH Division of Historical Resources will accept curatorial responsibility for archaeological materials collected from federally owned property held by the US Army Corps of Engineers by VBI, Inc. in order to comply with an application for a federal permit under the Archeological Resources Protection Act. Please use this letter to confirm that the NH Division of Historical Resources will accept curation of archaeological materials. It is my understanding that this effort is part of a larger undertaking and that these materials will be incorporated with a larger collection. I recommend that collections from publically owned property (federal, state, county or municipal) be specifically segregated within the collection such that if and when a governmental agency wishes to revisit the collections, they will be readily accessible.

If you need any additional information or clarification, please feel free to contact me.

Sincerely,

Richard A. Boisvert, PhD
State Archaeologist
Deputy State Historic Preservation Officer
NH Division of Historical Resources



QUALIFICATIONS AND RESUMES

VICTORIA BUNKER, INC.
ARCHEOLOGICAL CONSULTANT

Victoria Bunker
PO Box 16
New Durham, NH 03855

603-776-4306
vbi_wp@tds.net

VICTORIA BUNKER, INC.
COMPANY DESCRIPTION AND PHILOSOPHY

Victoria Bunker, Inc. is a woman-owned business specializing in New England archeology and cultural resources management. The Company is incorporated in the State of New Hampshire, and based in Alton, New Hampshire. Services in archeological research include site survey and reconnaissance, site examination and data recovery for Environmental Assessments and Impact Statements. Personnel are available for preservation planning, research and National Register nominations for archeological sites, ruins or districts of both historic period and pre-contact Native American age. Our staff includes an extended network of experienced professionals to meet the needs of each client and project; our personnel are qualified to address industrial, underwater, urban, rural, military, ritual, burial, and Native American resources. We have worked throughout the Northeast on a variety of impact assessment projects for Federal, State and local governmental agencies, utilities, engineering firms, developers and private individuals.

We have maintained a strong reputation in the archeological consulting field since our first projects in 1981. The mission of the Company is to provide the highest quality and broadest range of archeological services. We accomplish this while providing timely results within a fair budget, providing a safe workplace, maintaining ethical conduct, and working with a spirit of honesty, integrity, cooperation and proper conduct.

Victoria Bunker, Inc. enforces a confidentiality policy as the Company provides services to a variety of agencies and clients which require discretion and confidentiality. We also enforce an alcohol and drug policy and we are committed to nondiscrimination in the workplace.

Victoria Bunker, Inc. assumes responsibility for artifactual and documentary materials used during projects. Such materials may not be retained in the personal files or collections of individual employees and data are considered the property of agencies, institutions or property owners. Materials are typically deposited with museums or curatorial facilities upon completion of a project.

We are proud of our history of excellent working relationships with state and federal review agencies, clients and staff. The Company responsibility is summed up in a single word – commitment.

VICTORIA BUNKER, PHD
PROFILE

Victoria Bunker, PhD, is the Principal Investigator on all projects undertaken by Victoria Bunker, Inc. Responsibilities include administration, scheduling, development of research and field methodology, and technical writing. Victoria Bunker is responsible for assessing significance of results, insuring ethical conduct, and meeting standards.

Victoria Bunker has worked in New England archeology since 1977. She received her doctoral degree in Anthropology at Boston University, has held teaching positions at several New England institutions, and has been active in volunteer and avocational archeological programs. She contributes to journals and has served as both Editor and President for the New Hampshire Archeological Society. She has also served two terms on the governor's New Hampshire Rivers Management Advisory Committee, representing historic interests in developing protection plans for New Hampshire rivers.

VICTORIA BUNKER, PHD
RESUME

PROFESSIONAL EXPERIENCE

- 1981-present Victoria Bunker, Inc., Cultural Resources Management. Owner and Principal Archeologist for woman-owned business to conduct cultural resource reviews and impact evaluations for archeological resources.
- 1982-6 Archeologist, NH Historical Society. Director of research for state-wide survey and planning, volunteer training, public education, workshops and lectures.

EDUCATION

- 1983 Doctor of Philosophy, Boston University
1977-80 Center for Materials Research in Archeology and Ethnology:
Massachusetts Institute of Technology
1976 Master of Arts, Tufts University
1974 Bachelor of Arts, University of New Hampshire

RECENT PUBLICATIONS

- 2012 Water-Powered Mills, Dams and Canal Sites in Wakefield, New Hampshire. The New Hampshire Archeologist (in press).
- 2010 Reflections on a Graveyard. The New Hampshire Archeologist 50(1):57-74.
- 2009 The Bomber Crash of 1942. The New Hampshire Archeologist 49 (1).
- 2006 Time and Place: The Archeology of the Eddy Site. The New Hampshire Archeologist 46-47(1).
- 2002 Hornfels Tool-Making Industry in Freedom, NH. The New Hampshire Archeologist 42(1).
- 2002 Analysis and Interpretation of Early Ceramics from Sewalls and Amoskeag Falls, Merrimack River Valley, New Hampshire. In A Lasting Impression. Greenwood Publishing Company.

- 1999 Early Occupation in the Far Upper Connecticut River Valley. The New Hampshire Archeologist 39(1):70-81 (with Potter).
- 1998 Rescue Archeology at the Lodge Site, NH 31-6-6. The New Hampshire Archeologist 38(1):1-33 (with Gengras).
- 1996 The Place Between: Archeology at the Mine Falls Park Site, Nashua, New Hampshire. The New Hampshire Archeologist 36(1): 38-64 (with Potter).
- 1994 New Hampshire's Prehistoric Settlement and Culture Chronology. The New Hampshire Archeologist 33/34(1): 20-28.
- 1992 Stratified Component of the Gulf of Maine Archaic Tradition at the Eddy Site, Amoskeag Falls. Occasional Publications in Maine Archeology 9:135-148.

Additional Publications Available Upon Request

SHEILA CHARLES, MA
RESUME

PROFESSIONAL EXPERIENCE

- 2006-present Director of Archeology Strawberry Banke Museum, Portsmouth, NH. Responsible for management of archeological sites, artifacts and resources on Museum property, public education, field schools, community events, and research design.
- 2004-present Victoria Bunker, Inc., Cultural Resources Management. Co-Principal Archeologist for cultural resource reviews and impact evaluations for archeological resources.
- 2002-04 Project Director, Timelines, Inc. Conducted cultural resources management projects in Massachusetts and New Hampshire.
- 1999-present Project Supervisor, Green Mountain National Forest. Conducted cultural resources management projects in Vermont including curation, collections management, National Register of Historic Places nomination, and Passport in Time projects. Coordinator for Vermont Archeology Month.

EDUCATION

- 1978 Master of Arts, California State University
1973 Bachelor of Arts, California State University

RECENT PAPERS AND PUBLICATIONS

- 2010 The Diverse Archeological Investigations of Strawberry Banke: Compelling Evidence of a Neighborhood Over Time. *The New Hampshire Archeologist* 50(1):22-45.
- 2003 National Register of Historic Places Registration Form for the Aldrichville Mill Village Historic Archaeological District, Green Mountain National Forest.
- 2000 Relics & Ruins at Aldrichville. *Journal of Vermont Archaeology*, Volume 3.
- 2000 The Old Mill's Race Against Time: An Archaeological Phase I Investigation for the Weston Old Mill and Dam Reconstruction Project, Windsor County, Vermont.
- 1999 Forgotten Stories of Our Landscape: Glimpses into Vermont's Industrial Past. Historic Preservation Conference, Windsor, VT.

1999 From Wilderness to Fortress: Exploring the History of a
Revolutionary War Site, Mount Independence State Historic Site,
Orwell, Vermont. VT Division for Historic Preservation.
Vermont's Industrial Past.

Additional Publications Available Upon Request

DAVID W. TRUBEY, MA.
RESUME

EDUCATION

UNIVERSITY OF MASSACHUSETTS AT BOSTON

Master of Arts, History, Graduate Program in Historical Archaeology/History, 2000

UNIVERSITY OF LOWELL

Bachelor of Arts, History, Magna Cum Laude, 1989

Recipient – History Department Outstanding Academic Achievement Award

RIVIER COLLEGE, Nashua, New Hampshire

Currently enrolled in Teacher Certification Program – Social Studies

EMPLOYMENT

2010- Present Victoria Bunker, Inc., Cultural Resources Management. Project Archeologist for cultural resource reviews and impact evaluations for archeological resources.

2008-2009 FATHOM RESEARCH, LLC., New Bedford, MA

Senior Archeologist. Conducted archaeological remote sensing surveys along east coast in support of energy, public works and commercial projects. Provided historical and natural resource research. Authored reports detailing results of investigations.

1999-2008 MASSACHUSETTS EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS - BOARD OF UNDERWATER ARCHAEOLOGICAL RESOURCES, Boston, MA Archeologist/Deputy Director

Responsible for day-to-day administrative operations of the Board including management of archaeological permit program, review of permit activities and regulatory compliance to ensure protection of coastal and offshore archaeological sites. Maintain inventory/GIS database of known and reported sites. Participate in multidisciplinary project review and provide recommendations to state and USACE concerning potential impacts to archaeological resources. Conduct archaeological survey/investigation to evaluate newly discovered sites and in support of Board projects. Assist State Underwater Archeologist/Director in the development of policies and programs that promote Board's mission of resource protection and sound management.

1998-1999 R. CHRISTOPHER GOODWIN & ASSOCIATES, Frederick, MD

Archeologist Conducted archaeological survey of both terrestrial and marine project areas in Mid Atlantic and Gulf Coast regions. Conducted historical research in support of site evaluation. Responsible for data collection, analysis, recommendations for Section 106 and state regulatory compliance and report publication. Clients included U.S. Army Corps of Engineers, U.S. Navy, Maryland Dept. of Natural Resources. Maintained conservation of mid nineteenth-century nautical artifact collection.

PROJECT TEAM AND SECRETARY OF INTERIOR STANDARDS

The Project Team at Victoria Bunker, Inc. includes Senior Staff and Field Crew. All have been trained in New England archeology and all hold degrees in related disciplines. Together, the team is qualified to address Native American, Historic, Industrial and Underwater archeological resources.

The Senior Staff of Victoria Bunker, Inc. meets the Secretary of Interior Standards for Professional Archeologists as follows:

Victoria Bunker, PhD, 34 years of experience in New England archeology and cultural resources management

Sheila Charles, MA, 38 years of experience in New England archeology and historic research

David Trubey, MA, 13 years of experience in New England terrestrial and underwater archeology

Other staff have completed training in New England archeology at the undergraduate level and have compiled extensive experience in special topics as follows:

Dennis Howe, 30 years of experience in New England and New York particularly in the areas of military sites, water-powered mills, industrial sites, history of concrete and related research and graphics arts.

Field Crew have attained or are enrolled in undergraduate degree programs in anthropology, history and have attended archeological field schools.

In addition, Victoria Bunker, PhD has received a certificate for professional training from the Advisory Council on Historic Preservation for historic preservation responsibilities under Section 106 of the National Historic Preservation Act.



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 1-800-735-2964 FAX 603-271-3433
www.nh.gov/nhdhr preservation@dcr.nh.gov

October 29, 2013

Victoria Bunker, PhD
Victoria Bunker, Inc.
PO Box 16
New Durham, NH 03855

Dear Dr. Bunker,

I have received your request regarding confirmation that the NH Division of Historical Resources will accept curatorial responsibility for archaeological materials collected from federally owned property held by the US Army Corps of Engineers by VBI, Inc. in order to comply with an application for a federal permit under the Archeological Resources Protection Act. Please use this letter to confirm that the NH Division of Historical Resources will accept curation of archaeological materials. It is my understanding that this effort is part of a larger undertaking and that these materials will be incorporated with a larger collection. I recommend that collections from publically owned property (federal, state, county or municipal) be specifically segregated within the collection such that if and when a governmental agency wishes to revisit the collections, they will be readily accessible.

If you need any additional information or clarification, please feel free to contact me.

Sincerely,

Richard A. Boisvert, PhD
State Archaeologist
Deputy State Historic Preservation Officer
NH Division of Historical Resources



NAI PROJECT 21812

NORTHERN PASS HVDC TRANSMISSION PROJECT

VICTORIA BUNKER, INC.

July 24, 2013

Meeting Notes

The following notes summarize portions of a meeting held on Friday July 26 at 9 a.m.

The meeting was held at NH Division of Historical Resources, Concord, NH for the purpose of discussing details on archeological and architectural surveys.

These notes only summarize archeological topics. The following items were discussed:

- A Phase I-A is in process by SEARCH, which will provide a comparison to the VBI I-A findings
- We will learn if there is agreement between the 2 consultants on what is considered sensitive and what is not considered sensitive.
 - If both agree on what is considered sensitive, VBI will do the I-B
 - If both agree on what is not sensitive, we simply move on
 - If VBI recognizes a sensitivity area that SEARCH does not find sensitive, VBI will do the I-B
 - If SEARCH recognizes a sensitivity area that VBI did not find sensitive, SEARCH will do the I-B.
- Mary Ann Sullivan mentioned that temporary work areas and access off-row will be available in another 4-6 weeks
- Edna reiterated that site forms for newly discovered sites be submitted immediately
- Edna reiterated concern that entire corridor width – even into tree line – be considered in the I-B. We concurred and discussed that the width varies, assured DHR that we will address the entire width (as depicted on WAD aerials)

Additional discussions were directed to other archeological subjects

- Sara Jordan, WMNF archeologist, suggested that we contact Stacy Lemieux and/or Craig Young (permit specialist) re discussing need for ARPA permit for subsurface archeological investigation in the Forest
- Preservation Company – not VBI - will address the Appalachian Trail
- VBI is moving along on the I-B. Additional WAD maps will be provided for long-range, long-distance planning (Jake T will look into status)

NAI PROJECT 21812

NORTHERN PASS HVDC TRANSMISSION PROJECT

VICTORIA BUNKER, INC.

May 24, 2013

Meeting Notes

The following notes summarize a meeting held on Thursday May 23, 2013 at 10:30 a.m.

The meeting was held at NH Division of Historical Resources, Concord, NH for the purpose of discussing the Phase I-B archeological field strategy for the project and ascertaining the status of the Phase I-A Archeological Survey report review.

The meeting was attended by Lee Carbonneau (NAI), Victoria Bunker, Dana Bisbee, Jake Tinus, and Curt Thalken (by phone). DHR participants included Richard Boisvert, Edna Feighner, Tanya Krajeik, Christina St Louis.

The following topics were discussed:

#1. Phase I-A report:

Edna provided her comments worksheet for the Phase I-A report review. She had a few minor points but has approved the report. DHR will provide a formal letter to that effect. Edna indicated that resubmittal of a revised version of the report would not be required by DHR.

Dick expressed the following comments with respect to construction activities and sensitive archeological sites:

- In areas of archeological sensitivity, DHR requests that poles be cut at the surface to reduce disturbances from dragging poles to staging areas.
- Requested that any access roads that may be used to drag out poles or to stage equipment should also be tested for archeological sensitivity.

Housekeeping note: Dick requested that, for this project only, in the future all documents submitted to DHR be single-sided. Alternatively, they could be sent as PDFs (or on DVDs?) which would also facilitate redaction where deemed necessary when responding to Freedom of Information Act requests.

#2. Phase I-B strategy:

To refresh our recollection, Vicky presented a summary of salient points made by Richard Boisvert in March re the Phase I-B effort including:

- The APE constitutes the entire ROW width in areas of archeological sensitivity
- The I-B sampling approach could focus on the center and radiate out across the ROW
- 3-4 transects seemed likely
- Specific landforms would be addressed that would have been attractive for past human occupation, such as terrace edges, water feature margins, knolls, etc.
- A common sense approach would allow us to eliminate sampling on ledge, in standing water, or in spots of prior impact

Vicky then presented schematic templates and aerial photo-based exhibits as examples of proposed shovel test arrangements which were developed based on the March discussion.

The group then discussed the templates and aerals. A refined strategy was developed as follows:

- Rather than placing the “Principal Transect” along the ROW centerline the entire distance of a given sensitivity area, it will be shifted side-to-side as needed to cover sectors of the ROW which would likely experience the greatest impact from construction-related actions (such as access road use, multiple construction components, etc). The configuration of the “Principal Transect” will no longer be a single transect with tests at 8 m intervals. Instead, NPT will use 2 transects spaced 8 m apart with tests at 16 m intervals arranged in a systematic offset unaligned pattern (lattice-like vs grid-like)
- Sampling will radiate out from these transects, also using the offset pattern
- Sampling will address “attractive” landforms, also using 2 transects spaced at 8 m apart with tests offset at 16 m
- Sampling need not occur in certain landscape locations as dictated by common sense, although transects will come as close as possible to such locations (such as edges of gravel pits or the toe of a bedrock ledge)
- A 4 m increment will be used in areas considered sensitive for Paleo-Indian site occurrence
- If artifacts are found in test pits, additional bracketing tests will be placed at 2 m intervals at the ends or edges of find locations.
- Thorough walkover will be conducted on edges of gravel pits to determine if any cultural materials have eroded down slopes

It was noted that this approach has been tailored for this project and the meeting was to establish the fundamental methodology for the project

VB will compile revised templates and specific I-B methods statement and provide this revised information within one to two weeks of the May 23 meeting. Dick indicated that review of the next set of templates should go quickly (as he is initiating a new field project in June).

#3 Status of Coordination with the DOE Contractor

Dick indicated that the DOE contractors are performing their own Phase I-A but they (DHR) does not yet have a good idea of the status of progress by the DOE contractors. He also indicated that this project is a “test case” for the dual studies; he is not aware of other comparable examples. Curt suggested that the Advisory Council on Historic Preservation (ACHP) be contacted to inquire as to an appropriate level of effort required to minimize duplication of efforts. Curt also suggested that meeting be held between the three parties, i.e. DOE, DHR and NU to further coordination efforts regarding status of ongoing work and expectations and reminded everyone that it is the lead agency’s (DOE) responsibility to facilitate this coordination. Dick offered to reach out to DOE to suggest that this meeting is desired and that it occur soon, by mid-June if possible.

#4 Status of Historical Architectural Review

Edna inquired about the status of the above ground research. Lee indicated that Normandeau is reviewing the data but they would like to also understand the status of DOE’s efforts to avoid unnecessary duplication. Dick suggested that a similar meeting be held by the three parties to facilitate a better understanding of roles and expectations.

Phase I-B Archeological Survey

Notes

Telephone conversation – Victoria Bunker & Richard Boisvert, 1:30(EST) 3-25-13

Telephone conversation conducted between Victoria Bunker and Richard Boisvert (NH DHR) to confirm a few concepts re: Phase I-B archeological sampling for existing 140 mile ROW relative to the Northern Pass project. The call was intended as a follow up to the discussions on 3-21-13 to provide confirmation on some questions. The conversation was cordial, friendly and helpful.

Strong points:

RB stressed that the purpose of the Phase I-B is to define any and all archeological resources in the APE , particularly to obtain information on horizontal site extent, recognition of vertical extent, and sense of any artifact densities (“hot-spots”). The APE is considered to extend across the entire corridor width.

RB emphasized that any prior archeological studies within the corridor do not necessarily warrant clearance of sensitivity areas – especially if those studies were done only at impact points or in limited portions of the corridor.

Discussions:

We discussed other points as follows:

For the current DHR review, RB does not feel it is necessary to see project design plans at this time. His review can progress without them.

RB confirmed that because the APE is considered as the entire corridor width, the Phase I-B will provide “once-and-for-all” clearance of a sensitivity zone if no resources are discovered or if resources are found to not be important. In other words, “once it’s cleared, it’s cleared.”

We confirmed that the overall strategy for the Phase I-B effort will begin with a transect roughly placed to follow the “center” of the corridor and will fan out from there using additional transects or judgmental test placement. The sampling will be designed the best way possible to discover and define sites, transect placement may vary with location to avoid wet areas or ledge, and may accommodate a “lay-of-the-land” strategy. The actual number of tests will be determined per individual area. A rigid grid strategy is not needed.

RB noted that if resources are found, Phase II survey will entail greater focus, especially addressing specific proposed impact points.



MEETING MINUTES

NHDHR & DOE Meeting

MEETING DATE: 3/21/13

ATTENDING:

NPT: Brian Bosse, Lee Carbonneau, Curt Thalken, Dana Bisbee, Vicky Bunker (via phone)
DOE: Caitlin Callaghan
USACOE: Erika Mark (via phone)
NHDHR: Richard Boisvert (State Archeologist; Deputy SHPO)
Nadine Peterson (Historic Preservation Planner)
Chris St. Louis (Administrative Assistant)
Tanya Krajcik (Archeology reviewer)

Purpose / Objective

Review Section 106 Process, SEC Permitting, Archeological Report including 1B expectations and Historical requirements

Minutes

Archeological

1. Following introductions the meeting agenda was reviewed and it was noted that any other topics are open for discussion.
2. NHDHR indicated that they had not reviewed the revised 1A Archeological report in detail yet but felt that based upon a spot check the issues that they identified were taken care of and the methodology looked good. There was only one item that they wanted clarification on, a reference to a ROW expansion area. VHB indicated that this would be checked. NPT reviewed the project evolution associated with ROW expansion and that the project could be constructed within the existing ROW and no expansion is required.
3. NHDHR indicated that a detailed review will be performed on the 1A report. They are very busy but said that the review would take many weeks, not many months. NHDHR indicated that they would like to review the report in smaller sections that would be grouped into multiple towns. All indicated that this made sense and NHDHR indicated that they would start in the local area and most likely do a field review.
4. NHDHR indicated that they had received a letter that day from the DOE that set the Area of Potential Effects (APE) for archeological impacts as the entire ROW width, not just the construction area associated with the project.

{Submitted By: Brian Bosse_____

Date: _____3/25/13_____

Company: _____NPT_____

Phone: (603) 634-2933_____

5. The NHDHR indicated that they support this approach and consider it reasonable. NPT indicated that this letter from the DOE that they provided needs to be reviewed but the APE appears to be more substantial than what the ACOE has required for similar New Hampshire Transmission line projects to date. The ACOE representative agreed with this assessment and that they would not require such a broad APE for permitting purposes. The ACOE had not been consulted on the APE decision.
6. NHDHR indicated that they will reply back to the DOE supporting the APE next week but will wait to send the response until NPT replies. Any NPT response to the DOE letter will be issued by close of business next Wednesday, 3/27/13.
7. With the APE identified in the DOE letter, the group discussed the merits of this approach and what spacing between shovel test locations would be required. A test pit spacing of 8 meters on linear transects was discussed with no testing needed on ledge or wetland areas. NHDHR wants to be involved with establishing 1B test locations and suggested a coordinated effort with NPT to determine test sites.
8. NHDHR indicated that project correspondence associated with SEC issues should go to Dick Boisvert and RPR # 1448 should be on all correspondence.
9. DOE representative indicated that it was not known if the NPT Archeological Phase 1A Report would be accepted and sufficient for EIS purposes after the NHDHR review was completed.
10. The timing of the 1B testing was reviewed and it was identified that for the NHSEC and ACOE application, the 1B process does not have to be completed when the permit is submitted but must be provided during the permit review timeframe.
11. The NHDHR requested that the DOE provide guidance associated with proper communications between the groups involved in the project. The DOE representative took this as an action item. DOE also indicated uncertainty on whether the EIS contractors would be doing 1-B work.
12. The DOE requested an electronic copy of the 1A report and requested that it be via overnight mail (FEDEX).

Cultural Historical

1. DOE's letter established the APE for historic resources as 1 mile on either side of ROW.
2. The group discussed the contents of the project area forms that would be included in the initial State of NH Cultural submission. It was also agreed that the project would be submitted in sections to make review more efficient.
3. NPT must identify potential impacts by comparing project area inventory to view shed mapping results. Special places outside of the 2 mile corridor will be identified by NPT's consultant, as well.
4. Only historic resources where the setting is integral to eligibility or listing on the National Register can be affected by visual impacts. Visual impacts should consider both the structures and the ROW clearing.
5. NPT plans to visit the NHDHR in the next 1-2 weeks with the Historical/Cultural Consultant.
6. NHDHR believes historic resources impacts will be of far greater interest to most parties.

Action Items

Action Items	Responsibility	Due Date	Comments	Completed
1)Reply to DOE letter concerning 1B APE area	NPT	3/27/13		
2) NHDHR comments on Phase 1A report	DHR	weeks		
3) Meeting between the NPT Historical consultant and DHR	Normandeau/DHR	4/5/13		
2)Provide 1A report to DOE in electronic format	Normandeau	3/29/13		
3)Clarify communications procedures between parties	DOE			
5) Determine how we would propose to do the 1B work given the APE decision	NPT/Normandeau			



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

State of New Hampshire, Department of Cultural Resources
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603-271-3483
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preservation@dcr.nh.gov

February 12, 2013

Lee Carbonneau
Normandeau Associates, Inc.
25 Nashua Road, Bedford, N 03301

Re: Request for Report Review: *NORTHERN PASS HVDC TRANSMISSION PROJECT, Results of Phase I-A Archeological Survey, Existing Corridor and Franklin Converter Terminal*. Prepared by Victoria Bunker, Inc.; submitted by Normandeau Associates, Inc.

Dear Ms. Carbonneau:

The Division of Historical Resources (DHR) is in receipt of the Phase IA archaeological report for the Northern Pass HVDC Transmission Project cited above. The DHR understands the magnitude of this project and appreciates the level of research and survey effort that it has entailed, however after careful review the DHR has concluded that the above cited report has a number of issues that need to be addressed and clarified before the DHR can make an informed comment on the sensitivity assessment provided for the proposed project corridor.

The following technical comments provide focus on a number of specific examples that need editing, the DHR has a responsibility to review the information provided but not provide edits for the entire report. Regardless, the editorial problems inhibit the review of the report for substantive issues.

- A table of contents should be included with this document.
- Some general comments include minor spelling errors dispersed throughout the report; several examples include misspelling of "property" in the Management Summary and misspelling of Tanya "Krajcik" on page 3 in the methodology section, page 7-7 "that" is misspelled in the third paragraph. The DHR suggests that a thorough editing occur for the entire report since the report may contain other similar errors in the remaining text. Other formatting issues include extra line spacing (8-5), font size variations between Management Summary and Methodology Chapter when compared to the results sections. The Franklin Converter Terminal Chapter does not follow the report page formatting and the font size varies from the main body of the report.
- Within the Franklin Chapter the "Graveyard Research" has been combined with the "National Register Properties" discussion, this does not follow the general format provided in previous sections that address "Graveyard Research" followed by "Previous Archaeological Studies". It appears that in the Franklin Chapter there are soils maps missing for the southern section of the line, also it appears that the map on page 7-32 is a duplicate map on page 7-33 and that the map for photo locations for the southern portion of this line is missing.
- The Hill Chapter states that there has been only one previously identified Native American Site (page 8-1) in Hill, while the DHR records show that five Native American sites have been recorded in Hill (27-MR-222 to 27-MR-225, PAL, 1996 survey). Also, there is a known historic site located just outside of the corridor that was not mentioned in this section resulting in a negative line of evidence. This appears to be a case of faulty data resulting in problematic sensitivity assessments.



- In the New Hampton Chapter site 27-BK-33 (page 9-2) was identified along with a number of previously recorded sites in New Hampton. 27-BK-33 is a duplicate site number for site 27-BK-19, information provided on the site form explains the duplicate error and that the site number 27-BK-33 has been voided in the DHR data base.

Because of the volume of information provided within this report the DHR did not provide editing comments on the entire report and suggests a comprehensive editing review by the author prior to resubmitting the information to the DHR for comment.

The report format for this type of project this is appropriate and the sections within each chapter were adequately described and information defined, however the DHR suggests that several of the sections need further clarification on the content and nature of the documents used when determining absence of resources or negative evidence. The Management Summary Chapter discusses what is addressed in each section of the chapter and what information or data sets that are used to draw conclusions or provide analogs on archaeological sensitivity assessments. These analogs are then used to support the information presented in the "Expectations" section of each chapter.

The DHR has reservations regarding poorly supported suppositions presented within the "Previous Archeological Studies" and "Expectations" sections of all chapters. For example, each chapter describes the use of the Review and Compliance (R&C) information as most often providing negative evidence on site sensitivity. This should be clarified for the reader so that this information is not misused or misunderstood. Most if not all of the R&C projects have very narrow scopes for archaeological sensitivity and testing. For example, if within a 50 acre parcel that was determined to possess archaeological sensitivity only a small portion of the project area might have been reviewed since the permit area would not apply to the entire project area. The archaeologist may conduct field assessments and determine that no testing is required in the defined permit areas that evidence should reflect the specifics of the compliance file and not interpret the findings as purely negative evidence. Compliance comments on limited portions of land parcels have been applied to the entire parcel with an interpretation suggesting that since no sensitivity was identified in the limited area, no sensitivity has been applied to the whole parcel. The author has used the results from these types of projects to suggest that the section of line adjacent to previously reviewed or surveyed parcels lack of sensitivity since the review resulted in an "absence of resources" within or near the corridor. The DHR finds that this line of evidence may be misleading or may misinform the results of the "Expectations" sections.

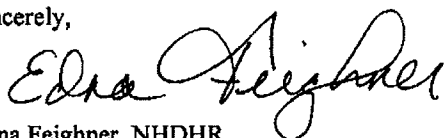
A substantial issue is that there is no clear statement on what is considered to be the existing corridor and what was archaeologically assessed. It is stated in the Methodology Chapter that the corridor measured 315 feet in width; does this mean the entire width of the corridor that includes both the cleared and forested corridor? Does this include new or proposed additional width to accommodate a new line? Why do the corridor dimensions vary so greatly in the chapters if the entire corridor measured 315 feet? It is difficult to understand exactly what width of the corridor was visually assessed, what side of the existing line was assessed, what portion of the corridor will hold the new line and was that portion visually assessed. Not all of this information is presented clearly, within the chapters' tables of archaeological sensitivity vary in widths from chapter to chapter. Will there be a consistent width cleared for the entire proposed new line corridor or will it vary? As an example; in the Canterbury Chapter on page 5-6 it was noted that historic period features were observed outside of the existing corridor, is this outside of the 315 foot corridor width or outside of the cleared corridor that does or does not include the proposed new line area? In review it appears that the survey addressed only the currently cleared portion of the corridor and not the legally defined right-of-way.

The DHR believes that the continual discussion of the "area of potential effect" (APE) is inappropriate at this level of effort. The transmission line needs to be assessed without concern about the amount of testing proposed or areas determined sensitive and constantly reminding the reader that areas may not have to be tested even though areas are considered archaeologically sensitive. The statements made concerning archaeological sensitivity as it relates to a yet undefined APE in the Recommendations Chapter should be omitted. The APE has yet to be defined by the lead federal agency.

In general the DHR suggests that the recommendations are not sufficiently supported in the report, of particular concern is the ambiguity regarding the extent of evaluation in the newly proposed transmission line project corridor.

We look forward to working with you, if you have any questions please call me at 603-271-2813.

Sincerely,

A handwritten signature in black ink, appearing to read "Edna Feighner". The signature is fluid and cursive, with the first name "Edna" written in a larger, more prominent script than the last name "Feighner".

Edna Feighner, NHDHR
Review and Compliance Coordinator

Cc: R. Boisvert, State Archaeologist, Deputy SHPO
Victoria Bunker
Anne Bartosewicz
Marvin Bellis, Esq.

NAI PROJECT 21812

NORTHERN PASS HVDC TRANSMISSION PROJECT

VICTORIA BUNKER, INC.

January 29, 2013

Summary of Discussions

Part I:

The first part of these notes is a brief summary of a discussion held on January 25, 2013. Participants included Lee Carbonneau, Brian Bosse, and Dave Keddell with Victoria Bunker by telephone.

The conversation was relative to gaining better understanding of the Army Corps review process and determination of Areas of Potential Effect for archeological resources.

In the meeting, Lee presented the Phase I-A archeological report (e.g., 140 miles and 118 acres in Franklin) to Dave K.

The process of review will include:

Submittal of overlay maps to ACOE to show zones of archeological sensitivity, wetlands, and locations of proposed construction activity (new structures and structures to be removed) as requested by Dave to begin his review. It is noted that new access roads have not yet been designed, but existing access roads are depicted.

Upon receipt of overlay maps, ACOE will begin the process of archeological review.

ACOE will then determine the Area of Potential Effect. The APE = the project area, which will define the zones for Phase I-B. For example, within a zone of archeological sensitivity the project area may only be equal to a proposed structure footprint, particularly if matting is placed right up to the point of impact.

ACOE will coordinate with DHR to define how much is needed for the Phase I-B. The final decision comes from ACOE.

Other subjects under discussion included:

No effect – overall, when measures can be taken to protect zones of archeological sensitivity from effects of the project, a finding of No Effect can be made, and no further Phase I-B work would be needed.

Use of mats – ACOE recognizes matting as a way to protect archeological resources from impact. As such, when mats are in place there is no effect on archeological resources and no Phase I-B work needed.

Tree cutting – for cutting trees in areas of archeological sensitivity, it is better to wait until the ground is frozen, then use chips to bury the sensitive area even deeper and offer more protection to it, resulting in no effect. However, the pathway (access route) to the tree cutting area still needs to be matted in sensitivity zones.

Continued Phase I-A – in areas not included in the Phase I-A survey & report to date, continued Phase I-A study is required to give a picture of where archeological constraints might occur through definition of broad sensitivity areas. This gives an opportunity for better design (e.g., to avoid areas of sensitivity)

Avoidance – whenever possible, the best bet is to avoid zones of archeological sensitivity. This may be achieved by leap-frogging between sensitivity zones. It may also be achieved by going around sensitive areas – for example by using an off-row route to circumvent sensitive zones.

Other coordination – the ACOE coordinates with the Advisory Council on Historic Preservation (ACHP) in advance. There are no federally recognized tribes in NH. For the White Mountain National Forest, the Forest will defer to ACOE as WMNF is simply providing a r-o-w and the ACOE is the lead federal agency.

Part II:

The second part of these notes is a summary of a telephone discussion held on January 29, 2013. Participants included Lee Carbonneau, Brian Bosse, and Victoria Bunker.

The conversation was relative to expanding on our understanding of the January 25 ACOE discussions. Points of our conversation are presented below followed by a list of Action Items.

Overall, the subjects we discussed included:

- Preparing a sample set of mile sheets and impact concepts/sketches to provide to ACOE for their review of the Phase I-A archeological report and determination of APEs. The sheets would include layers depicting wetlands, vernal pools and archeological sensitivity zones. As a starting point, the sheets might be limited to a few representative miles or towns where there is variation in resource extent (e.g., a few hundred feet vs a few thousand feet). We noted that: the “Travel Path” will need to be refined as part of the impact area: a schedule needs to be developed to create plans showing access within the r-o-w for ACOE; sketches or drawings need to be completed as examples of on-r-o-w disturbances; and, locations of temporary vs permanent impacts need to be depicted. (Action Items # 1, 2, 3, 4 below)

- Pros and cons re: DHR review of the Phase I-A report. The question came up about any value to asking DHR for concurrence on sensitivity zones independent of determination of APE. By so doing, we could establish agreement on areas of sensitivity – which, in turn, would better inform the APE designations. We also discussed creating a “subset” of point-specific spots that might lack sensitivity (due to prevalent conditions on a small scale) within a broadly depicted sensitivity zone. On the other hand, retaining the broad I-A sensitivity designations (as written in the report) should not pose a problem since during Phase I-B, field conditions will be documented & recorded to demonstrate why a location would be excluded from continued sensitivity assignment (e.g., position in standing water, saturated soils, ledge, prior impact, and the like). (Action Item #5 below)
- Use and sequencing of mats. In the January 25 discussion, the ACOE seemed very favorable to use of mats. They also suggested use of chips to bury & buffer sensitivity areas, especially in areas of new tree cutting. The subject of mat use for a single growing season/calendar year was also mentioned in the January 25 discussion. We noted that things could go “mat-crazy” (e.g., mat placement during a single growing season and/or calendar year may drive the construction schedule). Perhaps it would be worthwhile to evaluate cost, scheduling, logistics and other variables of mat use against Phase I-B archeological sampling – in some cases (such as large log yards or areas of multiple activities) it might be more strategic to get a “clean” finding for the archeology than to use a patchwork of numerous mats. (Action Items #6, 7 below)

Action Items per January 29, 2013 discussion

- #1 Provide ACOE with a sample set of mile sheets that include wetland and archeological layers
- #2 Develop a schedule for when access/travel way plans would be available for ACOE
- #3 Prepare examples of sketches, drawings, etc to provide details for on-r-o-w disturbances
- #4 Provide information on secondary impacts regarding wetlands
- #5 Have a follow-up discussion regarding DHR review of I-A results, specifically addressing receipt of DHR’s comments on I-A independent of APE and acceptance of the I-A broadly defined sensitivity zones presented in our report
- #6 Request a copy of the agreement ACOE made in Massachusetts re: mat use during a calendar year or growing season
- #7 Complete a strategic evaluation of matting vs archeology as an appropriate strategy in some locations.

Lee Carbonneau

From: Keddel, David M NAE [David.M.Keddel@usace.army.mil]
Sent: Monday, January 28, 2013 8:21 AM
To: Victoria Bunker ; Lee Carbonneau; Brian Bosse
Subject: a point of interest (UNCLASSIFIED)

Follow Up Flag: Follow up
Flag Status: Flagged

Classification: UNCLASSIFIED
Caveats: NONE

Hi Folks:

I don't know if this will affect anything for Northern Pass but I thought I would mention that when it comes to native American artifacts, the federally recognized tribes have always preferred to bury and leave anything undisturbed in the other New England states. In NH there are no federally recognized tribes nor are there any federally recognized tribes in other parts of the country that have expressed an interest in anything. The Corps maintains a tribal liaison so that if anything changes we would know about it.

It may be useful for you to know how tribes react to projects in other states since burying (avoiding impacts) would be the preferred solution to any native American sites you find in NH currently. Planning to bury and avoid, when possible, would avoid any last minute conflicts in an unlikely scenario where a recognized tribe becomes interested. A proper way to bury and avoid is using some material that does not have sharp material (such as large irregular sharp edged stones) which could penetrate the ground if driven on.

Have a great day

Classification: UNCLASSIFIED
Caveats: NONE

NAI PROJECT 21812

NORTHERN PASS HVDC TRANSMISSION PROJECT

VICTORIA BUNKER, INC.

January 10, 2013

Meeting Notes

The following notes summarize a meeting held on Wed. January 9, 2013 at 10:00 a.m.

The meeting was held at NH Division of Historical Resources, Concord, NH for the purpose of transmitting the Northern Pass Phase I-A Archeological Report. This report included information re Phase I-A level of archeological survey completed to date within the approx. 140-mile existing corridor and the approx. 118-acre parcel in Franklin.

The meeting was attended by Lee Carbonneau (NAI) and Victoria Bunker. While we were scheduled to meet with Edna Feigher, she was out sick, so Richard Boisvert, State Archeologist, attended in her place.

Richard Boisvert brought up the following points and comments:

- Given the size of the document, he believes that the normal 30-day review period is not realistic, so we should anticipate that review will exceed that time frame.
- He stated that both he and Edna will be reviewing the document, but according to him it is “unknown” exactly when.
- He stated that the official review begins when the Corps gets their copy
- He stated that DHR and the Corps will coordinate; apparently, DHR will wait for the Corps to contact them.
- He mentioned that the independent role of the EIS group is new to DHR and constitutes a dual process. He asked for clarification on how it will all work. Lee described the differences between the EIS side of things (DOE) and the permitting side of things. Richard asked who at NP would be best for clarification and Lee suggested Ann B.
- The subject of White Mountain National Forest involvement came up. Richard noted that DHR anticipates an underground crossing of the Appalachian Trail. He also informed us that the new archeologist at WMNF is Sarah Jordan.
- He stated that, according to DHR, “The APE is the whole corridor”
- He asked about the status of above-ground research and Lee responded that it has not yet begun. He advised that meetings, discussions, etc occur on this topic.

NAI Project 21812
Northern Pass HVDC Transmission Project

DRAFT
MEMO TO FILE

Submitted by Victoria Bunker, Inc.

September 14, 2011

Agency Information Discussion
Held on Tuesday September 13, 2011 at NH Division of Historical Resources
Attended by Jeff Simmons, Victoria Bunker and Edna Feighner

The overall purpose of the meeting was to discuss topics regarding continued Phase I-B study in areas of archeological sensitivity for the project.

Discussion Point A: Avoidance

We discussed the general concept that archeological sites and sensitive areas will be avoided, and not impacted, as much as possible and prudent. This will offer protection to any resources that are known, recorded or likely.

Discussion Point B: Phase I-B

We discussed Phase I-B survey for sensitive areas that are to become impacted by ground-disturbing activities as follows:

- Subsurface sampling will entail hand excavation of shovel tests placed on transects or in grid arrangements to define site presence. The number of tests will vary according to size and shape of impact areas. Testing is recommended for any activity zones that will undergo subsurface modifications.
- Typically an 8m test interval is standard; however, in areas where sites of the Paleo-Indian period (ca. 10,000 year ago) are expected, DHR requests a 4m sampling interval given the nature of artifact distribution previously demonstrated at sites of this time period.
- In the case of visible historic period sites (e.g., cellar holes) Phase I-B field effort will also include detailed walkover to identify related features (e.g., wells, dumps, outbuildings) and site recording forms will be completed even if specific features may be avoided.
- If sites are discovered at the Phase I-B level, continued archeological survey will be recommended to include Phase II or Phase III study, as needed.

Discussion Point C: Impacts

We discussed some of the kinds of impacts and related concerns, particularly focusing on impacts which would constitute subsurface disturbance and entail Phase I-B survey as follows:

- Within existing corridor, any placement of poles or structures, work areas, new access roads or other subsurface elements would undergo Phase I-B study.

- Within existing corridor, use of existing access road tracks is unlikely to constitute further impact, and therefore would not require a Phase I-B survey. However, any modifications to existing access roads or other facilities that involve soil disturbance outside the existing footprint (e.g., widening, scraping, drainage trenching, re-cutting, etc.) would undergo Phase I-B study. For example, in the case of widening of an access road, shovel testing could be conducted, but would be limited to ~~along the edge of the~~ existing roadway to examine resource presence in an area of sensitivity.
- Within and outside existing corridor, ~~any tree cutting is~~ may be of concern. Because ~~Stump removal involves soil disturbance, it is considered to be~~ a subsurface impact. Ideally, above-grade cutting would not result in subsurface impact, particularly if done in winter conditions or through use of vehicles with large tires, and therefore would not be subject to Phase I-B survey requirements. However, from DHR's perspective, the reality of the process of clearing activities, including felling of large trees, skidding and dragging of trees and brush, do frequently ~~often~~ result in ~~soil~~ subsurface disturbance. Even though such disturbance is generally shallow, it may affect sites which are not deeply buried. Thus, areas of tree cutting may require Phase I-B sampling, but may also be addressed on a case-by-case basis.
- Within and outside existing corridor, use of mats is of concern. While mats offer protection, their placement and removal, especially in muddy conditions, may result in subsurface disturbance. Similar to tree cutting, shallow sites may become impacted. Thus, mats are not considered to completely mitigate impact but may be addressed on a case-by-case basis.
- Outside existing corridor, any areas selected for project-related actions would be studied at Phase I-A level, then considered for Phase I-B if sites found or sensitivity assigned.

Comment [JS1]: Emphasize this word because it is key to them staying out of trouble.

Formatted: Font: Bold, Underline

Discussion Point D: Demonstrating the Negative

We discussed an alternative thought for conducting Phase I-B study, particularly in large areas where avoidance may not be feasible. If a Phase I-B study were to be completed in an entire zone (vs specific impact points) and if no resources were encountered, it would be possible to clear that zone of any and all constraints both for the present and for future projects.

Cc: Attendees

Brian Bosse, NPTL

Laura Games, NPTL

Curt Thalken, Normandeau Associates, Inc.

Notes re Phase I-B Archeological Meeting at NH Division of Historical Resources

Prepared For Northern Pass, HDVC Project

Victoria Bunker, PhD

February 20, 2012

The following notes have been compiled following a meeting held on February 14, 2012, at NH Division of Historical Resources, Concord, NH. Participants included: Richard Boisvert, PhD (State Archeologist, NH DHR), Tanya Krajick and Christina St Louis (NH DHR), Jeff Simmons and Lee Carbonneau (NAI), and Victoria Bunker.

This meeting was held to provide Richard Boisvert, State Archeologist, an overview of the project, a description of work completed to date, and a discussion on future Phase I-B archeological efforts as Edna Feighner, Review & Compliance Officer is out of the office until mid-March. During the course of the meeting, Richard Boisvert made the following points:

- He welcomed the opportunity to hear about the project.
- He sees his role, at this point in time, as supplemental to discussions with Edna and not as a substitution for her comments.
- DHR maintains a confidentiality policy both in terms of archeological site locations and project specifics, which extends to FOIA requests.
- DHR considers the Section 106 process as satisfying NEPA and permitting by any agencies (Army Corps, DOE, etc). For the Section 106 process, the review request should come from the lead federal agency, but the data can be collected by any approved archeological resource professional.
- DHR has not requested cooperating agency status for the NEPA process, but may choose to do so.
- The archeological process is to "identify, evaluate and treat" resources; identification is completed during Phase I-A and I-B, evaluation during Phase II and treatment as part of mitigation of adverse effect.
- DHR is also expecting to review direct and/or visual impacts to Historical Resources as part of the Section 106 review process.

Regarding the on-going archeological study, discussions confirmed the following:

- DHR was agreeable to the methods followed to date for Phase I-A and pleased with the two Phase I-A town reports (Campton and Thornton) that were presented as samples of the larger report.

- DHR understands that the Project Team intends to conduct the Phase I-B and that this will be completed prior to construction.
- DHR finds it preferable to review the Phase I-A results sooner, rather than later, but it is not mandatory to review I-A before conducting I-B.
- DHR requests as much information as possible for project review, under the belief that with more information there is better understanding and a better review.

We agreed that the Phase I-A results will be submitted to DHR as soon as possible, when we are authorized to do so. DHR wishes to receive a paper copy (this can be done in a punched notebook format with dividing tabs to make it simpler to handle hundreds of pages). DHR wishes to receive aerial photos with sensitivity zones/polygons depicted along the ROW to accompany the report. We will also submit the report on discs.

We all recognized that the submittal is massive. While DHR has a 30-day response time for review, we understand that the review may take more time and that a town-by-town or section-by-section review may be more manageable and work the best. Review will be initiated upon Edna's return in mid-March.

Other specific subjects included in the discussion included the following:

- R. Boisvert advises a 2-meter bracketing interval around artifact find spots vs the typical 4-meter interval, during Phase I-B sampling.
- R. Boisvert considers subsurface pole removal as an impact, such that existing pole removal locations in sensitivity areas should be considered. A mitigation measure for existing pole removal may be to simply cut the poles at ground level and not pull them out.
- Phase I-B sampling would be required for any proposed ground surface disturbance in areas of sensitivity, including stumping, grading for laydown areas or access roads, or subsurface lines.
- R. Boisvert stressed that a 25-foot buffer around graveyards be established, even if the subject graveyard is located outside the corridor.
- Stone walls have not been addressed to date. DHR considers stone walls as historic resources when located along state roads or when they constitute property boundaries. If impacted, DHR often requires recording (e.g., measurements, descriptions, photos), according to the nature of impact. In some cases, DHR requests that walls which are displaced be reconstructed in a style and method to be similar to the original wall.
- R. Boisvert requested that a meeting be held in the future, upon Edna's return, with the Project Team and EIS team so that DHR has clarity on roles, responsibilities, and coordination.

Notes on Phase I-B Archeological Phone Conversation with DHR

Prepared For Northern Pass, HDVC Project

Victoria Bunker, PhD

January 26, 2012

The following notes have been compiled following a brief telephone discussion with Dr. Richard Boisvert, PhD, State Archeologist, NH DHR. The conversation was conducted by Victoria Bunker on Thursday morning, January 26, 2012.

Discussion was brief and the purpose was to establish DHR communications as agreed in earlier telephone conference held on January 19, 2012.

Upon learning that Edna Feighner is in the hospital and not available until mid-March, it was Victoria Bunker's recommendation that we contact Richard Boisvert.

Results of the 1-26-12 conversation indicated the following:

- 1, That the EIS Team has not contacted NH DHR as of this time
- 2, That NH DHR agrees that the Project Team (VBI with NAI) will conduct Phase I-B studies
- 3, That NH DHR agrees with the sequence of survey, that is, I-B will follow permitting/design steps and will precede construction

In conversation, Richard Boisvert also expressed concerns about submittal of results and concerns re an independent EIS team reporting results to DHR.

Richard Boisvert also agreed to a more detailed discussion in a continued conference call with VB and NAI to be arranged asap.

Copy of VB hand-written meeting notes for November 22, 2010

Note that I discussed the general I-A strategy for research and walkover with Terry Fifield. He was not particularly concerned about Native American sites at high elevations and suggested that we look at a few stream crossings for sensitivity.

This was done in the Phase I-A effort.

He also considered the Appalachian Trail as sensitive. We did a walkover of the AT at corridor crossing, subsequently considered it as part of the architectural historian survey.

VB 070715

1/22/10 Terry Fife field w/ MNF
no discussion on related topics:

AT 1000' wide Analysis corridor
500' on each side
of E

Keep as
sensitive.

Soils layer - Terry
will ask GIS/Soils person
to provide data

GIS Road layer for Easton
- ask Sarah Jordan

Streams - look at a few for
NAm sens - no need
to look too high, at
this time - keep a
few in as sensitive.

Terry saw no need to
consider more than a few
locations as Nat. American
sensitivity.

NAI PROJECT 21812
NORTHERN PASS HVDC TRANSMISSION PROJECT

DRAFT
MEETING NOTES

SUBMITTED TO: Edna Feighner, DHR
Tany Krajick, DHR
Jeff Simmons, NAI
Curt Thalken, NAI

BY VICTORIA BUNKER, INC.

October 28, 2010

Agency Update Meeting held 1:00 pm on Tuesday October 26, 2010, at NH DHR
Attended by: Jeff Simmons, Victoria Bunker, Edna Feighner and Tanya Krajick

The overall purpose of the meeting was to (1) present the results of Phase I-A work completed to date and (2) have a discussion regarding continued Phase I-B efforts.

A summary of the discussion is presented below:

First, Victoria Bunker presented a summary of the archeological data collection efforts completed to date. Phase I-A study has been undertaken utilizing archival research and walkover field inspection within the existing r-o-w between Deerfield and Northumberland. As a result, sites and sensitive areas of both Native American and historic period European-American cultural affinity have been recognized. We discussed rationale for definition of sensitivity areas and the range of variables considered in assigning sensitivity. Edna Feighner was provided with a courtesy copy of the Hill chapter as a sample of report writing.

Discussion also addressed that the DOE is the lead agency and that we might consider talking to the cultural resources person there to provide clarity on archeological methodology.

Next, discussion addressed the possibility of continuing archeological data collection through Phase I-B subsurface sampling, within the existing r-o-w, knowing that engineering and design have not yet been completed. We recognize that effort could be undertaken during the remaining 2010 field season before snow flies and the ground freezes and would help to advance the project.

We moved into an overall discussion on Phase I-B methods and approaches. Points addressed by Edna Feighner are presented below.

(a). Edna differentiated between existing r-o-w and new r-o-w. She recognized that prior activities within the exiting r-o-w have already resulted in disturbance, to some degree.

(b). DHR considers the entire width of any new corridor as the impact area and recommends I-B sampling in all sensitive areas. Edna suggested that the entire new corridor width be looked at for Phase I-B efforts. She recommended utilizing a standard (the standard sampling interval is 8 m) strategy of systematic shovel test excavation using single and multiple transects to provide coverage across the entire new construction zone to define site presence. She also recommended 100% walkover coverage to define and record historic features or elements in zones of historic period sensitivity.

(c). Within existing r-o-w, Edna said we should evaluate areas of “fresh impact” within sensitivity zones and examine the new footprint(s) for any access roads, lay-down areas, poles, etc. Thus the approach for the existing r-o-w is not necessarily the same as the approach for off-corridor zones.

(d). For archeologically sensitive areas within existing r-o-w, Edna suggested that we utilize a “selective” or “stratified” sampling strategy for shovel testing, to include a combination of systematic, random and judgemental test placement, and that we sample places most likely for resource occurrence within any given zone (for example, look at knolls, gentle slopes or terrace benches but not necessarily irregular topography, steep slopes, wet spots or zones of prior impact). Therefore, some sensitivity zones might require only a couple of tests, while others may require multiple tests. She further indicated the need for a 100% walkover at historic period resource areas to define and record elements.

(e). Edna suggested that supplemental testing could provide useful information and enhance interpretations when shovel tests were positive. She indicated that placement of 4 tests in an array around a “find spot” could provide enough information to determine if the discovery constitutes an isolated occurrence or an actual site.

MEETING NOTES

NAI PROJECT 21812

NORTHERN PASS HVDC TRANSMISSION PROJECT

SUBMITTED BY VICTORIA BUNKER, INC.

June 23, 2010

An agency information meeting was conducted at the White Mountain National Forest with Bill Dauer and Stacy Lemieux.

During the meeting, the archeological survey approach was discussed. This included explanation of the Phase I-A survey effort which will result in identifying locations of known or likely resources of both Native American and historic period European-American cultural affinity. This will entail background documentary research on known resources, assessment of landscapes to predict any past human activity, visual inspection to confirm known sites or likely site locations and to define prior impacts that may result in a loss of resource integrity, photographs of existing conditions, and reporting. Subsurface excavation will not be completed at this level of study and artifacts will not be collected at this level of study.

It was determined that archeological efforts be coordinated with Terry Fifield, Heritage Resources Specialist at WMNF, as much as possible given that in-house work assignments have already been made for the season. Mr. Fifield will review our methods and provide any guidance for reporting or recording format (for example, any newly recorded sites will be given WMNF site numbers and appropriate forms will be completed). He will also coordinate Native American consultation.

We discussed some of the types of expected resources and locations that may be of interest. For Native American resources, these included: rock shelters, stone quarries and temporary encampments or hunting stations, particularly near Russell Brook, Moosilauke Brook, Bog Pond and other smaller streams. For historic period resources, these included: logging and lumber camps, or domestic sites (preserved today as cellar holes of residences and ancillary buildings or as graveyards). Other resource types and expectations will be developed in consultation with Mr. Fifield.

Archeological efforts will not be initiated until authorization is received. Access will be coordinated as much as possible with other resource scientists.

Copy of VB hand-written meeting notes for May 5, 2010

Note that we discussed the I-A strategy for research and walkover, with particular attention to what Edna Feighner called a "challenge" to include back-country locations away from river or other surface water features as archeologically sensitive.

This was done in all Phase I-A efforts from 2010 forward.

VB 070715

Vicki Bunker

From: "Wolfgang, Craig" <Craig.Wolfgang@tetratech.com>
To: "Vicki Bunker" <vbi@worldpath.net>
Cc: "Bob Varney" <rvarney@normandeau.com>
Sent: Thursday, May 13, 2010 2:38 PM
Subject: Northern Pass Transmission Project - off to the races

Vicki:

I am following up an earlier conversation I had with Bob Varney and his subsequent reply to your email. I would like to have a conversation ASAP to discuss your game plan for the archeological field work. Also, I am planning to be in NH next Thurs (and possibly Wed afternoon) and can discuss possible meetings we should have in advance of your work. Let me know your availability for our initial conversation, or just call me later today or tomorrow at your convenience (direct line today; cell phone tomorrow). I look forward to talking to you and working with you on this challenging project.

Craig Wolfgang | Director, Transmission Services
Direct: 973.630.8124 | Fax: 973.630.8165 | Cell: 973.600.9325
craig.wolfgang@tetratech.com

Tetra Tech | Energy Program
1600 The American Road | Morris Plains, NJ 07950 | www.tetratech.com

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Meet w/ Craig -
Thurs. a.m. Bedford
Thurs. p.m. DTR ???
VB set up.

Sensitivity
Approach

Focus on on
the essentials.

Edna:
Initiating studies -
lay the groundwork
make sure from day 1
we + DTR are on
same page w/ expectations.
work hand-in-hand.
cc Craig
Bob.

5/13/2010

5/20/10

mtg w/ Edna Feynman
Cray Wolfsgard

Err on side of caution

back/upland thing.
'Challenge'!

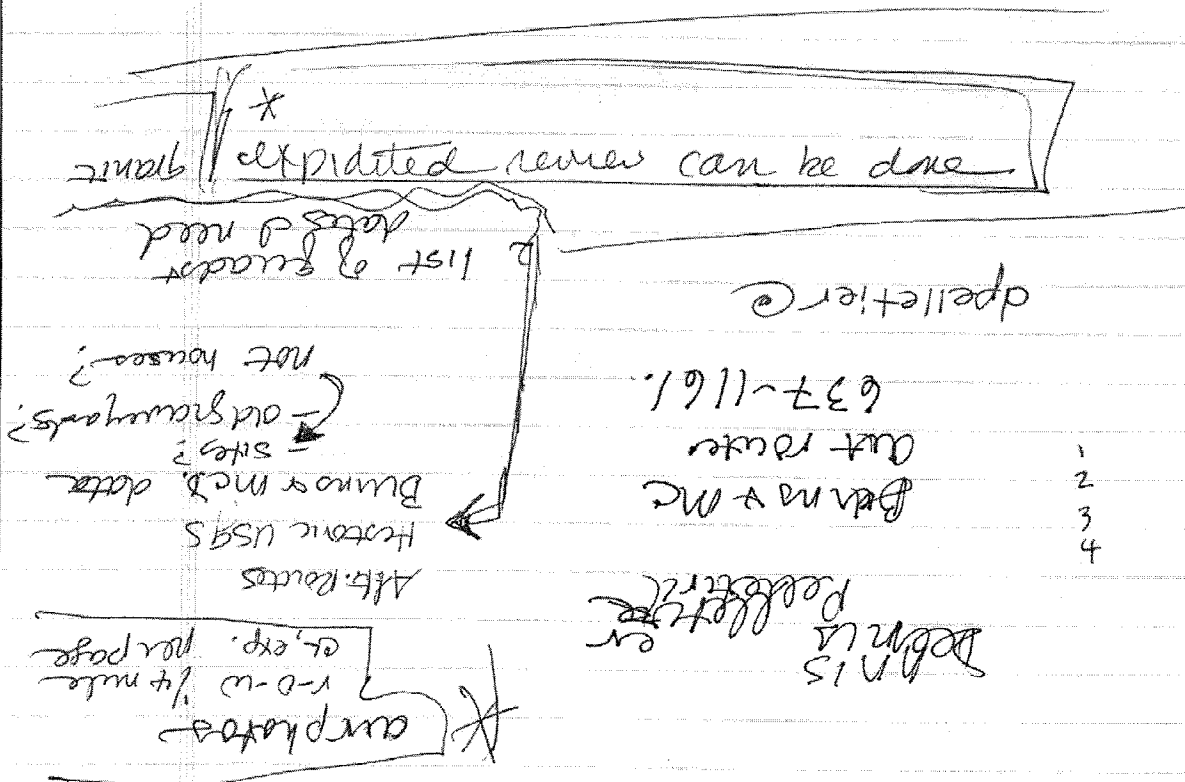
~~except~~
water
steep.

note she
is calling
it a
challenge
not a
requirement

level... - Ok.

water courses may be different.

avoid is the best thing



Notes on Phase I-A Archeological Strategy

For
NAI
Northern Pass, HDVC Project

Victoria Bunker
May 18, 2010

The following notes have been compiled in advance of meeting at NH DHR on May 20, 2010, in order to discuss strategy and approach for the project. Information below addresses topics such as: capability, schedule, research and survey strategy, and overview of methods for developing site expectations.

Phase I-A study will include background research and walkover inspection. Both Native American and Historic European-American sites will be addressed.

The study team includes 3 senior archeologists with support staff as follows:

Victoria Bunker, PhD, experience in both Native American and Historic sites
Sheila Charles, MA, specializing in Historic sites
David Trubey, MA, specializing in Historic sites
Dennis Howe, specializing in mapping, photography, graphic arts, Industrial sites
Abbie Young (BA in Anthropology) and Amy Booth (Anthropology student),
Field Crew for research and walkover.

These individuals will carry out a variety of tasks, including archival research, mapping, walkover/visual inspection and reporting. Recommendations will be made for any continued Phase I-B survey at sites or sensitive locations.

The survey strategy is as follows:

Complete archival research
Define sites and expectations from research
Complete walkover
Verify conditions, sites, sensitivity zones in field
Synthesize and write results

The time table for these activities is as follows:

Begin research May 17, 2010
Begin walkover, June 1, 2010
Continue research and walkover into fall, likely end in November, depending on weather

Research strategy:

The research is being organized on a town-by-town basis, with attention paid to overall geographic sections along the route(s) such as:

- Merrimack Valley and eastern tributaries
- Pemigewasset Valley
- White Mountains
- Northern Slopes
- Upper Connecticut Valley

Archival sources will include:

- DHR Site Files
- DHR Town Files
- DHR Review & Compliance Files
- DHR project report files & area forms
- DHR Contexts

Town histories (published & web-based)

Historic maps (e.g., Sanborn, Hurd, Walling, USGS Historic Topos)

Journals and Books (e.g., NH Archeologist, NH Historical Society, Forest publications, Starbuck's history of NH archeology, Hubka's Big House, Little House)

Research will result in compilation of known sites along the project corridor and definition of expectations for archeological site occurrence for both Native American and Historic European-American sites (* details below).

Walkover strategy:

- Walk in teams of 2, 1 senior and 1 support staff per team
- Record conditions, sites and sensitivity in notes and photos
- Cross-check maps and archives
- Sensitivity zones will be broadly designated within corridor(s) or other impact areas (e.g., access roads, staging areas) referencing such natural and cultural features as terrain, water bodies, roadways, walls or property lines, etc.
- If sites are encountered, basic data, description, measurements, photos will be collected to prepare minimum level site recording form. Location will be plotted.
- Prior land use and impacts will be factored into sensitivity assessments during walkover.

Native American Archeological Resource Sensitivity

Native American site research will span the entire cultural chronology from the Paleo-Indian through the Contact periods. Resources will include the full range of archeological occurrences, such as single stray finds, special use locations (such as rock shelters, petroglyphs or dug out canoes), burials, single and multi-component sites.

Native American resource sensitivity and site expectations will be developed utilizing the following archival sources:

NHDHR & WMNF site files – Attributes of known sites will be examined to develop an understanding of site setting. These attributes will include such features of the natural and cultural landscape as: aspect; slope; proximity to surface water bodies; proximity to resources or resource mosaics (e.g., stone outcrops, game corridors, trail networks, falls or rapids intersection of multiple features, pond outlets, wetlands, kettle holes, glacial lake shorelines, caves, rock shelters); and soil associations. Multiple variables will be addressed; no one variable will be used as a determinant.

Past archeological research – Extensive prior research has been completed throughout the project corridor zone, and has been written both in scholarly and CRM formats.

Examples of these research documents are:

Merrimack Valley – VB's multivariate model for site setting published in *Man in the Northeast*; Nicholas model for glacial lake shorelines

Interior uplands of Merrimack Valley – VB's report for Deerfield-Madbury PSNH corridor which included sampling on till-based and sloping terrain along tributary streams

Pemigewasset – VB's Mad River and Upper Pemi study for WMNF which included sampling on till-based uplands; VB's study along East Branch of the Pemi for Loon Mountain, including sampling on scoured river margins; VB's study on Pemi in association with the Ashland site near outlet of Squam River

Mountains – VB's study for Appalachian Mt project; studies addressing mountain use such as stone tool materials, sacred summits, etc.

Northern Slope – VB's study for pipeline project; Boisvert, Bouras & Bock's Paleo-Indian research

Upper Connecticut - VB's study for pipeline project; Boisvert, Bouras & Bock's Paleo-Indian research; Ohl's regional survey

Supporting research – stories, myths, legends, lore, histories, maps and ethnographic accounts provide information on Native American presence and habitation history. Data collected from these sources provide support for developing resource expectations.

Negative data – numerous prior studies have been completed within towns traversed by the project corridor(s) where archeological study did not recognize site occurrence. These findings will be reviewed to obtain a sense of patterned variables that may preclude assigning resources sensitivity.

Historic European-American Archeological Resources Sensitivity

Historic period site research will span the entire cultural chronology from the time of early exploration and settlement in New Hampshire to the middle of the nineteenth century. Resources will include the full range of archeological occurrences and will rely on the NH DHR Context list for classification.

Historic period resource sensitivity and site expectations will be developed utilizing the following archival sources:

NHDHR & WMNF site files, town files, area forms – Known sites and town history documentation will be examined to develop an understanding of site setting and to recognize any sites located within the project area.

Cartographic data – Map sequences will be created using nineteenth and twentieth century maps to identify settlement and land use patterns along the corridor. Particular attention will be paid to historic road crossings and areas where buildings are depicted on maps. Historic maps are integral for field examination to determine if former structures are no-longer standing and are located within the project area.

Past archeological and historical research – Extensive prior research has been completed throughout the project corridor zone, and has been presented in published and unpublished sources such as: town and county histories; historical society web pages and publications; thematic publications (e.g., railroad history, White Mountain history, military history); cultural resources management reports for survey areas within individual towns or regions; and other sources. In addition, general histories for rural New Hampshire will be utilized to develop expectations for the type and distribution of potential archeological elements particularly those associated with family farms, mills, or other settlement components.

Overall, data will be combined from source materials to predict the location of archeological sites and features in the project area.