

February 17, 2017

Ms. Caitlin Callaghan
National Electricity Delivery Division
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
1000 Independence Avenue, SW
Washington DC 20585

Re: Northern Pass Transmission project, Section 106 Compliance
Cultural Landscapes Identification

Dear Ms. Callaghan:

We appreciate the opportunity to provide comments in this step of the identification phase of the Section 106 process that is focusing on cultural landscapes, and urge the Department of Energy and its consultants to conduct robust, comprehensive identification. We continue to urge the consideration of landscape-level resources such as rural historic districts as well as cultural landscapes throughout the project area, including but not limited to historic vernacular landscapes, ethnographic landscapes, recreational landscapes, vistas to and from historic properties, scenic byways, and hiking trails. The scale of the project, history of land use along the proposed route, and connection between history and view make it a ripe area for the identification of cultural landscapes.¹ We understand that some cultural landscapes and potential historic districts have already been identified by citizens as well as by other consultants. There are likely more yet to be identified, and we offer the following suggestions to the current consultants and the Department of Energy to help in the ongoing identification work.

The scope of data collection needs to be broad in several ways:

- There is a need to fully utilize what has been previously identified by citizens and other consultants. For example, have all PAFs been reviewed and assessments made about whether to proceed with additional research and documentation? We would like to see a list of the suggested places collected from citizens and consulting parties over the last five years. We also request a description of the decision-making process used by the Department of Energy and the study team that determines which sites are considered, which are removed from further consideration, and the assessment methodology. This information can be made available on the consulting party website.
- On the consulting party call in January, it was mentioned that PAL would undertake a public survey process to collect additional possible cultural landscapes. How will the public survey be distributed and collected? How will these results be shared with consulting parties and the public?

¹ Preservation Brief 36, *Protecting Cultural Landscapes, Planning Treatment and Management of Historic Landscapes*, Charles A. Birnbaum. <https://www.nps.gov/tps/how-to-preserve/briefs/36-cultural-landscapes.htm>.

- As has been well-documented, the geographic scope for this cultural landscape identification work needs to extend well beyond the APE in some areas. In light of the topography and viewsheds, the natural environment and historic character and the interrelated direct and indirect effects cannot be delineated by a uniform line.
- Just because something has already been identified in a different context, doesn't mean it shouldn't be considered in connection to new cultural landscape research. For example, it was troubling that some specific features in Deerfield seemed dismissed as "already inventoried" when questions were posed regarding their connection to the Suncook landscape study area during the January 23, 2017, consulting party meeting in Concord.
- Since this is part of the "identification" phase of the Section 106 process, the degree of potential impact should not be used as a filter. For example, in the Suncook study area, there remains a need to look at connections to broad patterns of land use such as agriculture and recreation in adjacent towns. A connection to specific nodes of history and human activity like Suncook Village should be examined before these areas are ruled out. The existing boundaries for the two study areas need to be independently evaluated by the current consultants, particularly the proposed Suncook River Valley boundaries, which we believe are too narrow.

In addition, we offer the following varied examples of additional types of resources that should be identified:

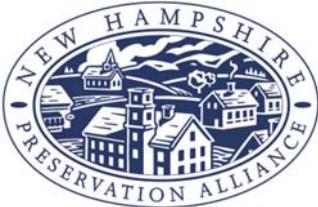
- Landscapes of the Great North Woods including, but not limited to, places in Northern Coos County with land use connections, or a landscape associated with Percy Peaks
- River valleys in addition to Suncook and the Pemigewasset, such as Israel's River, parts of the Connecticut River Valley, the Merrimack River, the Upper Ammonoosuc River, the Ammonoosuc River, Indian Stream, Hall's Stream and the Ham Branch River (Easton and Franconia)
- Agricultural land use along the Merrimack and Suncook Rivers
- National- and state-designated scenic byways
- Places of significance to Native Americans
- Industrial sites and associated working landscapes related to traditional industries such as iron, timber, logging, tin, mills, mines, etc.

We look forward to seeing the results of the next stage of the consultants' work, and we request that the next comment period be extended to at least 14 days after their initial work products have been shared. Currently, the consulting party deadline for comments is February 28, 2017, and we understand that material will not be shared by the consultants until February 28 and March 2, 2017.

The undersigned consulting parties want to share these concerns. Let us know if you have any questions. We understand that some individual consulting parties are submitting additional questions and concerns as well as survey forms for individual places and landscapes. More should be identified in the public survey process.

Jennifer Goodman

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Additional individual consulting parties signing this letter:

Kris Pastoriza

Susan Schibanoff

Note: All signatures were not available electronically. Contact Jennifer Goodman with questions; jg@nhpreservation.org.

Cc: Brian Mills, US Department of Energy
Eric W. Boyle, Federal Preservation Officer, US Dep't of Energy
Charlene Vaughn and Reid Nelson, Advisory Council for Historic Preservation
Elizabeth Muzzey, New Hampshire Division of Historical Resources
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