

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

DOCKET NO. 2015-06

**JOINT APPLICATION OF NORTHERN PASS TRANSMISSION, LLC AND
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE
ENERGY FOR A CERTIFICATE OF SITE AND FACILITY**

PREFILED DIRECT TESTIMONY OF

**PATRICIA M. O'DONNELL, FASLA AICP, ICOMOS, IFLA
HERITAGE LANDSCAPES LLC**

**ON BEHALF OF
COUNSEL FOR THE PUBLIC**

November 15, 2016

Qualifications and Purpose of Testimony

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

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

Q. Please summarize your educational background and employment experience.

A. I have 33 years of experience, and over 500 successfully completed projects in the field of historic preservation, focusing on cultural landscapes, as well as addressing aboveground heritage assets and archaeological sensitivity in these projects. Please see my *Curriculum Vitae* attached as Exhibit A.

Q. Have you testified previously before the New Hampshire Site Evaluation Committee or other regulatory bodies?

A. I have not testified before the New Hampshire Site Evaluation Committee ("SEC"). I have testified before other regulatory bodies in connection with the proposed Jordanville Wind project near Cooperstown, New York, where I provided written testimony and an oral presentation. I also have made several presentations to the Commission on Fine Arts for approval of Washington, DC projects.

Q. What is the purpose of your testimony?

A. On behalf of Counsel for the Public, Heritage Landscapes was asked to prepare an assessment report on the potential effects to aboveground historic sites and cultural landscapes from the Northern Pass Transmission Project (the "Project") as proposed by Northern Pass Transmission and Eversource Energy (the "Applicants"). The SEC process requires an assessment of effects to "historic sites," among other criteria, relevant to finding that the Project is in the public interest. My testimony introduces our Assessment Report on Potential Effects to Aboveground Historic Sites and Cultural Landscapes for the Northern Pass Transmission Project (the "Report"), which is attached as Exhibit B. In the Report, I evaluate the Applicants' expert's assessment of the Project's effects on historic sites. The Report also summarizes Heritage Landscapes' analysis of the effects and presents our conclusions regarding the adverse effects of the Project.

Overall Conclusions

Q. What are the conclusions of your analysis?

A. My expert opinion is that the Project will have unreasonable adverse effects on the historic sites and cultural landscapes in the Project's Area of Potential Effect ("APE"). The integrity of a large number of identified historic sites and cultural landscapes that view the Project will be diminished in terms of feeling, association and setting. The aesthetic quality of widespread historic sites and cultural landscapes sited along the Project corridor will be diminished by direct views of the Project as well as multiple views of the Project's components when arriving at and departing from valued historic sites and cultural landscapes. As one metric, for example, using the available GIS databases, we calculated the number of Project crossings, which provides evidence of the pervasive visual influence that would occur after construction to include: two (2) pond crossings; eight (8) designated river crossings; 133 river crossings; forty-one (41) national, state and local scenic road crossings; and 294 road crossings. This number of crossings would make the Project's influence pervasive and unavoidable.

Due to the widespread counts and acreages of historic sites and cultural landscapes and the long-term presence of the Project, there would be unreasonable adverse effects that permanently and significantly diminish resource character and quality. Further, it is my opinion that the Project is in conflict with the orderly development of the region based upon a review of host town planning and zoning documents.

For example, the Town of Whitefield includes a cluster of historic sites and cultural landscapes, including scenic roads, historic structures, recreation sites and areas, public waters, conservation lands and current use parcels that together shape the character of the town. In addition, the community identified thirty-seven (37) valued historic places, areas and objects. The Project's corridor is proposed to pass through many acres of Whitefield along existing transmission corridors inserting the large scale elements of the Project into this cohesive town fabric. The intrusions of the Project in Whitefield would create unreasonable adverse effects on the integrity, aesthetic quality, historic character, and orderly development of Whitefield. The 35 host and nearby towns would

1 be subject to parallel effects on their integrity, character, and orderly development, as
2 well the neighboring towns within the 10-mile APE which have views of the Project.

3 In addition, the Report has been prepared without the benefit of three studies
4 currently underway as part of the U.S. Department of Energy ("DOE") Section 106
5 process. A supplement to the Report may be required to address the findings of the three
6 DOE reports once they have become available.

7 **Evaluation Method**

8 **Q. Please explain the steps Heritage Landscapes utilized to evaluate the Project's**
9 **effects to aboveground historic sites and cultural landscapes.**

10 A. Heritage Landscapes synthesized the findings of a series of tasks undertaken on behalf
11 Counsel for the Public to assist the SEC in evaluating the Project's effects to New
12 Hampshire historic sites within the Project APE.

13 Heritage Landscapes reviewed filing materials presented by the Applicants for
14 capture of historic sites and the Applicants' assessment of Project effects on those
15 resources. This included both SEC and DOE documentation addressing historic
16 aboveground cultural resources. Attention was particularly focused on the Northern Pass
17 Transmission Project Assessment of Historic Properties Preservation Company, October
18 2015 ("Preservation Company Report"), which focused on the potential visual effects to
19 the historic properties they identified, and the Pre-Filed Direct Testimony of Cheryl E.
20 Widell, cultural resources expert for the Applicants, and related discovery and technical
21 sessions. In addition, documents as identified in the Report were reviewed to gain an
22 understanding of the relationships between above and below ground cultural resources,
23 and scenic and aesthetic resources, which include historic sites as one category, as well as
24 the assessment of the Project in relationships to orderly development of the region.

25 We worked with Counsel for the Public's scenic and aesthetics consultants from
26 T.J Boyle Associates, LLC to carry out a series of six public workshops along the
27 Project's corridor to gain direct citizen input on community values by having participants
28 identify resources that they valued as either historic or scenic or both. Heritage
29 Landscapes also field reviewed the Project's corridor through the host towns along public

1 roads within the APE to become familiar with the variety of resources and the proximity
2 to the Project's corridor.

3 Lastly, we gathered available datasets for mapping historic sites, including
4 cultural landscapes, from NH Granite Geographic Information Systems and other
5 relevant sources in order to identify all types of historic sites and cultural landscapes
6 within the 10-mile APE, as defined in the SEC rules for an undertaking of the size of the
7 Project, with a further focus on 35 host towns and towns within one mile of the Project.
8 These were mapped, enumerated, and summarized in addition to the historic resources
9 identified by the Applicants, to form a more complete capture of resources and to assess
10 the Project's effects to this more comprehensive group of historic sites and cultural
11 landscapes.

12 **Evaluation of Applicants' Expert's Assessment**

13 **Q. Please describe Heritage Landscapes' evaluation of the Applicants' expert's**
14 **assessment of the Project's effects on historic sites.**

15 A. The Preservation Company Report represents the Applicants' effort to identify and assess
16 possible adverse effects to historic resources, as well as to inform Cherilyn Widell's
17 testimony on the effects. The Preservation Company Report and Ms. Widell's
18 inconsistent use of SEC definitions and conflated terminologies limited consideration of
19 resources to an unnecessarily narrow subset of National Register eligible properties. In
20 particular, the Applicants used a definition of historic resources that is not consistent with
21 the SEC's rules and which eliminated many properties from even initial consideration.
22 Further, the selection of the narrow APE, also inconsistent with SEC rules, further
23 eliminated numerous candidates from initial consideration.

24 Moreover, methods applied in the assessment of visual effect, developed by the
25 Preservation Company Report, also reduced the number of historic properties considered.
26 Views categorized as minimal, more than minimal, and adverse, are not drawn from SEC
27 guidance, and are not defined in this manner in statutory guidance or scenic assessment
28 professional practice. Applying these view categories, 284 historic properties with
29 minimal, but potentially important, views were eliminated from further consideration.
30 One hundred ninety-four (194) properties with more than minimal views were screened

1 for significance and integrity, yielding only twelve (12) historic resources that were
2 determined by the Applicants as having adverse impacts. This is a very small number of
3 historic resources to be assessed as adversely impacted along a 192-mile corridor.

4 The Applicants failed to include the valued cultural landscapes of New
5 Hampshire that are conserved and protected through other means than historic
6 designation, such as town forests, state parks, historic graveyards, public waters, and
7 other resource types identified by Heritage Landscapes.

8 **Q. Do you believe that future compliance with the Section 106 process will protect New**
9 **Hampshire's historic sites from the Project's impacts such that the Sub-Committee**
10 **may simply defer to that process and thereby determine that the Project will not**
11 **have any unreasonable adverse effects on historic sites and cultural landscapes?**

12 A. No. The Applicants testified that the process they followed, parallel to and using the
13 framework of the Section 106 process, would protect the historic resources potentially
14 affected by the Project. Heritage Landscapes does not concur with this assertion by the
15 Applicants because the Section 106 process does not consider the New Hampshire
16 statutes, the SEC definitions of historic sites and cultural landscapes, or the values placed
17 on these resources by local communities through planning and zoning guidance or
18 through direct citizen identification of historic places, areas or objects. In addition, the
19 Section 106 process is not set up to make a permitting decision based on effects to
20 historic sites and is instead designed to provide compensatory mitigation for such effects.
21 This type of mitigation is insufficient in light of the extent, scale, and nature of the
22 Project. The Project would, in my opinion, permanently and significantly diminish the
23 integrity of historic sites and cultural landscapes and the aesthetic quality and character of
24 communities, rendering unreasonable adverse effects.

25 **Q. Does this conclude your testimony?**

26 A. Yes.

EXHIBITS

- A. *Curriculum Vitae* of Patricia O'Donnell, FASLA, AICP, ICOMOS, IFLA
- B. *Assessment Report on Potential Effects to Aboveground Historic Sites and Cultural Landscapes for the Northern Pass Transmission Project* report submitted by Heritage Landscapes LLC

Exhibit A



PATRICIA M. O'DONNELL, FASLA, AICP, ICOMOS, IFLA

CURRICULUM VITAE

EDUCATION

- MASTER OF LANDSCAPE ARCHITECTURE, University of Illinois at Urbana Champaign, Concentration behavioral aspects of landscape architecture, emphasis on applied behavioral research, 1982.
- MASTER OF URBAN PLANNING, University of Illinois at Urbana Champaign, Concentration in historic preservation with emphasis on the history, theories and practice of landscape preservation, 1985.
- BACHELOR OF SCIENCE IN DESIGN, State University of New York College at Buffalo, Concentration in Environmental Design, 1978.

PROFESSIONAL EXPERIENCE

- 1987-present, PRINCIPAL, FOUNDER, Heritage Landscapes LLC, Preservation Planners & Landscape Architects. Completed 500+ community and cultural landscape preservation plans and projects, applying best practices in cultural heritage and sustainable environment, society and economy. Implementation carried out through construction documents, staff and volunteer initiatives and management guidance.
- 1983-87, ASSOCIATE, Walmsley & Company, Inc. Project Manager for Prospect Park, Emerald Necklace, City Hall Park, and urban design, waterfront, residential community and residential design.
- 1980-81, VISITING LECTURER, Department of Landscape Architecture RESEARCH ASSOCIATE, Housing Research and Development Program, University of Illinois at Urbana-Champaign.
- 1979-80, CONSULTANT, Houghton Park User Survey, Community Development, City of Buffalo and Survey of Buffalo Olmsted Parks System, Landmark Society of the Niagara Frontier and NYS OPRHP.
- 1977-78, DIRECTOR, US Youth Conservation Corps, Buffalo, city youth work/education program.

SELECTED AWARDS, HONORS, EXPERT MEETINGS, MISSIONS

- 2014-1987, 79 Professional Awards for Planning and Implementation from National Trust, American Society of Landscape Architects, ASLA Connecticut, Kentucky, Louisiana, New York, Rhode Island and Vermont chapters; Connecticut and Vermont Public Spaces; Pennsylvania and Virginia Historic Preservation; New York State Preservation League; Pittsburgh History and Landmarks Preservation, Midwest and Mid-Atlantic Construction
- 2015-2006 ICOMOS World Heritage international and national upstream assistance, field reviews, desk review and missions
- 2015 December, UNESCO Culture for Sustainable Cities, Expert's Meeting, Hangzhou, China
- 2014 September, UNESCO WH Expert, Conference on the preservation and regeneration of cultural heritage in Historic Cities, Mayor's Forum, Nanjing, China
- 2014 May, UNESCO HUL Mainstreaming Workshop, co-leader, Edirne, Turkey
- 2014 February, UNESCO HUL Experts Mainstreaming Conference/Workshop, Zanzibar, Tanzania
- 2014-2005 Cuba-USA Hemingway's Finca Vigia Technical Preservation Team, Havana, Cuba.
- 2013 December UNESCO World Heritage Expert Meeting, Reflection on HUL, Paris, France
- 2013 September, UNESCO World Heritage Expert Meeting, Mainstreaming the Historic Urban Landscape Recommendation, WH Centre presenter and session chair, hosted by IPHAN, Rio de Janeiro, Brazil

Heritage Landscapes LLC

Preservation Planners & Landscape Architects

www.heritagelandscapes.com

501 Lake Road Charlotte, VT 05445 802.425.4330 34 Wall Street Norwalk, CT 06850 203.852.9966

- 2011 February, UNESCO Historic Urban Landscapes Initiative, International Expert Meeting, Paris, France, HUL Tools presentation, drafting committee contributions to framing final HUL Recommendation
- 2010 October, UNESCO International Landscape Convention, International Expert Meeting, Paris, France
- 2009 May, Rio de Janeiro World Heritage Nomination Framing Workshop, with Michael Turner, Israel and Katri Litzin, Sweden, invited experts, for IPHAN, Brazil Culture Ministry
- 2007 December, World Heritage Expert Meeting, Cultural Landscapes Authenticity, Aranjuez, Spain
- 2007 November, World Heritage Expert Meeting, Historic Urban Landscapes in the Americas, Olinda, Brazil
- 2005 May, IFLA Delegate, UNESCO World Heritage and Contemporary Architecture - Managing the Historic Urban Landscape, Vienna, Austria
- 1999 US/ICOMOS Cape Coast, Ghana Design and Planning Charrette Team Delegate and Report co-editor
- 1995 Elected Fellow of the American Society of Landscape Architects, for Executed Works
- 1993 North America Delegate, UNESCO World Heritage Centre, Cultural Landscapes Expert's Meeting, Germany

SELECTED PLANNING & IMPLEMENTATION PROJECTS

- Northern Pass Historic Sites and Cultural Landscapes Assessment for the
- Reimagine the Alamo Master Plan, San Antonio, TX, World Heritage Site, NHL, lead Preservation Design Partnership, for Alamo Foundation, Texas General Land Office, City of San Antonio, 2016
- President's Park Permanent Fence, Washington DC, lead Mills+Schnoering, for National Park Service, 2016
- John Jay Homestead, Katonah, NY, Historic Site Circulation, Rehabilitation Plan, for FojJH, NYS OPRHP, 2016
- Urban Heritage Study, for the World Heritage Centre, Michael Turner, Patricia O'Donnell, Ana Piera Roders, et al, addressing the status of World Heritage inscribed urban heritage of global human settlements, 2015
- Intramuros Identity and Urban Design Guidelines for future growth, and legal tools, good governance and case studies, applying UNESCO HUL, Manila, Philippines, as Senior Urban Conservation Expert for The World Bank Social Sector, 2014-15
- South Parks, Olmsted's Jackson, Midway and Washington Parks, Framework Plans and urban uplift strategies; Jackson Park GLFER historic park and habitat restoration, with Army Corps of Engineers, Chicago, Illinois, for Project 120 Chicago and Chicago Park District, 2014-2015
- Riverway, Niagara Falls State Park, planning and redesign in Olmsted-Vaux original character, Hatch Mott McDonald, team leader, for NYS Parks, 2008-15, under construction 2014-2015
- Library of Congress Cultural Landscape Report, Thomas Jefferson, John Adams and James Madison Building Grounds, Washington DC; for the Architect of the Capitol, 2015
- Union Square (Olmsted Jr.) US Botanical Garden, Bartholdi Square and Square 575 Cultural Landscape Report, Washington DC; for the Architect of the Capitol, 2015
- Mellon Square, Restoration and New Terrace construction, Mellon Square Preservation, Interpretation & Management Plan, award winning, 2008 to 2014
- Inclusive Urban Revitalization Guidelines for Indian Heritage Cities, O'Donnell, senior urban conservation expert, The World Bank, Social Sector, 2013
- Bhutan Heritage Villages Stewardship Plan framework, Bhutan Heritage Act PSI Assessment, senior urban conservation expert, The World Bank Social Sector, 2013
- Jefferson's Academical Village, NHL and World Heritage Site, CLR Part 1 Landscape History, Existing, Analysis; with Rivanna Archaeological Services, for Office of the Architect, University of Virginia, 2013
- Historic Nauvoo Master Plan: Presentation, Place, Management, for Historic Sites, LDS Church, 2013
- Capitol Square & Senate Parks Cultural Landscape Reports, Washington DC; with Charles Beveridge, PhD. for Olmsted Design Overview at Capitol Square; with Vitetta, for the Architect of the Capitol, 2010-2014
- Historic Sites Strategic Master Plan 2012-2032, for Historic Sites Executive Committee, LDS Church, 2012
- Defensive City of Viejo San Juan, Puerto Rico, Workshop and reporting on World Heritage extension informed by NHL research, for Puerto Rico Historic Preservation Office, 2012

- Pittsburgh Regional Parks, Pittsburgh, PA; Regional Parks Master Plan+10; team lead LBA, 2011; Regional Parks Master Plan, A Stewardship Ethic, LBA team lead, 2001; Pittsburgh Regional Parks Management Plan, ETM team lead; for Pittsburgh Parks Conservancy and City of Pittsburgh, 2000
- National Mall, Turf & Soils Rehabilitation Phases 1-2-3, Walkway Study, NAMA NPS, Washington DC: lead HOK Planning, 2010-2014
- US National Mall Mapping 1790s to 2010, Louis Berger contract lead; report awards, for NPS NAMA, 2010
- Jefferson Memorial, NAMA National Park Service, Washington DC: Jefferson Memorial Security, Historic Research, NEPA Section 106 Cultural Landscape Sections, WRT/DHM co-team lead, 2009-2013
- Vizcaya, Miami, FL; Vizcaya Cultural Landscape Report, Stewardship & Management Plan; for the Vizcayans and Vizcaya Museum & Gardens, Miami-Dade County, 2010, award
- Longwood Gardens, Kennett Square, PA; *Longwood Landscape Evolution*; Longwood Heritage Management Plan; Longwood Interpretive Plan; Lord Cultural Resources lead; 2010, award
- Louis I. Kahn Bath House & Day Camp, Ewing Senior Community Center; Green & Parking, 2012, Pool House & Day Camp, 2010; Ewing Community Center Master Plan, 2008; *Kahn Modern Landscape Research & Assessment* 2007; lead Mills + Schnoering Architects, for Ewing Township and Mercer County, NJ; awards
- Shelburne Farms, Shelburne, VT, F.L. Olmsted Sr., Inn landscape 2016; Paths Stormwater Infiltration, 2012; Renewal of Tree Allées, 2007-2010; Entry Road reconstruction, 2009; *Shelburne House & Garden Stewardship Plan*, 2006; Breeding Barn Complex Campus Cons. Plan, *Landscape Stewardship Plan*, 2004, awards
- Finca Vigia, San Francisco de Paula, Cuba; US Technical Team in collaboration with the Cuban Culture Ministry, cultural landscape research, assessment and training, 2005-2011, awards
- St. Elizabeths West Campus, Washington, DC, *Landscape Preservation Plan* 2010; *Landscape Integration Plan*, 2010 with Andropogon, *Draft Landscape Management Plan*, 2009; *Cultural Landscape Report* with Robinson & Associates, 2007; for General Services Administration
- Bamboo Brook, Morris County, NJ; Implementation: Historic Landscape Water System, 2010; Coffee Terrace & Garden Restoration, 2004; *Bamboo Brook Historic Landscape Preservation & Maintenance Plan*, 2000
- Birmingham Civil Rights, AL, Alabama Christian Movement, National Civil Rights Act, 1964. Tentative List Preservation Planning toward World Heritage nomination, 2008; for the Birmingham Historical Society.
- Formosa, Elisabet Ney Museum, Austin, TX; Phase I Landscape Restoration, ADA Access, 2010; *Formosa Comprehensive Restoration Cultural Landscape Plan*, 2007; *Formosa Historic Landscape Report, Part I*, 1997
- Highland Park Welcome Entry Garden and Fountain Rehabilitation; Schenley Park Visitor Center Window on the Park Project, Frick Park Entry Renewal; for Pittsburgh Parks Conservancy, 2000-2005; awards
- Longue Vue House & Gardens, New Orleans, LA; *Landscape Renewal Plan for Katrina Recovery*, 2006-2008; Tree Care Plan and Wild Garden Restoration, 2002, *Historic Landscape Report*, 1998 awards
- Virginia State Capitol, Richmond, VA; Capitol Square, Landscape Rehabilitation, George Skarmas, RMJM Hillier lead, for Department of General Services, Commonwealth of Virginia, 2003-2007; awards
- New York Botanical Gardens, Bronx, NY; *Cultural Landscape Report History*, 2008; and Chronological Collection of 1,500 Research Documents, 2005; professional award
- Jordanville Wind Power Project, Cooperstown, NY, central New York high plateau Wind proposal, DEIS, SSEIS review through NYSEQR process, regional historic resource impacts testimony, team collaboration with Stone Environmental Inc., Xtra-Spatial Productions, for Otsego 2000, Advocates for Stark, 2008.
- Lincoln Cottage & Smith Visitor Education Center, President Lincoln & Soldiers' Home National Monument, AFRH, Washington DC; Landscape Construction, Gold LEED USGBC Preservation Pilot, 2007; *Lincoln Cottage Historic Landscape Report & Preservation Treatment Plan*; lead George Skarmas, RMJM Hillier, for NTHP
- Oldfields, NHL, (Olmsted Brothers) Indianapolis, IN; Art & Nature Park, lead Edward Blake Jr.; Ravine Garden; Lilly House & Cutting Garden; Michigan Entry; NHL nomination contribution; Oldfields Landscape Plan; for Indianapolis Museum of Art, 1994-2006, awards
- Camden Garden Amphitheatre, Library Grounds (Fletcher Steele), Harbor Park (Olmsted Jr.) Restoration and Rehabilitation, Camden, ME; 2002-2006; Community consensus, 1999-2002; *Historic Landscape Report*, 1997, for Camden Public Library

SELECTED PUBLICATIONS

- O'Donnell, Patricia M., "Inclusive Public Spaces", *CULTURE URBAN FUTURE, UNESCO Global Report on Culture for Sustainable Urban Development*, Francesco Bandarin, et al, UNESCO Culture, Oct 2016, at Habitat iii.
- O'Donnell, Patricia M., "The Tudor Place Landscape," *Tudor Place Americas Story Lives Here*, 2016.
- O'Donnell, Patricia M., and Gregory W. De Vries. "Entangled Culture and Nature: Toward a Sustainable Jackson Park in the 21st Century" *Change Over Time: An International Journal of Conservation and the Built Environment*, Volume 5, Fall 2015
- O'Donnell, Patricia M., "Historic Urban Landscape: A New UNESCO Tool for a Sustainable Future," in *Conserving Cultural Landscapes: Challenges and New Directions*, Taylor Francis, 2014
- O'Donnell, Patricia M., "The Role of Regulatory Systems," in *Reconnecting the City: The Historic Urban Landscape Approach and the Future of Urban Heritage*, Francesco Bandarin, Ron van Oers, editors, Wiley & Sons, 2014
- O'Donnell, Patricia M. "An Ascendant Urban Space Restored" short essay in *Mellon Square Discovering a Modern Masterpiece*, Princeton Architectural Press, 2014
- Interview with Patricia M. O'Donnell, FASLA, AICP, Principal, Heritage Landscapes, LLC, US Advisory Council on Historic Preservation, January, 2014, <http://www.achp.gov/inclusiveness-patricia.html>
- O'Donnell, Patricia M., "Florence Charter on Historic Gardens (1982)" Springer Encyclopedia of Global Archaeology, Online, 2013
- Pascarella, Elena "An Interview with Patricia O'Donnell" CTHP News, Cultural Landscapes Issue, April 2012
- O'Connell, Kim, "Vibrant, Valued Landscapes", Clem Labine's Traditional Building, profile, October, 2009
- O'Donnell, Patricia M., "Thirty Years of Landscape Rescue", VIEW magazine, Library of American Landscape History, Summer 2008
- O'Donnell, Patricia M., "Preserving Cultural Landscapes USA: understanding and preserving the designed landscape," TOPOS 56: Cultural Landscapes, Fall, 2006
- O'Donnell, Patricia M., "Learning from World Heritage: Lessons in the Preservation & Stewardship of Cultural and Ecological Landscapes," George Wright Forum, September, 2004
- Schuyler, David and Patricia M. O'Donnell, "The History and Preservation of Historic Urban Parks and Cemeteries," *Preserving Cultural Landscapes in America*, John Hopkins University Press, 2000: 70-93
- Thompson, William J., "Is Historic Preservation Design?" Forum, Landscape Architecture, Dec 1998: 56-9
- O'Donnell, Patricia M., Cultural Landscape Currents: Benjamin Franklin Parkway Rehabilitation Case Study, Historic Landscape Initiative, Heritage Preservation Services, NPS, online, December 1998
- Weisgall, Deborah "Fighting Over the Future of an American Arden", Fletcher Steele's Camden Amphitheater, Camden, Maine, The New York Times, November 15, 1998: AR 26
- Dean, Andrea O. "Listening to: Landscape Architects", Forum, *Architectural Record*, August 1997: 44-49
- O'Donnell, Patricia M., "Cultural Landscapes of North America - An Overview of Status in the United States and Canada", in *Cultural Landscape of Universal Value*, October 1993, Gustav-Fischer Verlag, Germany/NY 1995
- O'Donnell, Patricia M. "Relating Integrity to Interpretation", *CRM Bulletin*, Thematic Issue on Landscape Interpretation, Volume 17, No. 7, 1994
- O'Donnell, Patricia M., Guest Editor, ICOMOS Landscapes Working Group Newsletter, North American Edition, September 1993, distributed to international group of experts
- O'Donnell, Patricia M., "The Treatment of Historic Landscapes: Determining the Most Appropriate Approach," *Historic Preservation Forum*, National Trust for Historic Preservation, Volume 7, Number 3, May/June 1993
- O'Donnell, Patricia M., "Cultural Landscape Analysis: The Vanderbilt Estate at Hyde Park" *APT Bulletin*, The Association for Preservation Technology, Volume XXIV, No. 3-4, 1992
- O'Donnell, Patricia M., co-guest editor issue "Historic Preservation Defining an Ethic", *Landscape Architecture*, July/August, 1987, "A Process for Parks," "A Preservationist's Glossary" and with Robert Z. Melnick, "Prospect"

SELECTED PRESENTATIONS & PAPERS

- "Culture Urban Future Habitat iii: Inclusive Public Spaces:, Special Session on Urban Culture and Heritage, Habitat iii, Patricia O'Donnell, 20 October 2016, Quito, Ecuador
- "Large Green Spaces and Urban Forests", Side Event on Public Spaces, World Urban Parks, Board Member, Habitat iii, Patricia O'Donnell, 17 October 2016, Quito, Ecuador
- "Employing Diverse Tools toward Sustainable Urban Heritage Management, Linking Urban, Peri-urban and Rural Context," Patricia O'Donnell, International Conference, Culture for Sustainable Cities, Toward Habitat iii: The need for an integrated vision for urban management, 10-12 December 2015 Hangzhou, China
- "Pittsburgh Parks Renaissance through Partnerships", Patricia O'Donnell, Meg Cheever, Susan Rademacher, Mike Gable, Large Parks in Large Cities Conference, 2-5 September 2015 Stockholm, Sweden
- "Revitalizing Historic Jackson Park: Integrating Heritage and Ecology, Sustainability and Resilience in Chicago," P. O'Donnell, L. Umek, G. De Vries, 12 June 2015, IFLA World Congress, St. Petersburg, Russia
- "Mellon Square: Revitalizing a Modern Masterpiece" Patricia M. O'Donnell and Susan M. Rademacher, 11 June 2015, IFLA World Congress, St. Petersburg, Russia
- "Sustaining & Revitalizing Urban Heritage in the Urban Millennium through Effective Change Management" Zube Lecture Series, UMass LARP, 29 January 2015, Amherst, MA, USA
- "Sustaining Heritage Cities into the Future: Fostering UNESCO HUL International Alliances," Mayor's Forum, 26 September 2014, Nanjing, China
- "Urban Landscapes: Integrating Culture & Sustainability for a Stronger Future through HUL Mainstreaming," 11-13 February, 2014, Zanzibar, Tanzania
- "Historic Urban Landscapes: Integrating Culture & Sustainability for a Vibrant Future through UNESCO HUL Mainstreaming" Lecture, Urban Preservation in Context: Challenges and New Approaches in the Mid-Atlantic Region, CHAPS Symposium, Rutgers University, 2 May 2014, New Brunswick, NJ, USA
- "UNESCO HUL Recommendation: Overview, Tools, Examples Annapolis MD, San Juan PR, Charleston SC", Conservation of Historic Urban Landscapes & Sustainable Development, Stanford University Archaeology Center with CICC, Cergy-Pontoise University, France, 7-8 March 2013
- "The Changing Role of Parks in Urban Water Management - Historic Iconic Landscapes Integrating Preservation & Sustainable Design," O'Donnell, Patricia M. and Gregory W. De Vries, City Parks Alliance, Webinar, Feb 2013
- "Cultural Landscapes for Our Global Future", University of Rhode Island, Landscape Architecture Global Future Lecture Series, 31 January 2013
- "UNESCO Historic Urban Landscape Recommendation for A Sustainable Urban Future" IFLA 49th World Congress, Cape Town SA; US/ICOMOS International Symposium, San Antonio, TX; San Juan, Puerto Rico; ICOMOS Theory Committee, Baku, Azerbaijan; with Michael Turner; September, August, May, April, 2012
- "Historic Iconic Landscapes: Integrating Preservation & Sustainability" Greater & Greener, New York, New York, City Parks Alliance and National Association for Olmsted Parks, July 2012
- "Global Standards for Contextual Development: A New UNESCO Tool", Presentation, American Planning Association Annual Conference, Los Angeles, CA, April 2012
- "Why Cultural Landscapes Matter," Invited Keynote, India Society of Landscape Architects, ISOLA 2011 Conference: Cultural Landscapes, Ahmedabad, India, September, 2011
- "Why Cultural Landscapes Matter", Why Does the Past Matter? Valued Landscapes of parks, parkways, iconic, modern places, P. O'Donnell, P. Viteretto, G. DeVries, S. Gaulty, UMass Amherst, May 2011
- "Why Cultural Landscapes Matter," Keynote & Panel Discussion, European Council of Landscape Architecture Schools, ECLAS 2010, Istanbul, Turkey, November, 2010
- "Historic Urban Landscapes: Responsibilities & Opportunities, Preserving Spirit of Place", Keynote, Center for Architecture in the Arab World International Conference, Petra University, Amman Jordan, Nov. 2008
- "Landscape Documentation: Fostering Informed Stewardship & Enriching Interpretation" American Public Gardens Association, Planting Fields Arboretum, Invited Keynote, Oyster Bay, NY, October 2008

- "Urban Cultural Landscapes & the Spirit of Place" ICOMOS, 16th General Assembly and Scientific Symposium, Québec City, Québec, Canada, October 2008
- "Is this Heritage Preservation or Sustainability?" As University, Oslo, Norway, invited lecture, April 2008
- "Cultural Landscape Preservation & Sustainability", Shanghai, Beijing and Wuxi, China, symposium and university invited lectures, and international exchange symposium, October 2007
- "Global Heritage Preservation & Historic Urban Landscapes", 1st IFLA Americas Region Conference 5th National Congress Landscape Architects Mexico, Mexico City, May 2007
- "Overview of World Heritage Inscription Trends, 1972 to 2006", and "USA Issues for World Heritage Tentative List", IUCN/US & US/ICOMOS Briefing & Symposium, September 2006
- "World Heritage Framework for Cultural & Natural Landscapes", Introductory presentation, Scientific Committee Chair, US/ICOMOS 7th Scientific Symposium, Natchitoches, LA, March, 2004
- "Public Landscapes at the Intersection of Culture and Nature", Symposium Developing an Urban Ecology Ethic: Promoting Urban Ecology, Park Stewardship & Sustainable Architecture, Pittsburgh Parks Conservancy, Jan. 2004
- "Cultural Landscapes of Universal Value" Keynote, Maine Statewide Preservation Symposium, 13 Sept 2003, Camden ME
- "Preserving Cultural Landscapes of Universal Value into the 21st Century", Lecture, University of Rhode Island, Providence, RI, May 2002

PROFESSIONAL REGISTRATION, SERVICE & AFFILIATIONS

- Licensed Landscape Architect, CLARB professional examination 1987, Connecticut 571, Illinois 157-000917, Indiana 298000005, Kentucky 516, Maine LR2332, Maryland 2023, Massachusetts 1190, New Jersey 21AS00070700, New Mexico 391387, New York 001438-1, North Carolina 1515, Pennsylvania LA001566-R, Texas 3134, Vermont 125.0079675, Virginia 0406-000972, West Virginia 347
- AICP, American Institute of Certified Planners, professional examination 1995
- ICOMOS international member 1990 to present, participation in General Assemblies, World Heritage process
- ICOMOS International Cultural Tourism Committee, 2009-13, French Grand Sites 2011, Vigan, Philippines
- US/ICOMOS, Board of Trustees 2011-2016, 2000-2005, ASLA Ex-Officio 2005-2010; Chair US ICOMOS World Heritage Working Group, 2012-2016, Chair, US ICOMOS CL Committee, 2006-2015, 1997-2001, Scientific Chair 7th US/ICOMOS International Symposium, 2004
- ICOMOS/IFLA Cultural Landscapes International Scientific Committee, USA Voting Member, 2006-2015, Work Session Host, 2008, Corresponding Member 2001-2005, Meeting Presentations 2002 to present
- IFLA Cultural Landscapes Committee, Global Chair, 2006-2015, IFLA CLC website creator, Organizer "Issues for Heritage Cities from Global to Local," lectures/mobile workshop ASLA/IFLA Meeting, Minneapolis, 2006, IFLA conference papers St. Petersburg, Russia, Cape Town, South Africa, Mexico City, Mexico, 2007, Edinburgh, Scotland, 2005
- American Society of Landscape Architects, 1995 Fellow for Executed Works, US/ICOMOS Board Ex-officio 2006-2009, HALS Co-chair 2000-2006, Historic Preservation Committee, Chair, leader, 1981-1991, Annual Meeting Papers, 1981-2002, 2004-2006, Symposia, 1987-1990, Mobile Workshop Lead 2003, 2006
- World Urban Parks, board member, Large Parks Committee, Research Working Group, co-leader, 2016.
- The Cultural Landscape Foundation, founding Board Member, Finance Committee, 1998-2009
- National Center for Preservation Technology & Training, Board, 2002-2006, Coalition for Preservation Technology 1990-95, US Congress Preservation Technology Transfer, Landscape Preservation Chair, 1986
- Alliance for Historic Landscape Preservation, Member 1980 to 2016, Board 1988-98, conference papers
- National Association for Olmsted Parks, advisor 2012-2015, board 1985-1988, founding member 1979-80, conference committee and papers
- Memberships: George Wright Forum, APT International, National Trust for Historic Preservation, Garden Conservancy, Connecticut Trust for Historic Preservation, NYS Preservation League

Exhibit B



Assessment Report on Potential Effects to Above Ground Historic Sites and Cultural Landscapes for the Northern Pass Transmission Project

Heritage Landscapes LLC

On Behalf of
Counsel for the Public

15 November 2016

Heritage Landscapes LLC

Preservation Planners & Landscape Architects

www.heritagelandscapes.com

501 Lake Road Charlotte, VT 05445 802.425.4330 34 Wall Street Norwalk, CT 06850 203.852.9966

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Part 1: Introduction and Heritage Landscapes Scope & Approach

A. Basis

On behalf of Counsel for the Public, and the State of New Hampshire Office of the Attorney General, Heritage Landscapes has prepared this Expert Assessment Report on Potential Impacts to Aboveground Historic Sites and Cultural Landscapes for the Northern Pass Transmission Project (Project) as proposed by Northern Pass Transmission and Eversource Energy (Applicants).

The Project requires a certificate of site and facility from the State of New Hampshire Site Evaluation Committee (SEC) pursuant to RSA 162-H:5. The SEC process requires determination that the proposed Project will not unreasonably adversely impact historic sites and scenic resources, among other criteria, relevant to finding the Project in the public interest.

B. Heritage Landscapes' work to address historic sites and cultural resources

This report synthesizes the findings of a series of tasks undertaken on behalf of Counsel for the Public to assist the SEC in evaluating the potential Project impacts to New Hampshire historic sites within the Project Area of Potential Effect (APE). This work also addresses the cultural landscapes of New Hampshire as heritage resources as included in state laws, identified in section C, below.

Heritage Landscapes reviewed filing materials presented by the Applicants for capture of historic sites and the Applicants' assessment of the Project's impacts on those sites. This included both SEC and U.S. Department of Energy (DOE) documentation addressing historic aboveground cultural resources. Attention was particularly focused on Appendix 18: Northern Pass Transmission Project Assessment of Historic Properties, Preservation Company, October 2015, which focused on the potential visual impacts to the historic properties they identified, and Pre-Filed Direct Testimony of Cheryl E Widell, cultural resources expert for the Applicants, and related discovery and technical sessions. It is important to note that Appendix 18 applies a one-mile APE to either side of the proposed Project corridor as established in the DOE process. In relation to the aboveground historic resources reporting, Heritage Landscapes participated in the discovery process and the Technical Sessions. Heritage Landscapes reviewed these materials to determine the identification and assessment of historic sites to include cultural landscapes. In addition, the following documents were reviewed for context in relationship to historic sites:

- i. Pre-Filed Direct Testimony of Victoria Bunker, PhD, for Archaeological Resources and related technical session;
- ii. Cultural Resources Technical Report for the Draft Environmental Impact Statement, Ecology and Environment, Inc., for DOE, October 2015
- iii. Appendix 17: Northern Pass Transmission Line Visual Impact Assessment, Terrence J. DeWan & Associates and Pre-Filed Direct Testimony of Terrence DeWan and Jessica Kimball, for SEC, 14 October 2015
- iv. Appendix 41: Review of Land Use and Local, Regional and State Planning: Northern Pass Transmission Project, Normandeau Associates, Inc., for SEC October 2015, and related Pre-Filed Direct Testimony of Robert W. Varney, 16 October 2015

These related materials were reviewed to gain an understanding of the relationships between above and below ground cultural resources, and scenic and aesthetic resources, which include

historic sites, as well as the assessment of the Project in relationships to orderly development of the region.

In addition, we worked with Counsel for the Public's scenic and aesthetics consultants from T.J. Boyle Associates to carry out a series of six public workshops along the Project corridor to gain direct citizen input on community values by having participants identify historic and scenic resources that they valued as either historic or scenic or both.

Heritage Landscapes also field reviewed the proposed Project corridor through the host towns along public roads within the APE to become familiar with the variety of resources and the proximity to the proposed corridor.

Further, we gathered available datasets for mapping historic sites, including cultural landscapes from NH Granit Geographic Information Systems and other relevant sources in order to identify historic sites of all types and cultural landscapes within a 10-mile APE. These were mapped and enumerated, in addition to the historic resources identified by the Applicants, to form a more complete capture of resources and to assess potential Project impacts to historic sites including cultural landscapes.

C. Review of SEC Rules and Definitions

Heritage Landscapes' work references and cites the New Hampshire Site Evaluation Committee, Title XII Public Safety and Welfare, Chapter 162-H Energy Facility Evaluation, Siting, Construction and Operation. The purpose of that document quoted here, includes attention to historic sites:

162-H:1 Declaration of Purpose. – The legislature recognizes that the selection of sites for energy facilities may have significant impacts on and benefits to the following: the welfare of the population, private property, the location and growth of industry, the overall economic growth of the state, the environment of the state, historic sites, aesthetics, air and water quality, the use of natural resources, and public health and safety. Accordingly, the legislature finds that it is in the public interest to maintain a balance among those potential significant impacts and benefits in decisions about the siting, construction, and operation of energy facilities in New Hampshire; that undue delay in the construction of new energy facilities be avoided; that full and timely consideration of environmental consequences be provided; that all entities planning to construct facilities in the state be required to provide full and complete disclosure to the public of such plans; and that the state ensure that the construction and operation of energy facilities is treated as a significant aspect of land-use planning in which all environmental, economic, and technical issues are resolved in an integrated fashion. In furtherance of these objectives, the legislature hereby establishes a procedure for the review, approval, monitoring, and enforcement of compliance in the planning, siting, construction, and operation of energy facilities.

Relevant definitions within these SEC rules include:

Site 102.23 "Historic sites" means "historic property," as defined in RSA 227-C:1, VI, namely "any building, structure, object, district, area or site that is significant in the history, architecture, archeology or culture of this state, its communities, or the nation." The term includes "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places

maintained by the Secretary of the Interior,” pursuant to 36 C.F.R. §800.16(l)(1).
Source. #10993, eff 12-16-15

Site 102.26 “Landscape” means the characteristic, visible features of an area including landforms, water forms, vegetation, historic and cultural features and all other objects and aspects of natural and human origin. Source. #10993, eff 12-16-15

Site 102.43 “Rural area” means any geographic area in the State of New Hampshire that is not included within an urbanized area or an urban cluster. Source. #10993, eff 12-16-15

Site 102.53 “Urban cluster” means an “urban cluster” as designated by the U.S. Census Bureau. Source. #10993, eff 12-16-15

Site 102.54 “Urbanized area” means an “urbanized area” as designated by the U.S. Census Bureau. Source. #10993, eff 12-16-15

Site 102.44 “Scenic quality” means a reasonable person’s perception of the intrinsic beauty of landforms, water features, or vegetation in the landscape, as well as any visible human additions or alterations to the landscape. Source. #10993, eff 12-16-15

D. New Hampshire Historic Preservation Law and National Historic Preservation Act

The SEC rules include under the definition of historic sites reference to the National Historic Preservation Act, 36 C.F.R. §800.16(l)(1), referencing eligibility for inclusion in the National Register of Historic Places in the definition listed above. In addition, RSA 227-C:1 section (b) provides a definition specific to New Hampshire, establishing an inclusive definition that extends beyond properties eligible for federal listing on the National Register of Historic places.

“Historic resource” means:

(a) Any historic property which has been listed in the National Register of Historic Places or has been determined by the keeper of the register to be eligible for the National Register using the criteria for evaluation in 36 CFR 60.6;

(b) Any object, or group of objects, located in or associated with an historic property or that enhances an understanding and appreciation of New Hampshire history;

Further, RSA 227-C described a broader interest and application to guide state historic preservation activities in its Findings and Purpose statement

227-C:1-a Findings and Purpose. –

I. The general court has determined that the historical, archeological, architectural, engineering, and cultural heritage of New Hampshire is one of the most important environmental assets of the state and that the rapid social and economic development of contemporary society threatens the remaining vestiges of this heritage; therefore, it is hereby declared to be public policy and in the public interest of this state to engage in a comprehensive program of historic preservation to promote the use and conservation of such property for the education, inspiration, pleasure, and enrichment of the citizens of New Hampshire.

The DOE process reflects the national guidance, while the SEC process can and should be guided by the New Hampshire legal framework as well.

E. Cultural Landscapes

Cultural landscapes are broadly understood as the combined works of humanity and nature.¹ The National Park Service defines cultural landscapes as geographic areas including cultural resources, natural resources, and domesticated animals and wildlife, identifying four types of cultural landscapes that can be listed on the National Register for their association with significant people, historic events or activities, or for cultural, aesthetic or other historic value. These four types of cultural landscapes, Designed, Historic, Ethnographic, and Vernacular Landscapes, range in scale from the land where an important historic event took place, to a designed estate landscape, or an agricultural valley. For example, in New Hampshire, the Weeks Estate is valued for its designed landscape, and the town forests of New Hampshire are vernacular landscapes, comprising long-standing publicly accessible land use.

The study of cultural landscapes provides an understanding the relationship of people and places that hold meaning and cultural value. Geographer Carl Sauer introduced this field of study in the 1920s, nearly a century ago. Today, the types of cultural landscapes recognized for their historic and cultural value continues to widen. It is notable that in 2015, the Hinesburg Town Forest, Hinesburg VT becoming the first town forest listed on the National Register.

Landscape as shaped by use and values is an important component of social and personal identity, and the concept of places. In New Hampshire, cultural landscapes and the values they hold inform people's decisions to live in the state and to visit it. The purposeful shaping of natural areas, designed town centers, and rural and agricultural landscapes has inspired centuries of art and literature, outdoor recreation, and health-related tourism. Cultural landscapes reflect historic patterns of use and management, including managed forests and agricultural fields, representing the historical landscape of New Hampshire sustained by enduring land uses that hold cultural values.

F. Comprehensive Identification of Historic Above Ground Resources to include Cultural Landscapes

Based on the SEC Rules and the New Hampshire RSA 227-C, Heritage Landscapes employed a broad definition of historic sites and cultural resources that have value for the people of New Hampshire. This approach included, but was not limited to, National Register and New Hampshire listed and eligible historic properties. In addition, the following categories are identified as resources contributing to the heritage of New Hampshire:

- i. Historic graveyards
- ii. Conservation lands, in public stewardship and private ownership, including town forests
- iii. Recreation lands
- iv. Designated scenic roads
- v. Named trails, including Traditional Native American routes

¹ World Heritage Convention 1992, Article 1 defines cultural landscapes as the “combined works of nature and humankind” identifying designed, evolved and associative landscapes as categories.

- vi. Public Waters, Designated Rivers, and public water access points
- vii. Current Use listed lands
- viii. Community identified places, areas or objects of historic and scenic value

Chapter 3 discusses these resources in greater detail, outlining the relevance of each resource to cultural landscapes and New Hampshire heritage as established in state law. These resources are then identified and enumerated, as possible, within the APE focusing on the host towns and towns included in the Applicants' 1-mile APE. When mapping was available these resources were also mapped in GIS to depict distribution along the corridor. This more comprehensive identification, listing and mapping of the historic properties and cultural resources of the proposed Project corridor is presented in narrative, charts and maps in Chapter 4.

G. Expert Opinion of Potential Project Impacts to Historic Sites and Cultural Resources including Cultural Landscapes

The combined findings of the review of the Applicant reporting and the identification and enumeration of historic sites and cultural resources culminates in laying out an expert opinion that assesses the breadth of historic sites and cultural resources that occur through the host towns and contextually within the APE, and presents an expert opinion of the potential adverse Project impacts and whether these potential impacts are unreasonably adverse.

Part 2: Overall Inclusion and Assessment of Impacts to Historic Sites and Cultural Landscapes within SEC Application and DOE Section 106 Process

A. Overall Inclusion and Capture of Historic Sites and Cultural Landscapes in Northern Pass SEC Application and DOE Section 106 Process

Heritage Landscapes reviewed SEC filing materials related to aboveground historic resources and cultural landscapes in detail. Those related to the DOE Environmental Impact Study and Section 106 processes were also reviewed to understand the capture of aboveground historic sites and consideration of cultural landscapes within the assessment of potential Project impacts. As noted in the Chapter 1, this included review of reports, pre-filed testimony, and data requests and other responses generated through the SEC process.

Materials generated through the DOE Section 106 process including Project Area Forms were reviewed to provide context for understanding and verifying the Applicants' assessment of impacts to historic sites. The *Cultural Resources Technical Report for the Draft Environmental Impact Statement* and four companion Project Area Forms (PAF) provided historic and geographic context for historic sites and were reviewed for capture of historic sites and cultural landscapes. While these documents provide a thorough research-based methodology for identifying and evaluating the integrity and significance of historic sites, they focus on architectural resources and bear limited inclusion of historic structures, objects or cultural landscapes.

Heritage Landscapes' review of application materials revealed that potential project impacts to landscape resources were considered in isolation, resulting in a less comprehensive assessment of potential impacts. While the SEC application process largely informs the consideration of and reporting on distinct areas of concern, the lack of purposeful collaboration on the part of the Applicants' experts limited the capture of aboveground heritage resources within the entire ten-mile APE. Cultural landscapes are often places holding values in diverse categories such as natural resources, aesthetics, and land use in addition to historic importance. Considering effects to each of these categories in isolation results in an incomplete assessment of the total impact a project may have on cultural landscapes.

The ability to directly compare the overall capture of resources and assessment of impact between the two DOE and SEC reporting is hampered by different methodologies.² While the Applicants categorically assessed potential impacts to historic resources, the DOE cultural resources study proposed further survey to determine effect. Despite that, the capture of historic sites within the DOE and SEC processes was biased toward architectural resources, with limited inclusion of landscape resources. A bias toward National Register eligibility within both the DOE and SEC reporting further limited the scope of the historic sites reviewed and assessed for potential impact from the Project.

² The discrepancy in methods and results between the DOE consultants and Applicant is discussed in detail in a November 30, 2015 letter from Edna Feighner, Archaeologist and Review and Compliance Coordinator for NH Division of Historical Resources, to Pamela Monroe, Administrator, NH Site Evaluation Committee.

B. Detailed Assessment of Applicants Historic Sites Methods and Capture

The Assessment of Historic Resources report prepared by Preservation Company represents the Applicants' effort to identify and assess possible impacts to historic resources, as well as to inform Cherilyn Widell's testimony on effect.

Site 301.06 "Effects on Historic Sites" establishes 5 requirements (301.06 (a) – (e)) of the Applicants to adequately assess the Project impacts on historic sites for consideration by the SEC. The SEC utilizes the Applicants' assessment report to determine whether the Project will "have unreasonable adverse effect on historic sites" through consideration of five criteria (301.14 (b)(1) through (5)).

Heritage Landscapes' review of the Assessment of Historic Resources report and accompanying Pre-filed Testimony finds the application does not fully capture historic sites and cultural landscapes that may be potentially impacted by the Project.

Specific concerns related to the Applicants' methods to adequately address the applicant filing requirements (Rule 301.06) and inform the SEC considerations relative to finding unreasonable adverse effects to historic sites (Rule 301.14(b)) are outlined below.

1. The Assessment did not properly identify "all historic sites and areas of potential archaeological sensitivity located within the area of potential effects, as defined in 36 C.F.R. §800.16(d)" (Site 301.06 (b))

a. Defining Historic Sites

The Applicants' report utilizes the term "historic resource" to identify elements of New Hampshire heritage within a one-mile APE, while the SEC Rules require the assessment of effects to "historic sites" (Site 102.23). At the time the report was written (October 2015) 'historic site' was not defined in SEC Rules; however, the Applicants could have relied on the definition of 'historic property' to guide the identification and assessment of impacts to historic sites.

As defined in RSA 227-C:1 VI, a "historic property" means any building, structure, object, district, area or site that is significant in the history, architecture, archeology or culture of this state, its communities, or the nation." Rather than using this inclusive definition which values historic sites with community level significance and is not reliant on State or National listing eligibility, the Applicants chose to use "historic resource" as defined in RSA 227-C:1 VII(a), meaning "Any historic property which has been listed in the New Hampshire state register of historic places or has been determined eligible for the New Hampshire state register of historic places by the Division Of Historical Resources or which has been listed in the National Register of Historic Places or has been determined by the keeper of the register to be eligible for the National Register using the criteria for evaluation in 36 C.F.R. section 60.4."

By utilizing the term "historic resource" the Applicants limited their identification of historic sites to those potentially eligible to the National Register, rather than taking a more inclusive approach

to assessing impacts to heritage required by the SEC Rules.³ The Applicants' inconsistent use of SEC definitions and conflated terminologies limited consideration of resources to a modest subset of National Register eligible properties.

b. Area of Potential Effects

The Applicants defined two APEs for the Project: a one-mile APE to address potential indirect impacts and a 20-foot from edge of road pavement APE to address potential direct impacts along the underground section.

SEC Rule 301.06 (b) requires the APE for historic sites be defined in accordance with Federal Code (36 C.F.R. §800.16(d)) which states,

"Area of potential effects means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

Federal code does not set a numerical value for defining APE, but indicates it should be determined based on the "scale and nature of the undertaking." Heritage Landscapes finds the two APEs defined by the Applicants to be insufficient for the scale and nature of Project. The one-mile indirect APE is not adequate for the scale of the Project both in terms of height of individual structures extending above the tree line, but also the geographic extent of modifications to the existing landscape. In addition to expanded clearing within forested areas, there will be a cumulative effect of views along public right-of-ways.

In her Pre-filed Testimony on behalf of the Applicants, Cheryl Widell notes the large number of historic sites the Applicants' assessment report identified within a one-mile APE. However, the actual potential for indirect impact (through visual impacts) to historic sites arguably extends up to ten miles for a project of this size and scale.⁴ Further, the SEC rules require a ten-mile APE for undertakings of this size to account for impacts to scenic resources not the 1 mile to each side applied by the Applicant, as stated in Site 301.05 4d.2.

4d. Electric transmission lines longer than 1 mile if located within any rural area shall extend to:

2. A radius of 10 miles if the line would be located in a new transmission corridor or in an existing transmission corridor if either or both the width of the corridor or the height of the towers, poles, or other supporting structures would be increased

³ On page 4 of the Executive Summary, the Applicants' Assessment of Historic Properties Report notes the document uses multiple terms to "refer generally to historic resources that could potentially meet the requirements for listing on the National Register."

⁴ Site 301.05 (b)(4)(d)2 determines a 10 mile radius APE is required to determine visual impacts from a "new transmission corridor or in an existing transmission corridor if either or both the width of the corridor or the height of the towers, poles, or other supporting structures would be increased" as is proposed for the Project. This Rule applies to historic sites, a category of scenic resource identified by 102.45.

As established in Site 102.45, scenic resources include “historic sites that possess a scenic quality” and therefore an APE of 10 miles to each side of the proposed Project Corridor is necessary to completely capture all historic sites with potential Project impacts.

The Applicants’ report does not discuss whether the density of historic sites identified in the one-mile APE is indicative of the density of resources within a ten-mile APE. Similarly, the Applicants did not discuss if the types and significance of historic sites identified in the one-mile APE are unique within the state of New Hampshire. If the types, quality and density of historic sites defined within the Applicants’ one-mile APE exist beyond a one-mile radius from the proposed Project, the potential for impact to historic sites is greater than the Applicants assessed.

We also find the twenty-foot direct APE inadequate to capture the potential direct effects to historic resources located along the underground section of the route resulting from drilling, blasting and lateral earth movement. In addition, the Applicants provided no discussion of the possible peripheral damage to adjacent historic resources through the movement of large machinery and creation of staging areas to hold equipment, materials, and excavated soils.

c. Limited Research

As noted in their report, the Applicants began their process of identifying historic sites with a windshield survey rather than research as guided by established preservation practice.⁵ Research provides a historical context that guides the identification of what types of heritage resources may be present as well as how they are significant. Review of historic maps and text, and aerial photographs also helps in identifying patterns of use and development that guide the identification of landscape features during field review.

The Applicants did consult town master plans and DOE Project Area Forms, however it is unclear if they consistently located historic sites identified in the town master plans. The Applicants’ report on Bridgewater, for example, lists four historic sites identified in the town master plan which they did not seek to locate through field survey. One of these sites in Bridgewater, the Webster Toll Bridge and House, is directly within view of the Project.⁶ Also, it is not clear at what point in the development of draft Project Area Forms the Applicants reviewed them. It is also unclear how the Applicants actually utilized the historic context to inform their field review.

d. National Register Bias

As discussed above, the Applicants narrowed the identification and assessment of historic sites to those they suggested may be eligible for the National Register. There are many elements of community and state heritage that, while important to the people of New Hampshire, are not eligible for listing in the National Register. Individual historic sites that are ineligible for the National Register because they possess a low level of significance or loss of some measures of integrity may still contribute to broader historic landscapes and the experience of New Hampshire’s history. These sites may also be important historic sites for local communities.

e. Architectural Focus

⁵ The National Register programs has promulgated guidance on the identification and preservation of cultural landscapes from the 1990s. A New England example of cultural landscape identification by experts and citizens is “Reading the Land: a guide to identification and protection” published by the Massachusetts Department of Conservation and Recreation, Heritage Landscape Inventory Program.

⁶ As noted by Heather Townsend, Intervenor, during 14 October Technical Session

Review of the Applicants' report, Widell's Pre-filed Testimony and Technical Session questioning revealed a focus toward buildings as primary indicators of historic sites during the windshield survey. Only within the underground section does it appear that the Applicants specifically identified small-scale structures and objects during their windshield survey.⁷ These features were recorded on large-scale maps within the report and not documented within spreadsheets or assessed for potential impact. The Applicants did not establish identification of structures as a method for documenting historic sites and cultural landscapes, noting that bridges, culverts and other structures "that clearly had no visual significance, were not surveyed or included in our database (whether previously identified or not)."⁸ The Applicants did include landmark structures such as dams (including Franklin Falls Dam, Ayer's Island Dam), fire towers (including Coleman State Park and Weeks State Park fire towers) and bridges (including the National Register listed H. Styles Bridge in Concord) within the 1-mile APE.

f. Insufficient Capture of Cultural Landscapes

The Applicants' report does discuss incorporating a cultural landscape "perspective" into their field survey "and other types of research," but the report does not specify methods used to identify cultural landscapes either during field or desktop review. As noted in National Park Service *Preservation Brief 36: Protecting Cultural Landscapes*, cultural landscape identification typically involves review of aerial imagery to identify landscape patterns including development, road networks, woodlands and clearing. During field review, objects and structures such as walls, earthworks and bridges are important to the identification of cultural landscapes as testament to patterns of land use and value.⁹ Although, capture of landscape features such as historic trees and walls was documented in maps of the underground section, the Applicants did not capture the location, description or evaluation of these features within a database. There is no indication these types of historic sites were identified during field survey of the aboveground sections or that these features were considered with an eye to their organization and placement as possible indications of cultural landscapes.

As noted above in subsection c, limited research, the Applicants did not engage local communities including town governance, historical societies, or other knowledgeable individuals for assistance in identifying historic sites and cultural landscapes, but did review available town master plans. Of the 29 towns studied by the Applicants, 24 have publicly available master plans, zoning ordinances or websites, and through these 23 of these towns provide statements clearly indicating the importance of historic sites and landscapes to the town, and the desire to preserve the character of the landscape. It does not appear that the Applicants reviewed the patterns of land use that result in existing character as cultural landscapes.

⁷ As noted above, the SEC definition of historic sites includes objects and structures. Structures are distinguished from buildings as being "functional constructions made usually for purposes other than creating human shelter," and can include canals, fences, earthworks, sheds, lighthouses, and silos.

⁸ *Appendix 18: Assessment of Historic Resources*, Methodology p. 6. The Applicant's do note they included consideration of barns without associated buildings, but did not include sheds or other structures during windshield survey of the aboveground Project section.

⁹ The importance of objects and structures as character-defining features of cultural landscapes is established in *Preservation Brief 36: Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes*. It is also discussed in *General Guidelines for Identifying and Evaluating Historic Landscapes*, February 1999, prepared by the Environmental Program of the California Department of Transportation, a document used to inform the DOE Section 106 process for identifying cultural landscapes within the Project APE

As a result of their architectural focus during field survey and limited prior research into the historic and geographic contexts shaping the landscapes within the APE, the Applicants presented a limited identification of cultural landscapes. Of the 1284 historic sites the Applicants identified, they evaluated 40 large areas/districts as having more than minimal views. Half were agricultural/farmstead areas, or residential sites or districts. The Applicants also assessed impacts to four state parks. Other identification of landscape-scale resources documented well-known historic trails, roads and railroads. They did not assess roads as unique resources and concluded without analysis that the roads within the APE have evolved and retain no integrity to a particular period of significance.

None of the historic sites identified by the Applicants were ethnographic landscapes or Traditional Cultural Properties, and the Applicants do not appear to have considered Native American heritage within the process of identifying aboveground historic sites.¹⁰ While the *Assessment of Historic Resources* report acknowledges Native travel routes along the Merrimack and Pemigewasset Rivers, it is not clear these areas were explored as possible cultural landscapes to consider during field review. The lack of federally-recognized tribes in the state should not preclude consideration of the importance of Native American heritage to the people of New Hampshire.

2. The Assessment did not adequately describe “the measures planned to avoid, minimize, or mitigate potential adverse effects on historic sites and archaeological resources, and the alternative measures considered but rejected by the applicant” (Site 301.06 (d))

The Assessment report indicates the consultants communicated with the Northern Pass design team to address potential impacts to historic sites during the identification and assessment process. The report supplies one chart listing minimization methods while a second chart displaying potential adverse effects is attached to the Pre-filed Testimony of Cheryl Widel. The relationship between the two charts is unclear. Roughly half of historic sites identified as having potential adverse effect in Attachment B are not listed in the minimization table suggesting that there were no efforts made to avoid or minimize effect to these sites. Of the 16 historic sites in the minimization table, four are listed on the “Potential Adverse Effect” table (Attachment B) suggesting that efforts to minimize impact were insufficient, resulting in a finding of adverse effect. However, the report provides no discussion of the effectiveness of the measures proposed to minimize Project impacts.

Review of the report and statements by Cheryl Widel during Technical Sessions indicates that visual assessments were not performed to understand the effectiveness of proposed minimization efforts. It is possible that all 16 of the properties for which minimization efforts were proposed should be included on the “Potential Adverse Effect” list. Also missing from the report is a list of proposed but rejected alternative measures.

¹⁰ As defined in National Park Service National Register Bulletin 38: Guidelines for Evaluation and Documenting Traditional Cultural Properties, Traditional Cultural Properties are those that are listed or eligible for listing in the National Register of Historic Places based on its associations with the cultural practices, traditions, beliefs, lifeways, arts, crafts or social institutions of a living community.

3. The Assessment did not adequately describe “the status of the applicant’s consultations with the division of historical resources of the department of cultural resources, and, if applicable, with the lead federal agency, and, to the extent known to the applicant, any consulting parties, as defined in 36 C.F.R. §800.2(c)” (Site 301.06 (e))

Review of reporting, technical session statements and discovery documents indicates the Applicants engaged with Division of Historic Resources as required. However, it appears the Applicants modified established DHR research methods, resulting in the Division finding their report “incomplete and inconsistent” with state and federal guidance.¹¹ The report does not identify any efforts to engage consulting parties, including affected communities, to identify locally valued resources. As established in 36 C.F.R. §800.2(c): “The agency official shall seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties, the likely interest of the public in the effects on historic properties.”

4. The Assessment did not properly consider “all of the historic sites and archaeological resources potentially affected by the proposed facility and any anticipated potential adverse effects on such sites and resources” (Site 301.14(b)(1))

Adequate assessment of the potential adverse effects is dependent on first identifying all historic sites within a defensible APE; second, determining what the potential effects of the Project may be; and third, defining what constitutes an adverse effect.

As discussed above in reference to Applicant filling requirements established in Site 301.06, the identification of historic sites and cultural landscapes is incomplete due to the insufficiently narrow APE, architectural bias, and lack of local input. The number of resources considered for effect was further reduced during the assessment phase by the use of viewshed modeling to determine the potential visibility to the Project. Depending on how the model was developed and the accuracy of the data used, the number of historic sites with views or adverse views could be higher than reported, as is discussed below in greater detail (see Additional Comment).

The Applicants utilized guidance from Vermont and Virginia state agencies to develop a rubric for assessing potential indirect effects. These methods are not approved by the State of New Hampshire, even though the State of New Hampshire has no established guidance for evaluating the indirect impacts of energy projects on historic sites. While the proper use by the Applicants of these guidance documents would not be problematic, we find the Applicants’ selective use of the guidance documents, particularly the Vermont guidance, to be problematic because it omitted consideration of key indirect effects such as project scale, auditory and atmospheric elements.

In addition to not fully utilizing the Vermont guidance to assess potential indirect impacts, we find the Applicants did not fully consider potential direct impacts along the underground section. As noted in the DOE Project Area Forms, direct impacts may include “physical disturbances” such as clearing forested areas for construction activity and access routes. The Applicants’ review of

¹¹ Feighner, Edna, NH DHR letter to Pamela Monroe, SEC Administrator, November 30, 2015.

potential direct impacts did not adequately address impacts from vegetation clearing within underground sections, including within areas such as Franconia Village and the Deerfield town center, which hold a density of historic buildings and cultural landscapes.¹² This clearing may affect the integrity of cultural landscapes along the underground route.

Direct impacts to historic stone walls near the Deerfield Substation expansion were also omitted from the Applicants' reporting, and determined through the formal Data Request process.¹³

The impacts of vibration due to blasting, drilling, jackhammering and construction can range from cosmetic damage to plaster and minor cracking to structural instability due to masonry damage or building settlement in disturbed soils. The determination of possible effects requires an engineering assessment that considers soils, and building structure and materiality; however, a recommended screening distance for potential vibration effects is 500 feet.¹⁴

5. The Assessment did not fully consider “the number and significance of any adversely affected historic sites and archeological resources, taking into consideration the size, scale, and nature of the proposed facility” (Site 301.14(b)(2))

Attachment B in Ms. Widell's Pre-filed Testimony lists the 12 potentially adversely effected sites, but does not identify whether the properties are State listed or have been determined eligible for the state or National Register. While Widell states that only one National Register listed property will potentially be adversely effected, she concludes that the indirect adverse effect “would not cause it to be removed from the National Register because of a loss of integrity.” In addition to this being a judgment for the NH DHR, not the Applicants' expert, listing in the National Register is not directly pertinent to assessing impacts to New Hampshire historic sites for the SEC process. Furthermore, within Federal Guidance a finding of “adverse effect” is defined as affecting the site “in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association” (36 C.F.R. §800.5(a)(1)).

6. We do not believe the Assessment's conclusions are supported by the work or analysis to determine “the extent, nature and duration of the potential adverse effects on historic sites and archeological resources” (Site 301.14(b)(3))

The Applicants' report and Pre-filed Testimony note the extent of indirect, or visual, impact to historic sites through visual impact categories. As noted previously, the Applicants did not define the visual impact categories within the report for independent concurrence of their methods and

¹² The Franconia Village History Walk brochure created by the Franconia Community Design Committee identifies 54 historic buildings extending south along Main Street from just north of the intersection with Rte 117, to the Dow Academy on Rte 116 (received during 1 August 2016 Community Workshop in Littleton); the Town of Deerfield documented a wealth of community-valued historic buildings and areas on a Bicentennial Celebration map (received during 28 July 2016 Community Workshop in Concord).

¹³ In the response to EXP 1-142 the Applicants note the During the restoration phase, the Project will rebuild the walls that are outside of the final expansion area footprint. These walls will be restored in consultation with the NHDHR. At this stage of design, we do not know what, if any, other such impacts there might be.

¹⁴ “Current Practices to Address Construction Vibration and Potential Effects to Historic Buildings Adjacent to Transportation Projects” prepared by Wilson Ihrig & Associates, Inc., ICF International, and Simpson, Gumpertz & Heger, Inc., September 2012

findings, as discussed in greater detail below. In addition, the Applicants' did not address the extent and duration of potential adverse effects on historic sites.

7. The Assessment did not properly assess “the effectiveness of the measures proposed by the applicant to avoid, minimize, or mitigate unreasonable adverse effects on historic sites and archaeological resources, and the extent to which such measures represent best practical measures” (Site 301.14(b)(5))

We find the Applicants' reporting lacks thorough consideration of the first mitigation tool avoidance, which is not applied at all. In addition, for each of the 16 historic sites proposed for minimization, a photo simulation analysis should have been conducted to assess the effectiveness of the proposed mitigation measures.

8. The Applicants' Visibility Assessment is not transparent

Within the *Assessment for Historic Resources*, a viewshed model was used to determine how many historic sites had potential for views of the Project and how impactful those views to the project may be. However, there is no statement defining how the computer model quantitatively determined which properties would be impacted by each view category. The number of properties assessed is based on “visibility,” yet there is no mention in the report of how the visibility categories were defined within the model, and no indication of even a general rubric for assessing or verifying those predefined visual impact categories in the field. Further, our review of available literature and consultation with Counsel for the Public's scenic experts, T.J. Boyle Associates, indicates that there is no industry standard for defining “minimal” or “more than minimal” views.

Our tabulation of all historic sites assessed by the Applicants (including those soon to be 50 years old) determined that 496 properties have views of the Project, and of these, 202 properties were found to have more than minimal views of the Project.

Applicants' Visual Impact Categories	Count in 1-mile APE	
Adverse Views	12	
More than Minimal Views	190	
		Subtotal 202
Minimal Views	284	
		Subtotal 496
No Views	822	
Total	1308	

SEC Rule 301.05 (b)(1) requires the Applicants to identify all areas where the Project would be visible “based on both bare ground conditions using topographic screening only and with consideration of screening by vegetation or by other factors.” The Applicants did not include a bare earth model within their assessment of impacts to historic sites, instead utilizing a model that incorporated vegetation and buildings. Even if the base data used by the Applicants accurately depicts existing ground conditions, construction patterns and, especially vegetation, are not entirely static. Depending on storm events, forestry and other land uses that result in clearing swaths of existing trees may open views to the Project that were not anticipated by the Applicants' viewshed model.

Heritage Landscapes utilized a bare earth viewshed model depicting the proposed Project alignment, associated structures and heights to determine the maximum extent of possible indirect effect on historic sites and cultural landscapes within a 10-mile APE. Heritage Landscapes utilized a viewshed model generated by T.J. Boyle Associates to calculate that 35.6% of the 3,462.6 square miles of land area within the 10-mile APE have potential views to the Project, as graphically depicted in map *HL9 Areas with Potential Views to Project*. As this map shows, historic sites within towns along the underground portion of the Project have potential visual impacts, which were not considered by the Applicants.

We also analyzed the Applicants' town-level datasheets included in the *Assessment of Historic Properties* report to quantitatively understand the incorporation of landscape setting within the assessment of potential impacts according to the following five lines of review:

1. Number of properties for which the report identifies views of the Project from a historic property landscape: 398
2. Number of views to the Project from a historic property dismissed because they were not from or of building facades: 148
3. Number of historic properties with views to Project identified as blocked by vegetation: 192
4. Number of properties with views to Project discounted as being "not historically significant": 168
5. Number of properties identified as potential cultural landscapes: 141

As these numbers indicate, the focus on buildings in both the identification and visual assessment phases limited the capture of cultural landscapes and the assessment of Project impacts to landscape resources. During field review for impacted sites, the degree of effect was assessed based on the degree of visibility for 'historically significant' views. It is unclear how the Applicants' consultants determined which views were historically significant without conducting the requisite research. In addition the Applicants assessed a large number of properties with landscape views to the project as either 'not historically significant' or blocked by vegetation.

9. Unclear/Improper Sequence of Identification-Eligibility-Assessment

The report identified 194 properties were found to have more than minimal views. This group of 194 was divided into sites with integrity and sites without integrity. Those found to contain integrity were then screened for significance, a process out of sequence with established preservation guidance. According to Federal guidance (*National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*) the steps to evaluating a historic property as eligible for listing to National Register are:

1. Identify the historic context (local, state, national story that makes this property important)
2. Identify the type of significance (using the four Criteria listed below)
3. Evaluate property integrity

While the Applicants appropriately relied on the DOE Project Area Forms to identify broad historic context for geographic regions of the state hosting the Project, the report does not establish a process for consistently determining significance of particular sites or areas through research. Without first identifying the importance of a historic site, within its historic and cultural context, it is improper to attempt to determine significance or evaluate integrity.

Significance is determined according to four criteria, and integrity of a historic site is grounded in the retention of physical features that allow the property to exhibit its significance according to one of these four criteria, listed below:

Criterion A: associated with events that have made a significant contribution to the broad patterns of our history; or

Criterion B: associated with the lives of persons significant in our past; or

Criterion C: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

Criterion D: have yielded, or may be likely to yield, information important in prehistory or history

The Applicants' assessment of Integrity appears to have been based solely on architectural retention of a building's original details (aligns to Criterion C), not the retention of landscape features of the property or district that are aligned to other criteria. Of the 12 potentially adversely effected properties, over half were proposed significant to Criterion C. The remaining properties were identified as potentially significant for Criterion A for agriculture, recreation, and conservation.

Within federal guidance there are established historic themes for which a site can be significant. The Applicants considered only "visual areas of significance" to determine which properties should be individually assessed for visual impact by the Project. They state that for the following themes of significance they selected, the "visual components/setting" of the property "were elements of significance": Agriculture, Architecture, Community Planning and Development, Conservation, Landscape Architecture, Recreation.¹⁵ This logic has two limitations:

1. The "setting" is important for all historic resources and is one of the seven measures of integrity.¹⁶
2. It is unclear how, if at all, the Preservation Company identified any of these themes in the field, aside from agriculture, architecture, and potentially, recreation.

In evaluating the Project visual effect on a historic site, the Applicants used four insufficiently developed and idiosyncratic criteria as noted below:

- Where Project is visible in primary public views of resource (these may not be historically significant views)
- Where visible from the resources (data review indicates an architectural bias for views from buildings rather than landscape)
- Where the Project will be a focal point distracting from appreciation of the resources (data review indicates an architectural bias for views to building facades)
- Where Project isolates resource from its historic setting (this should be informed by research)

¹⁵ Assessment of Historic Resources, Executive Summary, p10.

¹⁶ All 30 of the major historic themes for evaluating significance for the National Register have a visual component as listed in *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*

In evaluating site impact using these criteria, the Applicants considered site conditions we find inappropriate: screening vegetation, existing transmission facilities and the overall integrity of the setting. Given the impermanence of vegetation, prone to purposeful removal or weather events, we find the use of vegetation as minimization improper, particularly if on adjacent sites. The existence of transmission lines should not be used to justify further degradation of a historic site because the proposed Project will provide a larger scale and more prominent features than the existing, historic transmission lines.

Findings: Overall we find the Applicants' consideration of impacts to historic sites insufficient for the purposes of the SEC application due to incomplete capture of historic sites and an unclear framework for assessing "unreasonable adverse effect," resulting from an inappropriately narrow APE and methods not suited to identifying and assessing cultural landscapes. Historic site survey for the DOE Section 106 process identified over 200 historic sites that had potential effect and should be evaluated through further survey. It is unclear how the Applicants were able to determine effect with less information than that produced through the DOE Section 106 study.

C. Assessment of Applicants' Scenic Resources Methods and Capture of Historic Sites

As stated within SEC Rule, historic sites with scenic quality are classified as scenic resources and should therefore be included in the Applicants' Visual Impact Assessment. Our review of the VIA found a limited inclusion of historic sites within a three-mile APE.

The Applicants lists inclusion of historic sites within the Visual Impact Assessment, however it is unclear what sources were used to identify historic sites. At the Applicants' Aesthetics Technical Session, Terrence DeWan noted that scenic assessment only considered State or National Register listed sites, not those that were eligible for either Register. Terrence DeWan also stated that the scenic consultants only received input from Cheryl Widel regarding listed properties, but received no assistance in identifying additional historic sites within the Applicants' three-mile scenic APE. Further, using a three tier system for classifying the cultural significance of all scenic resources as either Low, Medium, or High, the Applicants reduced the number of resources assessed for visual impact. Only those classified as Medium or High cultural value that computer viewshed modelling showed to have possible views to the Project were assessed for visual impact.

According to the VIA report, historic sites were classified as Medium cultural value if they were listed in the State Register, and High cultural value if listed on the National Register.¹⁷ This system of classification removed locally valued resources and those determined eligible for state and national registers from any consideration of impacts. In addition, two National Register listed historic sites, Franklin Falls Historic District (Franklin) and Indian Stream Schoolhouse (Pittsburg) were categorized as having Low cultural value (despite their national recognition) resulting in them being excluded from assessment for visual impact.

¹⁷ The Applicants did include some local historic sites identified in town master plans, but due to their unlisted status, these resources were categorized as "Low" cultural value and the Project impact to them was not assessed.

Sites with medium or high cultural value were then evaluated using a rubric of aesthetic judgements on the quality and variety of the landscape scene. The value classification reduces the importance of local resources, many of which may be historic and rural cultural landscapes. Cultural landscapes, particularly in agricultural areas and historic town centers, may be central to the daily experience of local people and may not possess the dynamic visual quality that scores highly in scenic assessments.

Our review of the Applicants' VIA found 40 historic sites included in the identification of scenic resources. Of these 40, only four were assessed for impact: Mountain View Grand, Rocks Estate, Deerfield Center, and the CCC Camp Museum Complex in Bear Brook State Park. The remaining 36 were categorized as having low cultural value or were determined through their viewshed model not to have any views to the Project.

The VIA found in their assessment of the four historic sites that all four had potential for low effect from the Project, with one, Deerfield Center experiencing a low-medium effect. The historic properties were reviewed based on scenic values which are not necessarily pertinent to the visual effects the Project may have on the experience and integrity of the historically significant site. For example, the Daniel Webster Farm, a National Historic Landmark was assessed within the study as merely "conservation lands open to the public preserved for scenic qualities."

Despite some focus on landscape scale resources, the Applicants did not identify or provide an assessment of impact to cultural landscapes within the scenic assessment. The Applicants included descriptions of community existing conditions in the introduction to each geographic sub-area along the APE. However, these descriptions do not describe landscape character according to form, texture, and scale to provide necessary context for evaluating the overall impact of the Project. Also missing is a description of the overall character of the landscape context for scenic resources, including historic sites.¹⁸ In their final assessment the scenic consultants appear to evaluate the Project as to whether it poses atypical visual impact and what its effects will be on continued recreation in New Hampshire. However, this does not assess the overall level of landscape change people may experience as a result of the Project, and it does not address the cumulative experience the Project may have on the 'intrinsic scenic qualities' the report identifies as bringing people to the state.¹⁹

D. Assessment of Overall Capture of Historic Sites and Cultural Landscapes

The Applicants assessments of impacts to historic sites and other scenic resources employed study methods that unreasonably limited the number of historic sites identified and assessed for impact, by removing locally valued resources from consideration, and employing assessment strategies that are not suited for addressing impacts to historic sites. The lack of collaboration between the two studies further limited the number of historic sites assessed. Through their windshield survey of a 1 mile APE and mapping, Preservation Company identified over 1200 historic resources, only 5% of which they noted had previously been documented. These resources, especially those the Preservation Company determined potentially eligible should have been included in the scenic

¹⁸ Pursuant to Site 301.05(b)(3) the Applicants must provide "A narrative and graphic description, including maps and photographs, of the physiographic, historical and cultural features of the landscape surrounding the proposed facility to provide the context for evaluation any visual impacts."

¹⁹ As provided in the *Northern Pass Visual Impact Assessment*, p.C-5.

assessment. Similarly, such an approach could have identified additional historic resources within the three-mile scenic APE, to include those that are eligible for State or National Registers.

Part 3: Historic Sites & Cultural Landscapes Comprehensive Identification

Introduction

Considering the limitations of the Applicants' historic sites and cultural landscapes identification and related assessment of impacts, Heritage Landscapes looked to the broader definitions of historic sites and cultural landscapes in the SEC Rules and the NH Historic Preservation law. The text within these rules and statutes offers guidance for consideration of the heritage of places, areas and objects extending beyond National Register of Historic Places listing or eligibility.

New Hampshire RSA 227-C provides a basis for consideration of state heritage in 227-C:1-a Findings and Purpose that notes:

I. The general court has determined that the historical, archeological, architectural, engineering, and cultural heritage of New Hampshire is one of the most important environmental assets of the state and that the rapid social and economic development of contemporary society threatens the remaining vestiges of this heritage; therefore, it is hereby declared to be public policy and in the public interest of this state to engage in a comprehensive program of historic preservation to promote the use and conservation of such property for the education, inspiration, pleasure, and enrichment of the citizens of New Hampshire.

This clear statement of public policy in the public interest toward diverse state heritage directs toward a "comprehensive program of historic preservation to promote the use and conservation of such property." The breadth of the legal framework is expressed in specific definitions, including the definition of historic resource, as "Any object, or group of objects, located in or associated with an historic property or that enhances an understanding and appreciation of New Hampshire history" (RSA 227C:1(b)).

In light of this broad mandate it is important to point out that budget restraints for the New Hampshire Division of Historic Resources has hampered the pursuit of historic context studies that establish a framework for listings or of comprehensive surveys for either historic properties or cultural landscapes that would identify properties to list.²⁰ In addition, the citizenry of New Hampshire is known to be reticent to pursue government designations in general, and for historic properties National Register listings, while NH listings are noted as only slightly more favorably perceived.²¹ These factors yield limited identification and listing of historic resources.

A. New Hampshire Historic Sites And Cultural Landscapes Identification

The SEC rules in Site 102.23 offers "Historic sites" means "historic property," as defined in RSA 227-C:1, VI, namely "any building, structure, object, district, area or site that is significant in the history, architecture, archeology or culture of this state, its communities, or the nation." These rules further

²⁰ Discussion conducted with Linda Ray Wilson, retired Deputy State Historic Preservation Officer, and James Garvin, retired State Architectural Historian, regarding NH DHR survey progress and constraints on 9 August 2016, Office of the Public Counsel, Concord NH and 1 November teleconference with DOE Consulting Parties noting loss of funding to pursue cultural landscapes survey.

²¹ As cited above discussion 9 August 2016, Concord NH.

define the terms landscape, rural area, urban cluster, and scenic quality. In particular, Site 102.26 defines “Landscape” to mean “the characteristic, visible features of an area including landforms, water forms, vegetation, historic and cultural features and all other objects and aspects of natural and human origin.”

In addition the SEC Rules reference an APE of 10 miles to each side of the proposed alignment for assessment of impacts to scenic resources for an undertaking the size of the proposed Project because there is a potential that historic resources could be impacted to that distance from the corridor. The Northern Pass Project SEC process can and should be guided by these aspects of the New Hampshire legal framework as the rules text highlights a range of historical and cultural resources beyond the single yardstick of National Register inclusion or eligibility.

For this Northern Pass Application review the Public Counsel requested that direct citizen input be sought to identify scenic and historic places, areas or objects that had value in each of the towns within the APE. This public outreach and input was carried out resulting in detailed identification of valued historic and scenic resources throughout the potential 10 mile APE.

To address this breadth of New Hampshire heritage, the following narrative, accompanied by charts and maps includes sections on:

- A. National listed and eligible properties, (*see Map HL1*), and New Hampshire state listed or eligible properties (no mapping)
- B. Additional categories of resources as historic sites and cultural landscapes, listed below
- C. Community identified historic and scenic resources (*Map HL8*)

Mapping is generally available through the New Hampshire GIS mapping database GRANIT and relevant files were obtained. No mapping is available for State listed or eligible historic properties or districts or for current use lands. Maps for the area within the 10-mile APE, as indicated in the SEC Rules, were generated by Heritage Landscapes for each set of resources employing the GRANIT database or other sources as noted. The data sets were imported into ARC GIS, an industry standard geographic information systems software program. To show and count the aboveground historic resources this GIS mapping displays the distribution, density, patterns and/or clusters within the potential Project corridor APE. These maps provide a visual reference for these publicly available cultural landscape data. The maps by category are prepared at 11 x 17 inches for the entire state to illustrate the coverage and density of resources contained within the 10 mile APE. The categories Heritage Landscapes selected as historic sites and cultural landscapes include:

- B1. Historic Graveyards, Map HL2*
- B2. Land Conservation, Map HL3*
- B3. Current Use Properties, no mapping available*
- B4. Recreation Lands, Map HL4*
- B5. Scenic Roads, Map HL5*
- B6. Trails, Map HL6*
- B7. Public Waters, Designated Rivers, Access Points, Map HL7*

The texts in the SEC rules and RSA 227-C, and other specific statutes, are interpreted by Heritage Landscapes as expressing the broad values of New Hampshire heritage sites and cultural landscapes to consider the greater good of the people of New Hampshire. For each category of resources, there is a cultural process that sets aside, protects, and/or develops for use and access to achieve a positive societal purpose.

For **Historic Graveyards** their purpose as final resting places for relatives and community members makes them respected memorial landscapes shaped as cultural landscapes. Graveyard locations generally are selected as places of honor and memory and as such are valued by the present and hopefully future generations. See Map HL2.

Land Conservation sets aside forests, farm lands, and open spaces for the benefit of the broad public through decision-making and funding from private and public sources. The process of conservation is a societal act that values places and brings resources to protecting lands from development and providing broad access. Forests are a central component of New Hampshire land conservation and these forests are not native or old growth, rather they are cultural landscapes actively stewarded and managed. Agricultural lands in productive use are also conserved and these are human-shaped and managed and as such are cultural landscapes. Forest and farm land uses are relatively constant making these historic sites as well. See Map HL3.

Current Use is a *de facto* conservation process by landowners including their properties in this program. Current use taxation reduces the tax burden on half of the acreage of the state. 82% of the state-wide lands included in current use are owned by individuals and families, Landowners can achieve an additional 20% tax reduction by providing public access to their current use acreage, and many owners choose this option. Based on the statutes current use lands are predominantly productive lands in forest and farm uses subject to stewardship and active management as cultural landscapes. In addition these lands exhibit a high degree of use continuity, contributing to the historic land uses of New Hampshire.

Recreation Lands are open to the public to provide opportunities for outdoor activities. The people of New Hampshire engage in outdoor recreation in many forms and value their access to public lands. Heritage Landscapes reviewed the GRANIT recreation data, retaining all destinations and parcels where the landscape was central to the recreational purpose and experience. Likewise recreation destinations were removed from the data if the landscape was not important to the activity. Recreation lands include sites which are smaller and areas covering large acreages. As places shaped for and by human uses recreation lands are cultural landscapes. See Map HL4.

Scenic Roads crisscross the state offering views of the adjacent landscapes in all directions. The designation of scenic quality at the town, state or national level is a societal act determined on the quality of the experience of traversing that road. Scenic roads are important for visual access to the experience of the bordering landscapes. Many scenic roads offer long views over cultural and natural landscapes, traverse routes dotted with historic structures, lead to covered bridges and along stone walls. Scenic roads are generally located along historic routes through the countryside that have persisted over decades. See Map HL5.

Public Trails are mapped in a dense web across the state providing access and experience of varied landscapes, predominantly on forest lands. Trails are included as human shaped landscape features, laid out and constructed by people as a way of accessing the landscape on foot, horseback, ATV, mountain bike, snowmobile, etc. See Map HL6.

Public Waters in the form of great ponds, lakes, rivers and streams are features of every New Hampshire valley and hillside. These scenic water features and waterways are protected for nature conservation and for non-degrading human uses. Public water shorelines are also controlled through legal prescriptions that seek to avoid degrading human-created changes. The protection of

public waters is based on their multiple values including uses by residents and visitors to New Hampshire. See Map HL7.

Each of these groups of resources is considered by Heritage Landscapes to be included within the review of the proposed Project as historic sites and cultural landscapes valued by the people of New Hampshire.

The following sections address each of these types of New Hampshire heritage sites and cultural landscapes indicating the legal references, the corridor mapping as available, and the number of occurrences of the historic resource or cultural landscape category within the 10 mile APE.

B. New Hampshire Historic Sites And Cultural Landscapes Cumulative Mapping

The 10 mile APE establishes a considerably broader area to consider in terms of historic sites and cultural landscapes. To gain an understanding of density the National Register listed and eligible properties or districts data was obtained from the National Register of Historic Places Geospatial Dataset and is shown for the 10 mile APE. The National Register listed or determined eligible layer includes [159 properties or districts](#).

Historic resources were also identified by reviewing the GRANIT data layers for Recreation, Key Destinations and Geographic Name Information Service (GNIS). This effort included places and areas such as town commons or museums as historic properties within the APE and identified [103 historic recreation, destination or GNIS places](#).

New Hampshire state listed and eligible historic properties are not mapped. The listing of the towns touched by the 10 mile APE identifies [96 historic properties](#), buildings including house, schools, libraries, covered bridges and other unique resources such as the Haverhill Lime Kiln.

These identified historic resources, from three sources are shown on map [HL1 Historic Sites](#). They are likely to provide both unique and shared listings so that the total resources identified are not simply the sum of the three counts noted above as 159, 103 and 96.

The identification of the breadth of historic sites and cultural landscapes draws on New Hampshire statutes and mapping or lists of resources within that group. These references provide a summary of the resources identified in each category, encountered along the proposed Project corridor. The GIS mapping relies on existing accessible databases most frequently using the data within New Hampshire GRANIT database and others as indicated. When required Heritage Landscapes performed sorting of data by attributes.

B1. Historic Graveyards

The New Hampshire laws offers guidance for historic graveyards as cultural resources deserving respect, preservation, and management as well as offering opportunities for learning. Historic graveyards are often small areas containing graves of earlier generations, sited on private or public lands. Several statutes address these places of community memory and respect for our forbearers. RSA 289:1 Chapter provides detailed terms for having cemeteries in a town, to address lay out, funding, maintenance and record keeping, providing for management and oversight, discontinuing and relocating them. Also RSA 635 provides criminal penalties for interference with cemetery or

burial grounds, or removing or disturbing a tomb, marker or gravestone without proper notice to DHR.

The state historic preservation law offers some focus on unmarked burials in RSA 227-C. 1-a II providing specific guidance as follows:

227-C:1-a Findings and Purpose. –

II. The general court finds that:

- (a) Unmarked human burials and human remains are subject to vandalism and inadvertent destruction at an ever-increasing rate;
- (b) Existing state laws do not provide adequate protection to prevent damage to and destruction of these remains;
- (c) There is a great deal of scientific information to be gained from the proper excavation, study, and analysis of human remains recovered from such burials; and
- (d) There has been no procedure for descendants or other interested individuals to make known their concerns regarding disposition of these remains.

III. Some purposes of this chapter are:

- (a) To provide adequate protection from vandalism for unmarked human burials and human remains;
- (b) To provide adequate protection for unmarked human burials and human remains not within the jurisdiction of the county medical examiner that are encountered during archaeological excavation, construction, or other ground disturbing activities, found anywhere within the state except on federal land; and
- (c) To provide for adequate skeletal analysis of remains removed or excavated from unmarked human burials if the analysis would result in valuable scientific information.

It is appropriate to note that the text of the RSA 227 C:1 II focuses on the protection of *unmarked* burials of human remains, which can be found in historic graveyards where earlier grave markers have been lost over time, as well as historic burials in other locations throughout the state that are unmarked.

One additional section is relevant in that it enables the creation of a Commission to address documentation and preservation of historic burial grounds and cemeteries resources. RSA 227-C:12-a created a Commission on Historic Burial Grounds and Cemeteries. The purpose of the Commission is to “make recommendations on the documentation and preservation of the state’s historic burying grounds and cemeteries” and

On the establishment and criteria for a New Hampshire state register of historic burying grounds and cemeteries, including their markers, walls, gates, and other associated and identifying features and artifacts that are meaningful to the history, historic landscape, cultural, religious, craft, and architectural traditions of the state.

- (c) Concerning the protection of property owners, and owners of contiguous or surrounding properties, with respect to a listed property.
- (d) On the persons permitted to nominate a state historic burying ground or cemetery for a state register in accordance with RSA 289.
- (e) Concerning notice to potentially interested parties for proposals that affect burial grounds, and the adoption of a “public good” standard.

The statewide mapping of these historic burial grounds in NH GRANIT were identified by the NH Old Graveyards Association for six of ten counties. Mapping shown on [HL2 Historic Graveyards](#)

employs the NH GRANIT (layer graveptnh) for the historic graveyard points. The occurrences in this group that occur within the 10 mile APE include [555 historic graveyards](#).

B2. Conservation Lands

Conservation of lands and related public access to many of these lands is a deeply held value in New Hampshire. The text of several state statutes relates to these resources and the values that underpin conservation. In addition specific town master plans include language addressing conservation. Notable also are the actions of towns and citizens to raise the community and state-wide support and necessary funding to protect specific tracts of land in perpetuity.

RSA 162-C:6 clearly captures the widely held value of land conservation in its text:

In order to maintain New Hampshire's distinctive quality of life, strong economic growth must be balanced with responsible conservation initiatives, and that the history of conservation in New Hampshire has been marked by cooperation among government, business, individuals, and conservation organizations. The general court further recognizes the strong traditions of both public and private land ownership and use, and the need to respect investments in the conservation of natural resource lands in the state for the perpetual use of the people of New Hampshire. In addition, the general court recognizes that the land conservation investment program was undertaken, in part, with significant donations of cash and land value by citizens of the state who intended that the conservation value of these lands be protected in perpetuity.

Highlighting the economy and character of the state RSA 162-C:12 (eff. 12/31/16) establishes a Commission to develop a state conservation plan:

The general court finds that adequate protection of New Hampshire's natural assets is essential to maintaining and safeguarding the state's economy and character for today's population and for future generations. Continued and increased state investment in land and natural resource protection is not a luxury item in the state budget but is essential to our state's continued prosperity. To further this objective, there is established a commission to develop a long-term New Hampshire state conservation plan.

Town forests are another category of conservation lands that are set aside in each community and intended for multiple purposes. RSA 31:110 authorizes municipalities to establish town forests.

RSA 31:111 The main purpose of such city or town forest shall be to encourage the proper management of timber, firewood and other natural resources through planting, timber stand improvement, thinning, harvesting, reforestation, and other multiple use programs consistent with the forest management program, any deed restrictions and any pertinent local ordinances or regulations.

The state has also provided guidance and assistance in landscape conservation through the Land and Community Heritage Investment Program (LCHIP), established in 2000 under RSA 227. Section M:1 of this statute states the purpose of the act

“to conserve and preserve this state's most important natural, cultural, and historic resources through the acquisition of lands, and cultural and historic resources, or interests therein, of local, regional, and statewide significance, in partnership with the

state's municipalities and the private sector, for the primary purposes of protecting and ensuring the perpetual contribution of these resources to the state's economy, environment, and overall quality of life.”

LCHIP has the authority to provide financial assistance through grants and loans to acquire resource assets. As stated on the LCHIP website the open space acquisition program, has protected over 283,000 total acres, and preserved or revitalized 218 historic structures. Since inception awards of \$37 million have provided 376 grants that have “positively impacted 150 New Hampshire communities.”²² For example a 2013 Project in Pittsburg provided funds toward the protection of 278 acres of Maple Ridge Farm, which viewshed mapping indicates may have visual impact from the Project.²³

The mapping available for conservation lands was drawn from NH GRANIT (layer consnh, update May 2016) and recently conserved forest lands parcels obtained from the Society for the Protection of New Hampshire Forests were added into GIS data files. This GIS database consists of parcels two-acres or larger of generally undeveloped land. These parcels may be protected by easement limiting or eliminating future development or lands owned and/or stewarded by a public group, agency or institution intending to retain and manage the land for recreation, conservation, or educational purposes. These conserved lands are depicted for the 10 mile APE on [HL3 Conservation Lands](#). The occurrence of conserved lands within the 10 mile APE is [1816 conserved tracts](#).

B3. Current Use Lands

The purpose of the Current Use Assessment of lands is to reduce the property tax as a means of aiding landowners to keep their lands undeveloped. RSA 79-A, enacted in 1973, provides the framework for this approach to open land conservation in

RSA 79-A:1 Declaration of Public Interest. – It is hereby declared to be in the public interest to encourage the preservation of open space, thus providing a healthful and attractive outdoor environment for work and recreation of the state's citizens, maintaining the character of the state's landscape, and conserving the land, water, forest, agricultural and wildlife resources. It is further declared to be in the public interest to prevent the loss of open space due to property taxation at values incompatible with open space usage. Open space land imposes few if any costs on local government and is therefore an economic benefit to its citizens. The means for encouraging preservation of open space authorized by this chapter is the assessment of land value for property taxation on the basis of current use. It is the intent of this chapter to encourage but not to require management practices on open space lands under current use assessment.

Section 79-A:2 Definitions

V. "Current use value" means the assessed valuation per acre of open space land based upon the income producing capability of the land in its current use solely for growing forest or agricultural crops, and not its real estate market value. This valuation shall be

²² New Hampshire Land & Community Heritage Investment Program, Welcome, at <http://www.lchip.org> (last updated Jan. 6, 2006).

²³ Viewshed mapping of the Proposed project using a Digital Terrain Model of topographic conditions was created by T.J. Boyle Associates.

determined by the assessor in accordance with the range of current use values established by the board and in accordance with the class, type, grade and location of land.

VI. "Farm land" means any cleared land devoted to or capable of agricultural or horticultural use as determined and classified by criteria developed by the commissioner of agriculture, markets, and food and adopted by the board.

VII. "Forest land" means any land growing trees as determined and classified by criteria developed by the state forester and adopted by the board. For the purposes of this paragraph, the board shall recognize the cost of responsible land stewardship in the determination of assessment ranges.

VIII. "Land use change tax" means a tax that shall be levied when the land use changes from open space use to a non-qualifying use.

IX. "Open space land" means any or all farm land, forest land, or unproductive land as defined by this section. However, "open space land" shall not include any property held by a city, town or district in another city or town for the purpose of a water supply or flood control, for which a payment in place of taxes is made in accordance with RSA 72:11.

The details of the land use change tax are stringent in that once land is accepted into the current use program it remains. The land use change tax is a strong disincentive that requires payment of 10% of the land value to be paid as a penalty. In his remarks, Walter Peterson, former Governor (1979-1973), published in the "A Layperson's Guide to New Hampshire Current Use," page 3, the success of this statute is presented, published by SPACE in 2007²⁴

"Today, **nearly 3 million acres** (almost 60% of the state's taxable private land) are enrolled in the program by some 27,000 landowners. Contrary to popular notions, the average family with land in current use has below average median household income. For these and many other New Hampshire landowners, current use is the vital means by which they can afford to keep their lands.

Current use has worked well to achieve its original purpose. And, while not without occasional legislative tinkering, the law has remained remarkably similar to the original law passed in 1973. This is no accident; our lawmakers understand and have strongly supported current use taxation over the years.

In a state where tourism is an important component of the economy, it's important to reflect on the value of fair taxation of undeveloped land. The rural scenery—the farm vistas and forested country roads, appreciated by visitors and residents alike—is testament to the foresight of leading citizens and lawmakers a quarter century ago."

²⁴ SPACE 2007, located at <http://newenglandforestry.org/wp-content/uploads/2016/04/CurrentUseLaypersonsGuide.pdf>

Further, this same publication notes that court decisions have reinforced the purpose of current use taxation. In the case of Supreme Court Decision, *Tyler Road Development Corp v. Town of Londonderry*, 145 N.H. 615 (2000) at page 618

“First, the purpose of the current use system is not to facilitate development of land as the plaintiff suggests. To the contrary, the current use system was developed to encourage the preservation of open space in New Hampshire. See RSA 79-A:1.”

This 2007 SPACE report notes that 82% of lands in current use taxation are individual or family owned. As of 2007 over half of New Hampshire’s 5.74 million acres was taxed within a current use assessment. These lands were identified as 87% forest, 7% farm, 3% wetlands and 3% unproductive. While the state-wide coverage of the current use taxation is pervasive, there is no comprehensive mapping of current use lands. Records of current use parcels are held in town offices. Summary lists provide useful details. The host town communities within the proposed Northern Pass Project corridor have multiple parcels in current use taxation. The lists and parcel maps for current use properties are within each town and are not readily accessible.

B4. Recreation Lands, Parks

The category of recreation lands is another set of mapped resources that captures publicly accessible lands and destinations of various types. One category of recreation lands is State Parks which are addressed in RSA 216-A:2 stating that

It is the intent of the general court that a comprehensive state park system shall be developed, operated, and maintained to achieve the following purposes in order of the following priority:

- I. To protect and preserve unusual scenic, scientific, historical, recreational, and natural areas within the state.
- II. To continually provide such additional park areas and facilities as may be necessary to meet the recreational needs of the citizens of all regions of the state.
- III. To make these areas accessible to the public for recreational, education, scientific, and other uses consistent with their protection and preservation.
- IV. To encourage and support tourism and related economic activity within the state.

Heritage Landscapes assessed the NH Granit Recreation data base sorting out entries on that list that relied on landscape or a landscape setting for the recreation experience, eliminating indoor or event focused recreation sites. Recreation sites and areas for which landscape context is primary to enjoyment of activity. Data was extracted from Granit recreation layers according to "Primary Use" attribute to include values such as natural area, trail area, fishing, picnic, swimming, and scenic road. Data includes private lands, local state and federal lands. The data set contains overlap with Conserved Public lands and also includes 6 identified overlooks extracted from state data layers. Shown on [HL4 Recreation](#) the occurrence within the 10 mile APE includes [419 recreation sites](#), and [618 recreation area parcels](#) wholly or partially included in the proposed corridor.

B5. Designated Scenic Roads

Scenic roads and scenic and cultural byways carry designations at the town, state or national level. For state roads RSA 238:19 establishes a byway system “to provide the opportunity for residents and visitors to travel a system of byways which feature the scenic and cultural qualities of the state within the existing highway system, promote retention of rural and urban scenic byways, support the cultural, recreational and historic attributes along these byways and expose the unique elements of the state's beauty, culture and history.” The RSA 238:19 intent and process are specified as

II. It is the intent of the general court that the scenic and cultural assets of the byways will be respected, that the rights of individual property owners shall be preserved, and that nothing in this subdivision shall be interpreted to preempt any land and zoning authority granted to municipalities under title LXIV.

III. It shall be a process of state and local identification of scenic and cultural byways that shall build a statewide system. However, nothing in this subdivision shall restrict a municipality from designating scenic byways within its jurisdiction, require that such designated scenic byways be nominated for inclusion in the New Hampshire scenic and cultural byways system, or require that the scenic and cultural byways council accept such locally designated scenic byway into the system.

To address town roads RSA 231:157 provides controls for changes. For example a town scenic road designation requires that property owners get planning board approval to remove certain sized trees or disturb stone walls. The purpose of the scenic road statute is to “encourage the tourist attractiveness of our scenic roads in our towns and permit the retention of trees and stone walls so characteristic of our New England scenery” (RSA 231:157).

The scenic roads, shown on [HL5 Scenic Roads](#) are mapped to include national, state and town designations. Within the 10 mile APE there are [573 miles of scenic roads](#).

B6.Trails

In a state where outdoor recreation is widely enjoyed by residents and visitors the creation and care of a trail system began decades ago, some contemporary trails and roads appear to originate from the indigenous American Indian routes of earlier centuries, which continue to mark the landscape today. Town, state and national trails are designated in an overlapping state-wide network.

RSA 216-F establishes a statewide trail system and authorizes the state to acquire lands to create them. RSA 216-F:2 notes that

The trails within the system shall be held, developed and administered under this chapter primarily as recreational trails for hiking, nature walks, bird watching, horseback riding, bicycling, ski touring, snowshoeing, snowmobiling, mushing, and off highway recreational vehicles and the natural scenic beauty thereof shall be preserved insofar as is practical; provided, however, that the commissioner may permit uses of trails and land acquired hereunder, by the owner of adjoining land or others, in such a manner and at such seasons as will not substantially interfere with the primary use of

the trails. Use of motorized devices by mushers shall be limited to trails designated as appropriate for motorized use.

In addition RSA 231-A authorizes towns to acquire and establish trails for public access. National trails are also present in the state, notably the Appalachian Trail. A network of trails provides extensive access to the public lands and along scenic byways of New Hampshire.

[HL6 Trails](#) shows the identified hiking, skiing, snowmobile and ATV trails are included in the NH GRANIT trails, recreation layer. Within the 10 mile APE the [trails network traverses 1,542 miles](#).

B7.Public Ponds and Lakes

The landscape composition of New Hampshire, is composed of valleys, hills, mountains, and gracefully sloping fields is dotted with water bodies. These water resources are characteristic of the native and human shaped landscape of the state. A group of state statutes outlines the values, uses and protections of the public waters of New Hampshire. RSA 483-A establishes the Lakes Management and Protection Program and provides guidance. The initial statement of policy in RSA 483-A:1 details the biological, social and economic value of lakes as state assets

New Hampshire's lakes are one of its most important natural resources; vital to wildlife, fisheries, recreation, tourism, and the quality of life of its citizens. It is the policy of the state to insure the continued vitality of New Hampshire lakes as key biological, social, and economic assets, while providing that public health is ensured for the benefit of present and future generations. The state shall encourage and assist in the development of management plans for the waters as well as the shoreland to conserve and protect valued characteristics, including recreational, aesthetic, and those of community significance, so that these valued characteristics shall endure as part of lake uses to be enjoyed by the citizens of New Hampshire. If conflicts arise in the attempt to protect the valued characteristics of a lake, priority shall be given to those characteristics that are necessary to meet state water quality standards.

Under RSA 483-A:7, the lakes coordinator at NHDES is charged to develop lake management and shoreland protection plans. The plans are intended to address: recreational and non-recreational uses and activities; existing and future land uses; protection of wetlands, wildlife, fish habitats, and other significant natural areas; dams, bridges, and other water structures; public access by foot and vehicle; setbacks and other location requirements; dredging, filling, mining, and earth moving; prohibited uses; factors controlling water levels and flowage rights; facilities appropriate to support approved lake uses; water safety; and other factors affecting water quality. The planning foci as described focus on both protecting and using public water resources. These public waters serve residents and visitors as destinations that provide access and enjoyment of natural and human manipulated water bodies for varied cultural uses.

Great ponds are public waters of more than 10 acres. Pursuant to RSA 4:40-a, the state holds title to the bed and water of a lake to the mean natural high water line and provides these large water bodies for appropriate, non-degrading public uses. In accord with legal decisions “any member of the public may exercise a common law right to boat, bathe, fish, fowl, skate and cut ice in and on its public waters.”²⁵

²⁵ *Whitcher v. State*, 87 N.H. 405, 409 (1935)

Further RSA 233-A:1 and A:2 focus on public access to waters and establish a public water access advisory board to “Advise and monitor state agency public access efforts including the statewide public boat access program.” And in A:2 e specifies boat access

(e) Recommend to the fish and game department, priorities for the siting and development of public boat access areas, based on the demands and needs for different types of public boat access areas and public water bodies giving consideration to any lists provided to the board by any associated groups or interested parties.

RSA 233-A:3 establishes the Statewide Public Boat Access Program with clear direction toward the launching of private boats on these public waters with “The goal of the program is the acquisition, construction, refurbishment, maintenance, and operation of new and existing public boat access areas.”

Retention of the quality of the public water environment and the character of the scenery along water body and waterway shorelines if identified and detailed in the Shoreland Protection Act, RSA 483-B:1 a statute with that delineates both values and shoreline treatment in its purposes

I. The shorelands of the state are among its most valuable and fragile natural resources and their protection is essential to maintain the integrity of public waters.

I-a. A natural woodland buffer, consisting of trees and other vegetation located in areas adjoining public waters, functions to intercept surface runoff, wastewater, subsurface flow, and deeper groundwater flows from upland sources and to remove or minimize the effects of nutrients, sediment, organic matter, pesticides, and other pollutants and to moderate the temperature of the near-shore waters.

I-b. Scientific evidence has confirmed that even small areas of impervious surface coverage can have deleterious impacts on water quality and the aesthetic beauty of our lakes and rivers if not properly contained or managed within each watershed. These impacts are known to reduce recreational opportunity, reduce property values, and pose human health risks.

II. The public waters of New Hampshire are valuable resources held in trust by the state. The state has an interest in protecting those waters and has the jurisdiction to control the use of the public waters and the adjacent shoreland for the greatest public benefit.

III. There is great concern throughout the state relating to the utilization, protection, restoration and preservation of shorelands because of their effect on state waters.

IV. Under current law the potential exists for uncoordinated, unplanned and piecemeal development along the state's shorelines, which could result in significant negative impacts on the public waters of New Hampshire.

Controlling human degradation of public waters through application of good practices along shorelines indicates human stewardship of natural resources with shorelands shaped by stewardship and management, which integrates the natural and cultural aspects of water resources.

Public waters in New Hampshire are prescribed by common law as great ponds (natural waterbodies of 10 acres or more in size), public rivers and streams, and tidal waters. These common law public waters are held by the State in trust for the people of New Hampshire. The State holds the land underlying great ponds and tidal waters (including tidal rivers) in trust for the people of New Hampshire. Private property owners generally hold title to the land underlying freshwater rivers and streams, and the State controls an easement over this land for public

purposes. (NH Official List of Public Waters Revised July 29, 2016) Public waters include public lakes and ponds, rivers and streams and public access points. These aquatic environmental assets are owned or held in trust by the State. Shown on Map [HL 7 Public Waters](#) are water bodies 10 acres or more in size, public rivers and streams, and tidal waters. Diverse access point types include gravel ramps, fishing access and swimming beaches with walk-in or remote access positioning based on the site.

River and stream corridors are waterways traversing the low lying areas of the state. They are classified in natural and cultural resources in different categories that indicate natural processes and human influences. Scenic Rivers are addressed in the New Hampshire Rivers Management and Protection Program. The purpose of this statute is set forth in RSA 483:1 Statement of Policy

New Hampshire's rivers and streams comprise one of its most important natural resources, historically vital to New Hampshire's commerce, industry, and tourism, and the quality of life of New Hampshire people. It is the policy of the state to ensure the continued viability of New Hampshire rivers as valued ecologic, economic, public health and safety, and social assets for the benefit of present and future generations. The state shall encourage and assist in the development of river corridor management plans and regulate the quantity and quality of instream flow along certain protected rivers or segments of rivers to conserve and protect outstanding characteristics including recreational, fisheries, wildlife, environmental, hydropower, cultural, historical, archaeological, scientific, ecological, aesthetic, community significance, agricultural, and public water supply so that these valued characteristics shall endure as part of the river uses to be enjoyed by New Hampshire people. If conflicts arise in the attempt to protect all valued characteristics within a river or stream, priority shall be given to those characteristics that are necessary to meet state water quality standards.

This purpose clearly states the intent to conserve and protect outstanding characteristics which include historical, and cultural aspects.

Further RSA 483:2 establishes the Rivers Management and Protection Program at NHDES notes

It is the intent of the legislature that the New Hampshire rivers management and protection program shall complement and reinforce existing state and federal water quality laws, and that in-stream flows are maintained along protected rivers, or segments thereof, in a manner that will enhance or not diminish the enjoyment of outstanding river characteristics pursuant to RSA 483:1. It is also the intent of the legislature that, through said program, the scenic beauty and recreational potential of such rivers shall be restored and maintained, that riparian interests shall be respected,

RSA 483:6. Designation for protection in RSA 483:7-a includes classifications as natural, rural, rural-community and community rivers recognizing the variations in river course reflecting human modification into cultural landscapes.

The density of occurrence of shown on [HL 7 Public Waters](#) in 10 mile APE include [638 public lakes and ponds](#), [2419 measured segments](#) of public rivers and streams with [288 public access points](#) as identified on the NH Granite rivers mapping.

C. Community Workshops Historic and Scenic Resources Identification

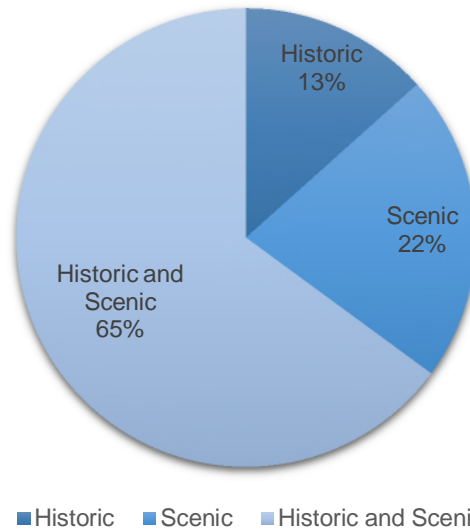
To specifically address the lack of locally known and valued historic sites and other scenic resources, Heritage Landscapes in collaboration with T.J. Boyle Associates conducted community workshops to solicit local knowledge from the 108 towns included in the 10 mile APE.

Between July 26th and August 17th, six community workshops were held in towns distributed along the proposed Project corridor: Colebrook, Lancaster, Littleton, Ashland and Concord. The meetings received widespread public notice throughout all and were held at public buildings. A total of 170 people attended these workshops.

At each workshop participants were invited to nominate local historic features, places and areas, and scenic resources by placing stickers on town maps and completing a series of questions. This survey sheet was filled out for each identified resource, with information on historic sites captured on one side and information on scenic resources captured on the reverse. If an identified resource was considered by the participant as both historic and scenic, both sides of the sheet were completed. Participants were asked to nominate whatever historic sites or scenic resources they felt met the criteria during the approximately 2 hour workshop. Each resource was mapped once, but no limit was placed on the number of participants who could submit a survey for a specific identified resource.

The community workshops generated 997 survey forms and resulted in the identification of 741 unique sites within 59 towns. Of these unique sites, 99 were identified only as a historic site, 481 were identified as both historic and scenic, and 161 were identified as only a scenic site. A total of 580 unique properties with the historic side of the community response form completed. The handwritten forms and the marked maps from the community workshops were individually and thoroughly entered into a GIS dataset.²⁶ These community historic identified places, areas or objects are shown on [HL 8 Community Identified Historic](#). As illustrated in chart C1 below, workshop participants categorized as historic over half of the resources they nominated.

²⁶ Refer to the T.J.Boyle report for additional details on Community Workshops data collection and processing

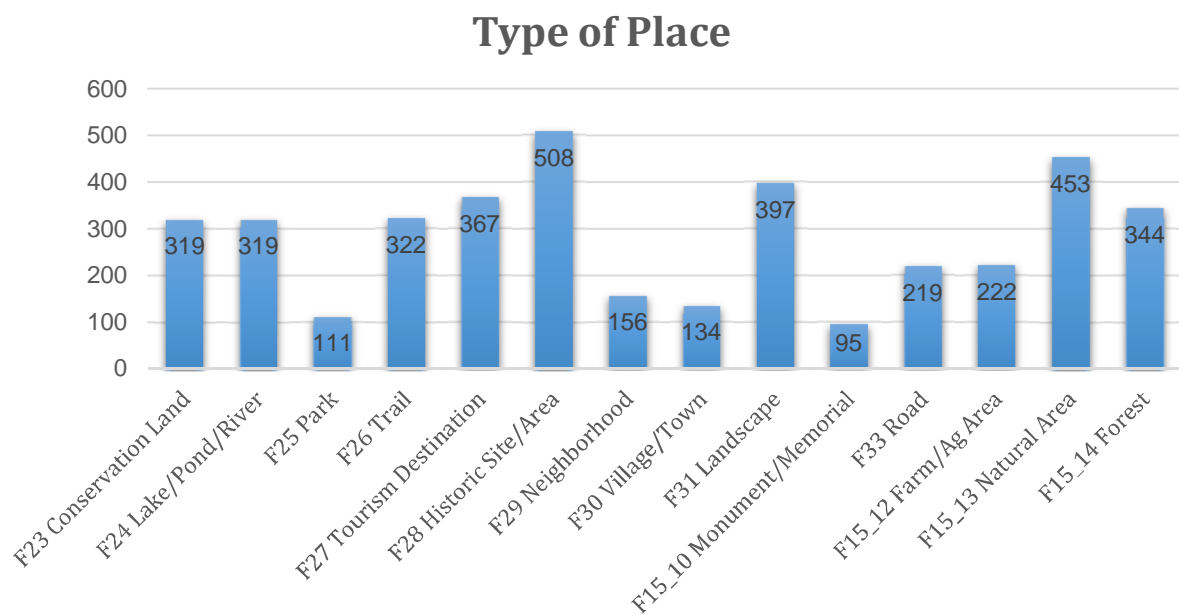


C1. Breakdown of identified resources according to historic and scenic categories

Survey sheets collected data on historic sites to understand three key characteristics of the identified historic sites:

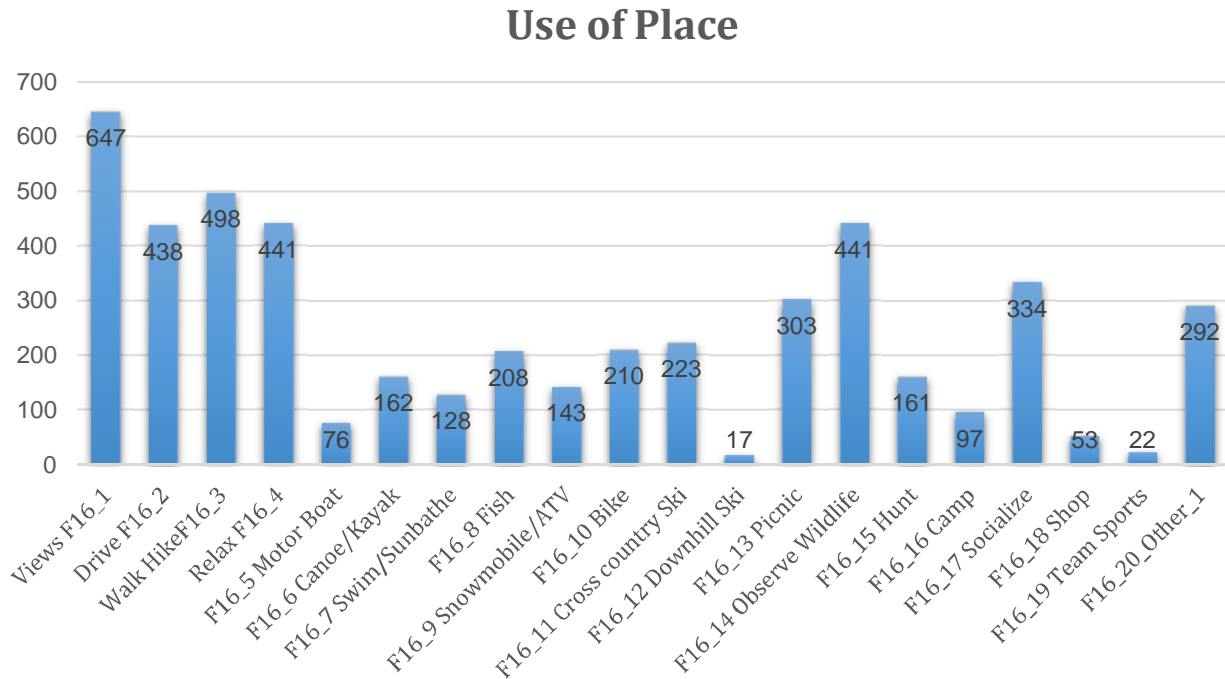
1. What type of place it is
2. How people experience the place
3. Why the place is important to them

Participants were asked to characterize the type of place they identified as a historic site, as filled out on the historic side of the form, according to 14 categories. The most common responses were “Historic Site or Area” and “Natural Area” as shown in the chart C2 below. Respondents were able to select multiple categories.



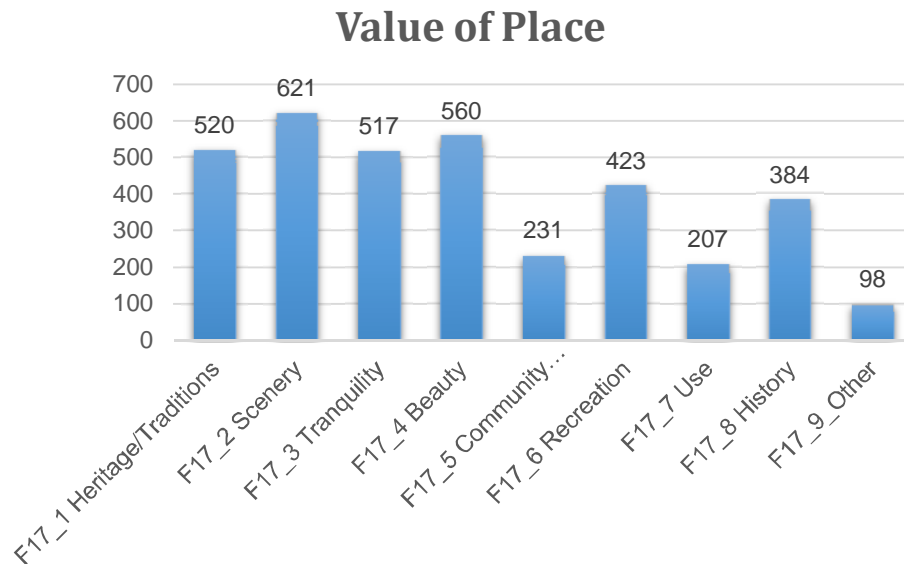
C2. Categories of historic site types identified during community workshops

The second question sought to understand how participants experienced local historic sites through different types of use. The most commonly selected use was “Enjoy/Appreciate Views.” Other commonly selected categories also indicate the importance of the visual quality of the landscape, including “Drive by/through” “Walk/Hike” “Relax” and “Observe Wildlife.” Participants also wrote in values 292 times to include uses such as ice nature-based sporting activity (e.g. climbing), photography, community events, foraging, and historical research or appreciation.



C3. Categories of historic site uses identified during community workshops

The third question on the historic sites survey asked participants to identify reasons the place held importance to them, selecting all categories that applied or supplying their own value. Scenery was the most frequently selected value, followed by “Beauty” “Heritage/Traditions” and “Tranquility.” There were 98 additional values supplied by community members in the “Other” category including religious value, family and local history, food production/foraging, natural resources, and as providing a historic sense of place.



C4. Categories of historic site values identified during community workshops

Data collected through the community workshops suggests a correlation between historic and scenic resources. This indicates not only the importance of the landscape context of historic sites to participants, but also suggests a general appreciation for the landscape itself as a heritage resource.

D. Summary Comprehensive Capture of Historic Sites, Cultural Landscapes

Alignment to the purpose, intent and guidance provided by the New Hampshire statutes and the SEC rules guided this process of identification of historic sites and cultural landscapes within the 10 mile APE. By employing available mapping the categories addressed have also been graphically displayed, with a few exceptions where mapping was unavailable. The findings indicate that within this APE there are a wealth of historic sites and cultural landscapes that are valued for the contributions they make to New Hampshire and its citizens. This listing shows the summary of valued historic sites and cultural landscapes presented above.

10 Mile APE Map	Historic Site Cultural Landscape Category	Count or Measure
HL1	National Register List/DOE	159
	NH State Register List/DOE	96 no mapping
	GNIS Identified Historic	78
HL2	Historic Graveyards	555
HL3	Conservation Lands	2192 parcels/1,098 sq.miles
	Current Use Properties	widespread no mapping
HL4	Recreation Lands- Sites	419
	Recreation Lands- Areas	756 sq. miles
HL5	Scenic Roads	573 miles
HL6	Trails	1,542 miles
HL7	Public Waters - Lakes or Ponds	638
	Designated Rivers	2419 segments
	Public Waters Access Points	288
HL8	Community Historic Sites	580

In conclusion, it is the opinion of Heritage Landscapes that the Applicant failed to take into consideration the statutes of New Hampshire and the SEC rules when considering the broad heritage of New Hampshire. They relied instead on the DOE guidance on the APE of 1 mile and the definition solely of listed and eligible historic properties. This process has identified six categories of historic sites and cultural landscapes, citing of the applicable states and mapping occurrences throughout the proposed Project corridor. In addition the input received from citizens at six public workshops to identify historic sites has been analyzed and mapped to incorporate the values of the public. This large and geographically widespread group of historic sites and cultural landscapes are assets of New Hampshire that benefit citizens and visitors. They should all be considered in relation to the potential Project effects.

Part 4: HISTORIC SITES AND CULTURAL LANDSCAPES ALONG PROPOSED PROJECT CORRIDOR THROUGH HOST TOWNS

E. Host Town Summaries and Mapping

Historic sites and cultural landscapes are widespread and pervasive throughout New Hampshire. As indicated in the statewide discussion and mapping, by properly applying the New Hampshire statutes relevant to these resources and focusing on the SEC Rules, more categories of New Hampshire assets are identified in this report as historic sites and cultural landscapes. In order to gain a spatial understanding and enumeration of the host town resources, those communities with the greatest potential for adverse effects from the proposed Project, Heritage Landscapes mapped and counted these resources at the town level.²⁷ For each town a concise compilation was created to include:

- Relevant town planning or zoning excerpts from 28 of these 35 town addressing values and intent to preserve and protect historic, scenic and natural resources and cultural landscapes of their community
- Applicant identified potential visual impacts for identified historic properties
- Comparison of Applicants' 1 mile APE and overall town-wide Listed or DOE historic resources
- List and counts of Heritage Landscapes identified historic sites and cultural landscapes on town summaries and in summary chart

Using data available online from the New Hampshire GIS clearinghouse, GRANIT, and data collected from several other sources, Heritage Landscapes created town level maps to graphically assess the distribution and density of historic sites and cultural landscapes within each host town that may be impacted by the proposed Project.²⁸ Existing GIS layers were minimally processed to remove obvious instances of duplicated resources between layers and to extract data pertinent to this study. Additional data was digitized to capture Designated Rivers and Community Identified Historic Sites.

These town level maps identify clusters of resources and patterns of associated resources valued by the citizens of New Hampshire. Heritage Landscapes' identification and enumeration of host town historic sites and cultural Landscapes is depicted on town maps to provide a graphic coverage of these resources. These maps clearly demonstrate considerable coverage and overlaps of these resources in every community.

There are 35 town summaries included, organized from north to south starting with Pittsburg and ending with Deerfield, in parallel to the Applicants assessment. These town

²⁷ Four additional non-host towns, Littleton, Jefferson, Boscawen and Epsom, are within a 1-mile APE and were included in our mapping and resource identification as they were also included by the Applicants' historic resource assessment and allow for a comparative assessment of overall capture of historic sites and cultural landscapes.

²⁸ Several data layers used within this assessment were obtained from T.J. Boyle Associates, scenic resource experts for Counsel for the Public. See the statewide data layer maps HL1 –HL8 for specific data sources.

summaries are sequentially titled by a number from 1 to 35 and the name of the town. The 35 towns reviewed by Heritage Landscapes include 31 host towns (for both above- and underground sections of the Project) and 4 additional towns located within the 1-mile APE that were included in the Applicants' reporting.

1 Pittsburg Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Pittsburg. Planning and zoning documents for Pittsburg that include references to scenic, historic and recreational resources and values were not located.

In terms of current use lands, Pittsburg includes 180,680.5 acres of land and of these 130,746.9 acres are current use taxation parcels making up 72.36% of the total town. Pittsburg current use lands include 252 parcels, held by 122 owners. Of these current use lands 126,875 acres or 97% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 70% of the total land area of Pittsburg.

The Applicants identified 11 historic properties within a 1-mile APE that could be indirectly (visually) impacted from the proposed Project. One cultural landscape was included in this group. The Applicant assigned each property a visual impact category related to the degree of potential visual effect. Of the 11 historic properties, 8 were noted with minimal or more than minimal views, while zero were found to be adversely effected. The Applicants' determination of views was:

11 Pittsburg Historic Properties Applicants Identified Visual Impacts

5	More Than Minimal views
3	Minimal views
2	No views
1	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
8	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants considered visual impact to the landscape context of each property.

Pittsburg Property Views, Applicants' determination of View Relationship to Project

8	Properties have views from landscapes
2	Dismissed not to/from building
5	Dismissed for vegetation blocking views
3	Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Pittsburg to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicants' 1 mile APE	Entire Town
State Listed/DOE site	0	2
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	1
NR Listed/DOE/NHL district or area	0	0
Totals	0	3

Pittsburg has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without the unmapped state listed and determined eligible properties or the current use lands covering 72.36% of town acreage, are shown on the accompanying Pittsburg map.

Resource Category &	Town Count		
NH State Register List/DOE	3	Public Water Access Points	15
GNIS Historic Designation	3	Community Identified Historic	14
Historic Graveyards	4	Scenic Roads (miles)	28
Conservation Lands	43	Trails (miles)	65
Recreation Lands- Sites	30	Designated Rivers (miles)	32
Recreation Lands- Areas	12		
Public Lakes or Ponds	31	Current Use Properties	252

The historic sites and cultural landscapes of Pittsburg, as enumerated above these sum to: 155 counts; 93 miles of trails and scenic roads and 32 miles of Designated River; and 252 properties in current use. These resources are clustered and dispersed through the town. Conservation and recreation lands are mapped and cover a high percentage of town lands. The proposed project corridor traverses recreation lands and community identified resources.

2 Clarksville Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes' identification of additional historic sites and cultural landscape resources for Clarksville. There was no guidance located regarding planning or zoning documents for Clarksville that addressed historic, cultural, scenic or recreational resources.

In terms of current use lands, Clarksville includes 38,685.93 acres of land and of these 32,654.97 acres are current use taxation parcels making up 84.41% of the total town area.

Clarksville current use lands include 196 parcels, held by 152 owners. Of these current use lands 26,243.10 acres or 80.36% of those in current use are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 80.36% of the total land area of Clarksville.

The Applicants identified eleven historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Two cultural landscapes were included in this group. The Applicants assigned each property a visual impact category related to the degree of potential visual effect. Of the 34 historic properties, 20 were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

34 Clarksville Historic Properties Applicants' Identified Visual Impacts

- 11 More Than Minimal views
- 9 Minimal views
- 11 No views
- 3 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Affected
- 20 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Clarksville Property Views, Applicants' determination of View Relationship to Project

- 2 Dismissed not to or from building
- 5 Dismissed for vegetation blocking views
- 2 Dismissed as not historically significant
- 16 Identified with landscape views

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Clarksville to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	0
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	2
NR Listed/DOE/NHL district or area	0	0
Totals	0	2

Clarksville has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, with the exception of the state listed or eligible properties and current uses lands covering 84.41% of town acreage, are shown on the accompanying Clarksville map.

Resource Category &		Town Count	
State NR listed DOE	2	Public Water Access Points	1
GNIS Historic Designation	6	Community Identified Historic	16
Historic Graveyards	1	Scenic Roads (miles)	
Conservation Lands	8	11	
Recreation Lands- Sites	2	Trails (miles)	52
Recreation Lands- Areas	1	Designated Rivers (miles)	11
Public Lakes or Ponds			
5		Current Use Properties	196

The historic sites and cultural landscapes of Clarksville, as enumerated above sum to 42 counts and 63 miles of trails and scenic roads and 11 miles of Designated River. These resources are pervasive throughout the town with designated scenic roads and trails particularly abundant. Specific historic sites and cultural landscapes are located along the proposed Project corridor.

3 Stewartstown Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes' identification of additional historic and cultural resources for Stewartstown. There are both underground and above ground section of the proposed Project corridor in Stewartstown. Planning and zoning documents addressing cultural, scenic and natural resources for Stewartstown were not located.

In terms of current use lands, Stewartstown includes 29,772.67 acres of land and of these 23,448.15 acres are current use taxation parcels making up 78.76% of the total town area. Stewartstown current use lands include 393 parcels, held by 246 owners. Of these current use lands 16,151.24 acres or 68.9% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 54.25% of the total land area of Stewartstown.

The Applicants identified 24 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. No cultural landscapes were included in this group. The Applicants assigned each property a visual impact category related to the degree of potential visual effect. Of the 24 historic properties, eight were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

24 Stewartstown Historic Properties Applicants' Identified Visual Impacts

- 4 More Than Minimal views
- 4 Minimal views
- 16 No views
- 0 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Effected
- 8 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Stewartstown Property Views, Applicants' determination of View Relationship to Project

- 8 Properties have views from landscapes
- 1 Dismissed not to/from building
- 2 Dismissed for vegetation blocking views
- 3 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Stewartstown to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicants' 1 mile APE	Entire Town
State Listed/DOE site	0	4
State Listed/DOE district or area	0	1
NR Listed/DOE/NHL site	0	4
NR Listed/DOE/NHL district or area	0	1
Totals	0	10

Stewartstown has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources with the exception of the current use lands covering 78.76% of the town acreage, and state listed or eligible properties, are shown on the accompanying Stewartstown map.

Resource Category &	Town Count		
State NR List DOE	10	Public Water Access Points	4
GNIS Historic Designation	7	Community Identified Historic	29
Historic Graveyards	3	Scenic Roads (miles)	12
Conservation Lands	21	Trails (miles)	37.5
Recreation Lands- Sites	4	Designated Rivers (miles)	8.5
Recreation Lands- Areas	3		
Public Lakes or Ponds		Current Use Properties	393
3			

The historic sites and cultural landscapes of Stewartstown, as enumerated above sum to: 84 count; 49.5 miles of trails and scenic roads; 8.5 miles of designated rivers and streams; and 393 parcels in current use. Conservation and recreation lands are readily noted on the town map while a further 393 parcels in current use are likely widespread. There are identified resources along the proposed Project corridor.

4 Dixville Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes' identification of additional historic and cultural resources for Dixville.

As noted in the Coos County Master Plan (adopted 2006), Dixville and other Unincorporated Places in Coos County "comprise the largest undeveloped region in New Hampshire. This area is one of few areas in New England where conservation of large acreages of woodland is still possible." The Master plan expresses values in sustaining heritage land uses, balanced with recreation and scenic enjoyment of historic sites and cultural landscapes:

The single most outstanding feature of these northern lands is the thousands of acres of forests. The forest is the County's most valuable economic resource and supplies the raw material for thousands of jobs. These same forests also are the base for recreational pursuits. (p.16)

Special Resources Goal: Protect and enhance identified features of natural, historical and cultural significance.

Recreation Resources Goal: Conserve and protect the natural beauty and unspoiled qualities of the highways, waters, shore lands, mountains, plant and animal habitats, forests, scenic vistas, trails, and other natural and recreational features in order to protect and enhance their values for a range of public recreational uses.(p.23)

Scenic Resource Goal: Protect quality, scenic character and natural values by fitting proposed land use activities harmoniously into the natural environment and by minimizing adverse aesthetic effects on existing uses, scenic beauty, and natural and cultural resources. (p.27)

In terms of current use lands, Dixville includes 31,369.93 acres of land and of these 30,782.74 acres are current use taxation parcels making up 98.13% of the total town. Dixville current use lands include 22 parcels, held by 7 owners. Of these current use lands 30,782.74 acres or 100% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation also comprise 98.13% of the total land area of Dixville.

The Applicants identified one historic property within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. No cultural landscapes were included in this group. The Applicants assigned the property a visual impact category related to the degree of potential visual effect. The one historic property, was noted with minimal views, and it was not found to be adversely effected. The Applicants' determination of views was:

1 Dixville Historic Properties Applicants' Identified Visual Impacts

- 0 More than Minimal views
- 1 Minimal views
- 0 No views
- 0 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Effected
- 1 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Dixville Property Views, Applicants' determination of View Relationship to Project

- 1 Properties have views from landscapes
- 0 Dismissed not to/from building
- 1 Dismissed for vegetation blocking views
- 0 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Dixville to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	0
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	1	3
NR Listed/DOE/NHL district or area	1	3
Totals	2	6

Dixville has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, with the exception of the state listed or eligible properties and current uses lands covering 98.13% of the town acreage, are shown on the accompanying Dixville map.

Resource Category &	Town Count		
State/NR Listed DOE	6	Public Water Access Points	0
GNIS Historic Designation	1	Community Identified Historic	9
Historic Graveyards	1	Scenic Roads (miles)	6
Conservation Lands	1	Trails (miles)	40
Recreation Lands- Sites	6	Designated Rivers (miles)	0
Recreation Lands- Areas	1		
Public Lakes or Ponds		Current Use Properties	22
4			

The historic sites and cultural landscapes of Dixville, as enumerated above sum to: 29 count; 46 miles of trails and scenic roads; no rivers or streams; and 22 current use properties. These resources are widespread and clustering as the conservation and recreation lands are important town assets.

5 Millsfield Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes' identification of additional historic and cultural resources for Millsfield.

As noted in the Coos County Master Plan (adopted 2006), Millsfield and other Unincorporated Places in Coos County "comprise the largest undeveloped region in New Hampshire. This area is one of few areas in New England where conservation of large acreages of woodland is still possible." The master plan expresses county values in sustaining heritage land uses, balanced with recreation and scenic enjoyment of historic sites and cultural landscapes:

The single most outstanding feature of these northern lands is the thousands of acres of forests. The forest is the County's most valuable economic resource and

supplies the raw material for thousands of jobs. These same forests also are the base for recreational pursuits. (p.16)

Special Resources Goal: Protect and enhance identified features of natural, historical and cultural significance.

Recreation Resources Goal: Conserve and protect the natural beauty and unspoiled qualities of the highways, waters, shore lands, mountains, plant and animal habitats, forests, scenic vistas, trails, and other natural and recreational features in order to protect and enhance their values for a range of public recreational uses.(p.23)

Scenic Resource Goal: Protect quality, scenic character and natural values by fitting proposed land use activities harmoniously into the natural environment and by minimizing adverse aesthetic effects on existing uses, scenic beauty, and natural and cultural resources. (p.27)

In terms of current use lands, Millsfield includes 28,715.83 acres of land and of these 27,140.85 acres are current use taxation parcels making up 94.52% of the total town. Millsfield current use lands include 11 parcels, held by 13 owners. Of these current use lands 100% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation also comprise 94.52% of the total land area of Millsfield.

The Applicants identified seven historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. No cultural landscapes were included in this group. The Applicants assigned each property a visual impact category related to the degree of potential visual effect. Of the seven historic properties, five were noted with minimal or more than minimal views, while zero were found to be adversely effected. The Applicants' determination of views was:

7 Millsfield Historic Properties Applicants' Identified Visual Impacts

4	More Than Minimal views
1	Minimal views
2	No views
0	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
5	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Millsfield Property Views, Applicants' determination of View Relationship to Project

- 4 Properties have views from landscapes
- 1 Dismissed not to/from building
- 3 Dismissed for vegetation blocking views
- 2 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Millsfield to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	2	2
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	2	2
NR Listed/DOE/NHL district or area	0	0
Totals	4	4

Millsfield has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, with the exception of unmapped state listed or eligible properties and current uses lands covering 94.52% of the town acreage, are shown on the accompanying Millsfield map.

Resource Category &	Town Count		
State/NR Listed DOE	4	Public Water Access Points	0
GNIS Historic Designation	0	Community Identified Historic	5
Historic Graveyards	0	Scenic Roads (miles)	1.5
Conservation Lands	1	Trails (miles)	13
Recreation Lands- Sites	2	Designated Rivers (miles)	0
Recreation Lands- Areas	0		
Public Lakes or Ponds	5	Current Use Properties	17

The historic sites and cultural landscapes of Millsfield, as enumerated above sum to: 29 count; 14.5 miles of trails and scenic roads; no designated rivers or streams; and 17 current use properties. These resources are generally dispersed along the Millsfield, Bragg and Long Ponds valley with expansive views from trails to the west and trails that cross the proposed Project corridor.

6 Dummer Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Dummer.

The Town of Dummer Zoning Ordinance (last amended January 17, 2013) is intended to sustain property values, "promote...the general welfare of the inhabitants of Dummer" and "to protect the integrity of the Town's natural resources and scenery." The Ordinance notes the importance of the cultural landscapes of Dummer as formed by natural and cultural processes:

A number of topographical, climatological, geological, historical, and geographical factors create an environment in the Town of Dummer, which is particularly suited to residential, agricultural and conservation-based land uses. (Article II-Purpose, p.2)

In terms of current use lands, Dummer includes 30,629.57 acres of land and of these 27,588.22 acres are current use taxation parcels making up 90.00% of the total town. Dummer current use lands include 145 parcels, held by 86 owners. Of these current use lands 23,371.09 acres or 84.71% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation also comprise 76.30% of the total land area of Dummer.

The Applicants identified 23 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Two cultural landscapes were included in this group. The Applicants assigned each property a visual impact category related to the degree of potential visual effect. Of the 23 historic properties, 11 were noted with minimal or more than minimal views, while one was found to be adversely effected. The Applicants' determination of views was:

23 Dummer Historic Properties Applicants' Identified Visual Impacts

3	More Than Minimal views
8	Minimal views
8	No views
3	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
1	Adversely Effected
11	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Dummer Property Views, Applicants' determination of View Relationship to Project

- 9 Properties have views from landscapes
- 2 Dismissed not to/from building
- 3 Dismissed for vegetation blocking views
- 3 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Dummer to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	0
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	0
NR Listed/DOE/NHL district or area	0	0
Totals	0	0

Dummer has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Dummer map, excepting the unmapped current use lands covering 90.07% of the town acreage, and state listed or eligible properties.

Resource Category &	Town Count		
State/NR Listed DOE	0	Public Water Access Points	5
GNIS Historic Designation	0	Community Identified Historic	7
Historic Graveyards	2	Scenic Roads (miles)	7.5
Conservation Lands	4	Trails (miles)	2.0
Recreation Lands- Sites	0	Designated Rivers (miles)	0
Recreation Lands- Areas	5		
Public Lakes or Ponds	6	Current Use Properties	145

The historic sites and cultural landscapes of Dummer, as enumerated above sum to: 29 count; 9.5 miles of trails and scenic roads; no designated rivers; and, 145 current use properties. These resources are cluster in the Dummer Ponds and Pond Brook valley which is aligned to the proposed Project corridor.

7 Stark Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes' identification of additional historic and cultural resources for Stark. Planning and zoning

documents for Stark that include references to scenic, historic and recreational resources and values were not located.

In terms of current use lands, Stark includes 37,901.9 acres of land and of these 11,079.12 acres are current use taxation parcels making up 29.93% of the total town. Stark current use lands include 248 parcels, held by 129 owners. Of these current use lands 7,339.59 acres or 66.25% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 19.37% of the total land area of Stark.

The Applicants identified 39 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Two cultural landscapes were included in this group. The Applicants assigned each property a visual impact category related to the degree of potential visual effect. Of the 39 historic properties, 20 were noted with minimal or more than minimal views, while two were found to be adversely effected. The Applicants' determination of views was:

39 Stark Historic Properties Applicants' Identified Visual Impacts

- 10 More Than Minimal views
- 10 Minimal views
- 16 No views
- 1 Not assessed due to age
- 1 NR, NH State, National Historic Landmarks Listed
- 2 Adversely Effected
- 20 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Stark Property Views, Applicants' determination of View Relationship to Project

- 13 Properties have views from landscapes
- 6 Dismissed not to/from building
- 4 Dismissed for vegetation blocking views
- 3 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Stark to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicants' 1 mile APE	Entire Town
State Listed/DOE site	0	2
State Listed/DOE district or area	0	1
NR Listed/DOE/NHL site	0	2
NR Listed/DOE/NHL district or area	0	1
Totals	0	6

Stark has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without the unmapped state listed and determined eligible properties or the current use lands covering 29.23% of the town acreage, are shown on the accompanying Stark map.

Resource Category &	Town Count		
State NR Listed/DOE	6	Public Water Access Points	4
GNIS Historic Designation	0	Community Identified Historic	23
Historic Graveyards	3	Scenic Roads (miles)	10
Conservation Lands	25	Trails (miles)	27.5
Recreation Lands- Sites	2	Designated Rivers (miles)	0
Recreation Lands- Areas	8		
Public Lakes or Ponds	9	Current Use Properties	248

The historic sites and cultural landscapes of Stark, as enumerated above these sum to: 80 counts; 37.5 miles of trails and scenic roads; and 248 properties in current use. These resources are widespread with current use parcels dispersed but unmapped and conservation and recreation lands mapped and covering a very high percentage of town lands. The proposed Project corridor traverses conserved recreation lands and community identified resources.

8 Northumberland Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Northumberland. No planning or zoning guidance that include references to scenic, historic and recreational resources and values was located for Northumberland.

In terms of current use lands, Northumberland includes 23,505.48 acres of land and of these 16,628.62 acres are current use taxation parcels making up 70.74% of the total town. Northumberland current use lands include 330 parcels, held by 164 owners. Of these current use lands 9,309.24 acres or 55.98% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 39.6% of the total land area of Northumberland.

The Applicants identified 23 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Three cultural landscapes were included in this group. The Applicants assigned each property a visual impact category related to the degree of potential visual effect. Of the 23 historic properties, three were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

23 Northumberland Historic Properties Applicants' Identified Visual Impacts

- 2 More Than Minimal views
- 1 Minimal views
- 15 No views
- 5 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Effected
- 3 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Northumberland Property Views, Applicants' determination of View Relationship to Project

- 11 Properties have views from landscapes
- 3 Dismissed not to/from building
- 3 Dismissed for vegetation blocking views
- 6 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Northumberland to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicants' 1 mile APE	Entire Town
State Listed/DOE site	0	3
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	3
NR Listed/DOE/NHL district or area	0	0
Totals	0	6

Northumberland has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, with the exception of the

current use lands covering 70.74% of the town acreage, and state listed or eligible properties, are shown on the accompanying Northumberland map.

Resource Category &		Town Count	
State/NR Listed DOE	6	Public Water Access Points	2
GNIS Historic Designation	0	Community Identified Historic	5
Historic Graveyards	0	Scenic Roads (miles)	10
Conservation Lands	15	Trails (miles)	13
Recreation Lands- Sites	0	Designated Rivers (miles)	17
Recreation Lands- Areas	5		
Public Lakes or Ponds		Current Use Properties	330
4			

The historic sites and cultural landscapes identified for Northumberland, as enumerated above and sum to: 37count; 23 miles of trails and scenic roads; 17 miles of designated scenic rivers of streams; and 330 parcels in current use. These combined resources are pervasive, with widespread coverage of Northumberland with conserved recreation lands some of which are bisected by the proposed Project corridor.

9 Littleton Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Littleton. Expressing the town recognition of the importance of historic and scenic resources as foundational to choosing to live in or to visit Littleton as cited in the Town of Littleton Master Plan 2004:

Vision: Littleton values its resources and attempts to use them wisely, whether they be level land suitable for development, open space and natural resources worthy of preservation, its scenic views and vistas, or its friendly small town atmosphere. It commits to working to protect all of these, and fostering development in a manner which encourages open space preservation (Ch.1, p.1)

Historic and Cultural Resources: The historic and cultural resources that remain in Littleton help define the fabric and character of the community. They are unique to Littleton and tell a story to residents and visitors alike. Often taken for granted by those who have grown accustomed to their presence, these simple homes, agricultural buildings, commercial structures and landscapes retain a sense of place and identity that is Littleton (Ch.5, p53)

The master plan included 11 historic and cultural features that were identified in the 2003 Littleton Natural Resources Inventory such Pin Hill Trails, the Historic Granit Quarry, Roadside Markers on Route 302 and the Dells Recreation Area.

In terms of current use lands, Littleton includes 32,021.11 acres of land and of these 18,866.77 acres are current use taxation parcels making up 58.92% of the total town area. Littleton current use lands include 272 parcels, held by 256 owners. Of these

current use lands 7,539.84 acres or 39.96% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 24% of the total land area of Littleton.

The Applicants' identified 8 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. No cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category related to the degree of potential visual effect. Of the 8 historic properties, 5 were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

8 Littleton Historic Properties Applicant Identified Visual Impacts

- 0 More Than Minimal views
- 5 Minimal views
- 3 No views
- 0 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Affected

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants' assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Littleton Property Views, Applicant determination of View Relationship to Project

- 4 Properties have views from landscapes
- 3 Dismissed not to/from building
- 1 Dismissed for vegetation blocking views
- 3 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Littleton to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	10
State Listed/DOE district or area	0	8
NR Listed/DOE/NHL site	0	4
NR Listed/DOE/NHL district or area	0	0
Totals	0	20

Littleton has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without the unmapped state listed and determined eligible properties or the current use lands covering 58.92% of the town acreage, are shown on the accompanying Littleton map.

Resource Category &		Town Count	
State NR Listed/DOE			
20		Public Water Access Points	8
GNIS Historic Designation	2	Community Identified Historic	7
Historic Graveyards	7	Scenic Roads (miles)	21
Conservation Lands	29	Trails (miles)	0
Recreation Lands- Sites	10	Designated Rivers (miles)	31
Recreation Lands- Areas	0		
Public Lakes or Ponds		Current Use Properties	272
7			

The identification of historic sites and cultural landscapes of Littleton, as enumerated above sum to: 90 count; 21 miles of trails and scenic roads and 31 miles of designated rivers and streams; and 272 properties in current use. The west boundary of Littleton is defined by the Moore Reservoir, a scenic waterway, notable in a town that includes 31 miles of designated rivers, and extensive acreage of conservation and recreations lands.

10 Lancaster Summary

This summary presents the findings of the Applicant reporting and Heritage Landscapes identification of additional historic and cultural resources for Lancaster.

The people of Lancaster clearly expressed the value of Lancaster’s cultural landscapes through the Lancaster Master Plan, adopted in 2011:

Historic and Cultural Resources: ...Lancaster is rich in historic and cultural resources. ... The preservation of these resources is of great importance to the people of Lancaster, not only because they are very attractive, but also because they are a silent and eloquent testimony to the history of Lancaster. (Chapter 7, p. 20)

Natural Resources: Lancaster’s mountains, hillsides, ponds, wetlands, rivers, scenic views and special resource areas contribute greatly to the economic well-being and quality of life in the North Country. The preservation of rural character and open space are high priorities in Lancaster, from the undeveloped shoreline of Martin Meadow Pond, the Kilkenny Mountain Range and the Israel River Valley to the scenic ridgeline connecting the summits of Mt. Orne and Mt. Pleasant. (Chapter 6, p. 18)

The Master Plan notes the importance of considering the landscape impacts of large projects: “For example, the location of roads, sewer, water and other infrastructure...impacts the natural environment and can have unintended consequences.” (Chapter 6, p. 18)

In terms of current use lands, Lancaster includes 32,129.91 acres of land and of these 24,636.87 acres are current use taxation parcels making up 76.68% of the total town. Lancaster current use lands include 642 parcels, held by 337 owners. Of these current use lands 9,912.78 acres or 40.24% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation also comprise 30.85% of the total land area of Lancaster.

The Applicant identified 41 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Five cultural landscapes were included in this group. The Applicant assigned each property a visual impact category related to the degree of potential visual effect. Of the 41 historic properties, 15 were noted with minimal or more than minimal views, while two were found to be adversely effected. The Applicants' determination of views was:

41 Lancaster Historic Properties Applicant Identified Visual Impacts

8	More Than Minimal views
7	Minimal views
21	No views
3	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
2	Adversely Effected

15 Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Lancaster Property Views, Applicant determination of View Relationship to Project

13	Properties have views from landscapes
6	Dismissed not to/from building
6	Dismissed for vegetation blocking views
4	Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Lancaster to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	2	11
State Listed/DOE district or area	0	4
NR Listed/DOE/NHL site	0	8
NR Listed/DOE/NHL district or area	0	4
Totals	2	27

Lancaster has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without the unmapped state register listed or eligible parcels or the current use lands, excepting the unmapped current use lands covering 76.68% of the town acreage, are shown on the accompanying Lancaster map.

Resource Category &	Town Count		
State/NR Listed DOE	27	Public Water Access Points	1
GNIS Historic Designation	1	Community Identified Historic	34
Historic Graveyards	1	Scenic Roads (miles)	26
Conservation Lands	15	Trails (miles)	19.5
Recreation Lands- Sites	8	Designated Rivers (miles)	12.5
Recreation Lands- Areas	4		
Public Lakes or Ponds		Current Use Properties	642
5			

The historic sites and cultural landscapes of Lancaster, as enumerated above sum to: 96 count; 45.5 miles of trails and scenic roads; 12.5 miles of designated rivers or streams; and 642 properties in current use. These resources cluster along the western Connecticut River corridor, adjacent and dispersed scenic roads and widely scattered community defined historic places and areas. The proposed Project corridor extends through several recreation and conservation parcels and crosses two scenic roads.

11 Jefferson Summary

This summary presents the findings of the Applicant reporting and Heritage Landscapes identification of additional historic and cultural resources for Jefferson. Expressing the town recognition of the importance of historic and scenic resources as foundational to choosing to live in or to visit Jefferson as cited in the Town of Jefferson Land Use Plan Ordinance 2012

The Town of Jefferson has a wealth of scenic beauty, scenic vistas, natural resources, and unassuming charm. A combination of all or a number of factors, topographical, geological, climatological, historical and geographical, create an environment in the Town of Jefferson which is and can be of specific appeal to residential, agricultural,

and conservation based developments. This Ordinance, therefore, is particularly designed to protect, preserve and encourage such developments (p1; Article II)

In terms of current use lands, Jefferson includes 32,061.52 acres of land and of these 16,703.01 acres are current use taxation parcels making up 52.1% of the total town area. Jefferson current use lands include 383 parcels, held by 259 owners. Of these current use lands 11,211.38 acres or 67.12% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 35% of the total land area of Jefferson.

The Applicant identified 14 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. No cultural landscapes were included in this group. The Applicant assigned each property a visual impact category related to the degree of potential visual effect. Of the 14 historic properties, 2 were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

14 Jefferson Historic Properties Applicant Identified Visual Impacts:

- 0 More Than Minimal views
- 2 Minimal views
- 12 No views
- 0 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Affected
- 2 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Jefferson Property Views, Applicant determination of View Relationship to Project

- 1 Properties have views from landscapes
- 0 Dismissed not to/from building
- 0 Dismissed for vegetation blocking views
- 0 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Jefferson to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	3
State Listed/DOE district or area	0	14
NR Listed/DOE/NHL site	0	3
NR Listed/DOE/NHL district or area	0	14
Totals	0	34

Jefferson has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without the unmapped state listed and determined eligible properties or the current use lands covering 52.10% of the town acreage, are shown on the accompanying Jefferson map.

Resource Category &	Town Count		
State NR Listed/DOE			
34		Public Water Access Points	2
GNIS Historic Designation	0	Community Identified Historic	5
Historic Graveyards	7	Scenic Roads (miles)	28
Conservation Lands	41	Trails (miles)	29
Recreation Lands- Sites	5	Designated Rivers (miles)	0
Recreation Lands- Areas	4		
Public Lakes or Ponds		Current Use Properties	383
3			

The historic sites and cultural landscapes of Jefferson, as enumerated above these sum to: 101 counts; 57 miles of trails and scenic roads; no designated rivers; and 383 properties in current use. The Israel River, Red Brook, Cherry Pond and two smaller ponds are scenic features of Jefferson's valley which includes a number of farm fields along Routes 2 and 115A. The historic sites and cultural landscapes of Jefferson are cluster in the river valley, align with scenic roads and frame the east and west areas with conservation and recreation lands. The proposed Project corridor runs through Whitefield to the west near the town boundary and is likely visible due to topography.

12 Whitefield Summary

This summary presents the findings of the Applicant reporting and Heritage Landscapes identification of additional historic and cultural resources for Whitefield. Whitefield Comprehensive Development Guide 1992, which was noted as current as of 12/10/2012, indicates a purpose directed to proper use of natural and cultural resources and preservation of community character

Purpose: ...to improve and protect the public health, safety and welfare; encourage flexibility and creativity in the appropriate and wise use of land; ...to assure the proper use of natural and historic cultural resources; and to preserve existing community character to the extent possible while allowing for development and a reasonable return on holdings. (Article II – Purpose, p.5)

In terms of current use lands, Whitefield includes 21,949.63 acres of land and of these 16,983.29 acres are current use taxation parcels making up 77.37% of the total town area. Whitefield current use lands include 429 parcels, held by 246 owners. Of these current use lands 4,728.23 acres or 27.84% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 21.54% of the total land area of Whitefield.

The Applicant identified 115 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Five cultural landscape were included in this group. The Applicant assigned each property a visual impact category related to the degree of potential visual effect. Of the 115 historic properties, 45 were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

115 Whitefield Historic Properties Applicant Identified Visual Impacts

27	More Than Minimal views
18	Minimal views
67	No views
3	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
45	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Whitefield Property Views, Applicant determination of View Relationship to Project

45	Properties have views from landscapes
18	Dismissed not to/from building
25	Dismissed for vegetation blocking views
15	Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Whitefield to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	2	5
State Listed/DOE district or area	1	2
NR Listed/DOE/NHL site	2	4
NR Listed/DOE/NHL district or area	1	2
Totals	6	13

Whitefield has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Whitefield map, , excepting the unmapped current use lands covering 77.37% of the town acreage, and state listed or eligible properties.

Resource Category &	Town Count		
NH State Register List/DOE	13	Public Water Access Points	4
GNIS Historic Designation	0	Community Identified Historic	37
Historic Graveyards	1	Scenic Roads (miles)	21
Conservation Lands	17	Trails (miles)	4
Recreation Lands- Sites	3	Designated Rivers	0
Recreation Lands- Areas	0		
Public Lakes or Ponds	3	Current Use Properties	429

The identification of historic sites and cultural landscapes of Whitefield, as enumerated above sum to: 78 count; 25 miles of trails and scenic roads; and 429 properties in current use. These resources are pervasive, clustering along the designated scenic roads and community identified scenic roads as well as within the town center. The proposed Project corridor passes north of the town center crossing through conservation lands, over three scenic roads and would also be visible to the west of Burns Pond.

13 Dalton Summary

This summary presents the findings of the Applicant reporting and Heritage Landscapes identification of additional historic and cultural resources for Dalton. The Dalton Master Plan (2011) clearly indicates the importance of landscape character and preservation of scenic beauty to the people of Dalton:

Dalton's essential rural character and quality of life are defined by the town's natural environment (rivers, forests, fields and ridges). (Introduction, p. 1)

The over-riding concern of a large majority of Dalton's citizens is a strong desire to maintain the rural character of the town. (Vision Statement, p. 4)

In terms of current use lands, Dalton includes 17,624.05 acres of land and of these 14,360.16 acres are current use taxation parcels making up 81.48% of the total town.

Dalton current use lands include 392 parcels, held by 213 owners. Of these current use lands 3,222.62 acres or 22.444% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation also comprise 18.29% of the total land area of Dalton.

The Applicant identified 17 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Two cultural landscapes were included in this group. The Applicant assigned each property a visual impact category related to the degree of potential visual effect. Of the 17 historic properties, 11 were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

17 Dalton Historic Properties Applicant Identified Visual Impacts

- 7 More Than Minimal views
- 4 Minimal views
- 6 No views
- 0 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Effected
- 11 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Dalton Property Views, Applicant determination of View Relationship to Project

- 9 Properties have views from landscapes
- 1 Dismissed not to/from building
- 4 Dismissed for vegetation blocking views
- 2 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Dalton to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	0
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	0
NR Listed/DOE/NHL district or area	0	0
Totals	0	0

Dalton has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, excepting the unmapped

current use lands covering 81.48% of the town acreage, are shown on the accompanying Dalton map.

Resource Category &		Town Count	
State/NR Listed DOE	0	Public Water Access Points	2
GNIS Historic Designation	0	Community Identified Historic	21
Historic Graveyards	2	Scenic Roads (miles)	6
Conservation Lands	7	Trails (miles)	0
Recreation Lands- Sites	1	Designated Rivers (miles)	7
Recreation Lands- Areas	2		
Public Lakes or Ponds	4	Current Use Properties	642

The historic sites and cultural landscapes of Dalton, as enumerated above sum to: 39 count; 6 miles of trails and scenic roads; 7 miles of designated rivers or streams; and 642 parcels in current use. There Connecticut River corridor, adjacent scenic route 135 and community identified historic sites are located to the northwest. Forest Lake State Parks and other forested conservation lands cover areas to the southeast of Dalton which is also an area identified as valued by the community as containing 15 historic sites. The proposed Project corridor location is along these valued lands to the southeast. The large number and acreage of current use lands may also be effected by the proposed Project.

14 Bethlehem Summary

This summary presents the findings of the Applicant reporting and Heritage Landscapes identification of additional historic and cultural resources for Bethlehem. Bethlehem identified “an opportunity to preserve its heritage and character, if the community moves to protect the resources that remain” (Bethlehem Master Plan 2004, Sec. 10.5, p. 8), which they documented in the 2004 Bethlehem Master Plan. The Plan established a vision for the town to “Maintain the rural landscape,...encourage economic vitality, protect environmental quality,” prompted by the acknowledgement of their historic and scenic resources:

Cultural/Historic: Three properties in Bethlehem have been listed on the National Register: Burt-Cheney Farm (listed 1982); The Rocks Estate (listed 1984); and Felsengarten (listed 1973) (Sec. 10.1.2, p. 4)

Scenic Resources: Bethlehem’s location on a high plateau in the heart of the White Mountains provides residents and tourists alike with unique scenic resources. In recent years, growth throughout the state and region has made people appreciate the natural scenery Northern New Hampshire has to offer. (Sec. 8.12, p. 23)

In terms of current use lands, Bethlehem includes 58,164.53 acres of land and of these 18,365.00 acres are current use taxation parcels making up 31.57% of the total town. Bethlehem current use lands include 465 parcels, held by 259 owners. Of these current use lands 4,904.00 acres or 26.70% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation also comprise 8.43% of the total land area of Bethlehem.

The Applicant identified 69 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Three cultural landscapes were included in this group. The Applicant assigned each property a visual impact category related to the degree of potential visual effect. Of the 69 historic properties, 24 were noted with minimal or more than minimal views, while one was found to be adversely effected. The Applicants' determination of views was:

69 Bethlehem Historic Properties Applicant Identified Visual Impacts

- 17 More Than Minimal views
- 7 Minimal views
- 40 No views
- 4 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 1 Adversely Effected
- 11 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Bethlehem Property Views, Applicant determination of View Relationship to Project

- 25 Properties have views from landscapes
- 15 Dismissed not to/from building
- 11 Dismissed for vegetation blocking views
- 7 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Bethlehem to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	1	8
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	1	7
NR Listed/DOE/NHL district or area	0	0
Totals	2	15

Bethlehem has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, , excepting the unmapped current use lands covering 31.57% of the town acreage, and state listed or eligible properties, are shown on the accompanying Bethlehem map.

Resource Category &	Town Count		
State/NR Listed DOE	15	Public Water Access Points	0
GNIS Historic Designation	2	Community Identified Historic	15
Historic Graveyards	0	Scenic Roads (miles)	27
Conservation Lands	14	Trails (miles)	63
Recreation Lands- Sites	7	Designated Rivers (miles)	12.5
Recreation Lands- Areas	8		
Public Lakes or Ponds		Current Use Properties	465
4			

The historic sites and cultural landscapes of Bethlehem, as enumerated above sum to: 65 count; 90 miles of trails and scenic roads; 12.5 miles of designated scenic rivers; and 465 parcels in current use. The historic sites and cultural Landspces of Bethlehem are widespread with recreation lands covering more than half the town land, and presumably much of the balance included as the 465 current use parcels. Listed historic properties are along scenic roads. The proposed Project corridor is sited to the northwest crossing scenic Route 302 and moving from above ground to underground along locally valued Route 18.

15 Sugar Hill Summary

This summary presents Heritage Landscapes identification of historic and cultural resources for Sugar Hill. The Applicant did not identify historic properties for Sugar Hill, because it is along the underground section of the Project route.

Expressing the town recognition of the importance of scenic and natural resources as foundational to choosing to live in or to visit Sugar Hill as cited in the Sugar Hill Master Plan 2014

Natural Resources: Sugar Hill's natural resources are important to residents and visitors alike. The scenic outdoor environment, and opportunities it provides, form an essential foundation of the community's character. When planning for the continued growth of Sugar Hill, it is critical to ensure that high priority natural resource areas are protected, and that development is sited and managed in a manner compatible with continued enjoyment of a clean, scenic outdoor environment. (Introduction, p. 19)

Scenic Resources: Our mountains, hillsides, waterbodies, wetlands, streams, scenic views and special resource areas continue to be very important elements to our economic well-being and quality of life in town. Key scenic views to protect include ridgelines, hilltops, and mountain peaks that can be seen from public locations, as well as spots from which to observe them. (p.38)

Further the Sugar Hill Master Plan specifically addressed the challenge of energy transmission in the following excerpt noting the special challenges of integration in this small community specifically expressing scenic views to protect

Special Land Uses: Special land uses such as transmission lines, telecommunications towers, and large energy production facilities such as wind farms pose special challenges for small communities like Sugar Hill. In many cases federal and state regulations preempt local control. It is important for the town to participate proactively and to have a strong voice in state and federal review processes. Proposals should be consistent with the preservation of scenic views and other local goals, with careful attention to mitigation of negative impacts. (p. 56)

In terms of current use lands, Sugar Hill includes 10,955.99 acres of land and of these 8,089.52 acres are current use taxation parcels making up 73.84% of the total town area. Sugar Hill current use lands include 270 parcels, held by 170 owners. Of these current use lands 2,931.97 acres or 36.24% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 26.67% of the total land area of Sugar Hill.

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Sugar Hill to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	4
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	2
NR Listed/DOE/NHL district or area	0	0
Totals		6

Sugar Hill has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without the unmapped state register or eligible historic sites or the current use lands covering 73.84% of the town acreage, are shown on the accompanying Sugar Hill map.

Resource Category &	Town Count		
State NR Listed DOE	6	Public Water Access Points	2
GNIS Historic Designation	0	Community Identified Historic	17
Historic Graveyards	0	Scenic Roads (miles)	
Conservation Lands	21	17.5	
Recreation Lands- Sites	0	Trails (miles)	0
Recreation Lands- Areas	4	Designated Rivers (miles)	0
Public Lakes or Ponds	3	Current Use Properties	270

The historic sites and cultural landscapes of Sugar Hill, as enumerated above sum to: 53 count; 17.5 miles of scenic roads; no trails; no rivers; and 270 parcels in current use. Considerable acreage in conservation and one recreation and conservation area is shown on the town map. Scenic roads form a network throughout the town. Coffin Pond and a pond access are located adjacent to the underground proposed Project corridor to the northeast.

16 Franconia Summary

This summary presents Heritage Landscapes identification of historic and cultural resources for Easton. The Applicant did not identify historic properties for Franconia, because it is along the underground section of the Project route. Expressing the town recognition of scenic and natural resources as foundational to choosing to live in or to visit Franconia as cited in the Franconia Master Plan 2008

The natural landscape and its many resources are important to the citizens of Franconia. There are various natural resources in Franconia, including wetlands and waterways, steep slopes and ridges, forested mountains, low-lying valleys and open fields. The citizens of the Town feel the natural resources are integral to the community and are a major factor in the decision to reside in Franconia. (p. 67)

... [T]here are many scenic resources in the Town that make it a desirable place to live and visit. Scenic Resources include the views of the White Mountains, thick forested lands, lakes, ponds and streams. (p.70)

In terms of current use lands, Franconia includes 42,073.06 acres of land and of these 7,145.22 acres are current use taxation parcels making up 16.98% of the total town area. Franconia current use lands include 220 parcels, held by 144 owners. Of these current use lands 627.23 acres or 8.78% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 1.5% of the total land area of Franconia.

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Franconia to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	5
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	5
NR Listed/DOE/NHL district or area	0	0
Totals	0	10

Franconia has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, excepting the unmapped current use lands covering 16.98% of the town acreage, and state listed or eligible properties,, are shown on the accompanying Franconia map.

Resource Category &		Town Count	
State/NR Listed DOE	10	Public Water Access Points	4
GNIS Historic Designation	0	Community Identified Historic	20
Historic Graveyards	0	Scenic Roads (miles)	11.5
Conservation Lands	13	Trails (miles)	40.5
Recreation Lands- Sites	10	Designated Rivers (miles)	2
Recreation Lands- Areas	3		
Public Lakes or Ponds		Current Use Properties	220
5			

The historic sites and cultural landscapes of Franconia, as enumerated above sum to: 65 count; 52 miles of trails and scenic roads; and 2 miles of scenic designated rivers and streams; and 220 parcels in current use. As readily seen on the Franconia map these resources are located town wide due to the extensive acreage in conservation and recreation uses to the east and the town center resources identified by the community to the west. The proposed Project corridor is sited under a road flanked by conserved recreation lands.

17 Easton Summary

This summary presents Heritage Landscapes identification of historic and cultural resources for Easton. The Applicant did not identify historic properties for Easton, because it is along the underground section of the Project route. Expressing the values of the town for scenic, natural, cultural and historic resources is articulated as important to residents and visitors to the town and the region, as a “quiet valley with its dark night sky, scenic views ... central to the character of the community” as stated in the Easton 2010 Master Plan noting

The town’s natural and scenic resources are important to the community’s year-round residents as well as visitors to the town and region. The quiet valley with its dark night sky, scenic views across open fields, large uninterrupted tracts of forestland on surrounding hillsides, and abundant wildlife are central to the character of the community. (p.13)

Kinsman Mountain was ranked as some of the state’s most important habitat in N.H. Fish and Game’s Wildlife Action Plan. This area is within the White Mountain National Forest. In addition, some of Easton’s lowland areas including stream corridors and wetlands were among the highest ranked habitat in the biological region. Upland areas on the western side of town were considered to be important supporting habitat. (p.18)

In terms of current use lands, Easton includes 19,929 acres of land and of these 4,658 acres are current use taxation parcels making up 23.37% of the total town. Easton current use lands include 74 parcels, held by 61 owners. Of these current use lands 2,346.7 acres are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 11.7% of the total land area of Easton.

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Easton to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	1
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	1
NR Listed/DOE/NHL district or area	0	0
Totals	0	2

Easton has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, excepting the unmapped current use lands covering 23.279% of the town acreage, and state listed or eligible properties, are shown on the accompanying Easton map.

Resource Category &	Town Count		
State/NR Listed DOE	2	Public Water Access Points	0
GNIS Historic Designation	2	Community Identified Historic	15
Historic Graveyards	0	Scenic Roads (miles)	
Conservation Lands	2	10	
Recreation Lands- Sites	3	Trails (miles)	7
Recreation Lands- Areas	1	Designated Rivers (miles)	0
Public Lakes or Ponds			
1		Current Use Properties	74

The historic sites and cultural landscapes of Easton, as enumerated above sum to: 26 count; 17 miles of trails and scenic roads; no rivers; and 74 properties in current use. These resources cluster along scenic Route 116, to include farm fields and valley woodlands along Reel, and Slide Brooks and the Ham Branch. Trails with historic sites on them provide access to the extensive recreation lands. Easton benefits from large acreages of conservation and recreation lands.

18 Woodstock Summary

This summary presents Heritage Landscapes identification of historic and cultural resources for Woodstock. The Applicant did not identify historic properties for Woodstock, because it is along the underground section of the Project route.

Expressing the town recognition of the importance of scenic and natural resources as foundational to choosing to live in or to visit Woodstock as cited in the Woodstock Master Plan adopted 2014:

Growth and change is inevitable, however, excessive growth or development may not be compatible to the desires of the community nor assist in maintaining the town's desired identity. Growth and change should maintain the "look and feel of a small town" and preserve the character of Main Street, N. Woodstock, and Woodstock Village, as well as the unique identity of the various areas of our community. Growth and change should protect and maintain our quality of life, our environment, and should not overly tax our infrastructures. (Master Plan Goals, p. 5)

In terms of current use lands, Woodstock includes 37,434.51 acres of land and of these 3,893.46 acres are current use taxation parcels making up 10.4% of the total town. Woodstock current use lands include 49 parcels, held by 37 owners. Of these current use lands 2,565.9 acres or 65.9% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 6.9% of the total land area of Woodstock.

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Woodstock to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	1
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	0
NR Listed/DOE/NHL district or area	0	0
Totals	0	1

Woodstock has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Woodstock map, , excepting the unmapped current use lands covering 10.40% of the town acreage, and state listed or eligible properties.

Resource Category &		Town Count	
State NR Listed/DOE		Public Water Access Points	6
1		Community Identified Historic	4
GNIS Historic Designation	4	Scenic Roads (miles)	
Historic Graveyards	0	22	
Conservation Lands	7	Trails (miles)	31
Recreation Lands- Sites	12	Designated Rivers (miles)	0
Recreation Lands- Areas	7		
Public Lakes or Ponds		Current Use Properties	49
10			

The historic sites and cultural landscapes of Woodstock, as enumerated above sum to: 51 count; 53 miles of trails and scenic roads; no rivers; and 49 current use properties. The town road network, including Routes 3, 112 and 118 are scenic. Recreation lands cover most of the town with identified resources along these road corridors including public waters, recreation sites, historic sites and community identified historic sites. The town resources cover the nearly the entire acreage. The proposed Project corridor is underground through Woodstock, however there are potential adverse effects within the margins of the lengthy Routes 118 and 3 proposed alignment.

19 Thornton Summary

This summary presents Heritage Landscapes identification of historic and cultural resources for Thornton. The Applicant did not identify historic properties for Thornton, because it is along the underground section of the Project route. Expressing the town recognition of scenic and natural resources as foundational to choosing to live in or to visit Thornton as cited in the Town of Thornton Master Plan updated 2013

Vision: First and foremost 96% of the responses (to the Master Plan update questionnaire) show that Town growth should be continued at the present rate or slower and the rural and scenic character of the Town should be preserved. (p. 5)

Natural Resources: Goal – Preserve the quality and quantity of Thornton’s rural character through conservation and preservation. (p.45)

In terms of current use lands, Thornton includes 32,176.75 acres of land and of these 8,325.06 acres are current use taxation parcels making up 25.87% of the total town area. Thornton current use lands include 263 parcels, held by 136 owners. Of these current use lands 2,339.99 acres or 28.11% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 7.3% of the total land area of Thornton.

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Thornton to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	1
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	1
NR Listed/DOE/NHL district or area	0	0
Totals	0	2

Thornton has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Thornton map, excepting the unmapped current use lands covering 25.87% of the town acreage, and state listed or eligible properties.

Resource Category &	Town Count		
State NR List DOE	2	Public Water Access Points	2
GNIS Historic Designation	2	Community Identified Historic	0
Historic Graveyards	0	Scenic Roads (miles)	
Conservation Lands	12	10	
Recreation Lands- Sites	6	Trails (miles)	11.5
Recreation Lands- Areas	7	Designated Rivers (miles)	7.5
Public Lakes or Ponds			
3		Current Use Properties	263

The historic sites and cultural landscapes of Thornton, as enumerated above sum to: 34 count; 21.5 miles of trails and scenic roads; 7.5 miles of designated scenic rivers or streams; and 263 properties in current use. These resources array along the Pemigewasset River valley and Route 3 corridor with large acreages of conservation and recreation lands to the east and west. The proposed Project corridor runs underground, however there are potential adverse effects along the length of the Route 3 proposed alignment.

20 Campton Summary

This summary presents Heritage Landscapes identification of historic and cultural resources for Campton. The Applicants' did not identify historic properties for Campton, because it is along the underground section of the Project route. Expressing the values of the town in support of sustainable development and natural beauty Forest Conservation Zoning is established in the Town of Campton Zoning Ordinance, as amended

The Forest Conservation Zone is established in order to protect property consisting of steep slopes, limited road access, and severe terrain, including a portion of the White Mountain National Forest, from development which may unreasonably burden Town services, be unsuited to the mountainous

environment, or detract from the natural beauty of the White Mountain National Forest and its immediately surrounding area. (Article III.E., p.5)

In terms of current use lands, Campton includes 33,240.3 acres of land and of these 21,470.22 acres are current use taxation parcels making up 64.6% of the total town. Campton current use lands include 362 parcels, held by 199 owners. Of these current use lands 16,830.4 acres or 78.39% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 50.63% of the total land area of Campton.

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Campton to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	4
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	4
NR Listed/DOE/NHL district or area	0	0
Totals	0	8

Campton has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, excepting the unmapped current use lands covering 64.59% of the town acreage, and state listed or eligible properties, are shown on the accompanying Campton map.

Resource Category &	Town Count		
State/NR Listed DOE	8	Public Water Access Points	1
GNIS Historic Designation	0	Community Identified Historic	5
Historic Graveyards	0	Scenic Roads (miles)	9
Conservation Lands	10	Trails (miles)	8.5
Recreation Lands- Sites	3	Designated Rivers (miles)	7.5
Recreation Lands- Areas	8		
Public Lakes or Ponds		Current Use Properties	362
9			

The historic sites and cultural landscapes of Campton, as enumerated above sum to: 41 count; 17.5 miles of trails and scenic roads; 7.5 miles of designated scenic rivers; and 362 parcels in current use. These resources are pervasive throughout the town covering large areas as well as specific sites. The proposed Project corridor runs underground, however there are potential adverse effects along the length of the Route 3 proposed alignment, where the river and specific sites are identified as valued by the community.

21 Plymouth Summary Underground and Above Ground

This summary presents the findings of the Applicant reporting and Heritage Landscapes identification of additional historic and cultural resources for Plymouth. The proposed project corridor is both underground and above ground. The southeastern corner of the town is the above ground segment. Expressing the town recognition of the importance of historic, scenic and natural resources the master plan establishes goals for each resource category noting the land uses of rural countryside surrounding the town as a preservation goal, as cited in the Town of Plymouth Master Plan, dated January 10, 2008

Historic Resources Goal: The preservation of Plymouth's rural character, traditional settlement patterns, historic resources, and cultural heritage. (p.30)

Natural Heritage Goal # 1: Responsible stewardship and sustainable use of Plymouth's natural resources in a manner that protects and enhances the town's natural environment for the benefit of current and future generations. (p.32)

Natural Heritage Goal #2: To protect and enhance Plymouth's visual character and aesthetic resources. (p.34)

Natural Heritage Goal #3: To create a useable inventory of the town's natural resources including: wildlife, vegetation, minerals, soils and waters. (p.34)

Community Facilities and Services Goal: Providing and maintaining community facilities and services, utilities and energy to meet present and future demands of Plymouth residents in a cost efficient and environmentally sound manner. (p.35)

Land Use Goal: To preserve the town's historic pattern of development with the traditional mixed-use downtown, limited mixed-use transportation corridors and residential areas surrounded by rural countryside. (p.45)

In terms of current use lands, Plymouth includes 18,063.11 acres of land and of these 12,924.94 acres are current use taxation parcels making up 71.55% of the total town area. Plymouth current use lands include 367 parcels, held by 244 owners. Of these current use lands 3,155 acres or 24.41% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 17.47% of the total town land area.

The Applicant identified 13 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. No cultural landscapes were included in this group. The Applicant assigned each property a visual impact category related to the degree of potential visual effect. Of the 13 historic properties, three were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

13 Plymouth Historic Properties Applicant Identified Visual Impacts

- 0 More than Minimal views
- 3 Minimal views
- 10 No views
- 0 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Effected
- 3 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Plymouth Property Views, Applicant determination of View Relationship to Project

- 3 Properties have views from landscapes
- 3 Dismissed not to/from building
- 2 Dismissed for vegetation blocking views
- 0 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Plymouth to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	1
State Listed/DOE district or area	0	1
NR Listed/DOE/NHL site	0	9
NR Listed/DOE/NHL district or area	0	2
Totals	0	13

Plymouth has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without the unmapped current use lands covering 71.55% of the town acreage, or state listed or eligible historic properties, are shown on the accompanying Plymouth map.

Resource Category &	Town Count		
State NR DOE	13	Public Water Access Points	2
GNIS Historic Designation	2	Community Identified Historic	18
Historic Graveyards	0	Scenic Roads (miles)	9.5
Conservation Lands	8	Trails (miles)	2.5
Recreation Lands- Sites	3	Designated Rivers (miles)	5.5
Recreation Lands- Areas	1		
Public Lakes or Ponds		Current Use Properties	367
2			

The historic sites and cultural landscapes of Plymouth, as enumerated above sum to: 49 count; 12miles of trails and scenic roads; 5.5 miles of designated rivers or streams; and 367 parcels in current use. A grouping of these resources is clustered along the proposed Project corridor which is positioned along a north-south aligned scenic Route 3 corridor with the Pemigewasset River adjacent. There may be effects to the margins of this corridor, particularly to multiple identified resources in the center of town.

22 Ashland Summary

This summary presents Heritage Landscapes identification of historic and cultural resources for Ashland. Expressing the values of the town in support of sustainable development and natural beauty Forest Conservation Zoning is established in the Town of Ashland Zoning Ordinance, as amended

Vision: The town of Ashland's location as the geographical center of the state and its beautiful, natural amenities provide for an exceptional quality of life for citizens and visitors.

Future growth and development should be regulated by town policies and ordinances in compliance with the Master Plan. These policies and ordinances must protect our natural resources, community values, and preserve the essential rural character of the town. ...

In terms of current use lands, Ashland includes 7,244.43 acres of land and of these 3,126.60 acres are current use taxation parcels making up 43.16% of the total town. Ashland current use lands include 98 parcels, held by 56 owners. Of these current use lands 1,634.79 acres or 52.29% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 22.57% of the total land area of Ashland.

The Applicants' identified twenty-four historic properties within a 1-mile APE that could be indirectly (visually) impacted from the proposed Project. Four cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category related to the degree of potential visual effect. Of the twenty-four historic properties, twelve were noted with minimal or more than minimal views, while zero were found to be adversely effected. The Applicants' determination of views was:

24 Ashland Historic Properties Applicant Identified Visual Impacts

- 5 More Than Minimal views (Green):
- 7 Minimal views (Blue):
- 12 No views (Yellow):
- 0 Not assessed due to age (brown):
- 0 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Affected
- 12 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants' assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property:

Ashland Property Views, Applicant Determination of View Relationship to Project

- 9 Properties have landscape views to project
- 5 Dismissed not to/from building
- 3 Dismissed for vegetation blocking views
- 0 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Ashland to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	1	1
State Listed/DOE district or area	10	14
NR Listed/DOE/NHL site	0	0
NR Listed/DOE/NHL district or area	10	14
Totals	21	29

Ashland has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without current use lands covering 43.16% of the town acreage, are shown on the accompanying Ashland map.

Resource Category &	Town Count		
State/NR Listed DOE	29	Public Water Access Points	3
GNIS Historic Designation	1	Community Identified Historic	1
Historic Graveyards	0	Scenic Roads (miles)	12
Conservation Lands	7	Trails (miles)	0.5
Recreation Lands- Sites	5	Designated Rivers (miles)	5
Recreation Lands- Areas	4		
Public Lakes or Ponds		Current Use Properties	98
4			

The historic sites and cultural landscapes of Ashland, as enumerated above sum to: 54 count; 12.5 miles of trails and scenic roads; 5 miles of designated rivers; and 98 current use properties. Scenic roads extending through Ashland include US 93, Route 3, Owl Brook Road. Resources are also clustered in the town center the entirety of which is identified as historic and valued by the community. The proposed Project corridor extends north to south, to west of and aligned to two scenic roads and along the Pemigewasset River. The proposed Project may be viewed from numerous identified resources.

23 Bridgewater Summary

This summary presents the findings of the Applicant reporting and Heritage Landscapes identification of additional historic and cultural resources for Bridgewater.

Expressing the values of the town as a friendly community and seeks to preserve the wealth of natural, cultural and recreational resources they enjoy, as expressed in the Bridgewater Master Plan 2006 that states

Vision: The vision for the future of Bridgewater is to preserve the range of assets that the community has, including that friendly, small town feeling, and the beauty and richness of its natural surroundings by working to strengthen its land use regulations. (p. 1.1)

Natural Resources: Bridgewater's natural resources support the community's economy, tax base, recreation, quality of life, and the water quality of Newfound Lake and the Pemigewasset River. The type and distribution of the town's natural resource base also influences the location and type of development that takes place within the community. Based on the natural resources that are present, some areas of the community are better suited for a particular use than others. (p. 3.1)

Cultural Resources: Bridgewater's cultural resources have an effect on land use decisions and impact the character of the community. The community would like to ensure that the built environment does not adversely affect the cultural features in Bridgewater. Here are a few items to consider related to cultural resources in Bridgewater. (p. 3.9 - 3.10)

Recreation Resources: Bridgewater's existing recreation resources provide area residents and visitors with exceptional opportunities to enjoy the outdoors and exercise. The community would like to encourage the acquisition and protection of additional land that is suitable for recreation to ensure that the growing and changing population continues to have adequate opportunities for recreation. (p. 7.3)

In terms of current use lands, Bridgewater includes 13,743.33 acres of land and of these 8,587 acres are current use taxation parcels making up 62.8% of the total town. Bridgewater current use lands include 180 parcels, held by 110 owners. Of these current use lands 4,148 acres or 48.31% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 30.18% of the total land area of Bridgewater.

The Applicant identified 43 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Three cultural landscape were included in this group. The Applicant assigned each property a visual impact category related to the degree of potential visual effect. Of the 43 historic properties, ten were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

43 Bridgewater Historic Properties Applicant Identified Visual Impacts

6	More Than Minimal views
4	Minimal views
30	No views
3	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
10	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Bridgewater Property Views, Applicant determination of View Relationship to Project

5	Properties have views from landscapes
2	Dismissed not to/from building
6	Dismissed for vegetation blocking views
2	Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Bridgewater to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	0
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	0
NR Listed/DOE/NHL district or area	0	0
Totals	0	0

Bridgewater has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without current use lands covering 62.48% of the town acreage, are shown on the accompanying Bridgewater map.

Resource Category &	Town Count		
State/NR Listed DOE	0	Public Water Access Points	1
GNIS Historic Designation	0	Community Identified Historic	11
Historic Graveyards	0	Scenic Roads (miles)	0.5
Conservation Lands	3	Trails (miles)	0
Recreation Lands- Sites	1	Designated Rivers (miles)	6.5
Recreation Lands- Areas	1		
Public Lakes or Ponds	2	Current Use Properties	180

The resources above, historic sites and cultural landscapes of Bridgewater, are enumerated to sum: 19 count; 0.5 miles of scenic roads with no mapped trails; 6.5 miles of scenic designated river and stream corridors; and 180 current use parcels. Current use parcels are widespread but unmapped. These resources as mapped cluster along the eastern town boundary along the Pemigewasset River, where the Project corridor is located, and may be viewed from various vantages.

24 New Hampton Summary

This summary presents the findings of the Applicant reporting and Heritage Landscapes identification of additional historic and cultural resources for New Hampton. Expressing the values of the town in support of the preservation of historic assets, rural and agricultural landscapes, and scenic quality are established in the New Hampton Master Plan, 2002

Preservation of Historical Assets: The visual evidence of New Hampton's early character and appearance contributes greatly to the town's current appeal and character, adding personality and a real sense of place. An ongoing, active preservation effort demonstrates that the town has a sense of caring and pride. (p.ix)

Land Use Goals: Preserve the rural working landscape and protect prime agricultural lands. (p.42)

Ensure that the town retains the unique and historic rural character. (p.43)

Preserve important wildlife Habitat, scenic view areas, ridgelines, wetlands and water resources. ... The best method for the protection of wildlife habitat, scenic view areas and ridgelines is to remove them from possible development. (p.44)

In terms of current use lands, New Hampton includes 23,560.7 acres of land and of these 15,663 acres are current use taxation parcels making up 65.08% of the total town. New Hampton current use lands include 394 parcels, held by 250 owners. Of these current use lands 9,861 acres or 62.96% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 41.8% of the total land area of New Hampton.

The Applicant identified 47 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Three cultural landscapes were included in this group. The Applicant assigned each property a visual impact category related to the degree of potential visual effect. Of the 47 historic properties, nineteen were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

47 New Hampton Historic Properties Applicant Identified Visual Impacts

9	More Than Minimal views
10	Minimal views
27	No views
0	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
19	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

New Hampton Property Views, Applicant determination of View Relationship to Project

16	Properties have views from landscapes
3	Dismissed not to/from building
9	Dismissed for vegetation blocking views
4	Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in New Hampton to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	2
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	5
NR Listed/DOE/NHL district or area	0	0
Totals	0	7

New Hampton has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without unmapped state register or eligible properties or current use lands covering 66,43% of the town acreage, are shown on the accompanying New Hampton map.

Resource Category &	Town Count		
State/NR Listed DOE	7	Public Water Access Points	5
GNIS Historic Designation	0	Community Identified Historic	13
Historic Graveyards	0	Scenic Roads (miles)	14
Conservation Lands	41	Trails (miles)	1
Recreation Lands- Sites	2	Designated River (miles)	15.5
Recreation Lands- Areas	27		
Public Lakes or Ponds	10	Current Use Properties	394

The historic sites and cultural landscapes of New Hampton, as enumerated above sum to 105 counts; 15 miles of trails and scenic roads; 15.5 miles of designated rivers; and 394 parcels of current use lands. Scenic Routes 132 and 104 and Blake Hill Road are the main passages through the community with identified resources along and near these corridors. Recreation and conservation lands are widespread as are unmapped current use parcels. These resources, pervasive throughout the town, reflect the preservation and conservation values of the community as set forth in their master plan and identified by community members. The proposed Project corridor along the north and south west town boundaries will likely be highly visible from many of the identified resources.

25 Bristol Summary

This summary presents Heritage Landscapes identification of historic and cultural resources for Bristol. The Bristol Master Plan (2014) expresses the importance of natural resources for tourism, wildlife and public health, providing values and goals for stewardship of the landscape including:

Protect and enhance Bristol's recreational areas and scenic resources (p. 5-7)
Monitor existing conservation easement areas (p.5-9)
Protect and enhance Bristol's forest resources for multiple uses while encouraging responsible logging, minimizing soil erosion, and protecting wildlife habitats, recreational uses, and air quality (p.5-10)

In terms of current use lands, Bristol includes 10,928.75 acres of land and of these 6,189.5 acres are current use taxation parcels making up 56.64% of the total town. Bristol current use lands include 202 parcels, held by 132 owners. Of these current use lands 3,970.27 acres or 64.15% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 36.33% of the total land area of Bristol.

The Applicant identified 60 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Six cultural landscapes were included in this group. The Applicant assigned each property a visual impact category related to the degree of potential visual effect. Of the 60 historic properties, 26 were noted with minimal or more than minimal views, while two were found to be adversely effected. The Applicants' determination of views was:

60 Bristol Historic Properties Applicant Identified Visual Impacts

8	More Than Minimal views
18	Minimal views
34	No views
6	Not assessed due to age
2	NR, NH State, National Historic Landmarks Listed
2	Adversely Effected
26	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Bristol Property Views, Applicant determination of View Relationship to Project

27	Properties have views from landscapes
13	Dismissed not to/from building
14	Dismissed for vegetation blocking views
15	Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Bristol to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	1	7
State Listed/DOE district or area	1	17
NR Listed/DOE/NHL site	0	5
NR Listed/DOE/NHL district or area	1	16
Totals	3	45

Bristol has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Bristol map, without unmapped state register or eligible properties or current use lands covering 56.64% of the town acreage.

Resource Category &	Town Count		
State/NR Listed DOE	45	Public Water Access Points	9
GNIS Historic Designation	0	Community Identified Historic	8
Historic Graveyards	0	Scenic Roads (miles)	5
Conservation Lands	9	Trails (miles)	0.5
Recreation Lands- Sites	6	Designated Rivers (miles)	9.5
Recreation Lands- Areas	5		
Public Lakes or Ponds	4	Current Use Properties	202

The historic sites and cultural landscapes of Bristol, as enumerated above sum to: 86 count; 5.5 miles of trails and scenic roads; 9.5 miles of designated rivers; and 202 current use properties. Bristol is framed by Newfound Lake to the north and the Pemigewasset River to the south. Scenic Peaked Hill and Hemp Hill Roads traverse typical hill and valley topography in this rural community offering some expansive views. Identified historic sites and cultural landscapes are widespread with a scattering located along the Newfound River and Route 3a and others along the shores of Newfound Lake and the Pemigewasset River. Historic sites dots the community. The proposed Project corridor runs through the southeast area passing over Peaked Hill Road and would be widely likely be visible.

26 Hill Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Hill. Hill Site Plan Review Regulations 2005, indicates a purpose directed to proper use of natural resources and avoidance of "negative environmental impacts; and to guide the character of development." (p.1)

In terms of current use lands, Hill includes 17,068.51 acres of land and of these 10,268.51 acres are current use taxation parcels making up 60.16% of the total town. Hill current use lands include 225 parcels, held by 153 owners. Of these current use lands 4,201.10 acres or

40.91% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 24.62% of the total land area of Hill.

The Applicants' identified 15 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Four cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category related to the degree of potential visual effect. Of the 15 historic properties, 7 were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

15 Hill Historic Properties Applicant Identified Visual Impacts

- 4 More Than Minimal views
- 3 Minimal views
- 6 No views
- 1 Not assessed due to age
- 1 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Effected
- 15 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants' assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Hill Property Views, Applicant determination of View Relationship to Project

- 7 Properties have views from landscapes
- 2 Dismissed not to/from building
- 2 Dismissed for vegetation blocking views
- 3 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Hill to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	0
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	1	2
NR Listed/DOE/NHL district or area	0	0
Totals	1	2

Hill has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without unmapped state register or eligible properties or current use lands covering 60.16% of the town acreage, are shown on the accompanying Hill map.

Resource Category &		Town Count	
State/NR Listed DOE	2	Public Water Access Points	7
GNIS Historic Designation	0	Community Identified Historic	3
Historic Graveyards	0	Scenic Roads (miles)	0
Conservation Lands	18	Trails (miles)	7
Recreation Lands- Sites	1	Designated Rivers (miles)	4
Recreation Lands- Areas	3		
Public Lakes or Ponds		Current Use Properties	225
8			

The historic sites and cultural landscapes of Hill, as enumerated above sum to: 42 count; 7 miles of trails; 4 miles of designated rivers; and 225 current use properties. Within Hill extensive undeveloped lands include conservation, recreation and current use acreages. The Pemigewasset River forms the east town boundary and the proposed Project corridor is positioned west of that river corridor extending through conservation, recreation and residential area along Route 3A.

27 Franklin Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Franklin. Franklin expresses the importance of protecting the integrity and character of landscape resources in their 2005 Master Plan:

Natural Resources: Protect and manage important lands for public use and provide for protection of important natural resources. (p.38)

Historic Preservation: Raise the awareness of, and promote the preservation and restoration of the historic nature of downtown and all of Franklin. (p.38)

In terms of current use lands, Franklin includes 17,708.94 acres of land and of these 8,690.47 acres are current use taxation parcels making up 49.00% of the total town. Franklin current use lands include 241 parcels, held by 148 owners. Of these current use lands 3,473.52 acres or 39.97% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 19.61% of the total land area of Franklin.

The Applicants' identified 130 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Two cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category related to the degree of potential visual effect. Of the 130 historic properties, 51 were noted

with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

130 Franklin Historic Properties Applicant Identified Visual Impacts

- 14 More Than Minimal views
- 37 Minimal views
- 75 No views
- 4 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 0 Adversely Effected
- 51 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants' assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Franklin Property Views, Applicant determination of View Relationship to Project

- 34 Properties have views from landscapes
- 3 Dismissed not to/from building
- 6 Dismissed for vegetation blocking views
- 2 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Franklin to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	6	18
State Listed/DOE district or area	17	40
NR Listed/DOE/NHL site	6	18
NR Listed/DOE/NHL district or area	17	40
Totals	46	116

Franklin has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, without unmapped state register or eligible properties or current use lands covering 49.07% of the town acreage, are shown on the accompanying Franklin map.

Resource Category &		Town Count	
State/NR Listed DOE	116	Public Water Access Points	7
GNIS Historic Designation	1	Community Identified Historic	0
Historic Graveyards	0	Scenic Roads (miles)	0
Conservation Lands	18	Trails (miles)	7.5
Recreation Lands- Sites	8	Designated Rivers (miles)	12
Recreation Lands- Areas	9		
Public Lakes or Ponds		Current Use Properties	241
8			

The historic sites and cultural landscapes of Franklin, as enumerated above sum to: 167 count; 7.5 miles of trails no scenic roads; 12 miles of designated rivers; and 241 current use parcels. Identified resources are clustered along the river corridors and main roads with public water and conservation lands throughout. The proposed Project corridor runs north south through Franklin west of the Pemigewasset and Merrimack River corridors and Routes 3A, 3, and 127 where development is clustered. The proposed location is potentially highly visible from multiple vantages within Franklin.

28 Northfield Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Northfield. Expressing the values of the town in support of open space, scenic quality, recreation, rural "peace and quiet" and commitment to integrated preservation of natural resources the 2014 Northfield Master Plan notes

Preservation of Open Space - Open space provides residents with outstanding scenic views, peace and quiet in rural areas, recreational opportunities such as those found at Sandogardy Pond, and enjoyment and interaction with wildlife and vegetation that are missing in urban areas. (page 4)

Natural Resources: Future land use planning efforts, including zoning and Site Plan Regulations revisions, will need to integrate the preservation of natural resources in order to ensure that the long term goals of the community are realized. (page 72)

In terms of current use lands, Northfield includes 18,485.7 acres of land and of these 11,909.5 are current use taxation parcels or 65.08% of the total town. Northfield current use lands include 351 parcels, held by 224 owners. Of these current use lands 6,902.1 acres or 57.95% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 37.34% of the total land area of Northfield.

The Applicants' identified 23 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. No cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category

related to the degree of potential visual effect. Of the 23 historic properties, three were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

23	Northfield Historic Properties Applicant Identified Visual Impacts
2	More Than Minimal views
1	Minimal views
15	No views
5	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
3	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicant's assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Northfield Property Views, Applicant determination of View Relationship to Project

3	Properties have views from the landscape
0	Dismissed not to/from building
1	Dismissed for vegetation blocking views
1	Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Northfield to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	0
State Listed/DOE district or area	0	9
NR Listed/DOE/NHL site	0	3
NR Listed/DOE/NHL district or area	0	0
Totals	0	12

Twelve is the town wide listed or eligible historic properties count. Northfield has many additional historic site and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Northfield map, with the exception of unmapped current use lands covering 65.08% of the town acreage and unmapped state listed historic properties.

Resource Category &	Town Count		
State NR listed DOE	12	Public Water Access Points	2
GNIS Historic Designation	0	Community Identified Historic	0
Historic Graveyards	0	Scenic Roads (miles)	
Conservation Lands	3		0
Recreation Lands- Sites	5	Trails (miles)	0
Recreation Lands- Areas	1	Designated Rivers (miles)	3
Public Lakes or Ponds			
8		Current Use Properties	351

The historic sites and cultural landscapes of Northfield, as enumerated above sum to: 31 count; no scenic roads or trails; 3 miles of designated rivers or streams; and 351 parcels in current use. These valued resources are pervasive, with conservation and current use lands covering more than half of the overall town acreage in this rural community. The proposed project corridor is located in the southwest area of town running east of the Merrimack River valley and crossing through a residential street, forests and fields.

29 Boscawen Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Boscawen. The values of the Town in support of sustainable development and preservation of cultural landscapes are established in the Town of Boscawen Master Plan (2002):

Assure the best and highest use for lands with respect and consideration for traditional uses such as agriculture and forestry, and maintain and enhance the rural character of the Town by revising ordinances and regulations in conjunction with Master Plan findings (Master Plan Goals Page II-2)

Modifications to town character and cultural landscapes are addressed through current (2002) and proposed regulatory measures for zoning and land conservation, identifying two categories of importance, and providing recommendations for treatment of cultural landscapes:

Primary conservation areas may include wetlands, steep slopes, aquifer recharge zones, and floodplains. Secondary conservation areas may include stone walls, viewsheds, prominent vegetation, prominent landforms, prime agricultural soils, historic sites and features, archeological sites, and communities and species identified in the Natural Heritage Inventory. (Page IX-17)

To preserve and protect historical resources in Boscawen, including old buildings, landmarks, cemeteries, and stone walls and to encourage their stewardship. Consider an amendment of the Subdivision and Site Plan Review Regulations to preserve the historic stone walls in Town when developments threaten their locations. (Page III-2)

In terms of current use lands, Boscawen includes 15,912.78 acres of land and of these 9937.31 acres are current use taxation parcels making up 62.45% of the total town. Boscawen current use lands include 226 parcels, held by 153 owners. Of these current use lands 6,735.29 acres or 67.78% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 42.33% of the total land area of Boscawen.

The Applicants' identified five historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Two cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category related to the degree of potential visual effect. Of the five historic properties, three were noted with minimal or more than minimal views, but none was found to be adversely effected. The Applicants' determination of views was:

5 Boscawen Historic Properties Applicant Identified Visual Impacts

2	More Than Minimal views
1	Minimal views
1	No views
1	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
3	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants' assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Boscawen Property Views, Applicant determination of View Relationship to Project

3	Properties have views from landscapes
2	Dismissed not to/from building
3	Dismissed for vegetation blocking views
3	Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Boscawen to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	1
State Listed/DOE district or area	0	0
NR Listed/DOE/NHL site	0	4
NR Listed/DOE/NHL district or area	0	0
Totals	0	5

Boscawen has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Boscawen map, with the exception of unmapped current use lands covering 62.45% of the town acreage and unmapped state listed historic properties.

Resource Category &	Town Count		
State/NR Listed DOE	5	Public Water Access Points	3
GNIS Historic Designation	1	Community Identified Historic	0
Historic Graveyards	0	Scenic Roads (miles)	0
Conservation Lands	21	Trails (miles)	9.5
Recreation Lands- Sites	3	Designated Rivers (miles)	12.5
Recreation Lands- Areas	5		
Public Lakes or Ponds	9	Current Use Properties	226

The historic sites and cultural landscapes of Boscawen, as enumerated above sum to: 47 count; 9.5 miles of trails; no scenic roads; 12.5 miles of designated rivers; and 226 current use properties. The conservation, recreation and public water resources are widespread, while mapped historic sites cluster along the Route 3 corridor. The proposed Project corridor is located east of the town boundary which follows the Merrimack River, in adjacent Canterbury. The location of the Project corridor is likely to provide broad visibility in the eastern areas of Boscawen.

30 Canterbury Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Canterbury. The Canterbury Master Plan (2010) expresses landscape values of the town in support of heritage land uses, orderly development, scenic beauty and preservation of historic character:

Historic – Agricultural: At present agricultural land is an important resource of the Town. This land provides a variety of values and uses including the preservation of open space, historic character, recreation, and local sources of food. (p.26)

Scenic Beauty: High priority should be given to preserving specific “scenic vistas” and “scenic roads” and their rights-of-way that may be bordered by stone walls and

mature trees. These roads need to be protected from efforts to widen and “improve” them to accommodate development. (p.42)

Natural Resources: Canterbury has some unique natural communities, some of which contain fragile habitats for rare and endangered species including along the Merrimack River and other places in town. ...Wildlife habitat and corridors should be given consideration in each decision to build in or change the natural environment. (p.40)

In terms of current use lands, Canterbury includes 28,123.94 acres of land and of these 19,834.76 acres are current use taxation parcels making up 70.50% of the total town. Canterbury current use lands include 545 parcels, held by 376 owners. Of these current use lands 10,801.12 acres or 54.46% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 38.41% of the total land area of Canterbury.

The Applicants’ identified 92 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Six cultural landscapes were included in this group. The Applicant’s assigned each property a visual impact category related to the degree of potential visual effect. Of the 92 historic properties, 21 were noted with minimal or more than minimal views, one was found to be adversely effected. The Applicants’ determination of views was:

92 Canterbury Historic Properties Applicant Identified Visual Impacts

8	More Than Minimal views
13	Minimal views
64	No views
6	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
21	Identified with views to Project

Heritage Landscapes reviewed the Applicants’ assessment to gain an understanding of how the Applicants’ assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants’ considered visual impact to the landscape context of each property.

Canterbury Property Views, Applicant determination of View Relationship to Project

18	Properties have views from landscapes
5	Dismissed not to/from building
5	Dismissed for vegetation blocking views
6	Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Canterbury to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	1	1
State Listed/DOE district or area	1	1
NR Listed/DOE/NHL site	0	1
NR Listed/DOE/NHL district or area	0	1
Totals	2	4

Canterbury has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes and the community. These resources are shown on the accompanying Canterbury map, with the exception of unmapped current use lands covering 70.53% of the town acreage and unmapped state listed historic properties.

Resource Category &	Town Count		
State/NR Listed DOE	4	Public Water Access Points	7
GNIS Historic Designation	0	Community Identified Historic	5
Historic Graveyards	0	Scenic Roads (miles)	11
Conservation Lands	27	Trails (miles)	13
Recreation Lands- Sites	2	Designated Rivers (miles)	10
Recreation Lands- Areas	5		
Public Lakes or Ponds		Current Use Properties	362
23			

The historic sites and cultural landscapes of Canterbury, as enumerated above sum to: 73 count; 24 miles of trails and scenic roads; 10 miles of Designated River; and 362 current use properties. These resources are pervasive with ponds dotted in low lying areas, and other resources located along scenic roads, while conservation and recreation land are dispersed throughout. Located east of the Merrimack River the proposed Project corridor runs approximately north to south and due to its height will likely be highly visible.

31 Concord Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Concord. The Concord Master Plan 2030 (completed 2008) is founded "on the concept of multiple use of natural resources and open space" (p. VII-1) and establishes the planning purposes of "orderly growth and development of the community; the preservation, conservation and use of natural and man-made resources" (p.I-1). The master plan also specifically recognizes the importance of historic sites and cultural landscapes:

Historic Resources: The overall goal is to recognize, preserve, enhance, and continue the use of buildings, structures, sites, areas, and districts having historical, architectural, or cultural significance to the City (p. VIII-1)

In terms of current use lands, Concord includes 40,933.68 acres of land and of these 15,663.06 acres are current use taxation parcels making up 38.26% of the total town. Concord current use lands include 489 parcels, held by 305 owners. Of these current use lands 4,780.91 acres or 30.52% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 11.68% of the total land area of Concord.

The Applicants' identified 179 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Six cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category related to the degree of potential visual effect. Of the 179 historic properties, 47 were noted with minimal or more than minimal views, one was found to be adversely effected. The Applicants' determination of views was:

179 Concord Historic Properties Applicant Identified Visual Impacts

15	More Than Minimal views
32	Minimal views
116	No views
15	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
1	Adversely Effected
47	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants' assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Concord Property Views, Applicant determination of View Relationship to Project

44	Properties have views from landscapes
18	Dismissed not to/from building
29	Dismissed for vegetation blocking views
27	Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Concord to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	7	56
State Listed/DOE district or area	2	167
NR Listed/DOE/NHL site	7	52
NR Listed/DOE/NHL district or area	2	167
Totals	18	442

Concord has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Concord map, with the exception of unmapped current use lands covering 38.26% of the town acreage and unmapped state listed historic properties.

Resource Category &	Town Count		
State/NR Listed DOE	442	Public Water Access Points	20
GNIS Historic Designation	4	Community Identified Historic	58
Historic Graveyards	0	Scenic Roads (miles)	1
Conservation Lands	58	Trails (miles)	60
Recreation Lands- Sites	28	Designated Rivers (miles)	22
Recreation Lands- Areas	15		
Public Lakes or Ponds		Current Use Properties	489
15			

The historic sites and cultural landscapes of Concord, as enumerated above sum to: 640 count; 61 miles of trails and scenic roads; 22 miles of designated rivers; and 489 parcels in current use. These resources are pervasive, clustering along the Merrimack River corridor and distributed throughout Concord. The proposed Project corridor is aligned to the east of the river valley and runs through and alongside of many identified resources, with likely high visibility.

Pembroke Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Pembroke.

Expressing the town recognition and appreciation of historic and cultural resources as irreplaceable and needing to be preserved, as well as natural resources to protect and preserve, forest and farm lands to protect and the visual character to safeguard, the Pembroke Master Plan 2004 states

Historical and Cultural Resources: Pembroke has a long and interesting history. Formally chartered in 1759, Pembroke was an industrial center for much of the nineteenth and early twentieth centuries. Evidence of Pembroke's past exists in

its historic homes, churches, village center, and even in the rural outskirts of town. The structures and sites that tell the story of Pembroke's history and culture are irreplaceable and need to be preserved as Pembroke grows and changes. (p.III-1)

Natural Resources: Goals: To preserve a variety of natural areas within the Town. (p.VII-2) ... To identify and protect surface (ponds, rivers, streams) and subsurface (aquifers) water resources. (p.VII-2) ... To develop alliances and provide educational opportunities which protect the town's natural resources and promote a heightened awareness of their important values. (p.VII-3) ... To provide long-term protection to the town's core rural areas by identifying and safeguarding the town's prime forestlands and agricultural areas. (p.VII-3) ... To identify the Town's scenic resources such as scenic roads, vistas and other viewscapes. (VII-4)

In terms of current use lands, Pembroke includes 14,486.99 acres of land and of these 8,227.79 acres are current use taxation parcels making up 56.79% of the total town area. Pembroke current use lands include 296 parcels, held by 203 owners. Of these current use lands 2,710.45 acres or 32.94% of the current use lands are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 18.7% of the total land area of Pembroke.

The Applicants; identified 114 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Four cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category related to the degree of potential visual effect. Of the 114 historic properties, seventeen were noted with minimal or more than minimal views, while none were found to be adversely effected. The Applicants' determination of views was:

114 Pembroke Historic Properties Applicant Identified Visual Impacts

5	More Than Minimal views
12	Minimal views
85	No views
12	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
17	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants' assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Pembroke Property Views, Applicant determination of View Relationship to Project

- 25 Properties have views from landscapes
- 4 Dismissed not to/from building
- 7 Dismissed for vegetation blocking views
- 14 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Pembroke to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	4
State Listed/DOE district or area	0	2
NR Listed/DOE/NHL site	0	4
NR Listed/DOE/NHL district or area	0	2
Totals	0	12

Pembroke has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources, excepting the unmapped state listed or eligible historic properties and the current use lands covering 56.79% of town lands, are shown on the accompanying Pembroke map.

Resource Category &	Town Count		
State NR Listed DOE	12	Public Water Access Points	4
GNIS Historic Designation	0	Community Identified Historic	12
Historic Graveyards	0	Scenic Roads (miles)	0
Conservation Lands	17	Trails (miles)	3
Recreation Lands- Sites	3	Designated Rivers (miles)	0
Recreation Lands- Areas	5		
Public Lakes or Ponds	3		
		Current Use Properties	296

The historic sites and cultural landscapes of Pembroke, as enumerated above sum to: 50 count; 3 miles of trails, no scenic roads; no designated rivers or streams; and 296 current use properties. These resources are widespread with some clustering along the proposed Project corridor which is likely in view from community identified resources, recreation and conservation lands.

33 Epsom Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Epsom. The proposed Project

corridor is located within 1-mile of the southern border of Epsom, and as such Epsom was assessed by the Applicants'. The Town of Epsom identifies landscape character and scenic beauty as guiding values within the Town of Epsom Zoning Ordinance (amended 3/11/2014), providing particular attention to the placement of largescale infrastructure:

In order to retain the beauty and rural atmosphere of the Town of Epsom, New Hampshire, to protect property values, to conserve natural resources, to encourage the most appropriate use of land throughout the municipality and to promote health, safety, morals, order, convenience, peace, prosperity, and general welfare of its inhabitants (Article I, Section A, p.6)

Telecommunication Towers: Reduce or eliminate adverse impacts such facilities may create. Adverse impacts may include, but are not limited to impacts on aesthetics, impacts on environmentally sensitive areas, impacts to historically significant locations, impacts on flight corridors, reduction in property values, and health and safety concerns (Article III, Section R, p.48)

In terms of current use lands, Epsom includes 22,066.73 acres of land and of these 14,948.59 acres are current use taxation parcels making up 67.74% of the total town. Epsom current use lands include 448 parcels, held by 258 owners. Of these current use lands 911.57 acres or 6.10% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 4.13% of the total land area of Epsom.

The Applicants' identified 32 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. No cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category related to the degree of potential visual effect. Of the 32 historic properties, ten were noted with minimal or more than minimal views, but none were found to be adversely effected. The Applicants' determination of views was:

32 Epsom Historic Properties Applicant Identified Visual Impacts

0	More Than Minimal views
10	Minimal views
18	No views
4	Not assessed due to age
0	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
10	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants' assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Epsom Property Views, Applicant determination of View Relationship to Project

- 13 Properties have views from landscapes
- 2 Dismissed not to/from building
- 4 Dismissed for vegetation blocking views
- 3 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Epsom to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	8
State Listed/DOE district or area	0	49
NR Listed/DOE/NHL site	0	8
NR Listed/DOE/NHL district or area	0	49
Totals	0	114

Epsom has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Epsom map, excepting the unmapped state listed or eligible historic properties and the current use lands covering 67.74% of town lands.

Resource Category &	Town Count		
State/NR Listed DOE	114	Public Water Access Points	2
GNIS Historic Designation	4	Community Identified Historic	0
Historic Graveyards	0	Scenic Roads (miles)	0
Conservation Lands	24	Trails (miles)	8
Recreation Lands- Sites	7	Designated Rivers (miles)	0
Recreation Lands- Areas	7		
Public Lakes or Ponds	7	Current Use Properties	448

The historic sites and cultural landscapes of Epsom, as enumerated above sum to 165 counts and 8 miles of trails and scenic roads. These resources are widespread, dotted throughout town. The proposed Project corridor is located within 1-mile of the southern border of Epsom, crossing the valley and Route 28 that is the main north south road through Epsom.

34 Allenstown Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Allenstown.

The Allenstown Master Plan (2003) expresses the values of the town in support of sustainable development guided by historic preservation and open space preservation:

Historic and Cultural Goals: To reestablish the Historical Society; To promote historic preservation; To solicit a closer relationship with state and local government; To preserve and protect historic sites and buildings; To place historic markers and information on identified historic sites; To promote cultural development as indicated in the NH Rural Development Report. (p. III-20 and III-21) Although Allenstown is unusual in regards to open space preservation due to the amount of open space land in the park, it is important to coordinate future development, particularly in the Deerfield Road area, to maximize the value of the park as a piece of the regional greenway. (p. VI-22)

Natural Resources: The natural features section of the master plan focuses heavily on Bear Brook State Park, as it must, given the area of town consumed by the park. The natural features section recommends that the Town work to improve the impact the park has on the Town by lobbying against motorized recreation in the park, pursuing additional state funding to reimburse the town for park-related services expenses, and coordinating with neighboring communities to increase bargaining power with the state. (p. VI-22)

In terms of current use lands, Allenstown includes 13,097.91 acres of land and of these 3,096.61 acres are current use taxation parcels making up 23.64% of the total town. Allenstown current use lands include 114 parcels, held by 71 owners. Of these current use lands 1,919.22 acres or 61.98% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 14.65% of the total land area of Allenstown.

The Applicants' identified 31 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Four cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category related to the degree of potential visual effect. Of the 31 historic properties, eight were noted with minimal or more than minimal views, but none were found to be adversely effected. The Applicants' determination of views was:

31 Allenstown Historic Properties Applicant Identified Visual Impacts

1	More Than Minimal views
7	Minimal views
18	No views
3	Not assessed due to age
2	NR, NH State, National Historic Landmarks Listed
0	Adversely Effected
8	Identified with views to Project

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants' assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Allenstown Property Views, Applicant determination of View Relationship to Project

- 8 Properties have views from landscapes
- 6 Dismissed not to/from building
- 8 Dismissed for vegetation blocking views
- 6 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Allenstown to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	2
State Listed/DOE district or area	0	1
NR Listed/DOE/NHL site	0	2
NR Listed/DOE/NHL district or area	0	1
Totals	0	6

Allenstown has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Allenstown map, excepting the unmapped state listed or eligible historic properties and the current use lands covering 23.64% of town lands.

Resource Category &	Town Count		
State/NR Listed DOE	6	Public Water Access Points	8
GNIS Historic Designation	0	Community Identified Historic	0
Historic Graveyards	0	Scenic Roads (miles)	6.5
Conservation Lands	8	Trails (miles)	60
Recreation Lands- Sites	1	Designated Rivers (miles)	0
Recreation Lands- Areas	2		
Public Lakes or Ponds		Current Use Properties	114
7			

The historic sites and cultural landscapes of Allenstown, as enumerated above sum to: 32 count; 66.5 miles of trails and scenic roads; no sections of designated rivers; and 114 properties in current use. These resources are widespread with a high percentage of town lands in recreation, conservation and public waters designation and uses. The proposed

Project corridor extends along west to east the northern margin of Allenstown crossing through recreation and conservation lands as well as rural properties likely in current use.

35 Deerfield Summary

This summary presents the findings of the Applicants' reporting and Heritage Landscapes identification of additional historic and cultural resources for Deerfield. The preservation of cultural landscapes and the importance landscape character is clearly valued within the Deerfield Master Plan (2008):

Vision Statement: "The Town of Deerfield, New Hampshire desires to maintain its character as a small, rural, but vibrant place with open space, natural beauty, and a strong sense of community. People live and move to Deerfield because of its rural and small town character, its quietness and privacy, its scenic qualities (p.5)

Land Use: Promote development that will preserve the natural and cultural features that contribute to Deerfield's rural character. (p.7)

Guide and Promote development and growth in areas that are already developed in an effort to reduce impacts on natural resources and infrastructure and to minimize sprawl. (p.8)

Natural Resources: Recognize that the town's natural resources and open space form the basis of the overall character and well-being of Deerfield. (p.13)

Cultural/Historical Resources: Promote the preservation and protection of its historic and cultural resources. (p.15)

In terms of current use lands, Deerfield includes 32,496.62 acres of land and of these 19,484.51 acres are current use taxation parcels making up 59.96% of the total town. Deerfield current use lands include 552 parcels, held by 388 owners. Of these current use lands 5,022.6 acres or 25.78% are within the recreation category that includes the provision of public access and compatible uses for a further 20% tax reduction benefit. These current use lands open to the public for recreation comprise 15.46% of the total land area of Deerfield.

The Applicants' identified 123 historic properties within a one-mile APE that could be indirectly (visually) impacted from the proposed Project. Six cultural landscapes were included in this group. The Applicants' assigned each property a visual impact category related to the degree of potential visual effect. Of the 123 historic properties, 25 were noted with minimal or more than minimal views, while 92 were found to be adversely effected. The Applicants' determination of views was:

123 Deerfield Historic Properties Applicant Identified Visual Impacts

- 13 More Than Minimal views
- 12 Minimal views
- 2 No views
- 4 Not assessed due to age
- 0 NR, NH State, National Historic Landmarks Listed
- 92 Adversely Effected
- 10 Identified with views to Project**

Heritage Landscapes reviewed the Applicants' assessment to gain an understanding of how the Applicants' assessed the visual relationship between the historic property and the proposed Project. The review focused on how the Applicants' considered visual impact to the landscape context of each property.

Deerfield Property Views, Applicant determination of View Relationship to Project

- 30 Properties have views from landscapes
- 17 Dismissed not to/from building
- 23 Dismissed for vegetation blocking views
- 15 Dismissed as not historically significant

Heritage Landscapes gathered data on National Register and state listed or determined eligible properties in Deerfield to identify all designated historic sites that may be visually impacted.

Historic Designation	Applicant 1 mile APE	Entire Town
State Listed/DOE site	0	1
State Listed/DOE district or area	0	1
NR Listed/DOE/NHL site	0	0
NR Listed/DOE/NHL district or area	0	1
Totals	0	3

Deerfield has additional historic sites and cultural landscape resources identified in the following groups by Heritage Landscapes. These resources are shown on the accompanying Deerfield map, excepting the unmapped state listed or eligible historic properties and the current use lands covering 59.96% of town lands.

Resource Category &	Town Count
State/NR Listed DOE	3
GNIS Historic Designation	1
Historic Graveyards	103
Conservation Lands	36
Recreation Lands- Sites	12
Recreation Lands- Areas	12
Public Lakes or Ponds	6
Public Water Access Points	6
Community Identified Historic	51
Scenic Roads (miles)	10.5
Trails (miles)	15
Designated Rivers (miles)	15.5
Current Use Properties	552

The historic sites and cultural landscapes of Deerfield, as enumerated above sum to 230 count; 25.5 miles of trails and scenic roads; 15.5 miles of designated rivers; and 552 current use properties. The historic sites and cultural landscapes of Deerfield are abundant and pervasive. Notable is the large number, 103 historic graveyards dispersed through the town. The proposed Project corridor essentially bisects the town running south of and parallel to Mt. Delight Road and Nottingham Road and is likely visible from many identified resources.

F. Assessment of Town Summary Mapping

We find that the 30 towns with master plans or land use ordinances available online have clearly indicated through those documents the importance of their landscape as a historic, cultural and scenic resource, providing recreation and other use values. Many of the towns specifically linked the landscape as part of their community identity and heritage, providing acknowledgement of the role cultural landscapes play in decisions to live in and visit these towns.

The cultural value that these towns place in historic land uses, scenic beauty, historic sites and landscape based recreation is evidenced by the large numbers of properties with conservation easements and those in Current Use, as shown in *Table 1: Current Use Chart of Host and within 1-mile Towns*. The mapping and enumeration of historic sites and cultural landscapes provides evidence of the wide distribution and large number of resources that have the potential for impact, which received scant review by the Applicants. The large number of historic sites identified through mapping and Community Workshops are listed in *Table 2: Historic Sites and Cultural Landscapes identified by Heritage Landscapes and Communities*, for the 35 towns reviewed for this study. While the capture is large, the number of historic sites and cultural landscapes that could be impacted by the Project likely exceeds those represented in Table 2, not only because the potential for visual effect extends to a 10-mile APE, but because the state data Heritage Landscapes used within this study is not actively maintained and incomplete, particularly for locally known and valued historic sites and cultural landscapes.

2015 Current Use Data for Potential Project Host Towns and within 1 mile APE

North to South	Town	Total Land (acres)	Current Use (acres)	Current Use (%)	CU Recreation Adj. (acres)	CU Recreation Adj. (%)	# Owners CU	# Parcels CU
1	Pittsburg	180,680.46	130,746.93	72.36%	126,875.04	97.04%	122	252
2	Clarksville	38,685.93	32,654.97	84.41%	26,243.10	80.36%	152	196
3	Stewartstown	29,772.67	23,448.15	78.76%	16,151.24	68.88%	246	393
4	Dixville	31,369.93	30,782.74	98.13%	30,782.74	100.00%	7	22
5	Millsfield	28,715.83	27,140.85	94.52%	27,140.85	100.00%	13	11
6	Dummer	30,629.57	27,588.22	90.07%	23,371.09	84.71%	86	145
7	Stark	37,901.86	11,079.12	29.23%	7,339.59	66.25%	129	248
8	Northumberland	23,505.48	16,628.62	70.74%	9,309.24	55.98%	164	330
9	Littleton	32,021.11	18,866.77	58.92%	7,539.84	39.96%	256	272
10	Lancaster	32,129.91	24,636.87	76.68%	9,912.78	40.24%	337	642
11	Jefferson	32,061.52	16,703.01	52.10%	11,211.38	67.12%	259	383
12	Whitefield	21,949.63	16,983.29	77.37%	4,728.23	27.84%	246	429
13	Dalton	17,624.05	14,360.16	81.48%	3,222.62	22.44%	213	392
14	Bethlehem	58,164.53	18,365.00	31.57%	4,904.00	26.70%	259	465
15	Sugar Hill	10,955.99	8,089.52	73.84%	2,931.97	36.24%	170	270
16	Franconia	42,073.06	7,145.22	16.98%	627.23	8.78%	144	220
17	Easton	19,929.03	4,658.04	23.37%	2,346.72	50.38%	61	74
18	Woodstock	37,434.51	3,893.46	10.40%	2,565.87	65.90%	37	49
19	Thornton	32,176.75	8,325.06	25.87%	2,339.99	28.11%	136	263
20	Campton	33,240.27	21,470.22	64.59%	16,830.41	78.39%	199	362
21	Plymouth	18,063.11	12,924.94	71.55%	3,155.00	24.41%	244	367
22	Ashland	7,244.43	3,126.60	43.16%	1,634.79	52.29%	56	98
23	Bridgewater	13,743.33	8,587.00	62.48%	4,148.00	48.31%	110	180
24	New Hampton	23,560.69	15,663.00	66.48%	9,861.00	62.96%	250	394
25	Bristol	10,928.75	6,189.50	56.64%	3,970.27	64.15%	132	202
26	Hill	17,068.51	10,268.51	60.16%	4,201.10	40.91%	153	225
27	Franklin	17,708.94	8,690.47	49.07%	3,473.52	39.97%	148	241
28	Northfield	18,299.61	11,909.45	65.08%	6,902.08	57.95%	224	351
29	Boscawen	15,912.78	9,937.31	62.45%	6,735.29	67.78%	153	226
30	Canterbury	28,123.94	19,834.76	70.53%	10,801.12	54.46%	376	545
31	Concord	40,933.68	15,663.06	38.26%	4,780.91	30.52%	305	489
32	Pembroke	14,486.99	8,227.79	56.79%	2,710.45	32.94%	203	296
33	Epsom	22,066.73	14,948.59	67.74%	911.57	6.10%	258	448
34	Allenstown	13,097.91	3,096.61	23.64%	1,919.22	61.98%	71	114
35	Deerfield	32,496.62	19,484.51	59.96%	5,022.60	25.78%	388	552
35	TOTALS	997,096.9	594,588.6	59.63%	399,659.03	67.2%	6,307	10,146

Table 1: Current Use chart of host and within 1 mile towns. Source- *State of New Hampshire Department of Revenue Administration, 2015 Current Use Report*

Summary Town Historic Sites and Cultural Landscapes Counts, Miles and Acres

North-South Order	Town	# State/NR Listed DOE	# GNIS Historic	# Historic Graveyard	# Conservation Land	# Recreation Lands- Site	# Recreation Lands- Area	# Public Lake Pond	# Public Water Access Points	# Community ID Historic	Scenic Roads Miles	Trails Miles	Designated Rivers Miles	# Current Use Acres	# Parcels Current Use
1	Pittsburg	2	3	4	43	30	12	31	15	14	28.0	65.0	32.0	130,747	252
2	Clarksville	2	6	1	8	2	1	5	1	16	11.0	52.0	11.0	32,655	196
3	Stewartstown	10	7	3	21	4	3	3	4	29	12.0	37.5	8.5	23,448	393
4	Dixville	6	1	1	1	6	1	4	0	9	6.0	40.0	0.0	30,783	22
5	Millsfield	4	0	0	1	2	0	5	0	5	1.5	13.0	0.0	27,141	11
6	Dummer	0	0	2	4	0	5	6	5	7	7.5	2.0	0.0	27,588	145
7	Stark	6	0	3	25	2	8	9	4	23	10.0	27.5	0.0	11,079	248
8	Northumberland	6	0	0	15	0	5	4	2	5	10.0	13.0	17.0	16,629	330
9	Littleton	20	2	7	29	10	0	7	8	7	21.0	0.0	31.0	18,867	272
10	Lancaster	27	1	1	15	8	4	5	1	34	26.0	19.5	12.5	24,637	642
11	Jefferson	34	0	7	41	5	4	3	2	5	28	29	0.0	16,703	383
12	Whitefield	13	0	1	17	3	0	3	4	37	21.0	4.0	0.0	16,983	429
13	Dalton	6	0	0	21	0	4	3	2	17	17.5	0.0	0.0	14,360	392
14	Bethlehem	15	2	0	14	7	8	4	0	15	27.0	63.0	12.5	18,365	465
15	Sugar Hill	6	0	0	21	0	4	3	2	17	17.5	0.0	0.0	8,090	270
16	Franconia	10	0	0	13	10	3	5	4	20	11.5	40.5	2.0	7,145	220
17	Easton	2	2	0	2	3	1	1	0	15	10.0	7.0	0.0	4,658	74
18	Woodstock	1	4	0	7	12	7	10	6	4	22.0	31.0	0.0	3,893	49
19	Thornton	2	2	0	12	6	7	3	2	0	10.0	11.5	7.5	8,325	263
20	Campton	8	0	0	10	3	8	9	1	5	9.0	8.5	7.5	21,470	362
21	Plymouth	13	2	0	8	3	1	2	2	18	9.5	2.5	5.5	12,925	367
22	Ashland	29	1	0	7	5	4	4	3	1	12.0	0.5	5.0	3,127	98
23	Bridgewater	0	0	0	3	1	1	2	1	11	0.5	0.0	6.5	8,587	180
24	New Hampton	7	0	0	41	2	27	10	5	13	14.0	1.0	15.5	15,663	394
25	Bristol	45	0	0	9	6	5	4	9	8	5.0	0.5	9.5	6,190	202
26	Hill	2	0	0	18	1	3	8	3	7	0.0	7.0	4.0	10,269	225
27	Franklin	116	1	0	18	8	9	8	7	0	0.0	7.5	12.0	8,690	241
28	Northfield	12	0	0	3	5	1	8	2	0	0.0	0.0	3.0	11,909	351
29	Boscawen	5	1	0	21	3	5	9	3	0	0.0	9.5	12.5	9,937	226
30	Canterbury	4	0	0	27	2	5	23	7	5	11.0	13.0	10.0	19,835	545
31	Concord	442	4	0	58	28	15	15	20	58	1.0	60.0	22.0	15,663	489
32	Pembroke	12	0	0	17	3	5	3	4	12	0.0	3.0	0.0	8,228	296
33	Epsom	114	4	0	24	7	7	7	2	0	0.0	8.0	0.0	14,949	448
34	Allenstown	6	0	0	8	1	2	7	8	0	6.5	60.0	0.0	3,097	114
35	Deerfield	3	1	103	36	12	12	6	6	51	10.5	15.0	15.5	19,485	552
35	TOTALS	981	39	30	574	187	173	226	131	417	360	577	247	594,589	10,146
SUM OF COUNTS														12,904	
SUM OF MILES (roads, trails, rivers)														1,183	

Chapter 5: EXPERT OPINION OF POTENTIAL PROJECT EFFECTS TO HISTORIC SITES AND CULTURAL LANDSCAPES

Introduction

The purpose of this narrative is to put forward a clear statement of opinion on the proposed Project effects bringing together the findings from Heritage Landscapes' study of the Applicants' report, the related reports from other experts and our identification and assessment of historic sites and cultural landscapes. The first step is to layout the framework for assessing unreasonable adverse effects. These relate to federal preservation guidance on effects that may diminish historic integrity, effects on aesthetic and historic site resources under the SEC rules and effects on orderly development. Applying these bases, the findings are reviewed and an expert opinion is provided based on potential adverse effects of the Project.

A. Framework For Defining Unreasonable Adverse Effect

The Applicants' assessment was based on Advisory Council on Historic Preservation (ACHP) regulations in particular that "an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association." 36 C.F.R. § 800.5(a) (1).

SEC Criteria For Findings Unreasonable Adverse Effect

The SEC defines unreasonable adverse effects by applying criteria established in Site 301.14(a) addressing aesthetics and in Site 301.14(b) addressing historic sites.

Site 301.14 Criteria Relative to Findings of Unreasonable Adverse Effects.

(a) In determining whether a proposed energy facility will have an unreasonable adverse effect on aesthetics, the committee shall consider:

- (1) The existing character of the area of potential visual impact;
- (2) The significance of affected scenic resources and their distance from the proposed facility;
- (3) The extent, nature, and duration of public uses of affected scenic resources;
- (4) The scope and scale of the change in the landscape visible from affected scenic resources;
- (5) The evaluation of the overall daytime and nighttime visual impacts of the facility as described in the visual impact assessment submitted by the applicant and other relevant evidence submitted pursuant to Site 202.24;
- (6) The extent to which the proposed facility would be a dominant and prominent feature within a natural or cultural landscape of high scenic quality or as viewed from scenic resources of high value or sensitivity; and

(7) The effectiveness of the measures proposed by the applicant to avoid, minimize, or mitigate unreasonable adverse effects on aesthetics, and the extent to which such measures represent best practical measures.

As historic sites are by definition scenic, these seven criteria must be considered in terms of unreasonable adverse effects of the potential Project.

(b) In determining whether a proposed energy facility will have an unreasonable adverse effect on historic sites, the committee shall consider:

(1) All of the historic sites and archaeological resources potentially affected by the proposed facility and any anticipated potential adverse effects on such sites and resources;

(2) The number and significance of any adversely affected historic sites and archeological resources, taking into consideration the size, scale, and nature of the proposed facility;

(3) The extent, nature, and duration of the potential adverse effects on historic sites and archeological resources;

(4) Findings and determinations by the New Hampshire division of historical resources of the department of cultural resources and, if applicable, the lead federal agency, of the proposed facility's effects on historic sites as determined under Section 106 of the National Historic Preservation Act, 54 U.S.C. §306108, or RSA 227-C:9; and

(5) The effectiveness of the measures proposed by the applicant to avoid, minimize, or mitigate unreasonable adverse effects on historic sites and archaeological resources, and the extent to which such measures represent best practical measures.

These five factors must be carefully considered in determining whether a potential Project will have unreasonable adverse effects on historic sites.

Further SEC Site 301.09 addresses the potential adverse effects on orderly development of region. Noting that

Each application shall include information regarding the effects of the proposed energy facility on the orderly development of the region, including the views of municipal and regional planning commissions and municipal governing bodies regarding the proposed facility, if such views have been expressed in writing, and master plans of the affected communities and zoning ordinances of the proposed facility host municipalities and unincorporated places, and the applicant's estimate of the effects of the construction and operation of the facility on:

(a) Land use in the region, including the following:

(1) A description of the prevailing land uses in the affected communities; and

- (2) A description of how the proposed facility is consistent with such land uses and identification of how the proposed facility is inconsistent with such land uses;

The relevant criteria for unreasonable adverse effects are addressed in the following narrative organized by topic.

B. Expert Opinion Of Potential Unreasonable Adverse Effects

Project size and extent through a 192 mile corridor of the state passing through and within one (1) mile of thirty five (35) towns requires a landscape-level assessment of cumulative effects. Heritage Landscapes' opinion of the potential unreasonable adverse effects on aspects of integrity, aesthetics, historic sites and orderly development are presented in the following sections.

1. Potential Unreasonable Adverse Effects on Integrity

The seven aspects of integrity of a historic property are applied site specifically within property boundaries to include assessment of integrity by location, design, materials and workmanship, feeling and association, and related to its adjacencies and its visual context to include integrity of setting, feeling and association. When the Project alignment does not directly pass through a historic site or cultural landscape, the proposed Project has a potential effect on three aspects of the integrity to include setting, feeling and association. When the proposed Project actually traverses the historic site or cultural landscape, the integrity of the property is affected, as it does in the case of conservation and recreation lands, and town centers or historic districts. The integrity of the property or district is affected in all aspects as the proposed Project elements are inserted into or adjacent to the property. The identified historic sites and cultural landscapes, categories defined by Heritage Landscapes in Chapter 3 that may have integrity effects from the proposed Project include the following:

- 981 State or National Register listed or determined eligible properties or districts
- 39 GNIS historic designations
- 30 Historic Graveyards
- 574 Conservation Lands
- 187 Recreation Lands Sites
- 173 Recreation Lands Areas
- 226 Public Lakes and Ponds
- 131 Public Water Access Points
- 417 Community Identified Historic Places, Areas or Objects
- 360 miles Scenic Roads
- 577 miles Trails
- 247 miles Designated Rivers and Streams
- 10,146 parcels, 594,589 acres Current Use Lands

These resources have been enumerated within this report and shown on maps at state and town scales. These historic sites and cultural landscapes are present throughout the ten

(10) mile APE. The list above for the thirty-five towns indicates that identified historic sites and cultural landscapes in each category are widespread. A summary chart of resources in the thirty-five towns that are host or within the one (1) mile of the potential Project demonstrates the significant quantities and widespread distribution by town. (See Chapter 4, *Summary of Town Historic Sites and Cultural Landscapes Counts*, chart)

The pervasive distribution of these historic sites and cultural landscapes can, for example, be understood in terms of listed historic properties, conservation lands and lands enrolled in current use.

For example, six towns with large quantities of town-wide eligible or listed sites are Concord (442), Franklin (116), Epsom (114), Bristol (45), Jefferson (34), and Lancaster (27) capture the large quantity of town or city wide listed historic properties or districts. With 981 state or national register listed or eligible properties in the thirty five towns along the corridor, views of the proposed project from, to or when arriving or departing these listed properties or districts will be inescapable. Proximity to the proposed Project will diminish the integrity of feeling, association and setting of these listed or eligible properties or districts.

Within these thirty-five towns there are 574 parcels of public and private conservation lands of varying sizes for an average of 16.4 parcels per town. Conservation lands are set aside through public and private collaborations and funding sources. Conservation is a societal decision process whereby lands of local, state and national value are conserved and protected from development with legal restrictions on future use. The related deeds include legal restrictions of future land uses that are stronger tools than listing on the National or State registers. These conservation lands are cultural landscapes shaped by nature and people and managed into the future. The widespread actions of individuals, citizens, town, and state leaders underpin land conservation and secure funding to set aside valued lands. The state-wide level of investment in land conservation is considerable with \$135,515,955 in municipal conservation funding committed to conservation from 2001 to 2010. It is important to note the municipal funding is only one source and state and private funds as well as private gifts and bequests are also dedicated to conservation of lands.

The proposed Project corridor passes through or aligns near many conservation land parcels. The scale of the proposed project monopoles and lattice structures rises above the forest cover and would place visually dominant objects in fields and along lakes, ponds and waterways. These adverse effects have not been included in the Applicants' assessment. The integrity of feeling, association and setting of these conservation properties will be diminished by the proposed Project.

The widespread distribution of current use lands is apparent as they comprise 594,589 acres, which is 59.63% of the total acreage of these 35 towns. These current use parcels in *de facto* conservation are predominantly managed forests, and lands in agriculture use, that are conserved by property owners through this taxation reduction benefit. New Hampshire landowners consider enrollment in current use taxation as a useful means of retaining

open lands and protecting them from development, toward future conservation. Landowners of 399,659 acres have opened these current use lands to public recreation for a further benefit to their communities and visitors to New Hampshire. The integrity of feeling, association and setting of these current use lands will be diminished by the proposed Project, particularly for those open for recreation.

These valued historic sites and cultural landscapes, as individual sites, conservation, recreation, public waters, scenic roads, trails and lands in current use, taken together cover well over 60% of corridor and directly adjacent towns. Given this pervasive presence of valued sites and lands, the proposed Project, if constructed, will have a broad and constant visual presence changing the character of the corridor. The scale of the project rises above the tree line making the monopole or lattice structures widely visible. The proposed Project would, if constructed, adversely affect the integrity of these public and private properties, in terms of feeling, association and setting.

Diminishing the integrity terms of feeling, association and setting of the historic sites and cultural landscapes within the thirty-five host and adjacent towns that have views of the potential Project, is considered an unreasonable adverse effect.

2. Potential Unreasonable Adverse Effects on Aesthetics

As historic sites are by definition scenic, the aesthetic criteria must be considered in terms of potential Project effects. The aesthetic criteria for unreasonable adverse effect, set forth in Site 301.14(a) notes that “In determining whether a proposed energy facility will have an unreasonable adverse effect on aesthetics, the committee shall consider” the following aspects

SEC aesthetic consideration (1) The existing character of the area of potential visual impact;

Small communities and rural and natural landscapes provide the predominant existing character of the proposed Project corridor. The scale of the proposed Project would impact the visual character of this corridor adversely.

SEC aesthetic consideration (2) The significance of affected scenic resources and their distance from the proposed facility;

In our expert opinion, a large number of historic sites and many thousands of acres of cultural landscapes that are significant at the town and state levels are located in visual proximity to the proposed Project. The potential adverse effects on only a few significant historic sites and cultural landscapes, including Weeks State Park, the Rocks Estate, Mountain View Grand, Kimball Hill Historic District, Northside Road district, Lock Neighborhood, North Road Agricultural District, Dana Hill District and a few others were considered by the Applicants’ experts and judged, within the overall project, to have no unreasonable adverse effect. Heritage Landscapes’ inventory of historic sites and cultural landscapes indicates that hundreds of valued resources occur along and are passed through by the proposed Project. These historic sites and cultural landscapes are scenic. They are designated by decisions to protect, conserve and open for public uses and recreation

through funding and legal restrictions. Based on those societal decisions these properties should also be assessed in studying potential adverse impacts of the proposed Project. In Heritage Landscapes' opinion, the widespread presence of 12,904 enumerated historic sites and cultural landscapes and 1,183 miles of scenic roads, trails and rivers, results in an adverse effect from the proposed Project.

SEC aesthetic consideration (4) The scope and scale of the change in the landscape visible from affected scenic resources;

In our expert opinion, the high level of change proposed by the Project potentially effects the widespread amount of scenic landscapes, including lands designated historic, conserved or set aside for recreation. These lands surround and within predominantly rural landscapes of forests and fields and small communities. The proposed Project scope and scale leads Heritage Landscapes to consider the proposed Project highly visible from multiple vantages within and moving around the landscapes of these towns. Assessing a ground plane bare earth GIS model more than a third of the acreage, 35.6% of the lands within the 10-mile APE have potential visibility of the proposed Project, as shown on [Map HL9](#), This huge potential visibility calls into question the Applicants use of a 3 mile APE scenic modeling and a 1 mile APE historic corridor. The proposed Project would adversely impact the visual character of this corridor.

SEC aesthetic consideration (7) The effectiveness of the measures proposed by the applicant to avoid, minimize, or mitigate unreasonable adverse effects on aesthetics, and the extent to which such measures represent best practical measures.

A few historic sites were identified as potentially adversely impacted by Project views for which very limited mitigation was proposed by the Applicants. The mitigation technique was to substitute the use of tall steel monopoles for lattice structures and use weathering steel. These poles remain overpowering in size within the context of the corridor, rising above tree lines and rooftops. The proposed focused mitigation is insufficient to address the potential adverse effects of the proposed Project, which also includes increased width of cleared corridor. Another mitigation measure proposed was to reduce the number of scenic road designations, which indicates that the Applicants considered the presence of the proposed Project along scenic roads is an adverse impact. Mitigation measures for historic sites and cultural landscapes are inadequate as too few were identified.

The potential impacts to aesthetic quality of the historic sites and cultural landscapes within the thirty-five host and adjacent towns that have views of the potential Project, is considered an unreasonable adverse effect.

3. Potential Unreasonable Adverse Effects on Historic Sites

(b) In determining whether a proposed energy facility will have an unreasonable adverse effect on historic sites, the committee shall consider:

SEC historic sites consideration (1) All of the historic sites and archaeological resources potentially affected by the proposed facility and any anticipated potential adverse effects on such sites and resources;

In consideration of (1), Heritage Landscapes identified a large count and expansive acreage of historic sites and cultural landscapes as historically important to the people of New Hampshire and its visitors. In addition, the community-identified historic sites included 581 unique places, areas or objects. These are both concentrated and dispersed throughout the APE. In particular, the proposed Project crosses conserved and protected lands throughout the corridor with large scale monopoles or lattice structures that rise above tree lines and are broadly viewed. Using the GIS based summary of potential number of times the Project crosses roads and public waters, mapping indicates that the crossings are frequent and pervasive

- 2 Pond crossings
- 8 Designated rivers crossings
- 133 river crossings throughout the APE
- 41 scenic roads crossings, national, state and local roads
- 294 road crossings

The number of road crossings indicates that along the 192-mile corridor there as an average of well over one crossing per mile. The visual frequency of these crossings can be considered as one every two minutes of travel at thirty miles per hour, yielding a pervasive presence. The Applicants failed to include local scenic roads and byways in their assessment. Noting the number of Project line crossings the Applicants' proposed that the scenic road designations should be substantially reduced, with fewer scenic roads to account for when considering potential Project effects.²⁹ There are also potential adverse visual effects farther from the Project, within the ten (10) mile APE, as the scale and pervasive presence of the Project will alter the perception of the historic sites within the APE.

SEC historic sites consideration (2) The number and significance of any adversely affected historic sites and archeological resources, taking into consideration the size, scale, and nature of the proposed facility;

The size, scale and nature of the proposed facility at 192 miles through or near thirty-five towns will adversely affect many of the 12,904 enumerated historic sites and cultural landscapes. The significance of these resources at the national, state or local level is detailed in the 981 listed or eligible properties or districts. While in many towns few historic properties are listed or determined eligible, this situation has been discussed in the report and is due in part to the limited resources of the NH DHR and the general reticence of the people of New Hampshire to list properties. It is highly likely that many more historic properties present in the 35 towns, warrant historic listing and would be found to be historically significant. For each host town there will be extensive views in specific locations because of the valley and mountain topography with related long views and broad panoramas. These adverse effects are broader and more numerous than indicated by the Applicant's' reporting.

²⁹ Appendix 41: Review of Land Use and Local, Regional, and State Planning, Normandeau Associates, p.21-23

SEC historic sites consideration (3) The extent, nature, and duration of the potential adverse effects on historic sites and archeological resources;

The proposed Project will have adverse effects into the distant future in all towns where the Project intends to be sited above ground. The extent of the proposed Project is massive with proposed monopoles and trellis frames rising above any future tree line, dwarfing all nearby historic sites and visually impacting all cultural landscapes. These Project elements, including substations and points where the line is proposed to transition from underground to above ground, will permanently mar the landscapes of the host towns.

SEC historic sites consideration (5) The effectiveness of the measures proposed by the applicant to avoid, minimize, or mitigate unreasonable adverse effects on historic sites and archaeological resources, and the extent to which such measures represent best practical measures.

As indicated above, very limited mitigation for a selected few historic sites has been proposed by the Applicants. These mitigation measures inadequately address the adverse effects to the breadth of historic sites and cultural landscapes that are located along the proposed Project corridor.

The failure to mitigate the potential impacts of the Project to historic sites and cultural landscapes that have views of and will be seen during arrival and departure is unreasonable because nothing will be done to abate adverse effects.

4. Potential Unreasonable Adverse Effects on Orderly Development

Further, SEC Site 301.09 addresses the potential adverse effects on orderly development of the region. Noting that:

Each application shall include information regarding the effects of the proposed energy facility on the orderly development of the region, including the views of municipal and regional planning commissions and municipal governing bodies regarding the proposed facility, if such views have been expressed in writing, and master plans of the affected communities and zoning ordinances of the proposed facility host municipalities and unincorporated places, and the applicant's estimate of the effects of the construction and operation of the facility on:

(a) Land use in the region, including the following:

- (1) A description of the prevailing land uses in the affected communities; and
- (2) A description of how the proposed facility is consistent with such land uses and identification of how the proposed facility is inconsistent with such land uses;

Throughout the proposed corridor the land uses are characterized by small community concentrations, residences along roads and conserved and managed lands. Twenty-eight of the thirty-five host towns located along the proposed Project corridor have set forth in master plans or town zoning their intent to preserve and protect historic sites and cultural

landscapes including scenic and natural landscapes and public waters. The Applicants indicated that the Project would not interfere with specific land uses; however, it will affect the experience of the historic sites and cultural landscapes in violation of long adopted town policies and plans. Heritage Landscapes concludes that the pervasive impacts to orderly development of the towns along and adjacent to Project corridor render the effects unreasonably adverse.

Conclusion

In conclusion, Heritage Landscapes assesses the proposed Project to have unreasonable adverse effects on the historic sites and cultural landscapes of the APE. The integrity of identified historic sites and cultural landscapes that view the Project will be permanently and significantly diminished in terms of feeling, association and setting. The aesthetic quality of historic sites and cultural landscapes will be permanently and significantly diminished by direct views of the proposed Project as well as multiple views of the Project components when arriving at and departing from valued historic sites and cultural landscapes. Due to the widespread and pervasive counts and acreages of historic sites and cultural landscapes and the long term presence of the proposed Project if constructed, there would be unreasonable adverse effects. Further, it is my opinion that the proposed Project is in conflict with the orderly development of the region based upon a review of town planning and zoning documents. The proposed Project would have unreasonable adverse effects.