

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

Track 2 (Aesthetics) **AMENDED** *Supplemental* Pre-filed Testimony of
Rebecca Weeks Sherrill More, Ph.D.,
on behalf of the Weeks Lancaster Trust, Intervener

Non-Abutter Group: Stark, Northumberland, Lancaster, Jefferson, Whitefield, Dalton, Bethlehem
[NAPO-SB]

Regarding

***The Impact of the proposed Northern Pass Transmission Project LLC on the
Lancaster NH - Connecticut River Watershed
Historic and Cultural Landscape Area***

amended, April 21, 2017

1. Please state your name and qualifications:

My name is Rebecca Weeks Sherrill More, Ph. D. I hold a PhD in History from Brown University. I have taught history at Brown University and the Rhode Island School of Design (RISD), as well as lectured and published in my areas of Late Medieval and Early Modern European and Colonial American social and economic history. I also served as founding director of the Harriet W. Sheridan Center for Teaching and Learning at Brown, working with the Center from 1989 until my retirement in 2010. Since 2010, I have held the position of Visiting Scholar in the department of History at Brown University. I retired from teaching history in the Division of Liberal Arts at RISD in 2014. I continue to do research on several topics both in Europe and the United States. For example, as a result of the centennial of the 1911 Weeks Act, which established federal policy on Forest Reserves and led to the establishment of the White Mountain National Forest (1918) amongst others, I lectured and published articles throughout New England. During the 250th Anniversary of the founding of Lancaster, I wrote a series of historical articles for local publication and had the Town's Royal Charter conserved for public display and education.

Of relevance to this Supplemental Pre-filed Testimony (SPFT) regarding the *Lancaster New Hampshire - Connecticut River Valley Watershed Historic and Cultural Landscape (L&CRV-HCL)*, is my use of artifacts as well as documents in my research and teaching. Such artifacts include architecture, maps and land use as primary historical source material for social and economic issues.

With regard to my concern for the public interest of New Hampshire, I have served on: the Plymouth State University President's Council (2007 - 2017); the Plymouth State University Museum of the White Mountains Advisory Council (2014 - present); and the Weeks Medical Center (Lancaster NH) Board of Trustees (Lancaster NH) from 1996 - to the present. I have recently been invited to join the New Hampshire Historical Society Board of Trustees (2017 -).

2. Please describe your interest in this matter?

The proposed Northern Pass Transmission LLC line abuts and lies within the 10-mile Zone of Visual Impact (ZVI) of both Weeks State Park in Lancaster NH and the property of the Weeks Lancaster Trust. Both Weeks State Park (a National Register for Historic Places site and NH Scenic Byway) and the Weeks Lancaster Trust lands (with a National Register-eligible house) lie near the center of the L&CRV-HCL area. Please see the attached Map - Exhibit S-PFT #1, on page 9 below. Approximately 35 miles of 80' - 120' proposed Northern Pass Transmission HV-DV Towers would run through this Historic and Cultural Landscape. At present the PSNH/ Eversource power lines are 45' and well below existing tree heights in this region.¹

I represent the Weeks Lancaster Trust as Intervener in the State of New Hampshire Site Evaluation Committee, Docket No. 2016 - 06. I also represent the Weeks Lancaster Trust as Intervener in the US Dept of Energy Environmental Impact Review, as well as a Consulting Party for the Section 106 Review (Historic and Cultural resources). As a volunteer, I have devoted over six years to studying the impact of this proposed project on Weeks State Park and its historic and cultural context.

The Weeks Lancaster Trust [WLT] was established by my grandfather, the Hon. Sinclair Weeks (1893 - 1972), Senator and Secretary of Commerce in the Eisenhower Administration. The purpose of the WLT is to ensure his over 700-acre farm south of Lancaster NH for the benefit of his descendants (now some 120 beneficiaries).

I am a great-granddaughter of John Wingate Weeks (1860-1926), native son of Lancaster, Congressman and Secretary of War in the Harding and Coolidge administrations. John Wingate Weeks was sponsor of the Weeks Act of 1911, the Weeks-McLain Migratory Bird Act (1913) and creator of the Weeks Estate in Lancaster. The Weeks Estate, now Weeks State Park, includes the 1911 Mountain Road

(a New Hampshire State Scenic Byway), the 1913 *National Register Arts & Crafts Lodge* and 1912 Observation Tower located at the summit of Mt. Prospect in Lancaster NH. The Lodge Museum and Observation Tower command a 360o view of the region, including the entire Presidential Range, the northern and southern sections of the White Mountain National Forest, the Green Mountains of Vermont and both the Connecticut River and Israel's River Valleys.

In 1941 Sinclair Weeks and his sister, Katherine Weeks Davidge, gave 446 acres of the 1,500 acre John Wingate Weeks estate to the State of New Hampshire for the purpose of a State Park intended to celebrate the reclamation of New Hampshire's forests, including the White Mountain National Forest, through the agency of the Weeks Act. Members of our family continue to live and pay taxes in Lancaster, representing 230 years of continuous commitment to the region, its history and its values. We are deeply concerned about the impact of the proposed Northern Pass on Weeks State Park, as well as the surrounding region.

3. What is the purpose of this Supplemental pre-filed direct testimony?

The purpose of this Supplemental Testimony is to provide the SEC subcommittee with the opportunity to consider the proposed degradation by the proposed Northern Pass Transmission LLC of one of the many remarkable, intact historic and cultural landscapes which define New Hampshire: ***the Lancaster New Hampshire and Connecticut River Valley Watershed Historic and Cultural Landscape (L&CTR-HCL)***.

This AMENDED Supplemental PFT places Weeks State Park, the focus of my Pre-filed Testimony (November 15, 2017), into its physical, historic and cultural landscape, the *Lancaster New Hampshire and Connecticut River Valley Watershed Historic and Cultural Landscape (L&CTR-HCL)* - please see Map - Exhibit S-PFT #1, p. 9 below. I hope this SPFT will help the SEC sub-committee see the impact of the proposed Northern Pass on this specific area in a broader context. It provides a finer level of detail and historic context for this area than the Prefiled Testimony regarding the entire 192-mile proposal of Patricia O'Donnell of Heritage Landscapes LLC was able to provide.ⁱⁱ This SPFT also seeks rectify the fundamental error of the 1-mile Area of Potential Effect (APE) by integrate the many individual, discrete locations cited in both the DOE Section 106 DHR Project Area Forms (PAF) forms and the NPT Preservation Company's Appendix into their *full geographic and historic context*.ⁱⁱⁱ Please note that the credibility and conclusions of the Preservation Company's Historic Resource Assessments is eroded by inaccuracies with regard to some of the Lancaster citations, as well by the evident findings of Map #2.^{iv}

Effective analysis of the impact of proposed Northern Pass on a large-scale historic and cultural landscape, such as the L&CTR-HCL, is deeply compromised by the use of a narrow and restrictive assessment area (Area of Potential Effect - APE). The APE was agreed upon by the NH DHR and the DOE in 2013, *prior* to public involvement in either the DOE EIS, the Section 106 Review (started June 2014), or the SEC deliberations (Feb. 2016). One asset of NH's mountainous terrain is that residents and visitors alike are able to see *long distances from many different vantage points*. As a result of the Indirect APE restriction to 2-miles either side of the center line of the Applicant's ROW, the Historic Resources and Visual Impact studies commissioned by the Applicant for both the DOE EIS & Section 106, and the SEC are not able to integrate the series of discrete historic and cultural sites into a coherent whole - an "historic vernacular landscape."^v

To assess the impact of the Northern Pass on the L&CTR-HCL, the 10-mile radius Zone of Visual Impact (ZVI) comes closer to outlining the Visual Impact (VIA) of the proposal on an entire landscape. However, in the case of the L&CTR-HCL, a 10-mile radius is too limited in scope. The specific topographic of this region opens a remarkable field of vision within a 20-mile radius. For example, the entire L&CTR-HCL, including the Connecticut River, is easily visible from the northwestern summit of

Mt. Washington, a distance of 20 miles. Likewise, Mt. Washington and the Presidential Range are seen from many points throughout the entire Watershed area, including Weeks State Park on Mt. Prospect, Guildhall and Lunenburg VT, Bethlehem, Whitefield, Jefferson and Northumberland. The studies done for the Counsel for the Public come closer to assessing the significance of the historic and cultural landscape over a large area.^{vi} See Map #2 below for the Applicant's DTM "Bare-earth" map that includes most of this area and indicates that over 21 Towers/Structures would be visible from the places identified in Q. 5 & 6 below.

For the visual reference by the SEC sub-committee, please find *included* in this text "Exhibits 1 - 5." These include a Map of the L&CTR-HCL and three sets of images to demonstrate the integrity of this historic vernacular landscape within and from the perimeter of the ZVI over the past 180 years:

1. Map of the L&CTR-HCL area hand-annotated by R. W. S. More to provide a sense of the geographic area and its topography;^{vii}
2. MAP - DTM "Bare Earth" Visual Impacts on Northumberland, Lancaster, Whitefield, Jefferson and Bethlehem, hand-annotated by R. W. S. More.^{viii}
3. A) W. H. Bartlett's 1835 view of the Pondicherry basin from Mt. Washington and
B) a photograph of approximately the same view in 2012^{ix};
4. A) Robert Duncanson's 1862 *View of Lancaster and the Presidential Range from Guildhall Vermont* and
B) Photograph from approximately the same location, taken February 2017^x;
5. A) James McDougal Hart's 1867 *View of the Presidential Range from LeGro Hill, Lancaster* and
B) a photograph of the same Gotham farmhouse just north of the NH Rte 2 Scenic Overlook taken February 2017.^{xi}

6. View of the White Mountain National Forest taken from the Weeks Lancaster Trust.^{xii}

These are not a substitute for a visit to the area, including the Observation Tower at Weeks State Park, to fully understand to vast scope of the area and the multiplicity of views obtained from many locations.

4. Why is the Lancaster New Hampshire and Connecticut River Valley Watershed Historic and Cultural Landscape worthy of consideration within the context of the proposed Northern Pass?

The above-ground portion of the proposed Northern Pass runs directly through and bisects the entire L&CTR-HCL area. The proposed Northern Pass would degrade forever and, therefore, have an *unreasonable adverse effect* on this remarkable, intact, Historic and Cultural Landscape. It is not possible to turn back the clock once an iconic landscape has been violated by a wide swath of cleared land with a parade of transmission lines visible from all directions. In the 19th century the L&CTR-HCL experienced degradation from the large-scale clearances by the wood pulp and timber industry from the 1870s on. The direct impact of the Boa Constrictor as it was known is well-documented: soil erosion, forest fires and flooding. The social impact was more subtle, but led to such a large number of abandoned family farms that in 1901 NH Governor Frank West Rollins established "Old Home Week" to encourage return. He was among the group that established the Society for the Protection of NH Forests in 1901 and worked with John Wingate Weeks to pass the Weeks Act in 1911. Because the industry was based on an organic product, reclamation of the landscape was possible over the next 100 years. However, in the case of Northern Pass, the transmission of Hydro-Quebec water power has the potential to undermine and force the closure of the many local NH hydro-dams which use natural "elevation drop" (such as the Androscoggin at Berlin) rather than flooding to produce power. Would this new "Boa Constrictor" cause another generation of people: second home owners, hikers, hunters, those who depend upon tourism to

move away as the quality of life is eroded by huge HV-DC Towers?

The State of New Hampshire includes *many* historic and cultural landscapes. The L&CTR-HCL area provides a sample of what James L. Garvin has described as a "place where things that were familiar to the people of 1730 can still be seen today..."^{xiii} To a resident or knowledgeable visitor, the L&CTR-HCL area is alive with still visible associations with the past. These range from the Jurassic geologic period, the Paleolithic native peoples, the arrival of English settlers in the 18th century, the spectacular scenery which attracted the White Mountain artists who prefigured the Hudson River School (see #s 4 & 5 below), the views from Mt. Washington of the entire region (see #s 3 below) or the success of conservation acts as evidenced by the more than 800,000 acres of pristine forest and recreation lands of the White Mountain National Forest (see # 6). While the North Country has struggled for over 250 years with the transportation challenges presented by its mountainous landscape, those same challenges have preserved much of its historic and cultural integrity - until now.

5. How does the Lancaster and Connecticut River Valley Watershed constitute a "Historic Vernacular Landscape"?

In 1796 the President of Yale University, Timothy Dwight took a tour up the Connecticut River to Lancaster and its surroundings. He wrote of his travels in a series of Letters published after his death in 1820. He described the L&CRV-HCL as "a field of view, singular in its form, unrivalled in the nobleness of its boundaries, and furnishing all the beauty and magnificence, of which a landscape is capable."^{xiv} To a modern visitor who takes the time to look in all directions and absorb both the grandeur and the details of this area, Dwight's assessment of this historic vernacular landscape is still accurate.^{xv} Each view of Mt. Washington from sites throughout the area is different, depending on the location, time of day, weather conditions, time of year. Leaf on, Leaf off, logging, insect blights, etc., can all change the view captured. The smell of approaching snow, powerful winds presaging a storm, the clear arc of the night sky alive with stars undefiled by "ambient light," the midnight cry of a loon, a Barred owl or a coyote, the warm taste of just-made maple syrup are as important to the sense of landscape as a view. The Towers of proposed Northern Pass will affect each of these elements of the landscape in different ways in different locales.

From the 1912 Observation Tower on Weeks State Park, the knowledgeable visitor can see the Jurassic Ring Dike remnant of Cape Horn and the Israel River Paleo-Indian complex. Along the Connecticut River, the rich intervale pastures run north to Canada. The colonial townships of Dalton, Lancaster, Lunenburg, Guildhall and Northumberland line its banks. The Presidential Range, named by men from Lancaster in 1820, looks almost exactly as 19th c. White Mountain artists saw it. The 1868 Cog Railway can still be seen ascending Mt. Washington from Lancaster, Each vantage point offers a window into stories of human activity, un-defiled by a double row of 120' transmission lines bisecting the view.

Mt. Washington is the psychological center of the L&CTR-HCL. Everyone looks up to it whenever and from wherever it is visible. Three of the four rivers drain from its flanks or adjacent Mt. Jefferson into the Connecticut River. It was and is the source of spring snows, alluvial deposits, timber and water power for saw and grist mills. Mt. Washington is visible from the all township settlements in the area on both sides of the Connecticut River. In clear weather, they are also visible from Mt. Washington's summit. It is no surprise that in 1820 a party of men from Lancaster and Guildhall hiked up Mt. Washington and named the Presidential Range flanking it on either side.

The specific terrain and climate define the nature of human habitation in this landscape. The combination of snow-capped mountains, forests, spring flooding, and rich intervale pastures provided abundant animal and plant life to sustain human habitation from earliest known Paleolithic era, such as Lake Coös). Native American peoples hunted and camped in the area until it attracted colonial settlers from the coastal areas of New Hampshire and upland Massachusetts following the end of the Seven

Year's/ French & Indian Wars in 1763.^{xvi} The townships of Guildhall (1761), Lancaster (1763), Lunenburg (1763) and Dalton (1764) were each settled along the intervalles where the Upper Ammonoosuc, Israel's and the John's River flowed into the Connecticut. Stark (1771), Jefferson (1765) and Whitefield (1774) were settled further inland along intervalles of those rivers.

Over the subsequent 200 years tourists, artists, hikers, and others have left a record of their experiences in superb guidebooks (from 1821), literature (Hawthorne and many others), White Mountain paintings and sketches (from 1835), letters, photographs, maps (1850s) and other historic and cultural artifacts. As a result, the L&CRV-HCL has a well-documented history, including sites already listed on or eligible for the *National Register of Historic Places*.^{xvii} A result of this historic and cultural landscape a distinct culture with local traditions developed in this area and continues to the present day. The annual Lancaster Fair is one surviving example.

6. What are some of the most significant characteristics that define the Lancaster & Connecticut River Valley Historic and Cultural area?

Below is a partial list of significant locations, artifacts, events, activities and individuals that helped create and define the Lancaster and Connecticut River Valley Historic and Cultural Landscape as a significant historic vernacular landscape with continuous integrity:

1. The Connecticut River Watershed is the *first National Blueway (2012)* and an **American Heritage River** (1998). Congress created the Silvio O. Conte National Fish & Wildlife Refuge in 1991, encompassing the entire four-state watershed, with the Connecticut River as its centerpiece. The following year, NH General Court designated the Connecticut River into the New Hampshire Rivers Management and Protection Program.^{xviii} The four tributaries that constitute the Watershed are the Upper Ammonoosuc, Israel's, John's and the Ammonoosuc rivers. The intervalles up each river and the elevation drop from Mt. Washington promoted human activity and later settlement within the L&CRV-HCL from prehistoric time. Pastures to support animals for hunting and domestication, and water power for mills attracted humans to the area.
2. *Mt. Washington*: was named by a party that included historian Jeremy Belknap in the 1780s. Belknap was schoolmaster in Hampton NH to the Weeks family who immigrated to Lancaster in 1786. It is the epicenter of the White Mountains and has attracted explorers, scientists, artists, writers, tourists, etc., from the 17th c. until today. From its summit are views that encompass the entire region, including much of the path of the proposed Northern Pass. Scenic overlooks and Scenic Byways designed to showcase Mt. Washington are placed throughout the region.
3. *Crawford Notch*: Access to this extraordinary, but remote, region was always a challenge. For English settlers in the southern NH, Maine and coastal Massachusetts, the Connecticut River was the only major access route until the discovery of Crawford Notch in 1771 by Lancaster resident Timothy Nash.^{xix}
4. *Lancaster*, the county town and township of Coös is the epicenter of this historic and cultural landscape. Located on the Connecticut River valley intervalles ("Cohass" [meadows] in Abenaki) these rich farmlands are shared by Lunenburg and Guildhall Vermont across the river and brought colonial English settlers to the area following the end of the French & Indian/ Seven Years War (1763). Lancaster is one of the few NH towns to retain its original *1763 Royal Charter*, signed by Benning Wentworth. Among the colonial proprietors was Joshua Wingate Weeks, friend of Jeremy Belknap and brother of immigrant Capt. John Weeks of Greenland NH. Lancaster also includes several National Register-listed structures (William D. Weeks Memorial Library, the US Post Office, etc.) and NR-eligible structures, such as the Stone House Farm (see the PSU Township Legacy Project below). In addition to the historic sites in the town itself, the North Road and Grange District constitutes a 19th c. Agricultural district located on the intervalles where Otter Brook flows into Israel's River. The Plymouth State University Public History

- "Township Legacy Project" (2015) was designed to raise public awareness (residents and visitors) of Lancaster's intact historic and cultural resources.^{xx}
5. *Lake Coös, Jefferson Meadows and the Pondicherry Basin*: A prehistoric glacial lake covered much of what is today the Israel's River Valley. Subsequently it was occupied by aboriginal peoples. It is the site of ongoing archaeological excavations, sponsored by NH and led by Dr. Richard Boisvert. The area around the Pondicherry lakes is part of the four state 1991 Silvio O. Conte National Fish & Wildlife Refuge. The Northern Pass proposes to use its ROW through this pristine refuge.^{xxi}
 6. *Cape Horn State Forest*: This is the western-most remnant of the Jurassic period Pliny Ring Dike geologic "caldera." It is considered to be the best topographically expressed structure of its type in North America (Chapman 1948). The Eversource ROW bisects the "exemplary" collection of rare plant material which this geology hosts. (See Bowman, "Ecological Inventory of Cape Horn State Forest," 2007 NH State DRED).
 7. *Early White Mountain Guidebooks*: The awe-inspiring beauty of the Connecticut River Valley Watershed attracted visitors, as well as settlers, from the 18th c. on. Among the first was Timothy Dwight, President of Yale University. His *Travels in New York and New England* were begun in 1796 and organized as letters to an "English Gentleman." Nathaniel P. Willis's *American Scenery* (1840) and Rev. Thomas Starr King's *Guide to the White Hills* (1859) complemented the contemporary superb paintings by artists such as Thomas Cole (from 1828), known today as White Mountain Art.
 8. *Early White Mountain Art*: From 1827 on Lancaster was a *pre*-Civil War center for artists producing "White Mountain Art." Over thirty known engravings and paintings depict the Connecticut River Watershed, centered on the views up Israel's River to the Presidential Range and south across the Pondicherry Basin to Mt. Moosilauke - areas to be traversed by the proposed Northern Pass. Among them are views by artists such as William h. Bartlett (1835), Aaron Draper Shattuck (1859), Robert Duncanson (1862), David Johnson, Harrison Bird Brown, James M. Hart (1867), *et al.* The 1862 painting of Lancaster and the Israel River Valley with Mt. Washington in the distance from Guildhall Vermont by African-American artist Robert Duncanson, is now in the MFA Boston. This painting was recently included in the 2016 Currier Museum, Manchester NH exhibition "Mt Washington: The Crown Jewel of New England."
 9. *The Presidential Range*: In 1820 a party of Lancaster and Guildhall men climbed up and named the Presidential Range (other than Mt. Washington). Known as the Weeks-Brackett party for its leaders Major John Wingate Weeks and his first cousin Adino Nye Brackett, two great-uncles of John Wingate Weeks [II], it also included Philip Carrigain, NH Secretary of State and creator of the first State Map of NH, and Ethan Allen Crawford. They hiked up the newly opened [Crawford] Path and spent several days naming the mountains they could see from Lancaster, Guildhall and Lunenburg for their Jeffersonian Democratic heroes: Madison, Adams, Jefferson, Clay, Monroe and Franklin.
 10. *Guildhall, VT*: Guildhall is the birthplace of the Rosebrook and Crawford family who established the first hotels in the Ammonoosuc Valley below Mt. Washington and hosted White Mountain artists such as Thomas Cole and Albert Bierstadt. It is also the perspective from which artists and mapmakers going back to the 1760s chose to illustrate Lancaster in relation to Mt. Washington. Lucy Crawford's *History of the White Mountains* is drawn from the exploits of the Crawford clan in the Mt. Washington Valley. Guildhall is also graced by a superb collection of 19th c. buildings and farms along the Connecticut River. The Guildhall Village District was created in 1980.^{xxii}
 11. *Tourism*: Amongst the ones with connections to the L&CRV-HCL are the following: a) Mt. Washington: The *Summit House* (1852) on Mt. Washington was built and run by Lancaster natives Lucius Rosebrook and Nathan Perkins. Among the guests in 1852 was noted artist Albert Bierstadt. *The Tip Top House* (1853) was build by Lancaster farmer, Samuel Fitch Spaulding. It still exists. The Mountain Washington Carriage Road (1861) and the innovative Cog Railway (1868) have been bringing visitors to the Summit to enjoy scenery unmarred by HV-DC

- Transmission lines; b) Bethlehem: *The Sinclair House* in Bethlehem was founded in 1857 by John G. Sinclair. Sinclair was a NH State Rep., business entrepreneur (mining, logging, real estate). Among his guests was Portsmouth brewer and business magnate Frank Jones, later US Congressman. His only daughter married Sinclair's son in 1873; c) Jefferson: The Waumbek Hotel and Cottages (1860s- 1880s). Several Views of the Pondicherry Basin were painted from the Jefferson - Mt. Waumbek area. The Hotel is now gone, but the Waumbek Cottage District, with views recorded from the 1860s on, is listed in the National Register (2006); d) Whitefield: The Mountain View House, grew from boarders taken into the William Dodge Farm to one of the Grand Hotels. It was restored in the 1990s and continues to bring vistors to the region. e) The 1918 White Mountain National Forest (both northern and southern sections) with contiguous Nash Stream State Forest, Mt. Washington State Park, Franconia Notch State Park, and conservation lands from Pittsburg to the three Notches constitutes an extraordinary are of outstanding natural beauty. National and State Scenic Byways, historic sites, world-class hotels, superb hiking trails and ski areas, as well as every other form of recreation, attract millions of visitors to the area each year; e) Carroll/Twin Mountain: the Mount Washington Hotel, site of the 1944 Bretton Woods monetary conference, is still a vibrant Grand Hotel beneath Mt. Washington and commanding the headwaters of the Ammonoosuc River.
12. *Covered Bridges*: 19th c. Covered bridges remain over the Upper Ammoonosuc at Stark, over Israel's River at Lancaster and over the Connecticut River below Mt. Orne connecting Lancaster and Lunenburg VT.
 13. *Franklin Leavitt*: The iconic White Mountain maps published by Lancaster native Franklin Leavitt from the 1852 until the 1888 provide graphic evidence of the development of the White Mountain region by railroads, tourism and logging. From early images emphasizing the mountains to complex maps of a network of hotels and scenic delights, they convey the 19th c. economy based on logging, wood pulp and tourism.
 14. *George P. Rowell* (1838 - 1908): Architecture and sites associated with George P. Rowell of Lancaster, considered the "father of US Advertising." Amongst the sites associated with Rowell are the Lancaster Fair, Prospect Farm (established by James Brackett Weeks) in Lancaster and the National Register-eligible Percy Summer Club (1883) on Lake Christine near Stark NH. Members of the Percy Summer Club included the publisher of *The Washington Star*, NY businessman Francis H. Leggett and US Rep. from NH Ossian Ray of Lancaster. Rowell was also involved in the short-lived 1883 hotel on Mt. Prospect in Lancaster, later the home of John Wingate Weeks. His remarkable 19th c. collection of taxidermied indigenous birds is on display in the Lodge at Weeks State Park.
 15. *Frank Jones* (1832 - 1902), although based in Portsmouth and Boston, Jones played a large role in the financing of significant ventures in the area during the 2nd half of the 19th century. These included the expanding network of railroads as well financial backing for the Sinclair and Weeks families. He was President of the Boston & Maine and the Maine Central RRs. Amongst the railroad junctions still extant with associations to Jones and Sinclair are the Quebec and Waumbek [stations], both of which are within the APE of the NPT. His partners in these ventures included lumberman George Van Dyke of Lancaster and John Wingate Weeks's brother-in-law Charles A. Sinclair, originally from Bethlehem.
 16. *Weeks State Park*: (NR 85001190) The summer estate of John Wingate Weeks, Congressman, Senator, Secretary of War (Harding & Coolidge administrations) and sponsor of the 1911 Weeks Act establishing the Federal National Forest Reserve process. Weeks's 1913 Lodge & 1912 Observation Tower are both on the National Register (1982). This area was given to the State of New Hampshire by his son and daughter and is now Weeks State Park. At the present time, only the Summit Lodge and Tower are listed on the National Register. The entire "Mountain" should be nominated as a National Register site.
 17. *Cat Bow Farm* on Mts. Orne and Pleasant: The estate of Sinclair Weeks, son of John Wingate Weeks, Senator and Secretary of Commerce (Eisenhower administration). As Secretary of

Commerce, he was charged with funding the Eisenhower Interstate Highway System (1956). In retirement, Weeks was part of the effort to preserve and create the Franconia Notch Parkway as part of I-93 in the 1960s. As a result, the Franconia Notch State Parkway is the only US Interstate highway that changes to a two-lane road through state conservation lands. Cat Bow Farm includes an 1830 farmhouse. Weeks's 1928 Colonial Revival House is National Register eligible.

18. *The Lancaster Fairgrounds*: founded as the Coös and Essex Counties Agricultural Society in 1870, this traditional county fair brings together the farm communities up both sides of the Connecticut River, from Dalton NH to Canaan VT. Fair goers can see Oxen and Horse-pulling, Livestock, Christmas Tree, Maple Syrup, Handicraft and Baking competitions, as well as 4-H and other agricultural activities.
19. *Stark POW Camp*: Allan V. Koop and Hartmut Lang have written an account of this remarkable story from WW II, *Stark Decency: German Prisoners of War in a New England Village* (1988).
20. Cherry Mountain (Mt. Martha & Owl's Head), Mt. Prospect, Bray Hill, Kimball Hill, Mt. Orne, Mt. Pleasant, Sand Hill, Dalton Mountain, Wallace Hill, the Pliny Range, the Kilkenny Range and the Pilot Range among others: these small mountains and "hills" may not be a high and majestic as the Presidential Range, but they are highly visible from many directions and command views the proposed Northern Pass which will have an Unreasonable Adverse Effect on those who visit or own property on or near them (these include several of the NAPO-SB Interveners).
21. "Lost Nation" - part of both Northumberland and Lancaster: this area is a remarkable remnant of the sort of small farm community that existed on the edges of many NH townships from the 18th century. Lost Nation today still has its widely separated farms, the remnants of an old mill stream, and a late 19th c. chapel with a pump organ and no electricity, still in use. The proposed Northern Pass runs along a ridge through this area and will degrade its historic and cultural integrity.

What else would you like the Site Evaluation Committee to consider regarding the impact of the Northern Pass on the Lancaster and Connecticut River Valley Historic and Cultural Area?

Its remarkable, pristine beauty has been conserved for the FUTURE by generations of local residents, second home owners, conservation organizations and visitors who value its historic sites, its mountains, weather, farmlands, forests and clear rivers and lakes.

Land conservation since 1900 has been a crucial factor in the unique landscape that still describes the Great North Woods and the Israel's River Valley Study Area. The destruction of the mountain forest lands by the wood pulp and paper industry from the 1870s on led to soil erosion which impacted downstream textile mills, destroyed many family farming practices, and fostered massive forest fires for some 20 years. The establishment of the Society for the Protection of New Hampshire Forests in 1901 led directly to the passage of the Weeks Act in 1911. In conjunction with the Appalachian Mountain Club (1876), the two organizations rallied support for the Bill in Congress. Once the Weeks Act enabled federal purchase of private forest land, the White Mountain National Forest was founded in 1918. Over time other conservation organizations such as the Nature Conservancy and local Land Trusts have played a critical role in preserving this remarkable historic and cultural landscape into the 21st century.

We hope that you will come and see for yourselves how significant a historic vernacular landscape truly is and what unique value it gives to New Hampshire.

Exhibit S-PFT #2

**DTM "Bare Earth" Map of Visual Impacts
 on the Lancaster & Connecticut River Valley Historic and Cultural area
 Northumberland, Lancaster, Whitefield, Jefferson, and Bethlehem, Annotated by R.W. S. More**

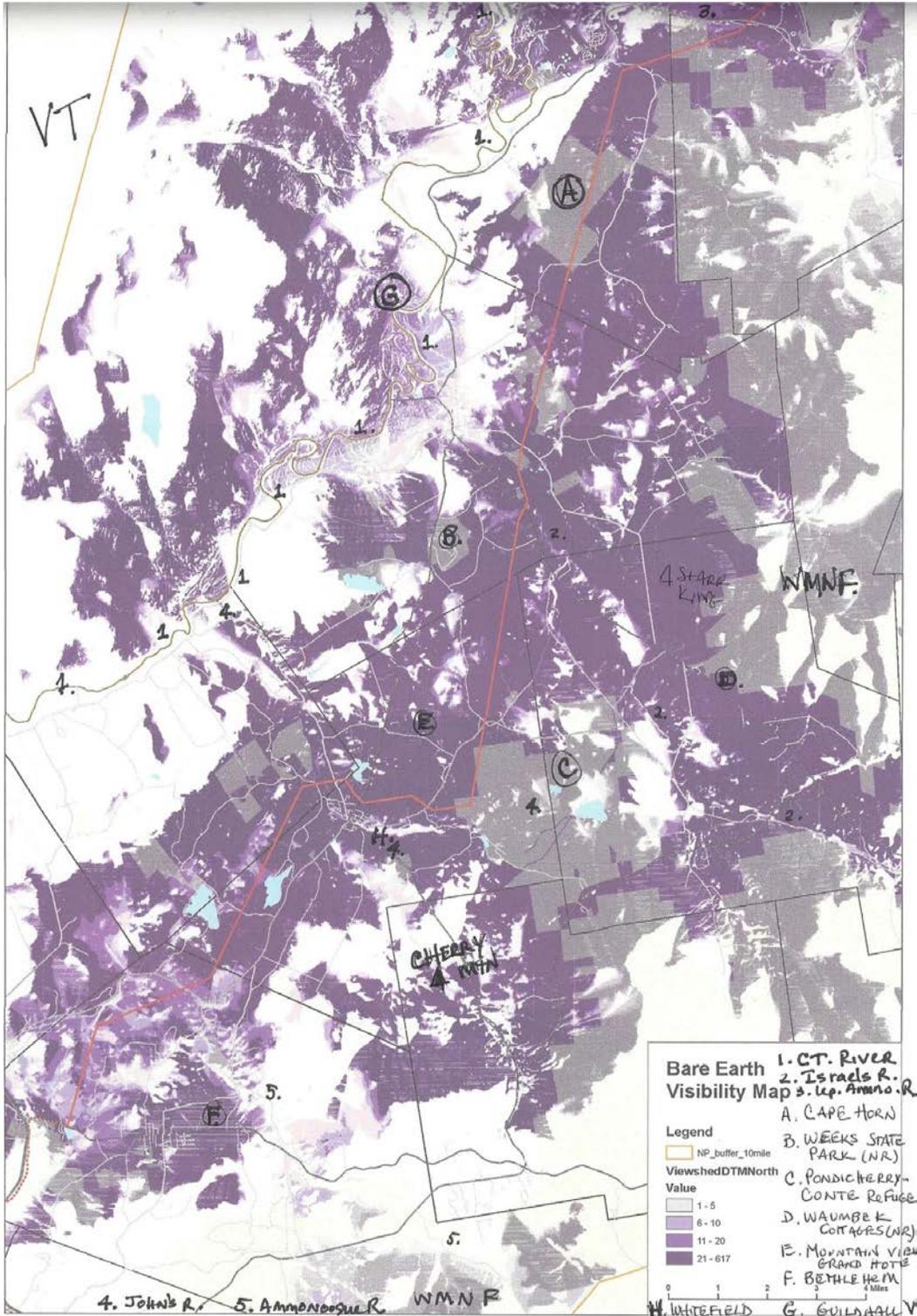
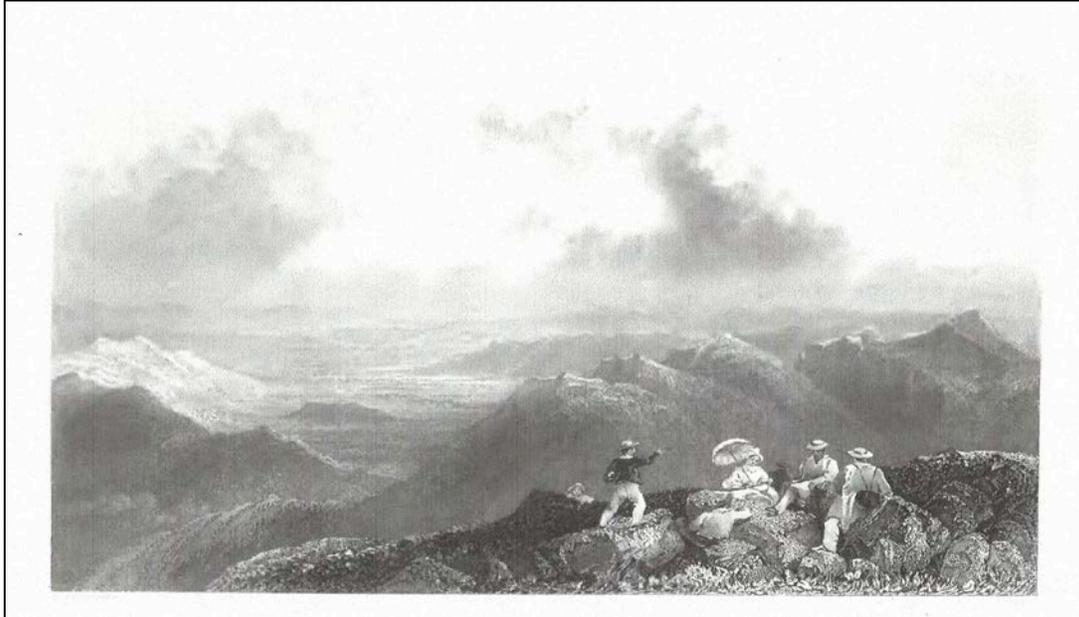
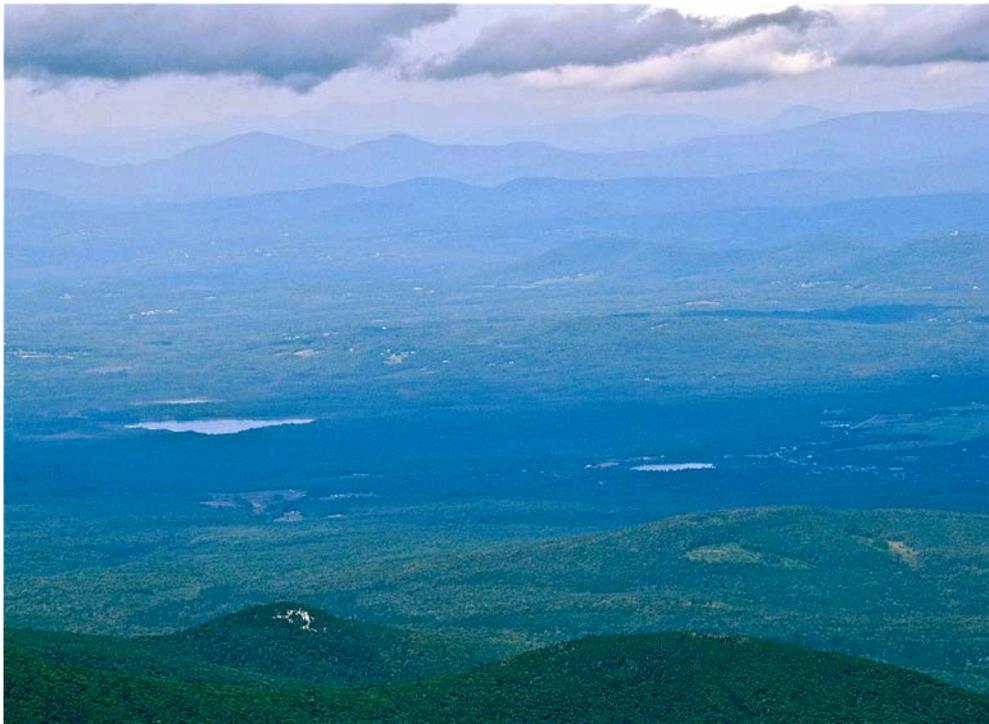


Exhibit S-PFT #3A



William H. Bartlett, "Mt Jefferson from Mt. Washington", 1835,
engraving from N. P. Willis, *American Scenery; or Land, Lake and River, Illustrations of Transatlantic Nature*, vol.
II, London, George Virtue, 1840, p. 25. Note: Pondicherry Lake in middle.

Exhibit S-PFT #3B



View from Mt. Washington of Pondicherry/Conte Refuge and Weeks State Park (R)
taken by R. W. S. More from the Mt. Washington Observatory, July 2012

Exhibit S-PFT #4A



Robert Duncanson, *Lancaster NH and Mt. Washington from Guildhall VT* (1862)
Museum of Fine Arts Boston (2011.1792)

Exhibit S-PFT #4B



Israel's River Valley & Mt. Washington from Guildhall VT, February 18 2017, taken by R. W. S. More

Exhibit S-PFT #5A



James McDougal Hart, *Mt. Washington from LeGro Hill (1867) with Rte 2 and the S. Gotham House*

Exhibit S-PFT #5B



S. Gotham House just before NH Rte 2 Scenic Overlook, taken February 18, 2017 by R. W. S. More

Exhibit S-PFT #6



View of the Presidential Range (1820), the Pondicherry Basin, Cherry Mountain and the White Mountain National Forest (1918) from the Weeks Lancaster Trust

ⁱ See the NPT Project Maps, Preliminary Design, February 2016 Revision, submitted as part of the NPT/ Forward NH SEC Application, Attachment 2. The Summit of Weeks State Park was National Registered-designated in 1985 (NR 85001190).

ⁱⁱ Please see the Prefiled Direct Testimony of Patricia O'Donnell, Heritage Landscapes LLC on behalf of the Counsel for the Public, submitted to the SEC on November 15, 2016.

ⁱⁱⁱ The Great North Woods PAFs relevant to this area were prepared by SEARCH in 2013 and revised in 2016. See http://media.northernpasseis.us/media/SEARCH_PAF_GreatNorthWoods_Mar2016_Redacted_reduced.pdf; The Preservation Company's October 2015 findings were commissioned by the Northern Pass LLC and submitted with their Application to the SEC, Appendix 18, vol. XVI, p. 1/33; for Lancaster, Vol. 2, Attachment A: Lancaster, pp. 1-10.

^{iv} For example, p. 2/10 states that John Wingate Weeks was a summer resident and created a 420-acre summer estate. However, Weeks was a native of Lancaster, with a sister still living in the community. His estate was about 1,500 acres, rather than 420. His children gave 446 acres to the State in 1941. Weeks was NOT the benefactor of the Weeks Medical Center, his son Sinclair and six Weeks grandchildren were the donors of the Beatrice D. Weeks

Memorial Hospital Building in 1947. There is mention of The Mountain Road, built by Weeks in 1911 to reach the summit of Mt. Prospect, and designated one of the first NH Scenic Byways in 1995 only in LANC02. These same errors are repeated in LANC02. These errors may seem trivial but suggest that the quality of the Preservation Company's research is cursory at best. Entry LANC01 "Prospect Farm" is riddled with errors. These include failure to realize that the large historic Barn across the road is part of Prospect Farm; that John Wingate Weeks's father was William *Dennis* Weeks (*N.B.* data cited from *Ancestry.com* always needs to be verified), and that George Presbury Rowell was very involved with the Lancaster community for his entire life. In addition to Prospect Farm, he co-owned part of the summit of Mt. Prospect when the Hotel was built and established the Percy Summer Club on Lake Christine. Finally the main house of Prospect Farm was restored back to its original appearance by Weeks's daughter Katherine W. Davidge. Note also that the accompanying Preservation Co. photographs (p. 8/8#3 & #4), which purport to demonstrate that the project would not be visible from the property, were taken from the road, not from the house itself - from which the residents would indeed have a view of the Towers. These errors as a whole call into question further statements by the Preservation Company that views of the Northern Pass would be "minimally visible" from the "Lookout" Tower and not visible from the Lodge (p. 3/10). The DeWan produced DTM bare-earth Map(#2) indicates that the proposed NPT project is visible from Prospect Farm, Weeks State Park, etc.

^v For the definition of the DOE Section 106 Indirect APE for the so-called Great North Woods Area, please see http://media.northernpasseis.us/media/SEARCH_PAF_GreatNorthWoods_Mar2016_Redacted_reduced.pdf, p. 6. For commonly cited information on these definitions see the 12 July 1995 Federal Register, 36 CFR Part 68, (vol. 60, No 133); US Dept. of the Interior, "Guidelines for the Treatment of Cultural Landscapes (<https://www.nps.gov/tPS/standards/four-treatments/landscape-guidelines/index.htm>).

^{vi} Studies already filed with the SEC relevant to the issue of an historic vernacular landscape include that of Patricia O'Donnell, Heritage Landscape LLC (15 Nov 2016) and Michael Buscher, James Palmer and Jeremy Owens [T. C. Boyle] (December 30, 2016).

^{vii} Exhibit SPFT #1: Map of the L&CTR-HCL made by R. W. S. More for the Historic and Cultural Landscape Study of the DOE/Section 106 Review in February 2017 - ongoing, Exhibit NAPO-SB #1.

^{viii} This bare-earth (DTM) map of the Northumberland to Whitefield was produced by Terrance J. DeWan Assoc. for the Applicant [ref. NPT_DIS 166703 to NPT_DIS 166792]. It was obtained with the assistance of Mr. Larry Garland of the Appalachian Mountain Club because a) these materials were not made clearly available to Interveners in the published SEC Application; and 2) the digital technology used to produce it is not readily available to the general public.

^{ix} Exhibit SPFT #2 A & B: William H. Bartlett, 1835 engraving for Nathaniel P. Willis, *American Scenery; or Land, Lake, and River: Illustrations of Transatlantic Nature* (London: George Virtue, 1840), pp. 25. Photograph taken from the deck of the Mt. Washington Observatory in July 2012 by R.W. S. More. Exhibit NAPO-SB #2.

^x Exhibit SPFT #3 A & B: Robert Duncanson, *Lancaster and the Presidential Range from Guildhall Vermont*, 1862, Museum of Fine Arts Boston (2011.1792). Photograph from approximately the same location, but closer to the elevation level of the Connecticut River, taken by R.W. S. More on February 18 2017. Exhibit NAPO-SB #3.

^{xi} Exhibit SPFT #4 A & B: James McDougal Hart, *View of the Presidential Range from LeGro Hill Lancaster NH*, 1867, private collection. In the foreground is the Gotham Farm with outbuildings (see Section 106/PAF (FID#1517) and the Preservation Company (LANC30/). Photograph taken by R.W. S. More on February 25, 2017.

^{xii} This photograph was taken by R. W. More and included in the WLT petition of February 4, 2016.

^{xiii} James L. Garvin, "New Hampshire's Cultural Landscape," originally presented at the Smithsonian Folklife Festival, July 27, 1999: p. 17. (http://www.james-garvin.com/images/New_Hampshire_s_Cultural_Landscape_Article2.pdf).

^{xiv} Timothy Dwight, *Travels in New-England and New-York*, vol. II, (1820), Letters XII - XIV, pp. 134 - 154. This work was edited by his nephew Theodore Dwight and republished continuously for the next 20 years as *The Northern Traveller*. Dwight devoted several pages to the climate in the region and its impact on farming. The Israel's River Valley/ Pondicherry Basin determines the flow of winds across much of North America directly to Mt. Washington. For this reason, the Mt. Washington Observatory is a world-class scientific weather laboratory, attracting students, scientists and tourists year round.

^{xv} An historic vernacular landscape is defined as one that has "evolved through use by the people whose activities and occupations shaped it. Through Social or cultural attitudes of an individual, a family or a community, the landscape reflects the physical, biological and cultural character of every day lives. Rural historic districts and agricultural landscapes can be examples." See Charles A. Birnbaum, Preservation Brief s #36, "Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes: 1 - 20 (<https://www.nps.gov/tPS/how-to-preserve/briefs/36-cultural-landscapes.htm>).

^{xvi} One of the earliest maps by Joseph Blanchard & Samuel Langdon, *An Accurate Map of His Majesty's Province of New Hampshire*, London (1761) specifically identifies the Connecticut River watershed for its "Great Intervals called Cohass", "Choice White Pines and good Land," its tributaries, and "Mountainous Country." The British Fort Wentworth (1755) where the Upper Ammonoosuc flows in to the Connecticut below Cape Horn, introduced many of Roger's Rangers and other scouts to the area and its possibilities for future settlement after the Treaty of Paris. When Colonial Governor Wentworth laid out Township Grants from 1761 on both sides of the Connecticut River to attract investment by proprietors and settlers, some of the scouts were amongst them. The coveted White Pines were earmarked for masts in the Royal Navy.

^{xvii} For a preliminary account of such sites, please see the NH DHR Project Area Forms, including the "Great North Woods" section submitted by SEARCH March 2016; the Preservation Company, the forthcoming Historic and Cultural Landscape Study (DOE/Section 106 Review)

^{xviii} See the following: <http://connecticutriver.us/site/content/about-river>; <https://www.doi.gov/news/pressreleases/AMERICAS-GREAT-OUTDOORS-RIVERS-Secretary-Salazar-Creates-National-Blueways-System-Designates-Connecticut-River-and-Its-Watershed-as-First-National-Blueway>; To conserve, protect, and enhance the diversity of species that exist in the vast Connecticut River Watershed, the Silvio O. Conte National Fish and Wildlife Refuge Act was passed in 1991. The US Fish and Wildlife Service, which administers the program, has identified special focus areas throughout the watershed, including sites in Vermont and New Hampshire, where resources are deemed highly valuable. The agency will direct its efforts for protection of these sites through various programs, including environmental education and habitat management. (http://www.des.nh.gov/organization/divisions/water/wmb/rivers/conn_river.htm).

^{xix} Transportation to and from this area was always a challenge, especially for people trying to get products to market. In the earliest periods, the evidence indicates that people, whether Native American or colonial settlers, traveled along Rivers. For example, to reach or return from L&CRV-HCL with cattle or sheep from coastal area, such as Greenland or Lee Portsmouth NH would travel via the Merrimack, the Pemigewasset, and the Baker River to the Connecticut. From there they made it north along the Connecticut above the Fifteen Mile Falls or up the Ammonoosuc to Lancaster. From the discovery of Crawford Notch by Lancaster resident Timothy Nash in 1771, settlers and travelers on horseback came north along the Piscataqua River, then via Ossipee and Conway to the Saco. The trek up and over Crawford Notch could be perilous in bad weather in the narrow Saco Valley. Once safely through the Notch they followed the Ammonoosuc River before crossing to Israel's River and Lancaster. Up until the advent of the railroads "pungs" or sleds drawn by horses were used to make the six-day trip to Portland with items for the markets there. The railroads in the mid-19th c. changed the landscape, its access and its uses.

^{xx} Following the end of the American Revolution, new settlers were attracted to the L&CRV-HCL region. The Weeks family, for example, was typical of families who were both farmers and soldiers. They came to Lancaster from Greenland, near Portsmouth, with two other related families (Brackett and Goss). Capt John Weeks established a farm on the Connecticut River intervalles south of Israel's River. He served as a NH representative to the Constitutional Congress. His eldest son, Major John Wingate Weeks (I) farmed his father's lands along the Connecticut River, served in the War of 1812, the NH legislature and in the US Congress. His youngest son, James Brackett Weeks, established a farm on the south flank of Mt. Prospect still in Weeks family ownership. His grandson William Dennis Weeks, for whom the National Register 1906 Library in Lancaster is named, was a founder of the Essex (VT) and Coös (NH) County Agricultural Society. Still operating, the Lancaster Fair is an indicator of the way in which the intervalles linked the inhabitants on both sides of the Connecticut River. The 1500-acre "estate" created in 1910 by his great-grandson John Wingate Weeks (II) was comprised of 19th c. farms of family members around the base of Mt. Prospect. Weeks honored his agricultural upbringing and credited it as the foundation for his skills. Working the farms was his escape from Congress and Cabinet duties under Presidents Harding and Coolidge. Sinclair Weeks's Cat Bow Farm is still engaged in agricultural activity of various sorts. From the 1920s until his death in 1972, it was a full working farm. In spite of his own career in Boston, Congress and Eisenhower's Cabinet, Sinclair Weeks served as a Fair Director and retired to Lancaster where he died. *The Township Legacy Project*, Plymouth State University: (2014). This project was developed by Prof. Linda Upham Bornstein, PhD and Rebecca W. S. More, PhD to enhance local appreciation for the historic landscape of a NH township. Using an online blog format, two PSU History students researched and created a "Tour" for visitors and residents alike. Hosted by PSU, the entries may be seen at: <http://lancasterproject.blogs.plymouth.edu/>. Future projects include forms that may be used by local elementary and high school students, and form the basis for inclusion in the NH DHR State Inventory. The project was supported by a Tillotson Fund Community Outreach grant through the NH Charitable Foundation.

^{xxi} See Caduto, 2004: <http://www.geology.um.maine.edu/friends/pdf/2002Littleton.pdf>. The archaeological

excavations led by Dr. Richard Boisvert since 1995 have identified Paleo-Indian habitation in the Israel's River Complex. The physical configuration of Cape Horn in Northumberland, the remnant of a Ring Dike formation, may have also offered a place of habitation for aboriginal peoples, however, it has not been studied for that purpose. The Israel's River Complex is described as "holding great potential for our understanding of Paleo-Indian culture in the Northeastern United States." (2002)

^{xxii} Guildhall VT. See <http://www.crjc.org/heritage/V22-22.htm> for an Inventory of Gulildhall's qualifications for the National Register.