



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

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June 17, 2015

Brian Mills
US Department of Energy
1000 Independence Ave. SW, OE-20
Washington, DC 20585

Re: Northern Pass Transmission Project; Project Area Forms (RPR 4680)

Dear Mr. Mills,

Please find attached the New Hampshire Division of Historical Resources (DHR) comments on the White Mountains Region Project Area Form, submitted by the SEARCH consultants in support of the Section 106 review of the Northern Pass Transmission Project. The DHR reviewed the White Mountains Region Project Area Form at the Determination of Eligibility Meeting on June 10, 2015. At this time, the DHR cannot agree with the recommendations as set-forth in the document until such time that it is revised to address comments found within the attached Determination of Eligibility review sheet.

The DHR has been in discussion with the Governor's Office regarding the four Project Area Forms submitted for our review and the public's interest in accessing them. The Governor's Office has officially requested that all four Project Area Forms, as well as the DHR's comments on them, be made available to the public on the Department's web site, as soon as possible. Given the public's interest in the material, the DHR agrees with this approach.

In addition, the Project Area Form and the DHR's comments on them are available by appointment to the public at the DHR offices (19 Pillsbury Street, Concord, NH). The DHR also understands that the Department of Energy is working to place copies of the materials at local repositories, such as public libraries, and to post the material online in a manner that is easily downloaded. Thank you for these efforts.

Please contact me or Nadine Peterson, 603-271-6628 or Nadine.Peterson@dcr.nh.gov, if you have further questions. We look forward to reviewing the revised materials.

Sincerely,

Richard A. Boisvert, Ph.D.
Deputy State Historic Preservation Officer

RAB:nmp

Enclosures

cc: Stefan Claesson, Ph.D., SEARCH
Nadine Peterson, Preservation Project Reviewer
Sarah Jordan, White Mountain National Forest
Frank Delgiudice, US Army Corps of Engineers



**NH Division of Historical Resources
Determination of Eligibility (DOE)**

Date received: 6/10/15

Inventory #:

Date of group review: 2/13/13

Area: ZMT-NPWW

DHR staff: Nadine

Property Name: Northern Pass White Mountains Region Town/City: Multi-town

Address: Bethlehem, Campton, Dalton, Easton, Franconia, County: Grafton and Coos
Landaff, Lincoln, Lisbon, Sugar Hill, Thornton, Whitefield, and Woodstock

Reviewed for: R&C PTI NR SR Survey Other
Agency, if appropriate: US Dept. of Energy

Individual Properties

NR	SR
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Not evaluated for individual eligibility
<input type="checkbox"/>	<input type="checkbox"/> Eligible
<input type="checkbox"/>	<input type="checkbox"/> Eligible, also in district
<input type="checkbox"/>	<input type="checkbox"/> Eligible, in district
<input type="checkbox"/>	<input type="checkbox"/> Not eligible
<input type="checkbox"/>	<input type="checkbox"/> Incomplete information or evaluation

Districts

NR	SR
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Not evaluated @ district
<input type="checkbox"/>	<input type="checkbox"/> Eligible
<input type="checkbox"/>	<input type="checkbox"/> Not eligible
<input type="checkbox"/>	<input type="checkbox"/> Incomplete information or evaluation

Integrity: ALL ASPECTS Location Design Setting Materials
 Workmanship Feeling Association

Criteria: A. Event B. Person C. Architecture/Engineering
 D. Archaeology E. Exception

Level: Local State National

IF THIS PROPERTY IS REVIEWED IN THE FUTURE, ADDITIONAL DOCUMENTATION IS NEEDED.

STATEMENT OF SIGNIFICANCE:

The Project Area Form for the Northern Pass - White Mountains region is centered on an Area of Potential Effects that encompasses a two-mile wide, 57.47 mile long corridor that originates near the borders of Jefferson, Whitefield, and Lancaster; extends southward through Whitefield, Dalton, Bethlehem, Franconia, Sugar Hill, Lisbon, Landaff, Easton, Lincoln, Woodstock, and Thornton, before crossing into the Lakes Region at the southern border of Campton. The area is characterized by rural farmlands and undeveloped forests as well as single-family dwellings, and small and large-scale tourism enterprises. The White Mountain National Forest covers a large portion of the area.

The methods and purpose section defines the methodology process and breaks it down into descriptions of key elements - how background research, field survey, viewshed analysis, and consultant recommendations were made. The geographical context and historical background sections provide a solid foundation in which decisions can begin to be generated.

Historic contexts that influenced development in this area during the historic period include agriculture, industry (lumber, sawmills, potato starch production, wool carding, and the manufacture of potash).

Recreation was also important during the early years well into the present day. Trails were constructed for recreational use.

An architectural description section notes a wide variety of resource types and styles. Residential resources include those designed in the Federal, Georgian, Greek Revival, Gothic Revival, French Second Empire, Queen Anne, and Colonial Revival styles. Many of these buildings take the form of Cape Cod residences and connected farmhouses. Meetinghouses, churches, schools, libraries, town halls, and other public buildings are centered within a number of village/town centers. Grand hotels, seasonal summer estates and other modest summer cottages were constructed near lakes or on promontories with scenic vistas.

ENTERED INTO DATABASE

ACREAGE: 76,322,2 acres

PERIOD OF SIGNIFICANCE: N/A

AREA OF SIGNIFICANCE: N/A

BOUNDARY: N/A

SURVEYOR: Jenna Higgins, Stefan Claesson, Jacob Freedman, Jessica Fish and Tricia Peone

FOLLOW-UP: Notify appropriate parties.

At this time, the New Hampshire Division of Historical Resources cannot concur on the recommendations of the Project Area Form until the following issues are addressed:

Maps:

- 1) A map showing the location of all four Project Area forms is required.
- 2) The Location Map and corresponding Sketch Maps should note the towns in letters large enough to read. Also, please depict the boundaries of the White Mountain National Forest.
- 3) All Sketch Maps should use the same terminology as the Location Map. The Location Map notes them as 16A not Sketch Map A.
- 4) The Direct APE on the sketch maps is noted as white in the key, but is colored to represent the number of "structures" visible from that location - it is confusing to the reader.
- 5) The "Project Area" should be noted as the Indirect APE (this should also be reflected in the written methodology).
- 6) All previously surveyed properties should be identified within the Indirect APE, not just those located within the Zone of Visual Influence.

Methods and Purpose (page 28):

- 1) Please provide an explanation as to how the direct/indirect Area of Potential Effects was defined.
- 2) The DHR is aware that the Department of Energy solicited information from consulting parties early in the Section 106 process. This information included a request that consulting parties provide locational information of properties of local importance. Please explain how this information was utilized in the evaluation methodology. A table in the body of the report or as an appendix would be useful.

Viewshed Analysis (pages 29-30):

- 1) Was the GPS point taken at the center of the developed area of a property?
- 2) How was the 50 m buffer zone arrived at? What if there was a property that had a greater boundary which landscape features inside that would be considered character-defining (ie. Farmfields, wood lots, orchards, etc), would the property as a whole be included in the study?

Flow Chart (page 31):

- 1) The DHR agrees with the first four decision-making steps in the flow-chart.
- 2) The property must retain integrity of more than just setting, and should also be assessed according to all seven aspects of integrity. Property types should be evaluated for potential significance in which setting/landscape/viewshed are character-defining features of the property.
- 3) The 6th step is not necessary. Determinations as to whether or not the property retains historical significance is completed during the next inventory phase.
- 4) Visual Impact Assessments are not part of the recommended products of a Project Area Form. Project Area Forms recommend if additional survey is required and in what type of format. Visual Impact Assessments may be used after resources have been identified during the assessment of effects phase of the undertaking.

Village Development (page 34):

Please provide a discussion under the significance statement as to whether or not any of the villages noted in this section warrant the preparation of historic district area forms.

Agriculture (page 39):

- 1) Please refer to more recent studies that have shown agriculture to be on an up-swing in New Hampshire and revise your statement at the end of this section (Jager 2004, 44). Agriculture in NH begins to decline ca. civil war period and picks up by 2002/03.

2) Is there a potential for encountering rural historic districts under this context?

Recreation (page 43):

1) Are there other trails in the area besides the Appalachian Trail that would be worthy of noting as part of this context? Either in or outside of the WMNF? Please discuss.

2) Page 45 has a repeated paragraph - please remove the first full paragraph on this page.

Section 22. Statement of Significance (page 56):

There are nuanced differences between understanding setting and a property's significance and setting under the definition of integrity. The second paragraph of this section ends with several statements that need to be clarified. In addition, it is not necessary at this time to discuss the need for assessment of effects. This is the crux of the issue with the Project Area Form. It doesn't tie together the architectural description and established contexts and then evaluate them to see where setting/viewshed/landscape is part of significance to establish what should be considered for further survey. It is too early in the process to be assessing effects.

The DHR disagrees with evaluation methodologies and cannot concur with survey recommendations at this time.

Final DOE approved by: