



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

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July 2, 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)
Great North Woods region

Dear Mr. Mills,

Please find attached the New Hampshire Division of Historical Resources (DHR) comments on the Great North Woods 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 Great North Woods Region Project Area Form at the Determination of Eligibility Meeting on June 24, 2015. We recognize that significant time and effort went into the preparation and review of these documents and we appreciate your assistance during the identification phase of Section 106. However, 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. As you may notice, many of these comments are similar to those found within the White Mountains Region.

We appreciate your efforts in making these documents available to the public and consulting parties on your website.

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: 4/30/15

Inventory #:

Date of group review: 6/24/15

Area: ZMT-NPGN

DHR staff: Nadine

Property Name: Northern Pass Great North Woods Region Town/City: Multi-town

Address: Pittsburg, Clarksville, Stewartstown, Dixville, County: Coos
Dix's Grant, Colebrook, Wentworth's Location, Errol, Millsfield, Dummer, Stark, Northumberland, Lancaster

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

Individual Properties

NR SR
 Not evaluated for individual eligibility
 Eligible
 Eligible, also in district
 Eligible, in district
 Not eligible
 Incomplete information or evaluation

Districts

NR SR
 Not evaluated @ district
 Eligible
 Not eligible
 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 - Great North Woods region is centered on an Area of Potential Effects (APE) that encompasses a two-mile wide, 63 mile long corridor that originates from the New Hampshire-Canada border in Pittsburg south through Stewartstown, Colebrook, Dixville, Dix's Grant, Hampshire-Canada border in Pittsburg south through Stewartstown, Colebrook, Dixville, Dix's Grant, Wentworth's Location, Millsfield, Errol, Dummer, Stark, Northumberland, before ending at the southern border of Lancaster. The area is characterized by mostly undeveloped forest, with small pockets of settlement consisting of limited farmlands and town centers. Most of the settlement is clustered around major waterways with small brooks and streams bisecting the APE.

European settlement in the Great North Woods region did not begin until relatively late in New Hampshire's history; with extensive settlement not being established until the late eighteenth and early nineteenth centuries. Boundary disputes were common during this period and the Republic of Indian Stream was established in July 1832 (dissolved in 1836) in which is now the town of Pittsburg.

Lumber and paper industries were the primary economic drivers in the region until their decline in the early twenty-first century. Mining operations were active in the region from the mid-nineteenth century and agriculture remained on a primarily subsistence level due to the terrain. Transportation, agriculture, industry, recreation, and public and educational institutions are discussed on pages 41-49. Cemeteries also appear to be prevalent on the landscape.

An architectural description section notes a wide variety of resource types and styles. The earliest examples from the Georgian and Federal period were not encountered, not surprising given the later development period of the area. However, resources include those designed in the Greek Revival, Gothic Revival, French Second Empire, Queen Anne, and Colonial Revival styles. Many of the residential 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 historic village/town centers. Modest seasonal summer cottages were constructed near lakes or on promontories with scenic vistas. Automobile related roadside commercial architecture includes motor courts and motels and small cabins, restaurants, gas stations, and other related resources.

ENTERED INTO DATABASE

ACREAGE: 80,127.4 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 (please note that the majority of these issues are consistent with the White Mountains Region project area form):

Towns: Does the Great North Woods Project Area Form include areas of Pittsburg? If so, please note it on page 2 under item #4.

Maps:

- 1) A map showing the location of all four Project Area forms is needed to show the proximity to each other and the overall extent of the project location.
- 2) The Location Map and corresponding Sketch Maps should note the towns in letters large enough to read.
- 3) All Sketch Maps should use the same terminology as the Location Map. For example, the Location Map notes them as 16A not Sketch Map A.
- 4) The Direct APE on the sketch maps is noted in the legend as white, but is shown in maroon and other colors on the maps to represent the number of "structures" visible from that location. A less confusing way to depict the Direct APE is needed.
- 5) The "Project Area" on the key should be called 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 30):

- 1) Please provide an explanation as to how the direct/indirect Areas of Potential Effects were 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 listing all properties provided by consulting parties placed in the body of the report or as an appendix would be useful.

Viewshed Analysis (pages 31-32):

- 1) How was the 50 m buffer zone arrived at?
- 2) Was the 50 m GPS point taken at the center of the developed area of a property?
- 3) How did the methodology account for large acreage properties such as farms and recreational areas at the edge of the indirect APE?

Flow Chart (page 33). The following methodology is based on the DHR's understanding of its discussions with the Department of Energy and its consultants:

- 1) The DHR agrees with the first three decision-making steps in the flow-chart.
- 2) Step 4 must consider whether aspects such as setting, landscape or viewshed are potentially character-defining features of the property.
- 3) Step 5 must recommend whether the property is sufficiently intact to warrant further inventory.
- 4) The 6th step is premature. Determinations as to whether or not the property retains historical significance is completed during the next inventory phase.
- 5) The final step highlighted in green, Visual Impact Assessments, are not part of the Project Area Form process. Project Area Forms recommend if additional inventory 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.

Page 35: Historical Background:

The North Country of New Hampshire is known for its deep rooted cultural history steeped in the backdrop of its mountains and vast forests. This history is based in part on the area's rugged terrain, harsh climate, isolation, and independence of its peoples.

Further investigation may prove that portions of this area qualify as a Traditional Cultural Property. One kind of cultural significance a property may possess, and that may make it eligible for inclusion in the Register, is traditional cultural significance. "Traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices. Some examples that may be relative to the North Country include:

- a rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents; and/or
- a location where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity.

Village Development (page 37):

Town and village centers are often inventoried for these types of projects. Please provide a discussion under the significance statement (and associated Table) as to whether or not any of the villages noted in this section warrant the preparation of historic district area forms.

Agriculture (page 42-43):

- 1) Is there a potential for encountering rural historic districts under the agricultural context?

Recreation (page 47):

- 1) The DHR recommends a separate historic context be culled out of Recreation to include Land Conservation (White Mountain National Forest, Weeks Act, the environmental movement, etc.).
- 2) Are there other trails in the area that should be inventoried as part of this context?
- 3) Are there any historic campgrounds that should be noted?
- 4) While the Weeks Estate may be located beyond the established APE, please provide a discussion as to whether or not the APE should be expanded in this area and if it should be noted given that its landscape may be potentially significant to its National Register eligibility.

Section 22. Statement of Significance (page 58):

There are differences between identifying properties that should be inventoried due to the potential importance of setting, landscape or viewshed to their significance, and the later step of evaluating setting under the National Register's definition of integrity.

The second paragraph of this section ends with several statements that are premature and need to be clarified. Please refer back to the comments under the Flow Chart above to revise this paragraph.

In addition, it is premature within a Project Area Form to discuss the need for assessment of effects. Please remove any statements that refer to this phase of Section 106.

Please include a discussion as to whether or not there may be the potential for encountering a Traditional Cultural Property in this region based on the guidance found within "National Register Bulletin 38 - Traditional Cultural Properties." This discussion may also prove necessary in other regions of the project area.

Please be aware that the DHR has a 10 year cut-off for eligibility recommendations under Section 106. A resource evaluated more than 10 years ago may need to be looked at to determine whether setting, viewshed, or landscape is character defining to the resource. Table 1 may need to be revised under the Integrity Statement section for such resources.

For the reasons noted above, the DHR disagrees with evaluation methodologies and cannot concur with survey recommendations at this time.

Final DOE approved by: