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VIA E-MAIL

September 20, 2019

New Hampshire Site Evaluation Committee
Pamela G. Monroe, Administrator
21 South Fruit Street, Suite 10
Concord, NH 03301

**Re: SEC Docket No. 2015-04: Public Service Company of New Hampshire d/b/a Eversource Energy for a New 115k Transmission Line from Madbury Substation to Portsmouth Substation
Eversource and Lulu Pickering's Joint Request for a Minor Modification - Structure F107-105**

Dear Ms. Monroe:

On April 12, 2016, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") filed an Application for a Certificate of Site and Facility ("Application") to the New Hampshire Site Evaluation Committee ("SEC") to construct and operate the Seacoast Reliability Project ("SRP" or the "Project"). On January 31, 2019, the SEC issued an Order and Certificate of Site and Facility with Conditions to construct the Project. As part of the Project, Eversource will install a 115 kV aboveground transmission line across parts of Lulu Pickering's property located at 375 Little Bay Road, Newington, NH 03801 (the "Property").

For the reasons discussed herein, Eversource and Ms. Pickering jointly request that the SEC Administrator approve a minor, non-material modification to the location of Structure F107-105 ("Structure 105") to accommodate Ms. Pickering's preferred location of the aboveground transmission line. Specifically, Eversource and Ms. Pickering request approval to shift the location of Structure 105 thirteen (13) feet to the west.

A. Background on Minor Modification

As part of its Application filed in April 2016, Eversource sought permission from the SEC to construct an aboveground transmission line across the Property. This design was shown on Drawing F10743010 in Appendix 5 of the Application. *See also* App. Ex. 149 (Revised Engineering Drawing F10743001).

Eversource has since been in communication with Ms. Pickering regarding the construction activities proposed on her property. On August 26, 2019, Ms. Pickering contacted Eversource and requested that Eversource shift the location of Structure 105 thirteen feet “towards the existing distribution pole to the west.” Ms. Pickering explained that doing so would better shield the structure and reduce visibility.

Eversource and Ms. Pickering now jointly propose this revised design, which is Ms. Pickering’s preferred location for Structure 105 because it takes advantage of existing vegetative screening to reduce visibility. The environmental maps attached to this letter depict the prior location (first map) and proposed relocation (second map) of Structure 105 and the associated work pad.

B. Description of Minor Modification

With the exception of the location, the proposed design of Structure 105 remains unchanged. This requested modification simply shifts the location of Structure 105 thirteen (13) feet to the west. Eversource will also shift the work pad for the structure accordingly to correspond to the new structure location. The proposed configuration is shown in Attachment A to this letter.

C. Potential Impacts Relative to Criteria Under RSA 162-H:16

As described by Eversource in the original Project Application and all supplemental filings, and as determined by the Subcommittee, the Project will not have an unreasonable adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety. The Subcommittee also determined that the Project will not have an undue interference on the orderly development of the region. Eversource and its experts have reviewed the proposed design modification and has concluded that this minor modification will not have any further adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety, nor will the requested modification have an undue interference on orderly development.

1. Aesthetics

Eversource consulted with its visual assessment expert, David Raphael, who concluded that the minor modification will not materially alter his conclusion that the Project will not have an unreasonable adverse effect on aesthetics or create an adverse effect on any one scenic resource in the area. The minor modification will not affect the Subcommittee’s conclusions on aesthetics. The revised design only slightly modifies the location of Structure 105 on Ms. Pickering’s property. Indeed, as discussed above, this modification is being proposed in satisfaction of a request received by Ms. Pickering on the basis that the shift would reduce visibility of the structure.

2. Historic Sites

As described above, the minor modification will not alter the aesthetics of Ms. Pickering’s property. Eversource’s historic resources consultant also concluded that the minor modification would not affect her conclusion that the Project will not have an unreasonable adverse effect on historic resources. *See* Attachment 1. Therefore, the minor modification will not have any indirect effect on above-ground historic resources. In addition, the construction of the Project will not have any direct effect on above-ground historic sites.

Eversource and its experts have conducted extensive field work on Ms. Pickering’s property to assess whether there may be archeological resources that may be impacted by construction of the Project. Based on this work, Eversource and its consultants concluded that there are no below-ground historic resources that may be affected by this minor modification. No additional test pits or surveys are necessary.

3. Water Quality and the Natural Environment

There will be no change in temporary or permanent wetland impacts associated with this modification. The minor modification does not include additional tree clearing.

4. Public Health and Safety

The requested modification will not impact public health and safety. The structure location shift will not materially alter the calculated electric and magnetic fields in the area. The revised design will not alter construction methods or increase traffic impacts. Eversource will comply with all terms and conditions of the Certificate.

5. Orderly Development of the Region

The relocation of Structure 105 was specifically made at the request of Ms. Pickering, the property owner and the revised alignment will have no effect on any of the criteria pertaining to orderly development.

D. Conclusion

Eversource received a request to revise the location of Structure 105 by Ms. Pickering—the underlying property owner. After careful analysis, Eversource determined that the structure revision will not result in any additional impacts. In addition, Eversource has confirmed that the proposed modification will not impact any matters within the jurisdiction of NHDES and, therefore, it is not necessary to seek review and approval from NHDES. Eversource is contemporaneously submitting a request to the New Hampshire Division of Historical Resources and the United States Army Corps of Engineers for their concurrence to make this minor modification.

Eversource respectfully requests that the SEC Administrator approve this minor modification.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Needleman", written in a cursive style.

Barry Needleman

BN:vcf
Enclosure

Cc: SEC Distribution List
Nadine Miller, NHDHR



Widell Preservation Services, LLC

September 12, 2019

Ms. Nadine Miller, Deputy State Historic Preservation Officer
New Hampshire Division of Historical Resources
19 Pillsbury Street
Concord, NH 03301-3570

Dear Ms. Miller,

As the expert witness for cultural resources for the Eversource Company for the Seacoast Reliability Project, I wanted to inform you of a very small change in the placement of a structure in the right of way of the project in the rear of the Alfred Pickering Farm, 339 Little Bay Road in Newington, NH.

The structure location (Old Structure 105) which is shown on the accompanying maps, will be moved thirteen feet from the original planned location to a new location (New Structure 105). The structure type and size will not be changed. The change in location is most clearly seen in the photo from the location which is attached to this letter. The yellow line was the original proposed location for the structure; the red line shows the new proposed for the structure.

I have reviewed this change to the original project. In my expert opinion, this change in location will not cause any additional adverse effect to the historic property nor change or negate the mitigation for the visual adverse effects previously identified during the design review, compliance and permitting processes for the project. It does not change my testimony presented to the New Hampshire Site Evaluation Committee that " the proposed project will have an adverse effect on the Alfred Pickering Farm as it will alter the setting and feeling of the open agricultural land that is a characteristic qualifying the property for inclusion in the National Register under Criterion A. The change will not cause any addition visual adverse effects to the historic property and no additional mitigation is required.

Should you have any additional questions about this change, please contact me or Ms. Brooke Kenline-Nyman, Cultural Resource Specialist at Eversource Energy at brooke.kenline-nyman@eversource.com or 603-634-2147.

Thank you for your attention to this matter.



Sincerely,

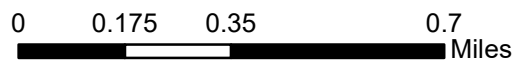


Cheryl W. Widell, Principal
Widell Preservation Services, LLC



Seacoast Reliability Project - Structure 105

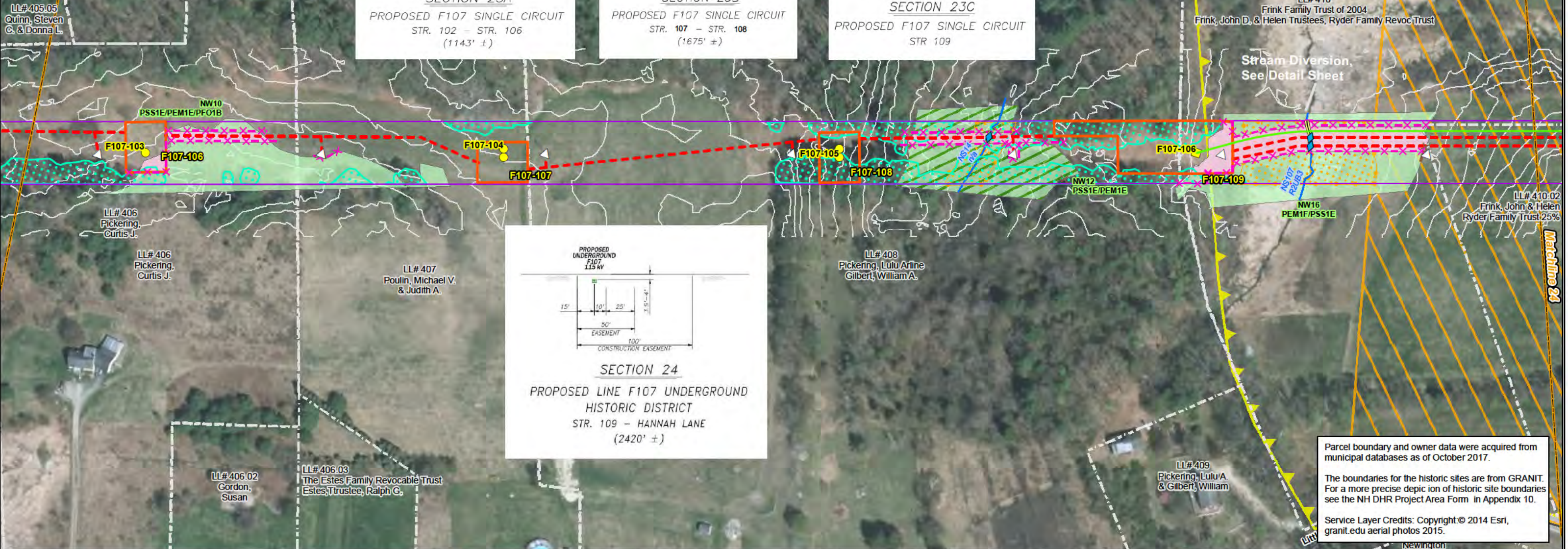
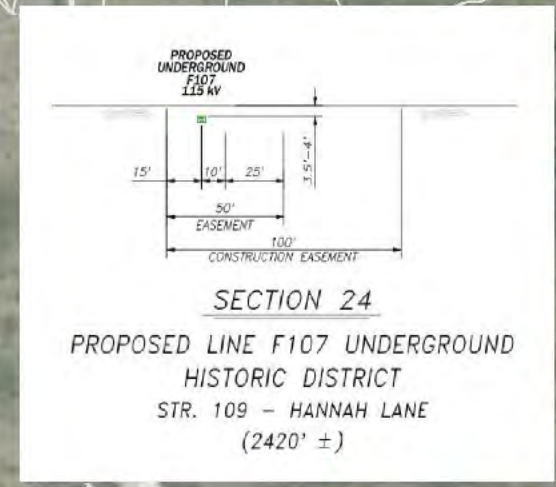
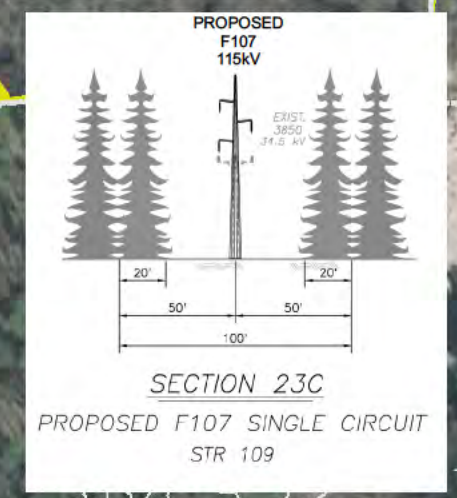
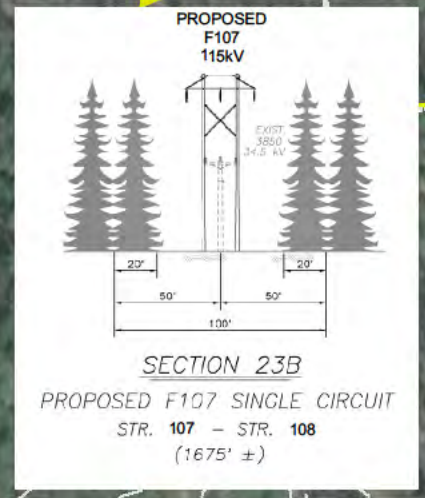
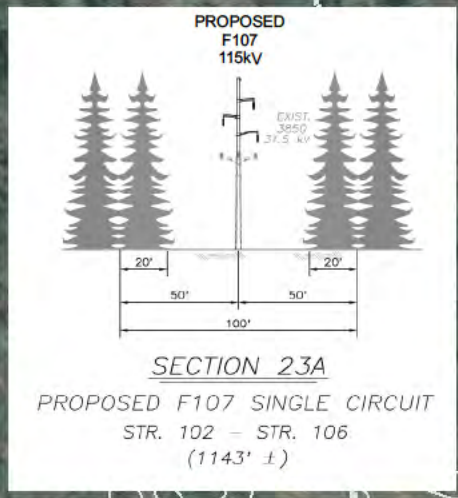
-  Structure 105 Location
-  Project Route



Service Layer Credits: Copyright:© 2013 National Geographic Society, i-cubed

Figure 1. Structure 105 location on topographic map.

Wetland ID	Impact Type	Area (Sq. Ft.)
NS107 (R2UB3)	Temporary	148
NS14 (n/a)	Temporary	42
NW10 (PSS1E/PEM1E/PFO1B)	Temporary	3507
NW12 (PSS1E/PEM1E)	Temporary	3310
NW16 (PEM1F/PSS1E)	Temporary	16035
NW16 (PEM1F/PSS1E)	Permanent (Str. F107-109)	19



Parcel boundary and owner data were acquired from municipal databases as of October 2017.

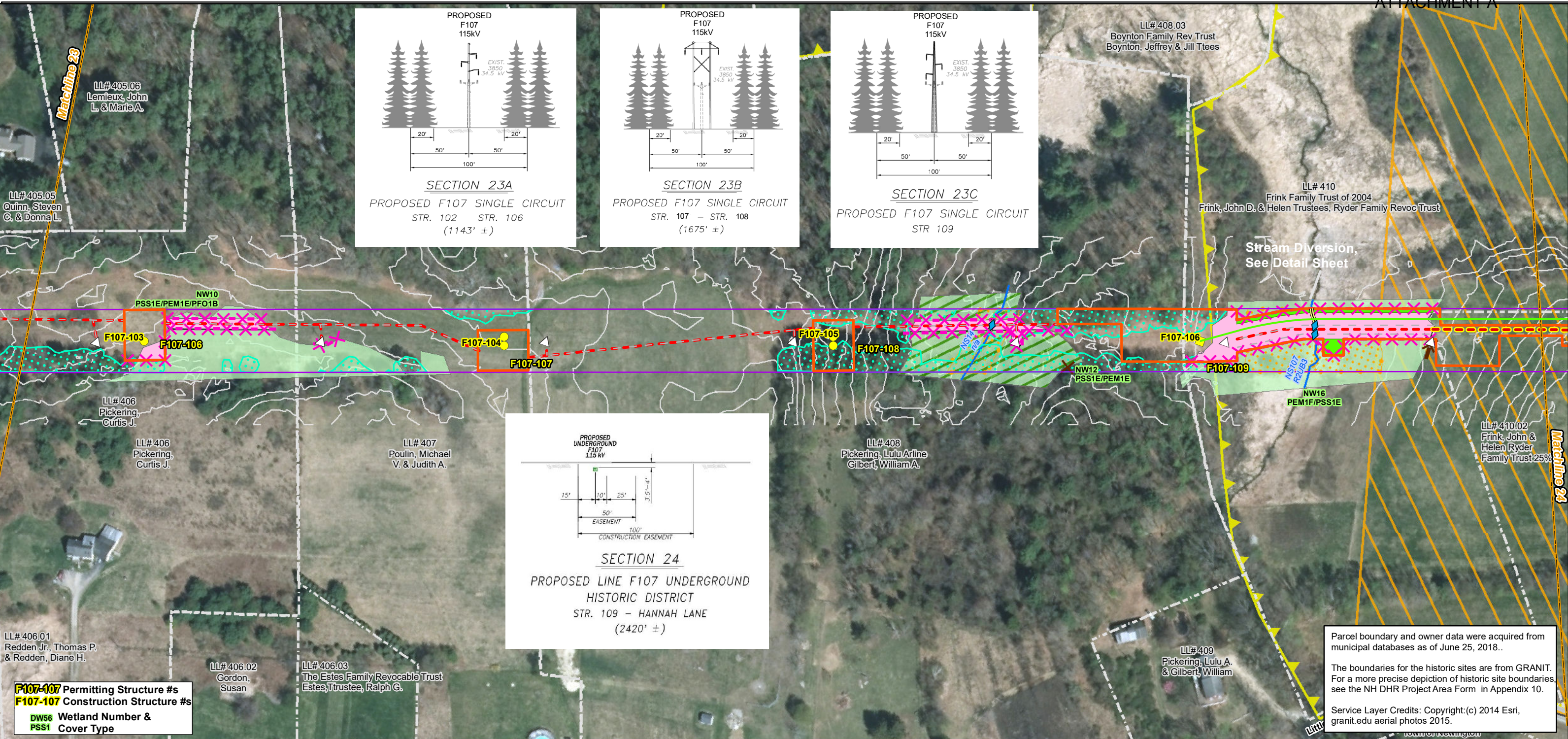
The boundaries for the historic sites are from GRANIT. For a more precise depiction of historic site boundaries see the NH DHR Project Area Form in Appendix 10.

Service Layer Credits: Copyright: © 2014 Esri, granit.edu aerial photos 2015.

<p>Drawn By: dpelleiter</p> <p>Date: 7/25/2018</p> <p>Project No: 22860_003</p>	<ul style="list-style-type: none"> Approximate Parcel Boundary PSNH Fee Area Project Corridor Work Pad Roads <ul style="list-style-type: none"> Local Not Maintained Private State Railroad Access Road Access Rd. Pending Owner Approval 	<ul style="list-style-type: none"> Existing Str (Remain) Existing Str (Removed/Modified) Underground Cable Silt Curtain Silt Fence, Hay Bale, Erosion Control Mix Berm Straw Wattle Wetland Prime Wetland Wetland Impact (PERM) Wetland Impact (TEMP) Town Boundary 	<ul style="list-style-type: none"> Stream Centerline Stream Top of Bank Temporary Culvert Stonewall alignment Temporary Mat Bridge NH DOT Right-of-way Historical Sites Designated River Buffer 250' Conservation Lands 100 Year Floodplain 	<ul style="list-style-type: none"> <all other values> Structures <ul style="list-style-type: none"> Direct Embed Drilled Pier Relocated Distribution Steep Slope BMPs Tree Clearing Stream Buffer 2ft Contour Tidal Buffer Zone Highest Observable Tide Line/Reference Line (4ft Contour) Mean Lower Low Water 	<p>Legend for F107-107:</p> <ul style="list-style-type: none"> Permitting Structure #s Construction Structure #s Wetland Number & Cover Type 	<p>Scale: 1 inch = 150 feet</p> <p>0 75 150 300 Feet</p>
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Seacoast Reliability Project

Revised Environmental Maps

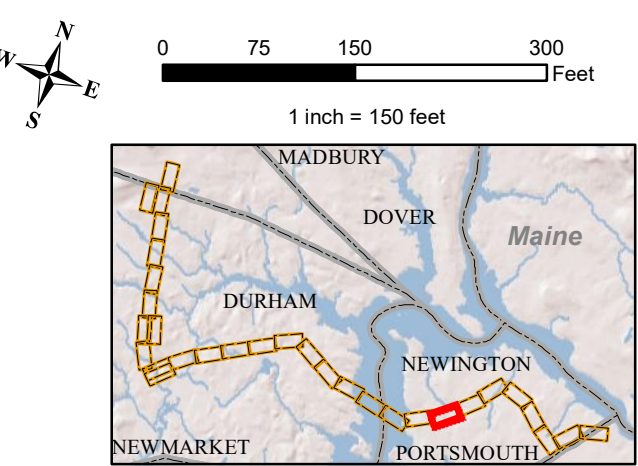


Date : 9/13/2019
Project No: 22860_003

- Project Corridor
- Work Pad
- Roads
 - Local
 - Not Maintained
 - Private
 - State
 - Access Road Needing Timbermatting
 - Access Road
 - Access Rd. Pending Owner Approval
 - Removed Access Road

- Existing Str (Remain)
- Existing Str (Removed/Modified)
- Underground Cable
- Erosion Control Removed
- Wetland
- Prime Wetland
- Wetland Impact (TEMP)
- Revised Impact Areas
- Wetland Impact (PERM)
- Wetlands Impact Removed
- Turbidity Barrier
- Silt Fence, Hay Bale, Erosion Control
- Mix Berm
- Silt Sock

- Stream Centerline
- Stream Top of Bank
- Temporary Culvert
- Stonewall alignment
- Temporary Mat Bridge
- NH DOT Right-of-way
- Historical Sites
- Designated River Buffer 250'
- Conservation Lands
- 100 Year Floodplain
- Railroad
- Approximate Parcel Boundary
- PSNH Fee Area
- Structures
 - Direct Embed
 - Drilled Pier
 - Relocated Distribution
 - Supplemental BMPs
 - Removed BMP
 - Tree Clearing
 - Stream Buffer
 - 2ft Contour
 - Tidal Buffer Zone
 - Highest Observable Tide Line/Reference Line (4ft Contour)
 - Mean Lower Low Water
 - Town Boundary



EVERSOURCE ENERGY

NORMANDEAU ASSOCIATES
Environmental Consultants

Seacoast Reliability Project

Revised Environmental Maps

STATE OF NEW HAMPSHIRE
SARAH D. ALLEN
No. 083
CERTIFIED WETLAND SCIENTIST

7/16/18

Figure 3. New proposed location of structure 105 on project environmental maps



Figure 4. Existing conditions with approximate old (yellow) and new (red) proposed structure 105 locations.



Figure 5. View of SRP transmission corridor from behind Pickering Farm main house, facing north.



Figure 6. View of SRP transmission corridor from behind Pickering Farm main house, facing north.



Figure 7. View of Pickering Farm from Little Bay Road, facing north.



Figure 8. View of Pickering Farm main house from Little Bay Road, facing northeast.



Figure 9. View of SRP transmission corridor from Little Bay Road, facing north.

Appendix A:
Revised Effects Table for the Alfred Pickering Farm

HISTORIC PROPERTY/PROPERTIES AFFECTED TABLE
RESULTS OF EFFECT EVALUATION FOR
Alfred Pickering Farm, 339 Little Bay Road, Newington (NWN0001)
Seacoast Reliability Project, 2019

Significance (including Criteria):

The Alfred Pickering Farm was determined eligible for the National Register of Historic Places in 2015 under Criteria A and C in the Areas of Agriculture and Architecture. The Georgian-style frame farmhouse was built ca. 1812 for Thomas Pickering by Cyrus Frink who was an engineer and builder of bridges and homes in the Piscataqua Region. The house and surrounding 37+ acres of land are still owned by members of the Pickering Family. The property also retains two early nineteenth century outbuildings; a carriage house and a large barn, with a rare surviving interior silo. The buildings have seen some historic period alteration, and the house has a ca. 2000 addition; however the property retains integrity to demonstrate its significance under both Criteria A and C for its agricultural associations and as an example of an intact functionally-planned New England Farm, as recorded in the Determination of Eligibility. The setting of open field is a character-defining feature. The land remains in agricultural use as hay field and pasture. The character-defining features under Criterion A include the large barn, shed and house, set on a high point surrounded by fields backed by woods. The roadside stone walls, driveway and barnyard contribute to the setting. A baseball diamond was in use for several years but has reverted to grass with little evidence remaining in the landscape. Other historically associated land to the east and west was subdivided in the late twentieth century and the fields became large house lots for new homes. The Pickering family cemetery is located on one of those parcels, not within the eligible historic property. The reduction of the farmland from roughly 88 acres to 37 acres and development of surrounding land have diminished the original setting, association and feeling of the agricultural property. The electric utility right of way dates from near the end of the historic period in the 1950s and is not a contributing element, but rather relates to construction of Pease Air Force Base.

NR Boundary (description/justification):

The boundary of the National Register eligible property includes all of the land presently associated with the historic buildings. Identified in Newington tax records as Map-Lot 23-23, it contains 37.4 acres. The historic property includes fields around the buildings and extending to the north where the electric utility right-of-way crosses the property at the edge of the woods. Other land to the east and west was subdivided for new home construction in the late twentieth century and no longer conveys agricultural associations.

Individual Properties**NR SR**

- Eligible (district N/A)
 Eligible, also in district
 Eligible, only in district
 Listed in the NRHP
 Not evaluated for individual eligibility

Districts**NR SR**

- Eligible
 Not eligible
 Listed in the NRHP
 Not evaluated as a district

RELATIONSHIP OF PROPOSED ACTION TO HISTORIC RESOURCE	
<p>The Seacoast Reliability Project will cross the Alfred Pickering Farm in the existing electric utility corridor. The 100'-wide right of way runs east-west for about 0.2 miles across the historic property. The existing distribution line will be relocated elsewhere and the proposed transmission line installed in its place. A single pole on the property, Structure 105 will be moved thirteen feet west from its initial proposed location.</p>	
DEFINITION OF EFFECT	EVALUATION
<p>An effect may occur when there is alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the National Register as defined in Section 800.16(1).</p>	<p>This change in location will not cause any additional adverse effect to the historic property nor change or negate the mitigation for the visual adverse effects previously identified during the design review, compliance and permitting processes for the project.</p>
RECOMMENDED FINDING	<p>No historic property affected.</p>

**APPLICATION OF THE CRITERIA OF ADVERSE EFFECT FOR
Alfred Pickering Farm, 339 Little Bay Road, Newington (NWN0001)
Seacoast Reliability Project, 2016**

CRITERIA OF ADVERSE EFFECT

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 of Historic Places in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse Effects may include reasonably foreseeable effects caused by the undertaking that may occur late in time, be farther removed in distance or be cumulative.

Example of Adverse Effects, pursuant to Section 800.5(a)(2)	Evaluation
Adverse effects on historic properties include, but are not limited to:	
(i) Physical destruction of or damage to all or part of the property;	None
(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR§68) and applicable guidelines;	None
(iii) Removal of the property from its historic location;	None
(iv) change of the character of the property's use or of physical features within the property's setting that contribute to its historic features;	None
(v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;	The proposed location change for Structure 105 will not introduce a new visual element that diminishes the setting of the property.

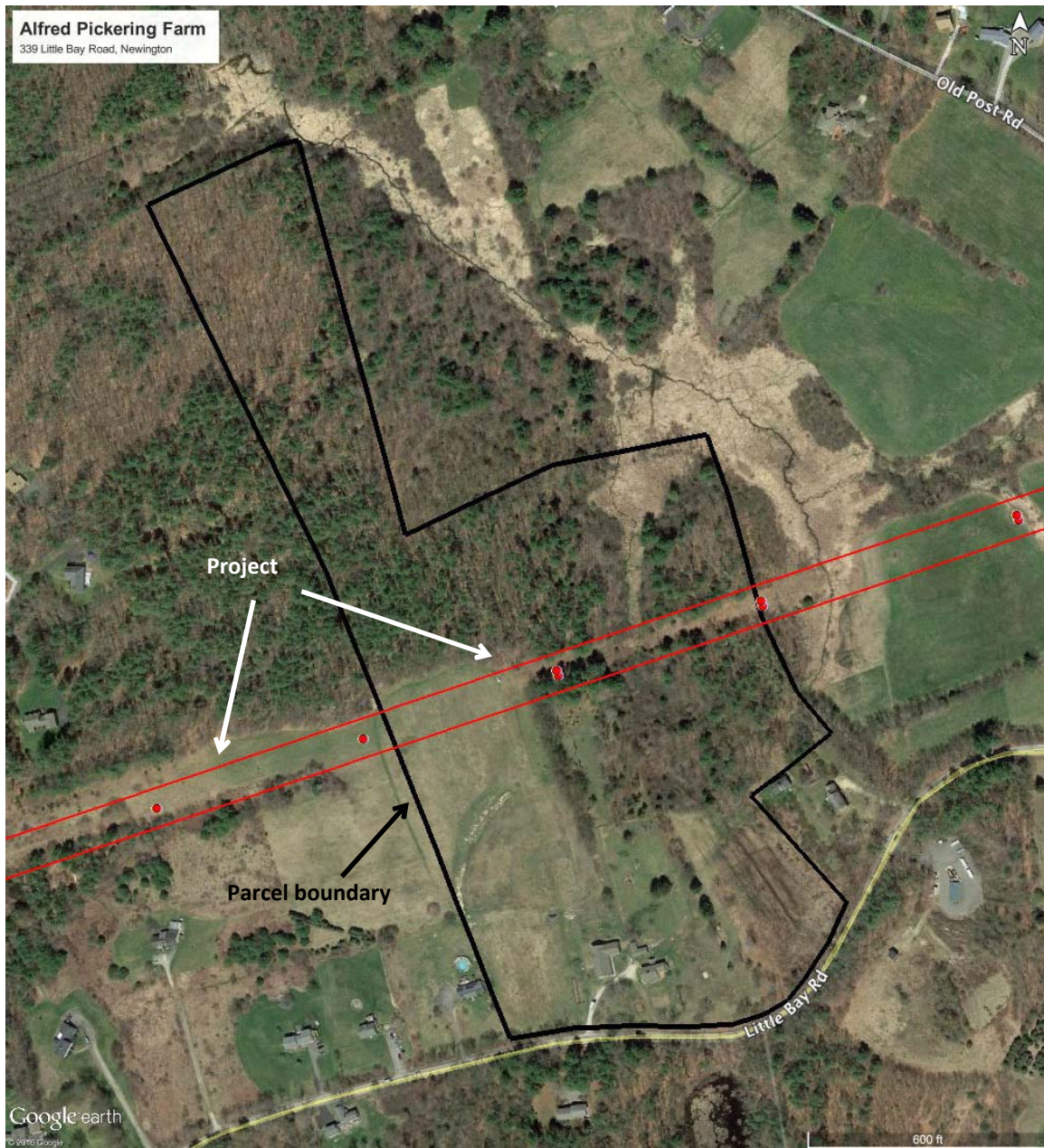
(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property or religious and cultural significance to an Indian tribe or Native Hawaiian organization; and	None
(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.	Not Applicable
(viii) OTHER:	None
RECOMMENDED FINDING	No Adverse Effect -- The proposed location change will not cause any additional adverse effect on the Alfred Pickering Farm.

Sources:

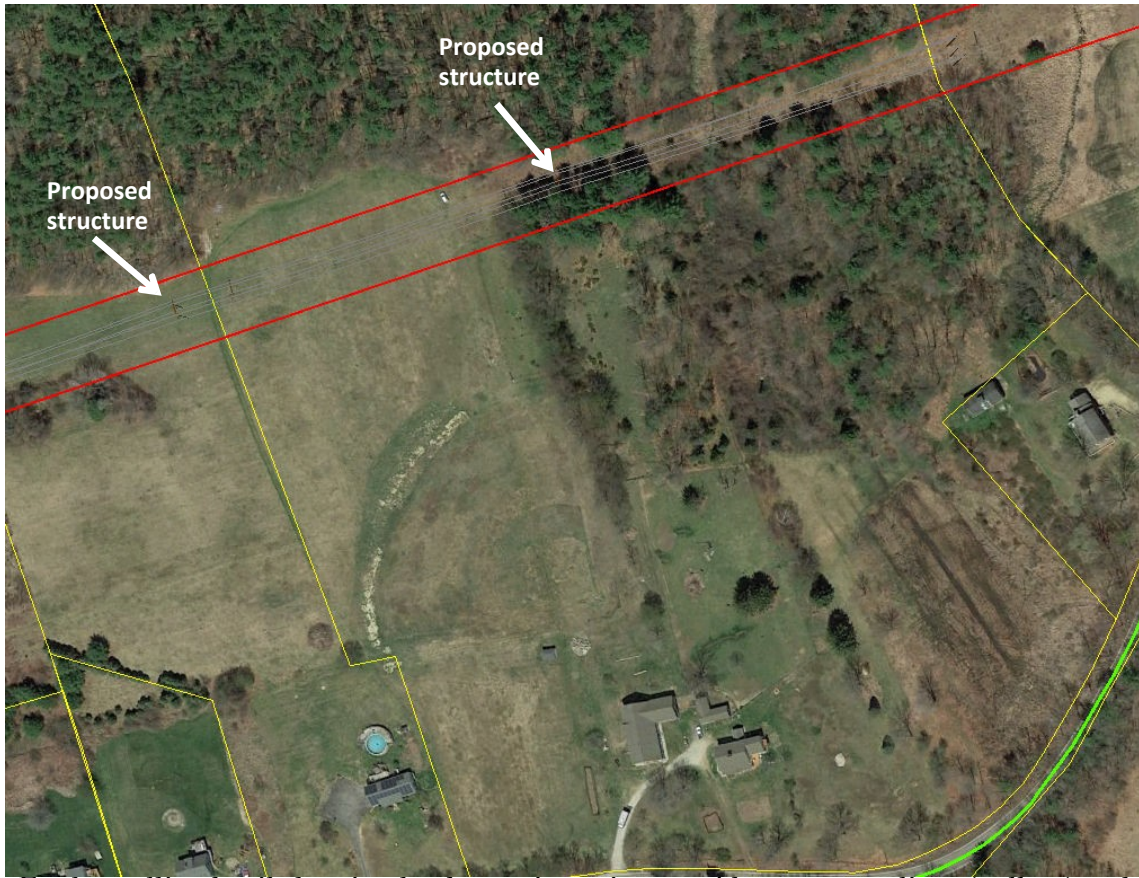
Casella, Richard M.

2015 Alfred Pickering Farm NHDHR Inventory Form, NWN0001, on file at New Hampshire Division of Historical Resources, Concord.

Alfred Pickering Farm, Little Bay Road, Newington



Satellite image from Google Earth of the Alfred Pickering Farm and its boundary (black line), right of way (red lines) and the Project with proposed structures (red dots).



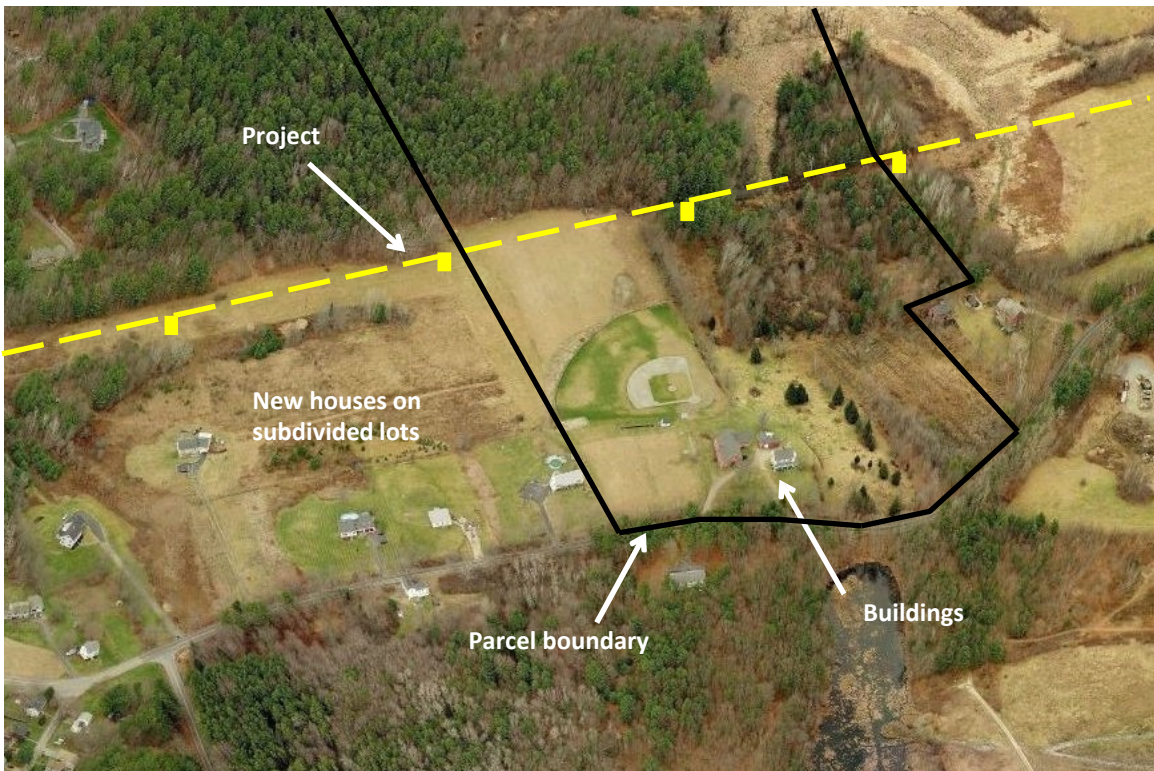
Google Earth satellite detail showing landscape in project corridor, property lines (yellow) and right of way (red)



Panoramic view with project location in back of field at left



View from driveway of existing distribution line behind barn, facing north, showing approximate structure location



Bing Bird's-eye satellite image, showing ballfield, now gone and new houses on subdivided lots, with project and approximate structure locations (yellow dotted line and squares) indicated