



VIGGO C. FISH
Direct Dial: 603.226.4412
Email: viggo.fish@mclane.com
Admitted in NH
11 South Main Street, Suite 500
Concord, NH 03301
T 603.226.0400
F 603.230.4448

VIA E-MAIL

March 26, 2020

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's Request for a Minor Modification - Structure F107-45**

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.

For the reasons discussed herein, Eversource requests that the SEC Administrator approve a minor, non-material modification to the location of Structure F107-45 ("Structure 45") to avoid possible current and future impacts to both natural and cultural resources, namely, potential impacts to a delineated wetland and a historic stonewall (WP-12). Specifically, Eversource requests approval to shift the location of Structure 45 15 feet to the south.

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. This design was amended and was approved by the SEC as shown on Drawing F10743001 in the Revised Engineering Drawings, App. Ex. 149, and on map 10 of the Revised Environmental Maps, App. Ex. 148.

The proposed location of Structure 45, as approved by the SEC, is situated directly between a delineated wetland and a historic stone wall (WP-12) in the Town of Durham on property owned by The University of New Hampshire (Figure 1). The proposed construction change would include moving Structure 45 fifteen feet south onto property owned by New Hampshire Fish and Game to avoid potential impacts to both the delineated wetland and the

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Manchester, Concord, Portsmouth, NH | Woburn, Boston, MA

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historic stone wall during current construction or future maintenance activities. The structure type and size will not be changed.

B. Description of Minor Modification

With the exception of the location, the proposed design of Structure 45 remains unchanged. This requested modification simply shifts the location of Structure 45, 15 feet to the south from property owned by the University of New Hampshire to property owned by New Hampshire Fish and Game. Eversource will also shift the work pad for the structure accordingly to correspond to the new structure location. The proposed reconfiguration is shown in Attachment 1 to this letter on page 4.

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 45. Indeed, Mr. Raphael has concluded that the requested change is minimal, is proposed for an existing right-of-way and infrastructure corridor, and will not be visible from any public roads or adjacent trails, farmhouses, agricultural lands or historic resources which comprise the context for this review. Also, as discussed in the *Revised Effects Table*, Attachment 1, pages 8 – 11, the relocation of the structure will not be visible from any of the significant and character defining views of the agricultural district and there will be no overall loss of integrity of setting, feeling or association.

2. Historic Sites

Eversource’s historic resources consultant has concluded that the minor modification will not have any adverse effects on above-ground resources and would not affect her original conclusion that the Project will not have an unreasonable adverse effect on historic resources. See Attachment 1, pages 6 – 7.

Additionally, Eversource’s archaeological experts have conducted extensive field work in the vicinity of the relocation to identify archaeological resources and assess whether they may be impacted by the 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 recommended.

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.

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 45 is specifically being made to avoid impacts to natural and cultural resources. The revised alignment will have no effect on any of the criteria pertaining to orderly development. In addition, Eversource has notified and received assent from New Hampshire Fish and Game regarding the proposed relocation.

D. Conclusion

Eversource requests to revise the location of Structure 45 to avoid impacts to natural and cultural resources. After careful analysis, Eversource has determined that the structure revision will result in reduced potential 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 respectfully requests that the SEC Administrator approve this minor modification.

Sincerely,



Viggo C. Fish

VCF:amd
Enclosure

Cc: SEC Distribution List
Nadine Miller, NHDHR



13 Legends Drive

Hooksett, NH 03106

March 26, 2020

Nadine Miller
New Hampshire Division of Historical Resources
19 Pillsbury Street
Concord, NH 03301

Re: Seacoast Reliability Project (RPR# 6528) Construction Change in Vicinity of Historic Property
Structure 45 Modification - Durham, New Hampshire

Dear Ms. Miller-

Eversource Energy (Eversource) is proposing a minor construction change in the vicinity of a historic property to avoid possible current and future impacts to both natural and cultural resources as part of the Seacoast Reliability Project (the "Project"). The original proposed location of Structure 45 is situated directly between a delineated wetland and a historic stone wall (WP-12) in the Town of Durham on property owned by The University of New Hampshire (Figure 1). The newly proposed construction change would move Structure 45 fifteen feet south onto property owned by New Hampshire Fish and Game to avoid potential impacts to both the delineated wetland and the historic stone wall during current construction or future maintenance activities (Figure 2). The structure type and size will not be changed.

Structure 45, as initially proposed, is located in a remote area directly east of the railroad within the overlapping boundaries of University of New Hampshire Historic District and the Newmarket and Bennet Roads Farm Historic District, as shown on New Hampshire Division of Historical Resource's Enhanced Mapping & Management Information Tool (EMMIT). The University of New Hampshire Historic District was listed on the National Register of Historic Places in 2016 under Criterion A and C and the Newmarket and Bennet Roads Farm Historic District was recommended eligible for listing in 2010 under Criterion A and C. Eversource is currently proposing a 15-foot shift that would move Structure 45 out of the East Foss Farm area of the University of New Hampshire Historic District and the new structure location would be positioned solely within the Newmarket and Bennet Roads Farm Historic District. The proposed change will not adversely affect either historic district as it will not alter, either directly or indirectly, any of the significant characteristics that qualify the historic districts for inclusion in the National Register (see Attachment A - Widell Letter). Furthermore, the proposed change will likely reduce potential impacts to the resources by eliminating the need to elevate the timber mat work pad over the stone wall associated with both districts during current construction activities and by potentially eliminating the need to traverse over the stone wall during future maintenance activities.

Additionally, the proposed change will not impact any known archaeological sites, nor is it expected to impact any yet-to-be identified archaeological resources as the area was not considered sensitive for archaeological resources during the Phase IA Archaeological Sensitivity Assessment (Bunker 2015) and no archaeological resources were identified during the Phase IB Intensive Archaeological Investigation in nearby Sensitivity Areas Durham-5 and Durham-6 (Bunker 2018).

A revised effects table for the Newmarket and Bennet Roads Farm Historic District is located in Appendix A; no effects table is provided for the University of New Hampshire Historic District as the proposed change would move the structure outside of the boundaries of the resource.



13 Legends Drive
Hooksett, NH 03106

If you have any questions, please feel free to call me at 603-717-5198 or email me at brooke.kenline-nyman@eversource.com.

Sincerely,

A handwritten signature in cursive script, appearing to read "B. Kenline-Nyman".

Brooke Kenline-Nyman
Eversource Energy
Cultural Resource Specialist

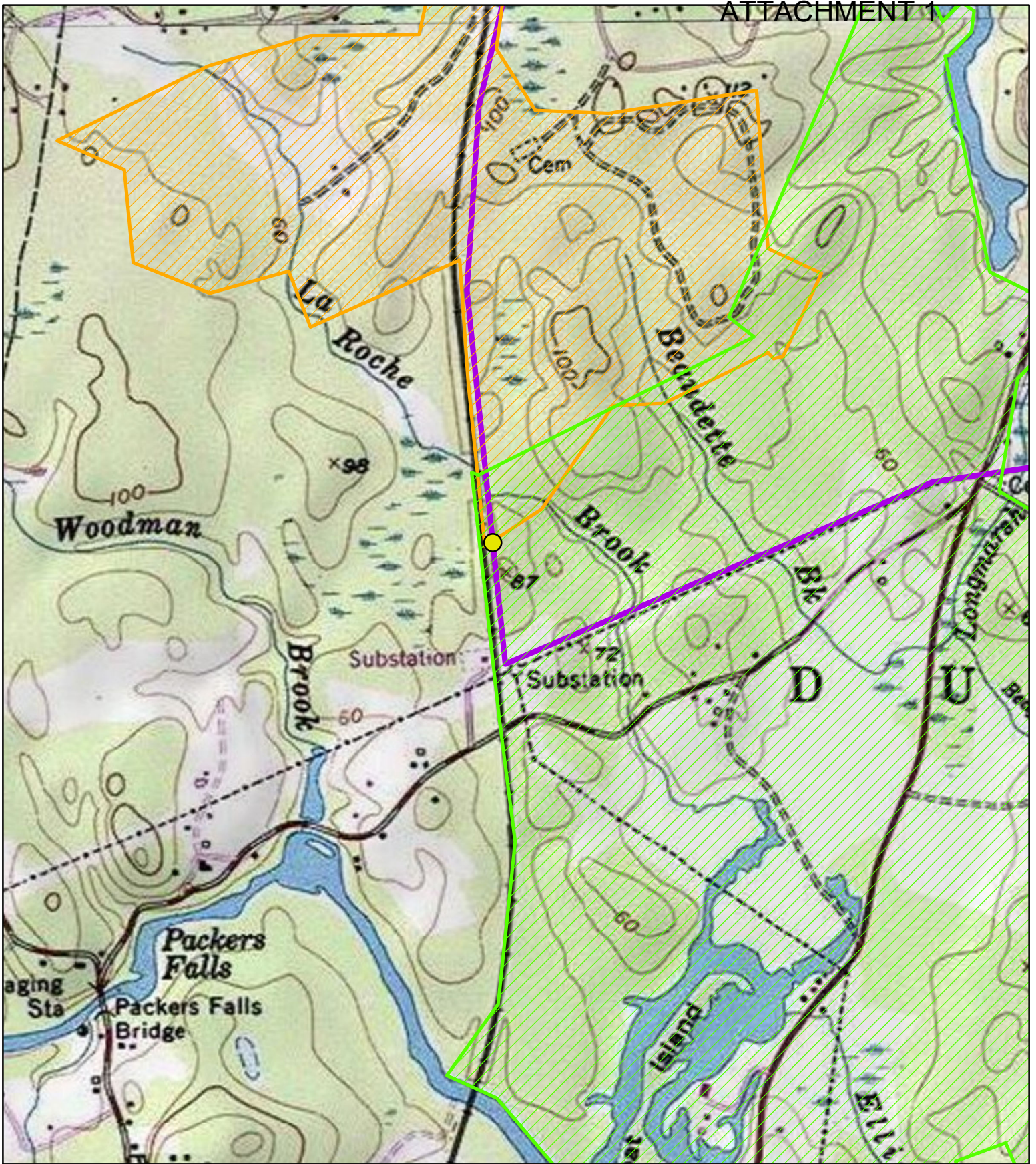
Enclosure

Cc: David Trubey, DHR
Pamela Monroe, SEC
Lindsey Lefebvre, USACE
Todd Selig, Town of Durham
Phil Barthel, Eversource
Matt Cardin, Eversource

References Cited:

Bunker, Victoria

- 2015 Phase 1-A Preliminary Archeological Survey, Seacoast Reliability Project, Madbury, Durham, Newington and Portsmouth, NH. Report Prepared for Normandeau Associates, Inc. on File at NH DHR, Concord, NH.
- 2018 Seacoast Reliability Project: Results of Phase I-B Archeological Survey Madbury, Durham, Newington and Portsmouth, NH. Report Prepared for Normandeau Associates, Inc. on File at NH DHR, Concord, NH.



Seacoast Reliability Project - Structure 45

- Structure 45 Location
- UNH HD
- Project Route
- Newmarket & Bennett Roads Farms HD



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Figure 1. Structure 45 Location on USGS Topographical Map



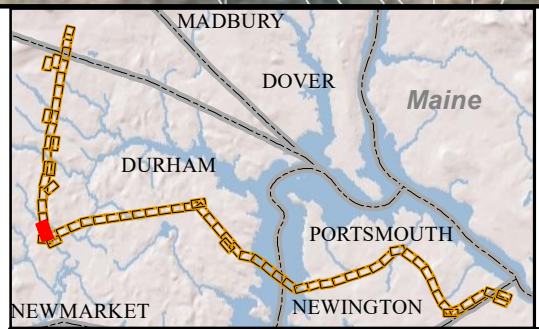
DW56 Wetland Number & PSS1 Cover Type
F107-107 Construction Structure #s

Drawn By: dpellelier
 Date: 3/17/2020
 Project No: 22860.003

- | | | | | |
|---|--|---|--|---|
| Structures
<ul style="list-style-type: none"> ● Direct Embed ■ Drilled Pier ▲ Relocated Distribution — Underground Cable ⊙ Existing Str (Remain) △ Existing Str (Removed/Modified) ▭ Parcel Boundary ▭ Town Boundary ▭ Cable House | <ul style="list-style-type: none"> ▭ Workpad - - - Access Road Needing Timbermatting - - - Access Road - - - Access Rd. Pending Owner Approval ▭ Wetland ▭ Prime Wetland | <ul style="list-style-type: none"> ▭ Stream Buffer ▭ Stream Top of Bank ▭ Project Area ▭ Stream Centerline ▭ Temporary Culvert ◆ Temporary Mat Bridge ⊙ Stonewall (Rev. 8-2019) ▭ NH DOT Right-of-way ▭ Designated River Buffer 250' ▭ Steep Slope BMPs | <ul style="list-style-type: none"> — 2ft Contour - - - Mean Lower Low Water — Highest Observable Tide Line/Reference Line (4ft Contour) Roads
<ul style="list-style-type: none"> — Local — Not Maintained — Private — State — Railroad | Arch. Site/Avoid
<ul style="list-style-type: none"> ▭ Quarry Activity ▭ Quarry Bench ▭ Cellar Hole ▭ Graveyard ▭ Archeology/Avoidance Fencing ▲ Timber Mat Stonewall Crossing △ Use Existing Opening for ▭ Elevate Workpad at Stonewall |
|---|--|---|--|---|

Service Layer Credits: Copyright:(c) 2014 Esri, granit.edu aerial photos 2015.

0 37.5 75 150 Feet



NORMANDEAU ASSOCIATES
 ENVIRONMENTAL CONSULTANTS

Seacoast Reliability Project

Revised Structure 45 Map

EVERSOURCE ENERGY

Attachment A
Cherilyn Widell Letter
and
Revised Effects Table for
Newmarket & Bennett Roads Farm Historic District



Widell Preservation Services, LLC

March 23, 2020

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

Re: Seacoast Reliability Project (RPR#6528) Construction Change in the Vicinity of Historic Properties due to Modification in the Placement of Structure 45, Durham, New Hampshire

Dear Director Wilson,

As the expert witness in cultural resources for Eversource Energy (Eversource) for the Seacoast Reliability Project, I wanted to inform you that Eversource is proposing a minor construction change in the placement of Structure 45. The change of this structure location will be a move of fifteen feet to the south from its current location but still within the right of way of the Seacoast Reliability Project within the Town of Durham onto property owned by New Hampshire Fish and Game.

The original proposed location for **Structure 45** was in a remote area directly east of the railroad within the overlapping boundaries of the University of New Hampshire Historic District and the Newmarket and Bennet Roads Farm Historic District on property owned by the University of New Hampshire as shown on the New Hampshire Division of Historical Resources' Enhanced Mapping and Management Information Tool (Emmit).

The University of New Hampshire Historic District was determined eligible for listing on the National Register of Historic Places in 2016 under Criterion A and C. The Newmarket and Bennet Roads Farm Historic District was determined eligible for the National Register of Historic Places in 2010 under Criterion A,C, and potentially D.

The proposed construction change would move Structure 45 fifteen feet south to a location outside of the East Foss Farm area and outside of the University of New Hampshire Historic District. The new structure location would now be located only in the Newmarket and Bennet Roads Farm Historic District between a delineated wetland and an historic stonewall (WP-12) in the Town of Durham on property owned by New Hampshire Fish and Game. The type of structure and size will not change.



The change in location of Structure 45 will move the structure to avoid potential impacts to both a delineated wetland and an historic stonewall. Protective measures already in use will continue to be implemented in the new location.

The proposed change in location of this structure will not adversely affect the Newmarket and Bennet Roads Farm Historic District directly or indirectly, as it will not alter any of the significant characteristics that qualify it for inclusion in the National Register of Historic Places. This change in the location of Structure 45 will likely reduce potential impacts to the historic resources near the original location of Structure 45 by eliminating the need to elevate timber mat work pads over the stone walls associated with both districts during current construction activities and by eliminating the need to traverse over the stone wall during future maintenance activities. For these reasons, it is my opinion that the proposed change will reduce the chance of any potential impacts to the stonewall feature during current construction or future maintenance activities.

Should you have any questions, please call me at 443-480-2862 or email me at cherilyn809@yahoo.com.

Sincerely,

Cherilyn Widell

Cherilyn Widell, Principal
Widell Preservation Services, LLC

HISTORIC PROPERTY/PROPERTIES AFFECTED TABLE
RESULTS OF EFFECT EVALUATION FOR
Newmarket & Bennett Roads Farms Historic District, Durham (DUR-DMDS)
Seacoast Reliability Project, 2020

Significance (including Criteria):

The Newmarket and Bennett Roads Farms Historic District was determined eligible for the National Register of Historic Places in 2010, including an area previously determined eligible as the Doe-Mooney-Dame-Stevens Historic District in 2005. The large rural historic district is comprised of farmsteads and undeveloped historically associated land, totaling approximately 925 acres. According to the NHDHR Determination of Eligibility, the Newmarket and Bennett Roads Farms Historic District is eligible under Criterion A in the Area of Agriculture, as the most extensive and well-preserved historic agricultural landscape in Durham. The area, first settled in the mid-seventeenth century, developed over the course of the nineteenth and early twentieth centuries, with seven substantial farms. Under Criterion A, the historic district also has associations with French-Canadian farming families who settled on all but one of the farms in the early twentieth century. The district is also eligible for the National Register under Criterion C in the Area of Architecture. Eligibility under Criterion D for archaeology was not determined, but the district does contain a number of potential sites. Character-defining elements include extensive acreage, continuous open fields and surrounding woodland, farmhouses and outbuildings, stone walls, old roads and three family cemeteries, plus at least six cellar holes. The Lamprey River Moat and Longmarsh Brook including what is locally believed to be an early canal are important landscape features. Land-use patterns include tilled low-lying land and rockier upland pastures and wood lots, with buildings occupying points of high ground. There are a dozen late twentieth century houses within the eligible historic district, which affect integrity of setting in some places. The 100' wide electric utility corridor established in 1948 parallel to the north side of Bennett Road was not identified as a feature in the historic district documentation and the ca. 1949 and ca. 1975 distribution lines do not contribute to the agricultural significance of the district.

NR Boundary (description/justification):

The boundary of the Newmarket and Bennett Roads Farms Historic District determined eligible for the National Register in 2010 includes all of the historic resources and open land that are known to accompany each of the seven historic farmsteads and/or the French-Canadian families who resided within the historic district. Though much of the outlying land is now in separate ownership, it remains undeveloped and linked to the farms. Newer houses surrounded by contributing parcels of land, are included in the district boundary as non-contributing. The historic district encompasses several large tracts of woodland north of Bennett Road, open fields to the south and on both sides of Newmarket Road/NH 108. The railroad corridor bounds the district on the west and the Lamprey River forms the southwest border.

<p>Individual Properties</p> <p>NR SR</p> <p><input type="checkbox"/> <input type="checkbox"/> Eligible (district N/A)</p> <p><input type="checkbox"/> <input type="checkbox"/> Eligible, also in district</p> <p><input type="checkbox"/> <input type="checkbox"/> Eligible, only in district</p> <p><input type="checkbox"/> <input type="checkbox"/> Listed in the NRHP</p> <p><input type="checkbox"/> <input type="checkbox"/> Not evaluated for individual eligibility</p>	<p>Districts</p> <p>NR SR</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Eligible</p> <p><input type="checkbox"/> <input type="checkbox"/> Not eligible</p> <p><input type="checkbox"/> <input type="checkbox"/> Listed in the NRHP</p> <p><input type="checkbox"/> <input type="checkbox"/> Not evaluated as a district</p>
RELATIONSHIP OF PROPOSED ACTION TO HISTORIC RESOURCE	
<p>The Seacoast Reliability Project is located within the Newmarket and Bennett Roads Farms Historic District in existing electric utility corridor. The Seacoast Reliability Project traverses the northern part of the historic district for just over one mile in the existing 100' wide right of way, parallel to the north side of Bennett Road and crossing Newmarket Road/NH 108. A single pole in the historic district, Structure 45, will be moved fifteen feet south of its initial proposed location. This location is not visible from any public roads, farmhouses, outbuildings, or agricultural fields.</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>The proposed change in structure location could potentially have an effect on the Newmarket and Bennett Roads Farms Historic District, because it has the potential to directly or indirectly alter characteristics that qualify the district for the National Register of Historic Places, which include setting and landscape. The structure proposed to be moved is located in an existing electric utility right-of-way through the historic district in mostly wooded land and will not be visible from public roads, farmhouses, outbuildings, or agricultural fields.</p>
RECOMMENDED FINDING	<p>Historic properties affected.</p>

**APPLICATION OF THE CRITERIA OF ADVERSE EFFECT FOR
Newmarket & Bennett Roads Farms Historic District, Durham (DUR-DMDS)
Seacoast Reliability Project, 2020**

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;	<p>Construction will be limited to the existing electric utility right-of-way which does not contribute to the district's National Register significance.</p> <p>There are nine stone walls that intersect the right of way in this district. Most are in isolated wooded locations and none are visible from the road. The fifteen foot shift will lessen potential impacts to the stone wall that borders UNH property by eliminating the need to elevate the work pad around the stone wall during construction and future maintenance work. Traversing the stone wall may also not be needed for future maintenance with the proposed change.</p>
(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;	The proposed change will not affect the district's use. It will be located in the existing cleared electric utility right of way through land that is wooded.

ATTACHMENT 1

	The proposed change to structure 45 will have no effect on the setting, feeling or association of the large historic district.
(v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;	Due to the wooded setting of the right of way, the proposed change will not be visible in any of the significant and character-defining views of the agricultural district. There will be no overall loss of integrity of setting, feeling or association.
(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:	
RECOMMENDED FINDING	No Adverse Effect – The proposed change will not have an adverse effect on the Newmarket and Bennett Roads Farms Historic District. It will not alter, either directly or indirectly, any of the significant characteristics that qualify the historic district for inclusion in the National Register in a manner that would diminish the integrity of the district and its ability to convey significance under National Register Criterion A or Criterion C.

Sources:

Elizabeth Durfee Hengen

2004 Doe-Mooney-Dame-Stevens Farms Historic District Area Form (Area M), on file at New Hampshire Division of Historical Resources, Concord.

Elizabeth Durfee Hengen

2005 Levi Hamel-Beliveau House NHDHR Inventory Form DUR0013, on file at New Hampshire Division of Historical Resources, Concord.

Elizabeth Durfee Hengen

2010 Newmarket and Bennett Roads Farms Historic District Area Form, on file at New Hampshire Division of Historical Resources, Concord.