

June 19, 2015

Commissioner Van McLeod
New Hampshire Department of Cultural Resources
20 Park Street
Concord, NH 03301

Dear Commissioner McLeod:

On June 10 we attended a work session hosted by the New Hampshire Division of Historic Resources to update cooperating partners and other stakeholders on the progress of the US Department of Energy's consultants in assessing the impact of the proposed Northern Pass project on New Hampshire's historic resources. As consulting parties to the federal Section 106 process, we are writing to express our deep frustration with this process, and to strongly urge you and your Department to set a higher bar for how New Hampshire's historic landscapes and other cultural resources are treated in the forthcoming state regulatory review process for Northern Pass established in RSA 162:H.

While we believe that NH DHR staff are raising some good and relevant questions in their own analysis of the work DOE contractors are doing on the Section 106 review, we are dismayed that NH DHR agreed to the federal decision to limit the study area (referred to as the "Area of Potential Effect") to one mile on either side of the proposed centerline for the proposed Northern Pass power line. The most significant historic resources of central and northern New Hampshire are the landscapes which are home to tens of thousands of residents and which attract millions of visitors annually from around the world. By limiting the scope of the federal review to one mile on either side of Northern Pass's proposed overhead power line, the federal government is treating these assets at best as if they are non-existent and at worst as if they are worthless. New Hampshire deserves better. We trust that under your leadership the Department of Cultural Resources will provide the New Hampshire Site Evaluation Committee with a comprehensive assessment of the rich history of these landscapes if and when the SEC considers an application from the Northern Pass project that proposes to scar these landscapes.

As one example, we would encourage you to look at the impact Northern Pass as proposed will have on several distinct views from the Appalachian National Scenic Trail and other historic trails to the peaks of New Hampshire's 4000 footers. Many of these historic landscapes as viewed from hiking trails are outside the one mile APE. Other similar large scale transmission

projects have used APE's well beyond one mile on either side of the proposed project centerline.¹

A second concern we have as consulting parties to the federal Section 106 process is the lack of transparency of the process itself. We understand that there are some archeological resources that deserve to have a layer of confidentiality to protect their location on (and in) the ground. However, the public also deserves a full and open discussion of how historic resources will be conserved when development projects on the scale of Northern Pass are proposed.

We believe the review process in this instance should err on the side of too much sunshine, not on the side of too little. To date, the historic resource impacts of the Northern Pass project are primarily discussed only behind closed doors, with limited public access to documents and opportunity for review. New Hampshire deserves better. We trust that under your leadership the State of New Hampshire's regulatory review of Northern Pass impacts on our cultural resources will include a very robust and very public discussion to properly and fully inform SEC decision-makers. It is imperative that non-sensitive documents be made available online for public scrutiny.

A third concern we would like to share with you concerning the federal Section 106 review process is the frustration of watching the important issue of cultural resources being segregated from the environmental review that the federal government conducts under the National Environmental Policy Act. It appears that the federal regulatory review process treats cultural resources separately from environmental issues, almost as if cultural resources are an afterthought. These federal reviews occur on two separate, parallel tracks. The problem is that natural and historic resources share the same ground. They are part of one larger whole. We trust that under your leadership the decision-makers at the NH SEC will receive information from your Department that fully and accurately depicts how the Northern Pass project as currently proposed impacts the common ground that cultural and natural resources share. For example, many historic sites in New Hampshire's White Mountain region are historic because of the exceptional views of the mountains from them. Protecting the sites without protecting the views from the sites perfectly illustrates the dictionary definition of "myopia."

We write this letter because we believe the federal review process of historic and cultural resources as it relates to the Northern Pass application for a federal Presidential Permit is failing New Hampshire. But it is not too late for your Department to assure that the state regulatory review process conducted by the NH Site Evaluation Committee does not also fail New

¹ AMC pointed out in its previous Section 106 submittals, examples of federal transmission projects in the western US where distances to 5 miles for viewshed impacts on historic resources were used, e.g. Advisory Council on Historic Preservation Case Digest: Section 106 in Action, Summer 2012, Gateway West Transmission Line at pages 18-19.

Hampshire and some of its most treasured and long-honored cultural assets. We encourage you to set a high bar for this state review, and to assure New Hampshire citizens that the extraordinary landscapes we live with daily and that we market worldwide remain part of the legacy we leave to future generations of Granite State residents and visitors.

Sincerely,

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cc: Governor Maggie Hassan
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