

APPENDIX A

**NEW ENGLAND CLEAN ENERGY CONNECT: TREATMENT AND
AVOIDANCE PLANS FOR ABOVE GROUND AND
ARCHAEOLOGICAL RESOURCES**

PREPARED FOR:

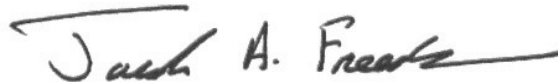
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JUNE 2020

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ACRONYMS AND ABBREVIATIONS

ABA	Architectural Barriers Act of 1968
ANST	Appalachian National Scenic Trail
APE	area of potential effects
ATC	Appalachian Trail Conservancy
CARMA	Cultural and Architectural Resource Management Archive
CL	centerline
DOE	U.S. Department of Energy
GPS	Global Positioning System
LOD	limit of disturbance
MATC	Maine Appalachian Trail Club
MDEP	Maine Department of Environmental Protection
MHPC	Maine Historic Preservation Commission
MP	milepost
NECEC	New England Clean Energy Connect
NPS	National Park Service
NRHP	National Register of Historic Places
NTP	notice to proceed
Project	NECEC project
Proponent	Central Maine Power Company
QI	Qualified Individual
ROW	right-of-way
SA	sensitive area
SEARCH	SEARCH Inc.
SR	State Route
STP	shovel test pit
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USGS	U.S. Geological Survey

1 INTRODUCTION

Central Maine Power Company or its successor in ownership of the New England Clean Energy Connect (NECEC) Project (Proponent) will implement the NECEC project (Project) to upgrade existing and construct new transmission infrastructure from the Canadian border to the Surowiec Substation in Pownal and from the Coopers Mills Substation in Windsor to the Maine Yankee Substation in Wiscasset. The Project is 322.5 kilometers (km) (200.4 miles [mi]) long and crosses seven counties, 24 municipalities, and 15 unorganized territories within the state of Maine (**Figure 1-1**). The Project will require a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers (USACE) New England District and a Presidential Permit from the U.S. Department of Energy (DOE). Therefore, the Project qualifies as an undertaking with the potential to affect historic properties under Section 106 of the National Historic Preservation Act. The USACE, DOE, and National Park Service (NPS) have identified the USACE as the lead federal agency for Section 106 consultation. Proponent contracted with Burns & McDonnell and its subcontractor, SEARCH Inc. (SEARCH), to conduct surveys for archaeological and above ground historic resources and provide National Register of Historic Places (NRHP) eligibility and effects recommendations for federal and state review.

This document presents information regarding historic properties and resources that are treated as historic properties for the Project. Through Section 106 consultation with the Proponent, Maine Historic Preservation Commission (MHPC), DOE, and NPS, the USACE has determined that the Appalachian National Scenic Trail (ANST), the Hilton Hill Road Rural Agricultural Historic District, Turmel Road Barn, and Bowman Airfield will be adversely affected by the undertaking (**Table 1-1**). In addition, the Proponent recommended, MHPC concurred, and USACE has determined that the remaining NRHP eligible and undetermined resources will either be avoided or will not be adversely affected by the Project. The remaining resources are composed of 16 archaeological resources and one historic cemetery.

The indirect area of potential effects (APE) recommended for the Project by MHPC and adopted by USACE consisted of a 0.8 km (0.5 mi) buffer on each side of the Project centerline (CL). In addition, a 0.8 km (0.5 mi) buffer around converter and substation footprints was considered. The direct APE recommended by MHPC and adopted by USACE consisted of the entire right-of-way (ROW) width or facility footprint where ground-disturbing activities could take place. This document also details the specific avoidance, treatment, and mitigation plans that will be implemented at each resource.

The USACE initiated Section 106 consultation in May of 2019 (letter from Jay Clement). At that time, Proponent had already sponsored identification, evaluation, and finding of effects studies utilizing the anticipated indirect and direct APE recommended by MHPC. These studies were conducted in advance of Section 106 consultation to ensure necessary data were available to consulting parties when needed and to facilitate permitting under Maine's Site Location of Development Law (Site Law). Accordingly, MHPC provided its findings of effects on historic properties (utilizing the federal Section 106 framework) during the Site Law permitting process. Additional consultation actions have included a June 15, 2019 teleconference, circulation of a

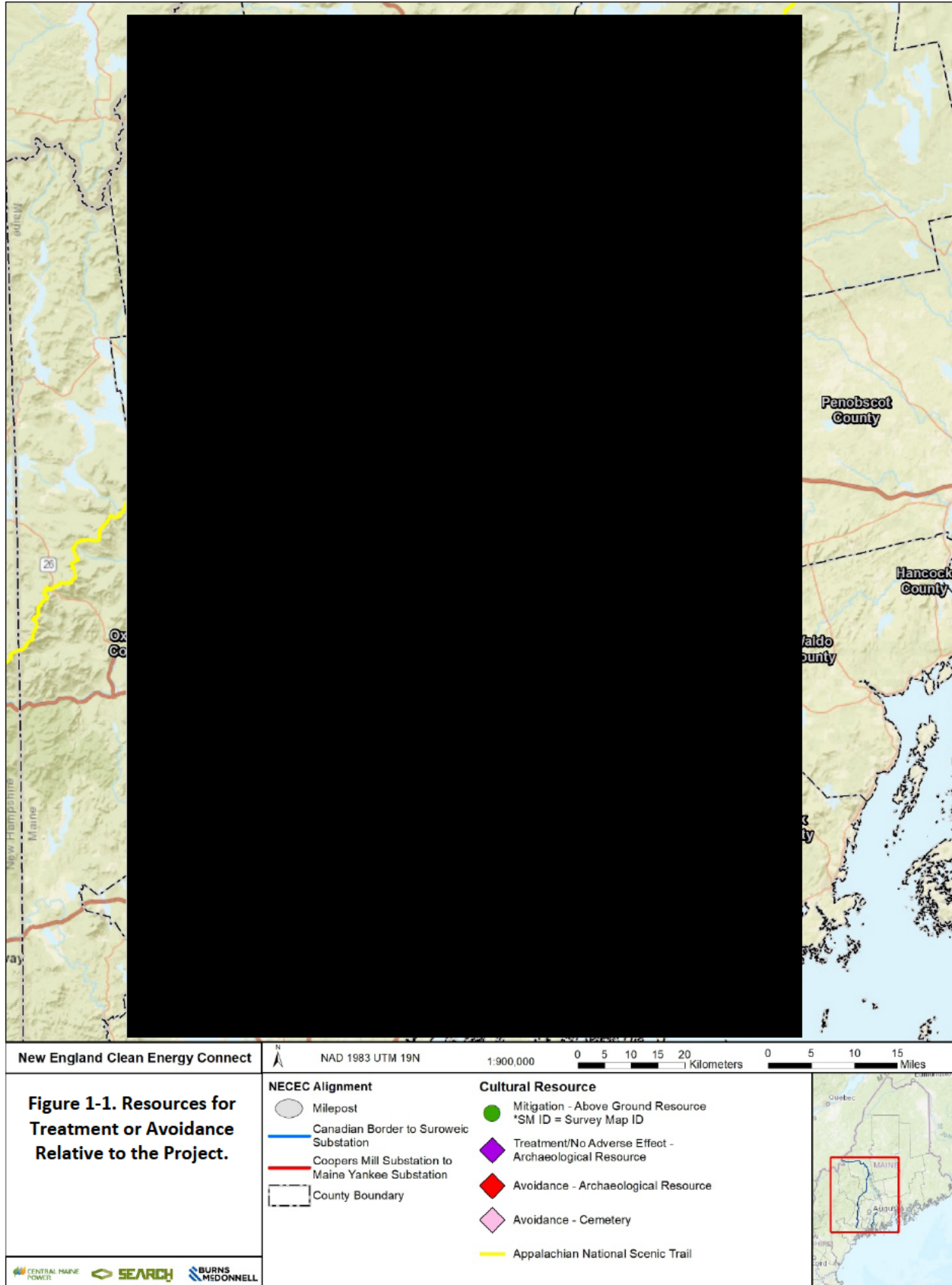
summary package detailing the Proponent’s proposed mitigation measures, determinations of eligibility and finding of effects by the USACE on March 26, 2020, a March 2020 teleconference, and circulation of the draft avoidance, treatment, and mitigation measures contained herein as a condition of the draft Memorandum of Agreement.

Table 1-1. NECEC Cultural Resources Consultation Summary

Citation	Summary	MHPC Concurrence	USACE Determinations and Findings
Freedman et al. 2017	Desktop assessment and scope-of-work for archaeological and above ground reconnaissance surveys.	9/11/17	3/11/20
Clement et al. 2018a	Archaeological reconnaissance survey results and scope-of-work for Phase I subsurface investigations. Submitted in four addenda.	6/22/2018; 8/8/2018; 8/9/2018; 8/9/2018	
Dunham et al. 2018a	Above ground identification survey results with NRHP evaluation and finding of effects recommendations.	1/18/19	
Dunham et al. 2018b	Addendum: Above ground identification survey results with NRHP evaluation and finding of effects recommendations.	1/18/19	
Clement et al. 2018b	Phase I survey results, avoidance plans, and treatment plans for archaeological sites.	2/11/19	
Freedman 2019	Letter in response to request for additional information on above ground resources from MHPC.	3/26/19	
Jay Clement, May 15 2019 letter	May 15, 2019, USACE letter initiating Section 106 consultation.	N/A	N/A
Clement 2019	Archaeological and above ground identification survey results for the Merrill Road Converter Station.	6/12/19	3/11/20
Teleconference	June 15, 2019 consulting party teleconference.	N/A	N/A
Mack 2019	Archaeological and above ground identification survey results for the Merrill Strip Alternative direct APE.	9/26/19	3/11/20
SEARCH 2019	October 28, 2019, Section 106 mitigation summary packet.	N/A	N/A
Kirk Mohny, March 18, 2020 letter	MHPC letter concurring with USACE determinations of eligibility and finding of effects for the Project.	3/18/20	N/A
Teleconference	March 26, 2020, consulting party teleconference.	N/A	N/A

1.1 DOCUMENT ORGANIZATION

Following this introduction, summaries of above ground historic properties are presented in Section 2, accompanied by treatment plans for these resources. Summaries of archaeological resources that will be avoided or treated to avoid adverse effects are included in Section 3, accompanied by detailed avoidance and/or treatment plans. Section 3 also includes summary information about Quinnam Cemetery, and a plan for its avoidance. Section 4 presents the implementation schedule and Section 5 presents the cited references. Attachment 1 contains Section 106 correspondence referenced in this appendix.



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2 ABOVE GROUND RESOURCES

In April and May 2018, SEARCH conducted a reconnaissance survey to identify above ground historic resources within the direct and indirect APE. In August 2018, on behalf of the proponent, SEARCH submitted to MHPC a draft *Above Ground Historic Resources Identification Survey, NRHP Evaluation, and Finding of Effects Report*, that included NRHP eligibility and effects recommendations. SEARCH submitted a revised survey report to MHPC, and an addendum report, which documented nine additional resources, in October and December 2018 respectively (Dunham et al. 2018a and 2018b).

2.1 SUMMARY OF FINDINGS

Based on these reports, MHPC concluded that the Project would adversely affect four above ground historic properties (**Table 2-1**; see **Figure 1-1**). The USACE, following MHPC recommendations, determined that these four resources (ANST, the Hilton Hill Road Rural Agricultural Historic District, the Turmel Road Barn, and the Bowman Airfield) were NRHP-eligible and that they would be adversely affected by the undertaking (Jay Clement March 10, 2020 letter; **Attachment 1**). Measures to avoid, minimize, and mitigate adverse effects were discussed during the June 15, 2019, consulting party teleconference, circulated in summary form for consideration on October 28, 2019, and discussed again during the March 26, 2020, consulting party teleconference.

Table 2-1. Summary of Above Ground Historic Resources Adversely Affected by the Project.

Property Name	Property Type/ Property Survey Map ID	MP	Address	Town	County	Period of Significance	Associated Historic Structures	Survey Map ID
Appalachian National Scenic Trail	Recreational Trail	61.0	N/A	Bald Mountain	Somerset	1920–1968	N/A	ID-66
Rural Agricultural Historic District: E. Gray Farm and B.F. Hilton Farm	Rural Agricultural Historic District	96.0, 95.9	1294 and 1195 Hilton Hill Road/Route 43	Starks	Somerset	1811–1968	Gray residence	ID-1022
							Gray garage	ID-1033
							Gray dairy barn	ID-1023
							Gray milk houses (2)	ID-1024; ID- 1029
							Gray original house	ID-1025
							Gray stable	ID-1026
							Gray barn	ID-1030
							Gray hay barn	ID-1032
							Gray chicken house	ID-1031
							Hilton farmhouse	ID-1017
							Hilton storage/dairy barn	ID-1018
							Hilton sheep barn	ID-1019
							Hilton dairy barn	ID-1016
Hilton milk house	ID-1015							
Hilton barn	ID-1014							
Turmel Road Barn	Dairy Barn	122.3	40 Turmel Road	Livermore Falls	Androscoggin	Mid- to late- nineteenth century	Barn	ID-795
Bowman Airfield	Airfield	127.2	River Road	Livermore Falls	Androscoggin	Mid-twentieth century	N/A	ID-719

2.2 TREATMENT PLANS FOR ABOVE GROUND HISTORIC RESOURCES

2.2.1 Appalachian National Scenic Trail (Survey Map ID [SM ID]-66), Bald Mountain Township

The ANST (SM ID-66) is a multistate hiking trail that was established in the 1920s and 1930s. The 454 km (282 mi) of the ANST is in Maine. The NPS is the lead federal agency for the administration of the ANST under the National Trails System Act (16 USC §§ 1241 et seq.). In 2008, NPS prepared a resource management plan and proposed that the entire ANST corridor is eligible under Criterion A for its association with early regional planning. NPS further stated that sections of the trail could also be eligible under other criteria. The segment of the ANST corridor in Maine was not evaluated for eligibility prior to the Project. The ANST was determined NRHP-eligible in the vicinity of the Project under Criterion A for its landscape design and association with hiking clubs (e.g., Appalachian Mountain Club), the conservation movement, and the Civilian Conservation Corps. The period of significance is circa 1920–1968.

Currently, the ANST (SM ID-66) crosses the direct APE three times south of Moxie Pond in Bald Mountain Township in the vicinity of milepost (MP) 61 (**Figure 2-1**). It first crosses the existing transmission line approximately 152 meters (m) (500 feet [ft]) west of Troutdale Road, then parallels and is collocated with Troutdale Road for approximately 274 m (900 ft) to the south before crossing a second time, and has a final crossing approximately 427 m (1,400 ft) east of Baker Stream. At these crossings 12, 7, and 15 existing transmission line structures are visible from the ANST, respectively, for up to 122 m (400 ft). In addition, the density and height of the vegetation to the west of the currently cleared ROW will be reduced, cumulatively causing direct and indirect impacts that will adversely affect the ANST.

Proponent is in discussion with the Appalachian Trail Conservancy (ATC) and the Maine Appalachian Trail Club (MATC) since March 2018, regarding options to minimize and mitigate adverse effects to the ANST at Moxie Pond by modifying both the ANST's alignment and the Project's design. These discussions informed the Section 106 process and anticipated a finding of adverse effect to the resource. ATC and MATC concluded that the ANST users' experience will be enhanced by modifying the location and number of crossings. As a result, Proponent will eliminate two of the three locations where the ANST crosses the ROW. The current ANST route was implemented between 1987 and 1989. The pre-1987 route likely dates to the early 1970s and replaced an earlier route that followed present-day Moxie Pond Road for approximately 3.5 km (2.2 mi). The modified trail alignment would cross the ROW only once and is in the vicinity of the route circa 1956 and 1962 as depicted on the U.S. Geological Survey (USGS) Bingham and The Forks 15-minute quadrangles (USGS 1956a, 1962).

The following measures detail treatments designed to minimize adverse effects to the ANST. Measures also address impacts to the ANST from the Bald Mountain summit area and reduction of structure heights 529-453:

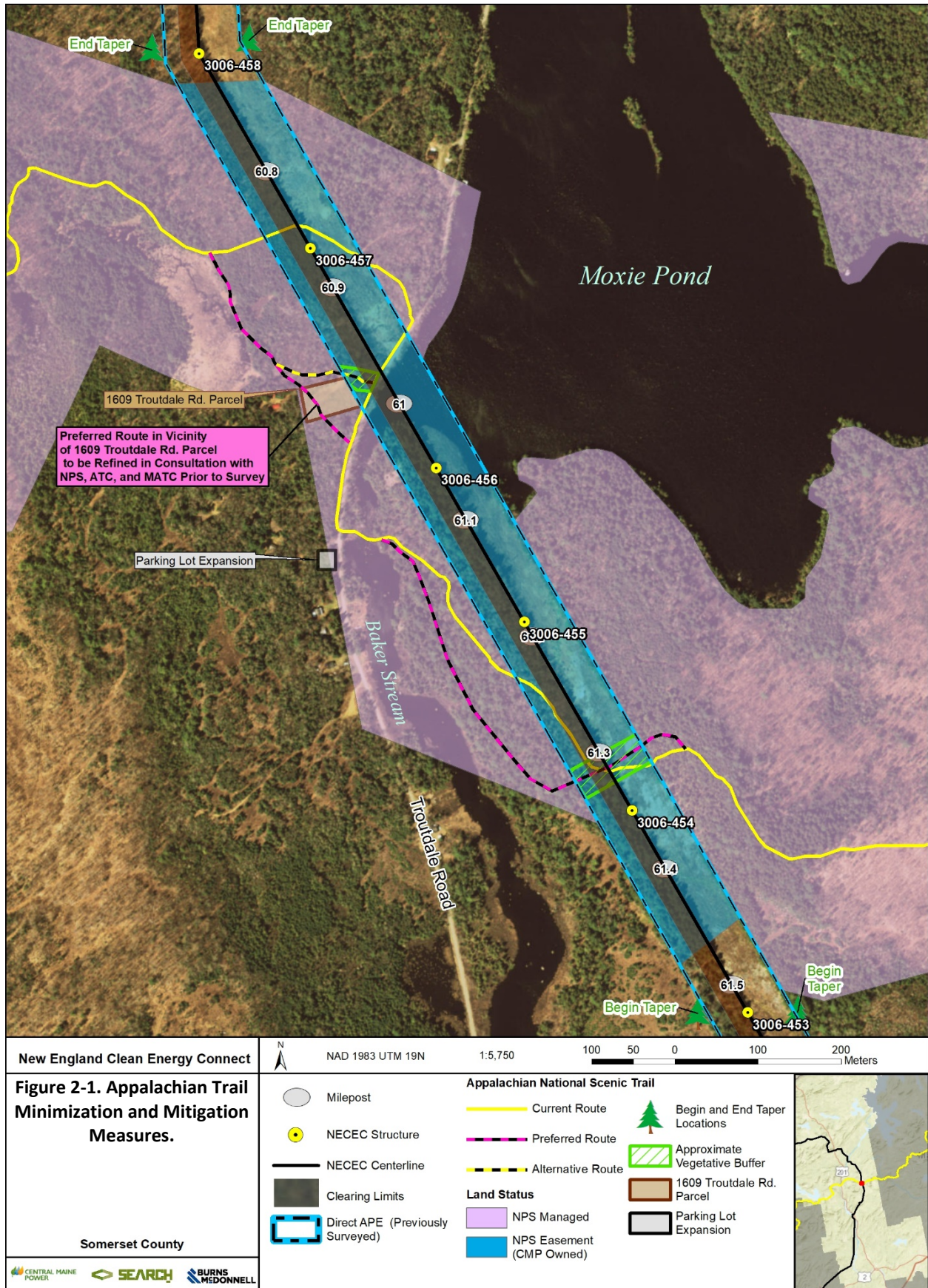
- Proponent will use non-specular conductors between structures 453 and 458 as well as within the viewshed of the ANST from the Bald Mountain summit area between structures 458 and 529.
- Proponent will reduce structure heights between structures 529 and 453, west of Moxie Pond. The structures will be reduced in height from a typical height of 30 m (100 ft) to a typical height of 23 m (75 ft) or less. Individual structure heights are indicated in Attachment 2. Final structure heights may vary based on topography and subsurface conditions encountered during installation.
- Proponent will modify its standard vegetation management practices to taper the height of vegetation (instead of clearing) on both the forested (generally southerly) side of the corridor and the currently cleared (generally northerly) side of the corridor in Section 3006 between structures 453 and 458.
- Proponent will not use herbicide treatments to control vegetation within the cleared transmission line corridor between structures 453 and 458.
- Proponent will install and maintain vegetative screens/buffers of sufficient height and density to provide visual screening between the relocated ANST and the ROW west of Troutdale Road (Alternative Route) and east of Baker Stream (Preferred Route) (**Figure 2-1**). Proponent will develop detailed planting plans and photo simulations for these areas for review and approval by the NPS. The planting areas will feature one crossing for construction and/or maintenance activities and will be maintained by the Proponent to provide effective visual screening. The vegetative screens/buffers will be installed during the planting season following Project in-service. Once the ANST is relocated to its preferred alignment, with Maine Department of Environmental Protection approval the Troutdale Road vegetative buffer will be abandoned.

The following measures detail treatments designed to mitigate adverse effects to the ANST in Section 3006 between structures 453 and 458:

- Proponent will fund the relocation of the ANST west of Troutdale Road and east of Baker Stream and will engage a trail building organization acceptable to NPS (**Figure 2-1**). The preferred relocation route of the ANST would cross a parcel, at 1609 Troutdale Road, owned by the Proponent; however, this route is not feasible because the current tenant continues to occupy the lot in accordance with their leasehold interest. Therefore, Proponent will relocate the trail, at its expense, to an alternative relocation route prior to construction of the NECEC transmission line. The proposed preferred and alternative ANST route alignments relative to the 1609 Troutdale Road parcel are shown in **Figure 2-1**. The proposed ANST routes are subject to NPS compliance review and approval.
- Proponent will, at its cost, survey the preferred and alternative routes for impacts to historic properties under Section 106.
- When the current tenant releases their interest in the 1609 Troutdale Road Parcel, Proponent will, at its cost, remove structures from this parcel.
- Proponent will, at its cost, relocate the ANST to the preferred route across the 1609 Troutdale Road Parcel when the current tenant decides to sell or abandon the site. This

parcel will then be offered for transfer to NPS or its designee at no cost. If the NPS accepts the property, then Proponent must meet all NPS requirements for land transfer, at its cost.

- Proponent will, at its cost and in consultation with NPS, improve the existing two-vehicle parking area on the west side of Troutdale Road (**Figure 2-1**) to accommodate approximately ten vehicles (two vehicle spaces and routing are to meet the Architectural Barriers Act of 1968 [ABA] accessible requirements). Prior to beginning work, Proponent will develop and provide engineering/architectural design plans to NPS. Plans will outline proposed area of disturbance, vehicle layout, furnishings (signage, wheel-stops, fencing, curbing, etc.), construction elevations, hydrology/drainage management, vegetation/landscaping, accessibility elements, number of trees to be removed, materials list, staging site(s), rendering drawings and site mapping.
- Proponent will, at its cost and in consultation with the MHPC and NPS, survey the expanded parking lot footprint for impacts to historic properties under Section 106.



2.2.2 Rural Agricultural Historic District, Turmel Road Barn (SM ID-795), and Bowman Airfield (SM ID-719)

Three additional above ground resources will be adversely affected by the Project (see **Figure 1-1; Table 2-1**). Summaries of these resources and the accompanying detailed treatment plan are provided below.

Rural Agricultural Historic District: E. Gray Farm (SM ID-1028), 1294 Hilton Hill Road/Route 43, Starks, and B.F. Hilton Farm (SM ID-1020), 1195 Hilton Hill Road/Route 43, Starks

The rural agricultural historic district is composed of the E. Gray Farm (SM ID-1028) at 1294 Hilton Hill Road/Route 43 in Starks and the B.F. Hilton Farm (SM ID-1020) at 1195 Hilton Hill Road/Route 43 in the Town of Starks. The E. Gray Farm is eligible for listing in the NRHP under Criterion A for Agriculture/Farming and Settlement and Criterion C for Architecture. Positioned on the west side of Starks Road, the farmstead consists of 12 separate structures, including a primary residence (SM ID-1022), a garage (SM ID-1033), a dairy barn and two milk houses (SM ID-1023, SM ID-1024 and 1029), a shed (SM ID-1027), the original house (SM ID-1025), a stable (SM ID-1026), a barn (SM ID-1030), a hay barn (SM ID-1032), a chicken house (SM ID-1031), and a modern chicken coop.

The B. F. Hilton Farm (SM ID-1020), at 1195 Hilton Hill Road/Route 43 in the Town of Starks, is eligible for listing in the NRHP under Criterion A for Agriculture and Settlement and Criterion C for Architecture as an intact local example of a connected mid-nineteenth-century New England farm. Positioned on the east and west sides of Hilton Hill Road, the current property configuration includes a Greek Revival connected farmhouse (SM ID-1017), a storage/dairy barn (SM ID-1018), a small sheep barn (SM ID-1019), a dairy barn (SM ID-1016), a circa 1930s milk house (SM ID-1015), and an additional barn (SM ID-1014).

The E. Gray Farm and the B.F. Hilton Farms comprise a potential rural agricultural historic district that is locally significant. Both farmsteads are intact and retain their historic agricultural landscape setting and function to represent the mid-to-late nineteenth century agricultural development in Somerset County, Maine. The farmsteads retain high integrity of location, design, setting, feeling, and association and overall retain sufficient integrity to convey their significance for agriculture under Criterion A and architecture under Criterion C. The proposed period of significance is circa 1811–1968. The proposed district's boundary is composed of the entire parcels of each farmstead, to include all associated buildings and both agricultural and forested lands therein.

The existing transmission line bisects the district near MP 96, where it enters on the east side of Hilton Hill Road, crossing Hilton Hill Road approximately 64 m (210 ft) south of the E. Gray Farm and 1,800 feet north of B.F. Hilton Farm. A transfer station and access road are on the west side of Hilton Hill Road. Within the rural agricultural historic district the Project is clearly visible. The Project will have an adverse effect on the district as it bisects the district between the two farmsteads. Improvements to the corridor will include clearing a 23 m (75 ft) wide path within the existing ROW for a new transmission line with proposed 30 m (100 ft) tall structures

adjacent to the existing 14 m (45 ft) tall structures. This district was identified by MHPC during its review of SEARCH's survey results and is treated as a historic property for the purposes of Section 106 consultation.

Turmel Road Barn (SM ID-795), Livermore Falls

The barn at 40 Turmel Road (SM ID-795) is in the Town of Livermore Falls and was determined eligible for listing in the NRHP by the MHPC in November 2009 (MCHP #249-0033a) under Criteria A: Agriculture/Farming; and C: Architecture. Constructed in the vernacular tradition, the New England dairy barn is a typical example of mid- to late-nineteenth century agricultural construction that contributes to the setting, feeling, and association of mid- to late-nineteenth century New England agricultural development.

Although the barn is within the indirect APE and faces away from the Project, it is 24 m (80 ft) west of the direct APE and approximately 40 m (130 ft) from one of the existing transmission lines near MP 122.3. No trees or topography shield the structure from the visual impacts of the existing transmission line or the proposed Project. Although existing transmission lines are present, they are the same height as the surrounding trees and not visually intrusive. The Project includes the addition of a new line with 30 m (100 ft) tall structures and the height difference will adversely affect the setting, feeling, and association of the barn.

Bowman Airfield (SM ID-719), River Road, Livermore Falls

Bowman Airfield (SM ID-719), situated along River Road in the Town of Livermore Falls, was determined eligible for listing in the NRHP by the MHPC in June 2009 (MCHP #249-0031) under Criterion A for Transportation. The airfield consists of a one-story hangar constructed in the vernacular tradition. The hangar was constructed in the 1960s and was moved from the northern end of the runway following the construction of additional modern hangars in the 1990s. The resource is a typical example of mid-twentieth-century rural airstrip and complex that retains its rural setting.

Although the structures on the airfield are in the indirect APE, the direct APE and existing transmission lines currently pass immediately west of the airfield along the western property line near MP 127.2. A clear view of the existing transmission corridor is along a 152 m (500 ft) portion of the western border before it becomes buffered by a wooded area. The proposed Project includes the addition of a new transmission line with 30 m (100 ft) tall structures adjacent and to the west of the existing lines, which requires clearing a 23 m (75 ft) wide buffer within the existing ROW. The Project will be at least partially visible while looking south from within the airfield or from the associated buildings. The Project will introduce a new visual element west of the airfield that will adversely impact the property's historic integrity of setting and feeling.

Treatment Plans for Other Above Ground Historic Resources

Through discussions with MHPC, on various mitigation alternatives, MHPC suggested conducting additional reconnaissance-level survey in towns or areas that have not been fully surveyed, such as the Town of Livermore Falls and/or Starks, as a preferred mitigation. Although not directly related to the affected resources, this option provides an opportunity to supplement existing survey coverage in the towns these affected resources are located in and provide a fuller picture of the historic resources within one or both localities. The survey data will provide a broader public benefit to the towns and the state by informing preservation planning aims.

The following measures detail the reconnaissance-level survey that will be conducted to mitigate adverse effects to the Rural Agricultural Historic District (SM-ID 1028 and SM ID-1020, Turmel Road Barn (SM ID-795), and Bowman Airfield (SM ID-719):

- Proponent will conduct reconnaissance survey within a portion of the Town of Livermore Falls selected in consultation with MHPC. This area is depicted in **Figure 2-2**.
- Streets comprising the survey area include the following:
 - Baldwin Street
 - Bemis Street
 - Cargill Street
 - Central Street
 - Church Street
 - Depot Street
 - Free Street
 - Gagnon Street
 - Gordon Street
 - Green Street
 - Hidden Avenue
 - High Street
 - Horan Street
 - Knapp Street
 - Latham Terrace
 - Monroe Street
 - Millet Street
 - Otis Street
 - Pleasant Street
 - Prospect Street
 - Reynolds Street
 - Richardson Street
 - School Street
 - Searles Street
 - Sturtevant Place

- Union Street
- Vine Street
- Wheeler Street
- The survey coverage will include a minimum of 200 resources. MHPC will be consulted if the survey exceeds 250 resources.
- Level of effort required under this treatment plan will be between 1400 and 1600 hours.
- Previously identified resources will not be resurveyed.
- Proponent will identify a consultant who meets the professional qualifications for architecture history (architectural historian) presented in the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (Federal Register V. 48 N. 190 Part IV p. 44738–44739, September 30, 1983). This professional will also appear on MHPC's approved lists of architectural and Cultural and Architectural Resource Management Archive (CARMA) trained consultants.
- The architectural historian will conduct the survey according to MHPC standards set by the *Above Ground Resources Survey Manual*.
- Resources identified during the reconnaissance survey will be entered into the CARMA database by the architectural historian following the MHPC guidelines. The CARMA forms will be submitted electronically to MHPC for review upon completion. The architectural historian will respond to MHPC requests for corrections, photographs, completion of missing or incomplete data fields, and continuation sheets. Once MHPC provides electronic approval, the architectural historian will print hard copies of the survey forms for submission with the Reconnaissance Survey Report. Hard copy forms and photographs will be printed according to MHPC guidelines. A sample of the photographs printed directly onto the forms will be submitted to MHPC for approval prior to commercially printing the survey forms.
- The architectural historian will prepare and submit the draft reconnaissance report according to MHPC guidelines. The draft reconnaissance report, associated maps, and survey matrix will be submitted to MHPC for initial review. Upon approval, the architectural historian will submit to MHPC in hard copy:
 - survey forms with attached photographs;
 - photographs (attached to forms);
 - topographic maps; supplementary maps as needed;
 - image index;
 - CD with digital images;
 - survey report; and
 - survey matrix.



New England Clean Energy Connect  NAD 1983 UTM 19N 1:6,000  Meters

Figure 2-2. Survey Area in Town of Livermore Falls.

 Survey Areas



Androscoggin County



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3 ARCHAEOLOGICAL RESOURCES AND QUINNAM CEMETERY

In 2018 and 2019, SEARCH and TRC conducted Phase I archaeological survey for the Project. The direct APE consisted of the entire ROW width or facility footprint where ground-disturbing activities could take place. The Phase I archaeological survey utilized a tiered approach to identify archaeological sites within the Project APE. The tiered approach included a desktop review of the Project APE to identify archaeologically sensitive areas (SAs) within the Project based on environmental variables; a reconnaissance survey to identify the areal extent of sensitivity within each broadly defined SA based on the observed presence/absence of environmental variables, and to locate and document portions of each SA that would require subsurface archaeological testing; and a Phase I survey during which subsurface archaeological testing was undertaken. Archaeological resources identified are reported in *New England Clean Energy Connect Phase I Archaeological Survey, Androscoggin, Cumberland, Franklin, Lincoln, Sagadahoc, Somerset, and Kennebec Counties, Maine* (Clement et al. 2018a). Additional Phase I survey (Mack 2019) was undertaken; however, no resources were identified during this survey (see **Table 2-1**).

3.1 SUMMARY OF FINDINGS

Phase I archaeological survey identified 47 new resources, including 29 sites and 18 isolated finds. Fourteen newly identified archaeological sites required either avoidance or treatment because their NRHP eligibility status is undetermined. Phase I archaeological survey also identified one historic cemetery (Quinnam Cemetery). The historic cemetery is protected under Maine law and will be avoided. Sixteen previously recorded sites were not subjected to field investigation due to previous surveys that meet current standards and provided sufficient data for Section 106 consultation. Of these, one is recommended for avoidance because it is a historic property and one is recommended for avoidance because it has undetermined NRHP eligibility. **Table 3-1** summarizes the 16 archaeological sites and one cemetery recommended for avoidance by the Project from north to south from the Canadian Border to Surowiec Substation and then from the Coopers Mills to Maine Yankee substations; their locations relative to the Project are indicated in **Figure 1-1**.

The Proponent recommended, MHPC concurred, and USACE has determined that the avoidance and treatment measures detailed below and in Section 3.3 will avoid or prevent adverse effects to the 17 resources listed in **Table 3-1**. Proponent has committed to implementation of the plans contained herein.

Table 3-1. Summary of Archaeological Sites and Historic Cemetery Recommended for Avoidance.

Site No.	Site Type	Period of Occupation	NRHP Eligibility Status	Treatment	Finding of Effect	Town	MP
ME 431-035			Undetermined	Fencing and monitoring	No effect—avoided		
ME 293-015			Undetermined	Fencing and monitoring	No effect—avoided		
ME 293-016			Undetermined	Travel lane and monitoring; timber mats	No adverse effect		
ME 013-003			Undetermined	Travel lane and monitoring	No adverse effect		
ME 013-002			Undetermined	Fencing and monitoring	No effect—avoided		
ME 154-009			Undetermined	Fencing and monitoring	No effect—avoided		
ME 154-012			Undetermined	Fencing and monitoring	No effect—avoided		
ME 217-003			Undetermined	Travel lane and monitoring; hand felling, reach in techniques and timber mats	No adverse effect		
ME 217-001			Undetermined	Travel lane and monitoring	No adverse effect		
ME 24-40			Not eligible; recommended for avoidance**	Fencing and monitoring	No effect—avoided		
ME 131-003			Eligible	Fencing and monitoring	No effect—avoided		
ME 358-008			Undetermined	Fencing and monitoring	No effect—avoided		
ME 484-006			Undetermined	Travel lane and work area located in disturbed portion of site; monitoring	No adverse effect		
ME 478-006			Undetermined	Travel lane and monitoring; spot excavation at pole and anchor locations	No adverse effect		
ME 478-007			Undetermined	Fencing and monitoring	No effect—avoided		
N/A	Cemetery	Nineteenth century	N/A; protected by state law*	Fencing and monitoring	No effect—avoided	Wiscasset	19.5
ME 491-057			Undetermined	Fencing and monitoring	No effect—avoided		

* Protected by Maine law under 17-A§507-A (Interference with cemetery or burial ground) and 17-A§508 (Abuse of corpse).

** MHPC indicated site would require re-evaluation if impacted.

3.2 GENERAL CONDITIONS FOR IMPLEMENTATION OF AVOIDANCE AND TREATMENT PLANS

Implementation of the site-specific avoidance and treatment plans detailed in Section 3.3 below will require that the following general conditions are fulfilled:

- The **consulting archaeologist** supervising the implementation of these avoidance and treatment plans will meet the MHPC's Standards for Archaeological Work in Maine (94-089 Chapter 812) and the professional qualifications for archaeologists presented in *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (Federal Register V. 48 N. 190 Part IV p. 44738–44739, September 30, 1983). The consulting archaeologist will designate and supervise archaeological monitors.
- A **Qualified Individual (QI)** is an individual who is certified in Erosion Control Practices by the Maine Department of Environmental Protection, who is certified by Envirocert International, Inc. as a Certified Professional In Erosion and Sediment Control, or is certified by the consulting archaeologist; and who has reviewed and is familiar with the archaeological avoidance and treatment plans.
- Proponent will clearly identify the avoided site or avoided portions of the site, within the APE, prior to and during construction and maintenance with temporary construction fencing and flagging. The fencing, flagging, and signage will be clearly recognizable by Project personnel. For the purposes of these avoidance and treatment plans, maintenance includes activities that could cause mechanical ground disturbance. Proponent will provide the QI with plan maps, GPS data, and written descriptions indicating the area(s) to avoid. The QI will verify that each site's boundary and travel lane are properly identified prior to construction or maintenance.
- The QI will be responsible for ensuring that protective fencing, flagging, and exclusion area signage are maintained, and that construction crews or equipment do not enter the resource area. Following the completion of construction activities and ROW restoration, the final condition of these resources will be documented by either a QI or an archaeological monitor.
- Proponent or its designee will notify the consulting archaeologist regarding the schedule for construction or maintenance in the vicinity of the resources listed in **Table 3-1**. An **archaeological monitor** will be present when mechanical ground-disturbance occurs within 50 m (164 ft) of these resources. The archaeological monitor will document site conditions prior to and following the monitoring activity. The archaeological monitor will have stop-work authority in order to ensure that unanticipated cultural resource discoveries in the vicinity of a site are promptly protected and investigated.
- Vehicle access inside the boundary of the sites listed in **Table 3-1** is prohibited during construction and maintenance activities, except within the travel lane or during tree clearing, as specified.
- Proponent will contact the consulting archaeologist immediately if it becomes necessary to enter the boundary of these resources, or if the resources are mistakenly disturbed. Proponent will provide construction personnel with contact numbers for the consulting

archaeologist so that problems that arise may be quickly communicated and resolutions considered. Proponent or the consulting archaeologist will notify USACE and MHPC, should such conditions arise. Proponent acknowledges that some site disturbances may require a "stop-work" order to permit the consulting archaeologist to assess the impact and develop a mitigation plan (if necessary). In addition to the archaeological monitor, the QI will have stop-work authority regarding unexpected impacts on the resources in **Table 3-1**.

- Proponent will require that tree or shrub removal during maintenance within the boundary of these resources is accomplished using techniques that conform to the methods detailed below.
- If construction plans are modified, Proponent will consult with MHPC to determine whether the site-specific avoidance and treatment plans contained herein will require amendment.

3.3 SITE-SPECIFIC AVOIDANCE AND TREATMENT PLANS

3.3.1 Site ME 431-035

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

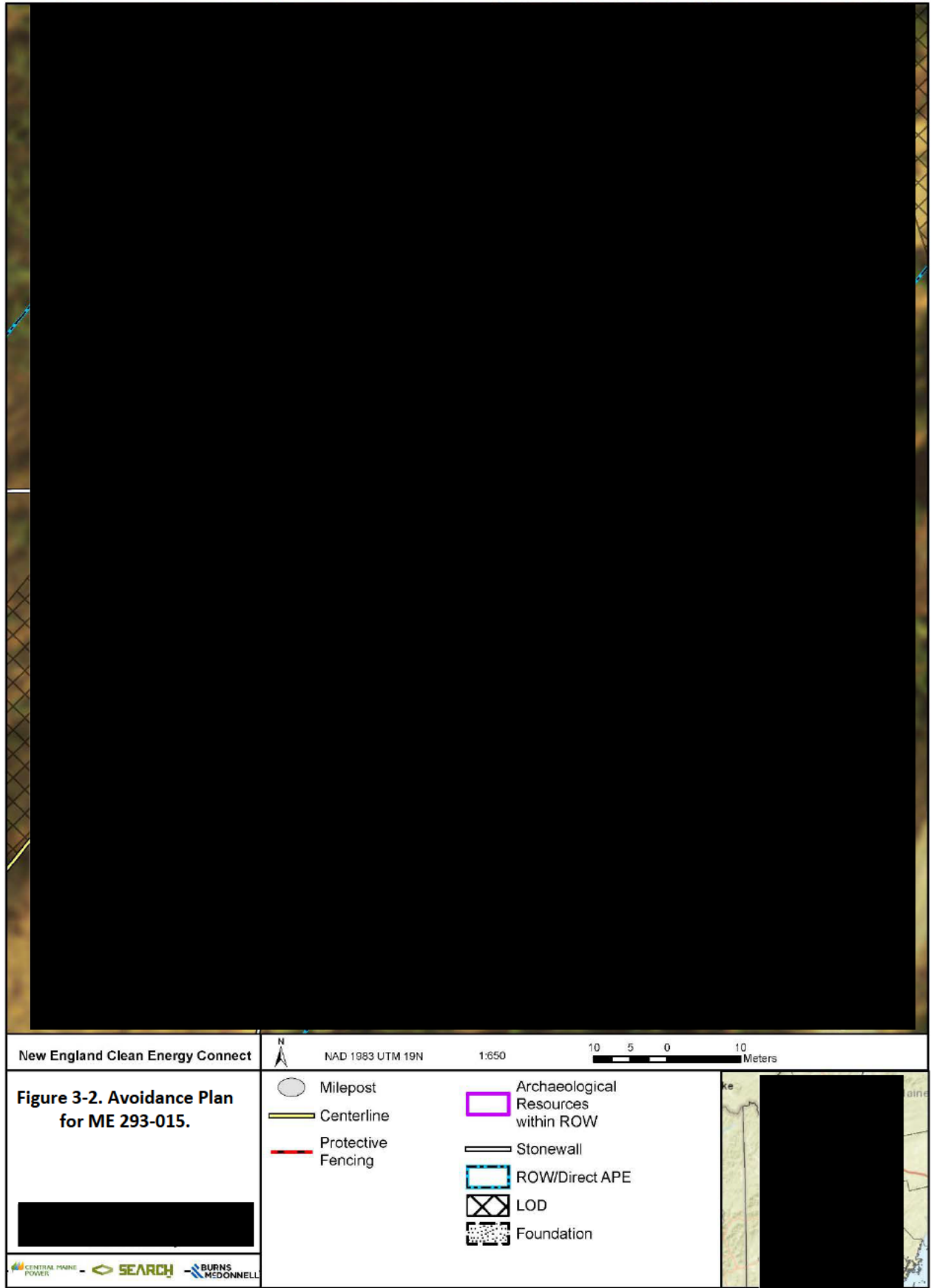


3.3.2 Site ME 293-015

[REDACTED]

[REDACTED]

[REDACTED]



3.3.3 Site ME 293-016

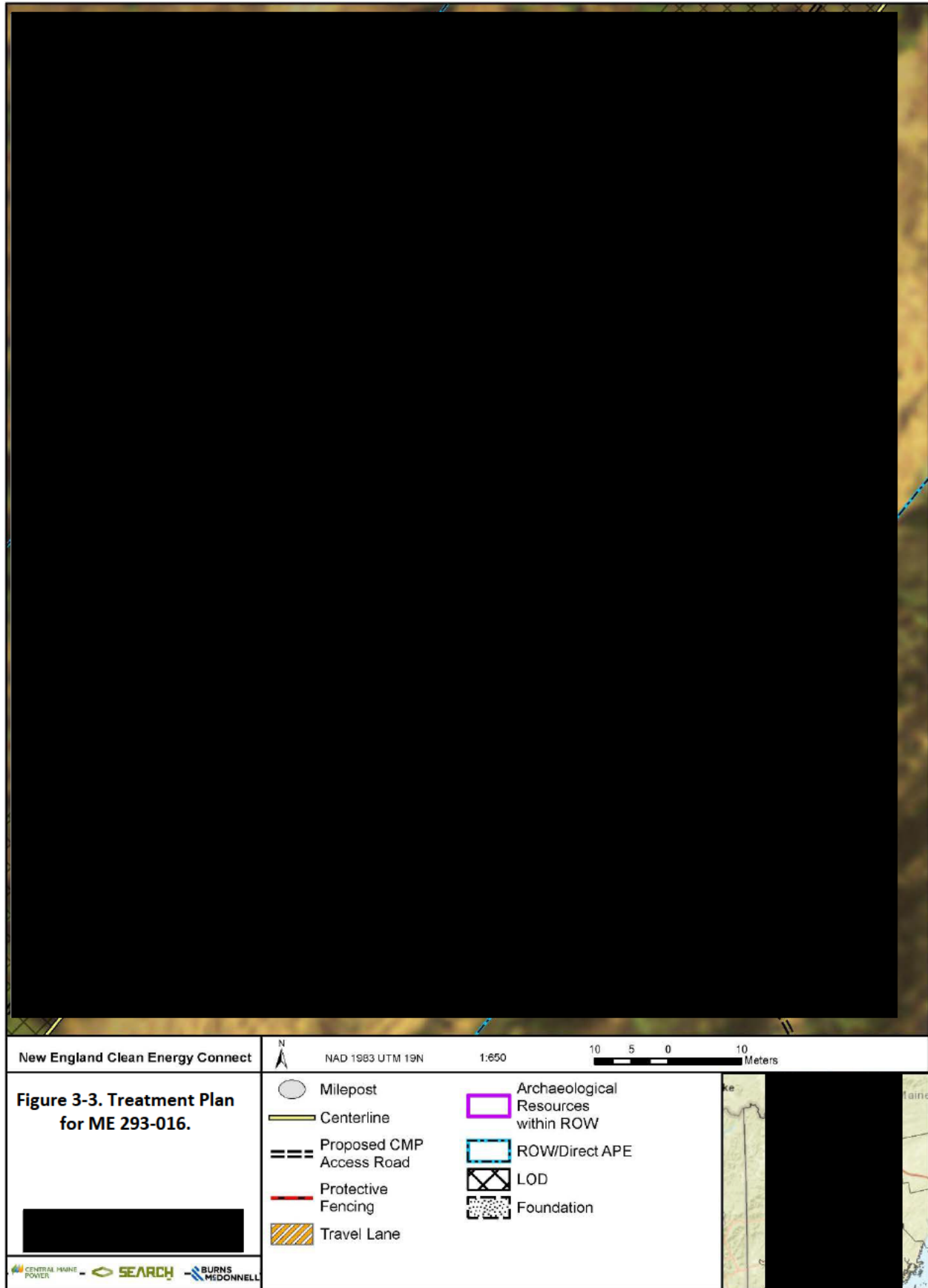
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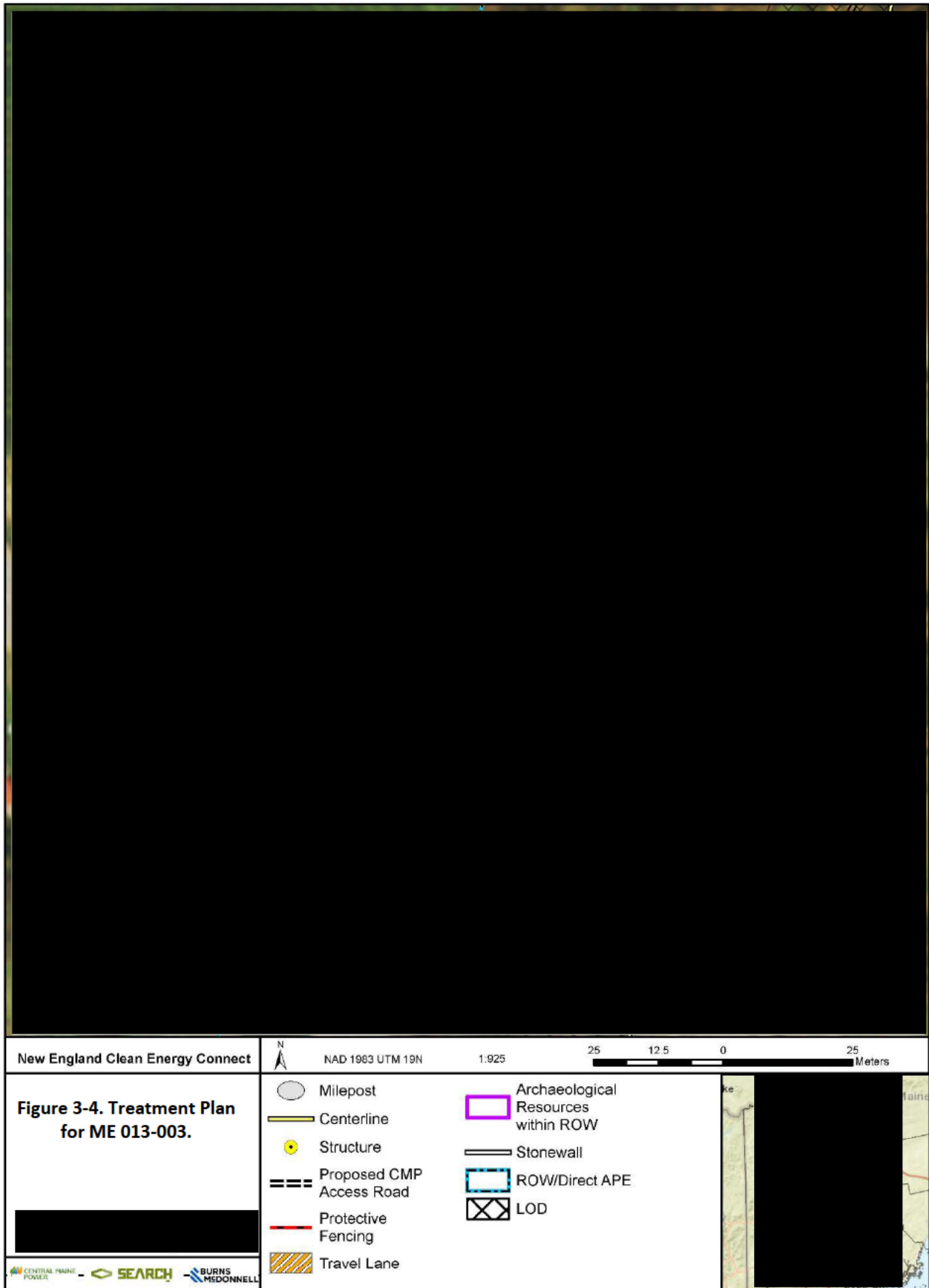


3.3.4 Site ME 013-003

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[REDACTED]

[REDACTED]

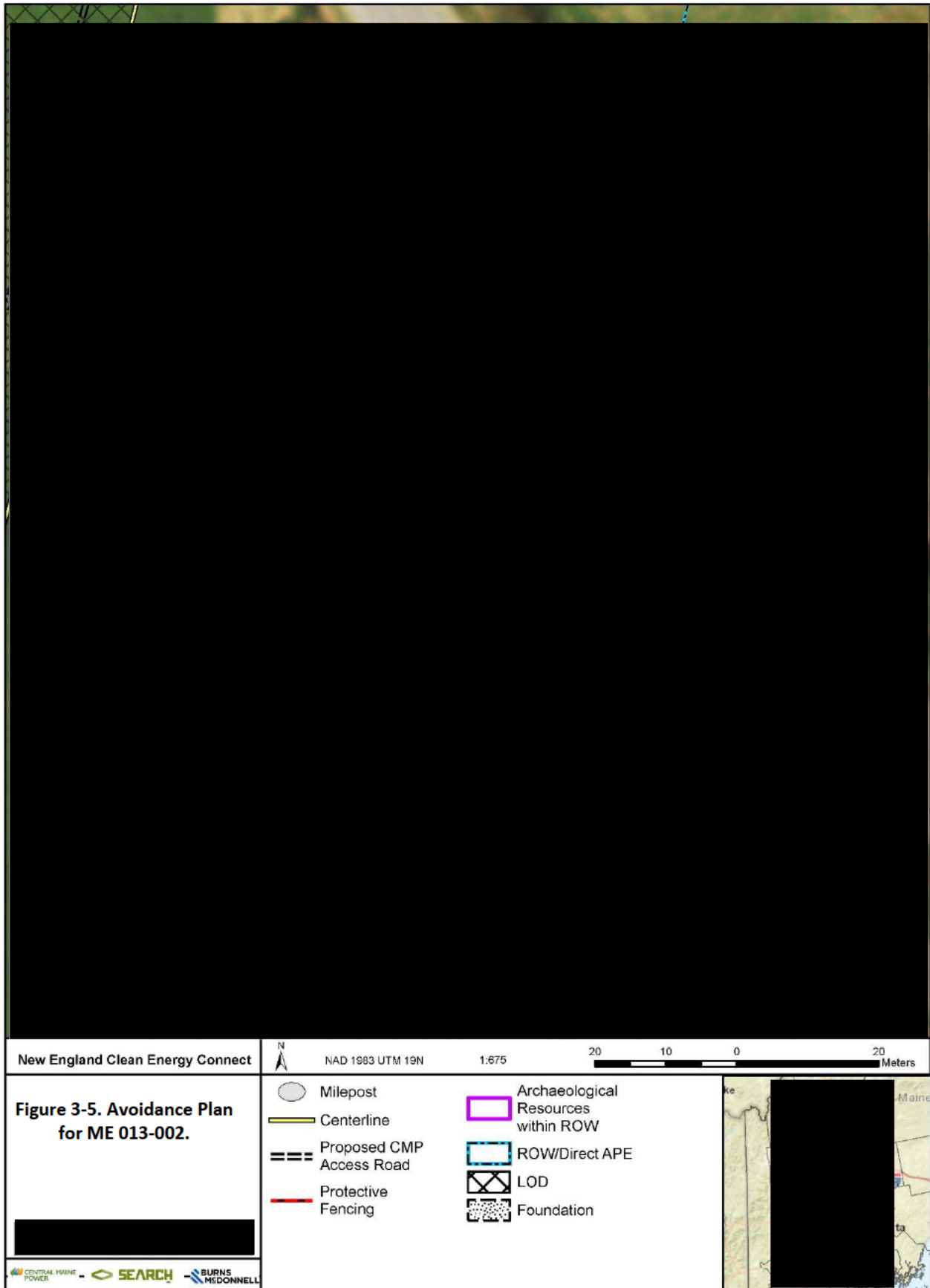


3.3.5 Site ME 013-002

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[REDACTED]

[REDACTED]

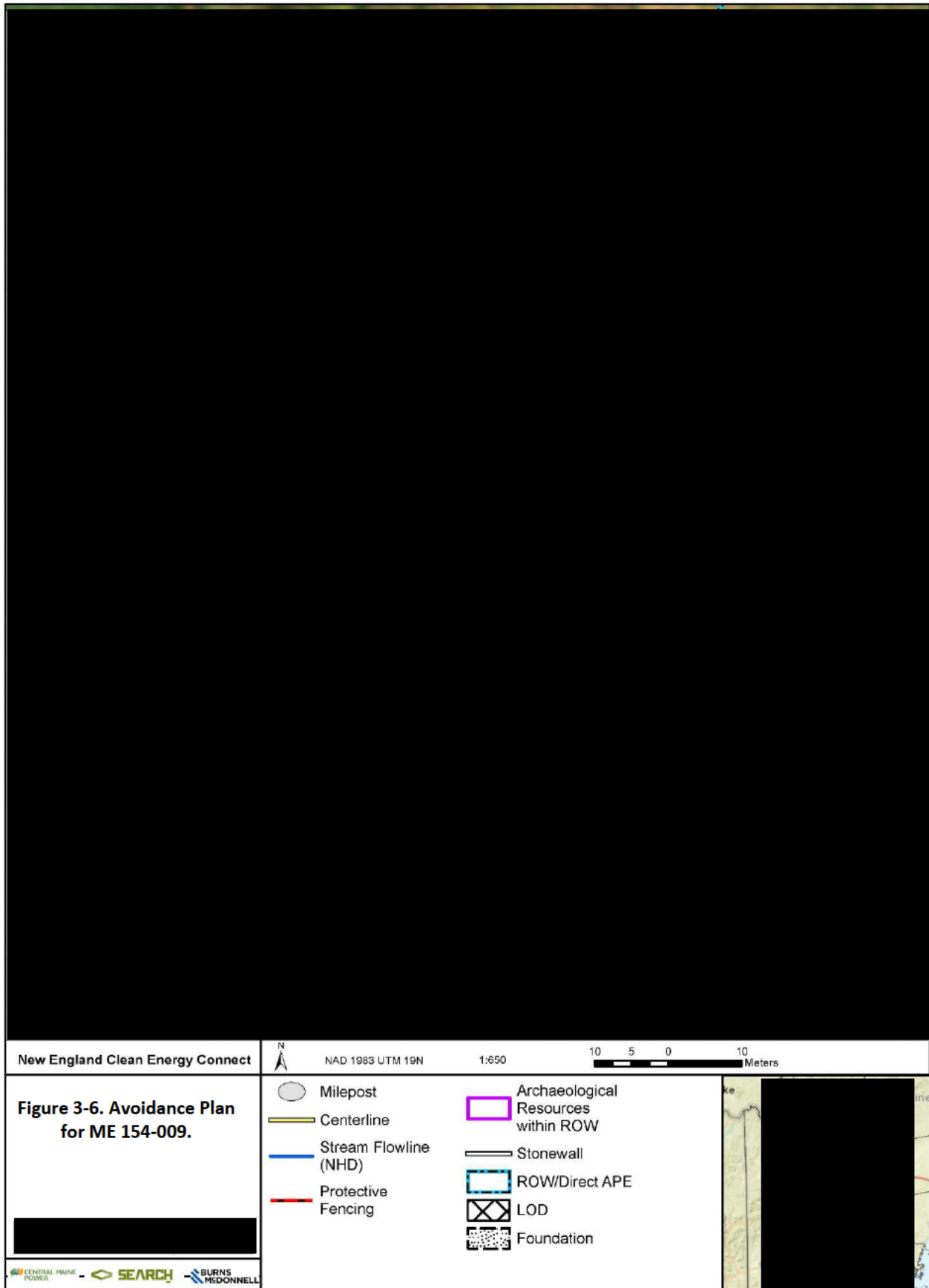


3.3.6 Site ME 154-009

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[REDACTED]

[REDACTED]

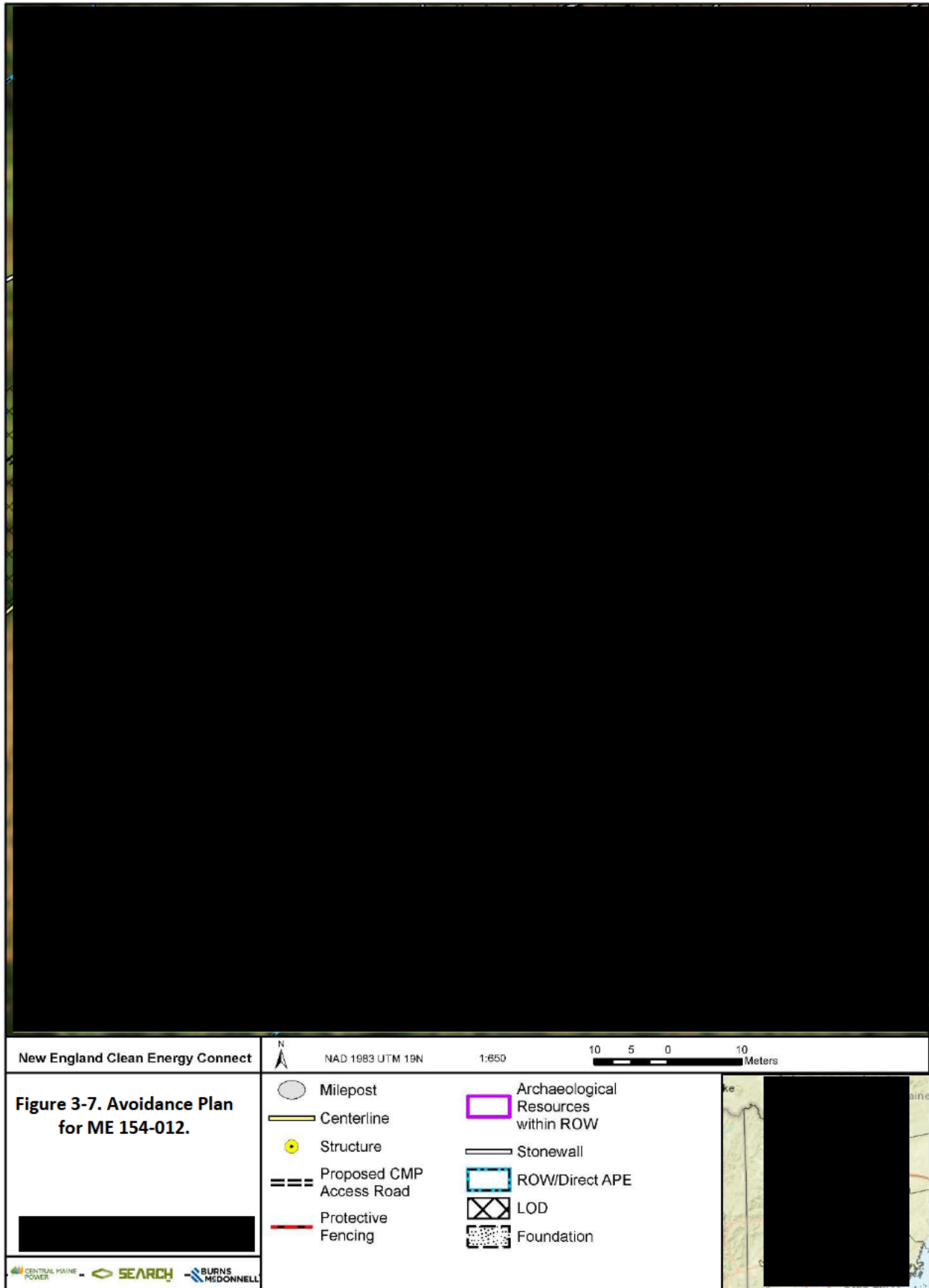


3.3.7 Site ME 154-012

[REDACTED]

[REDACTED]

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3.3.8 Site ME 217-003

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[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]



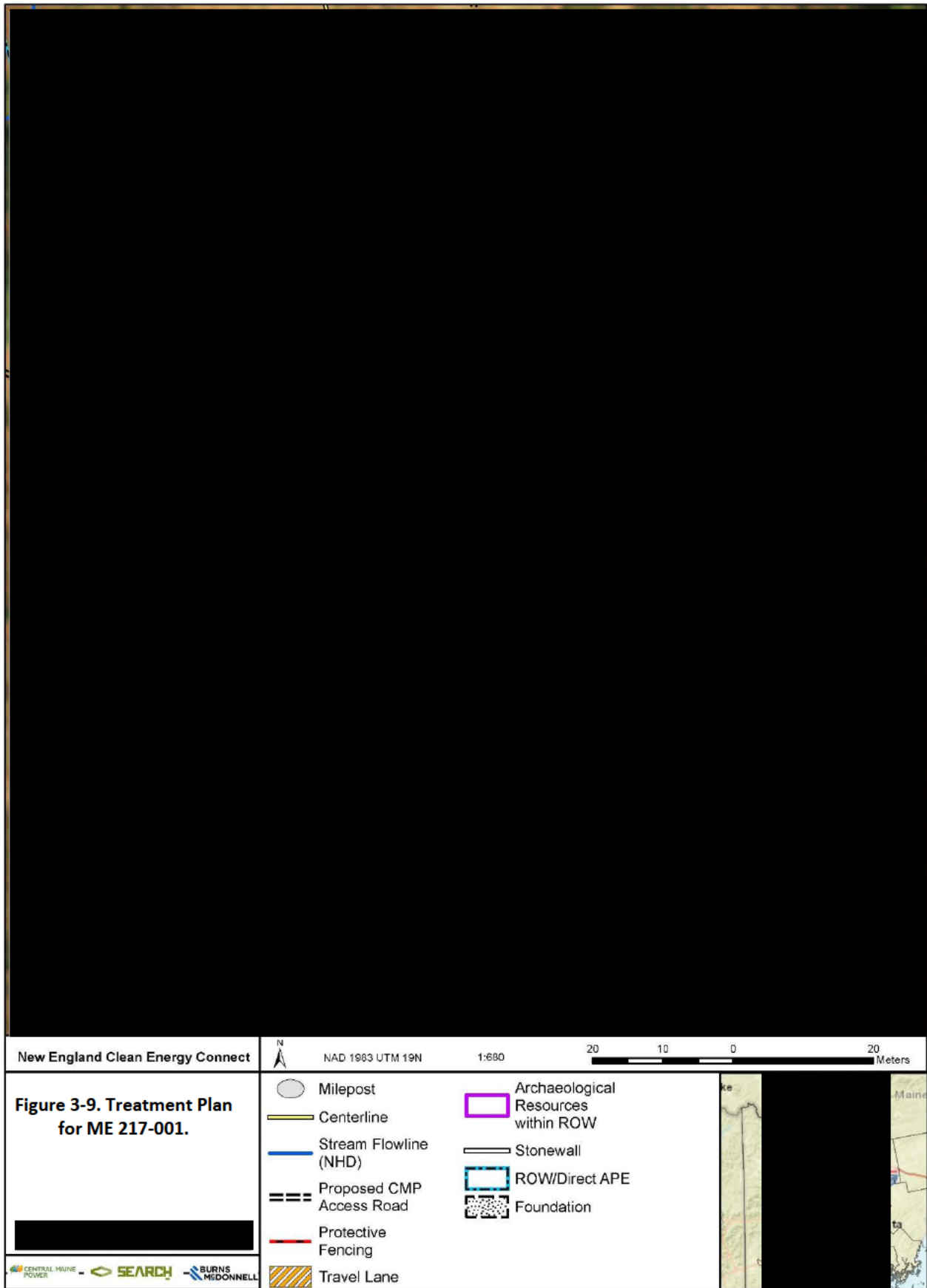
3.3.9 Site ME 217-001

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[REDACTED]

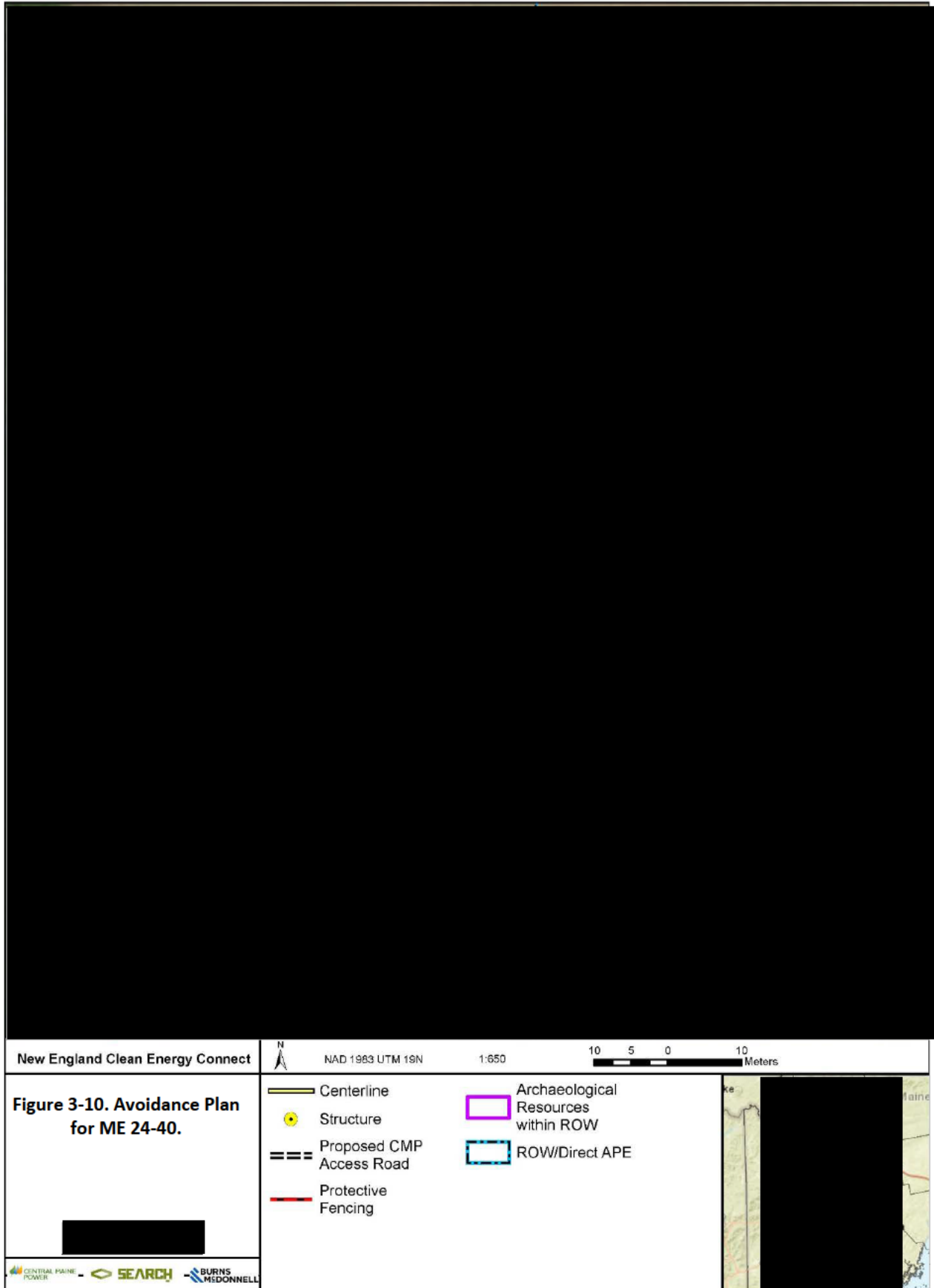


3.3.10 Site ME 24-40

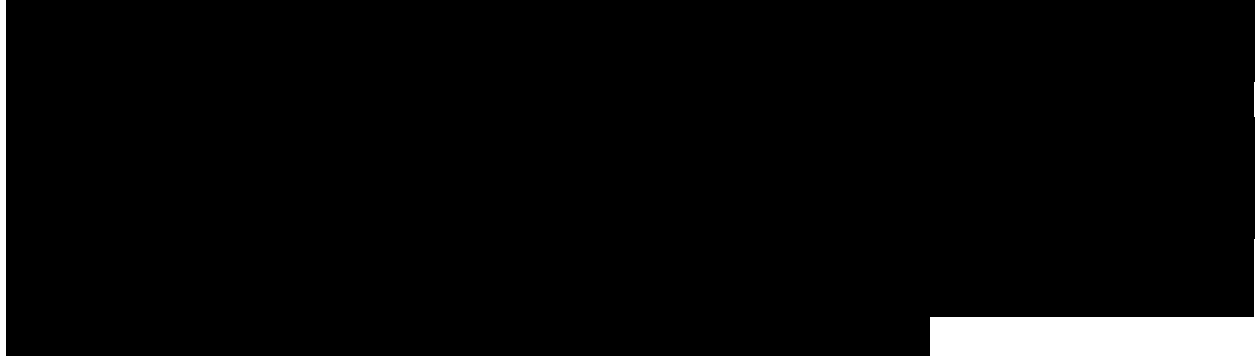
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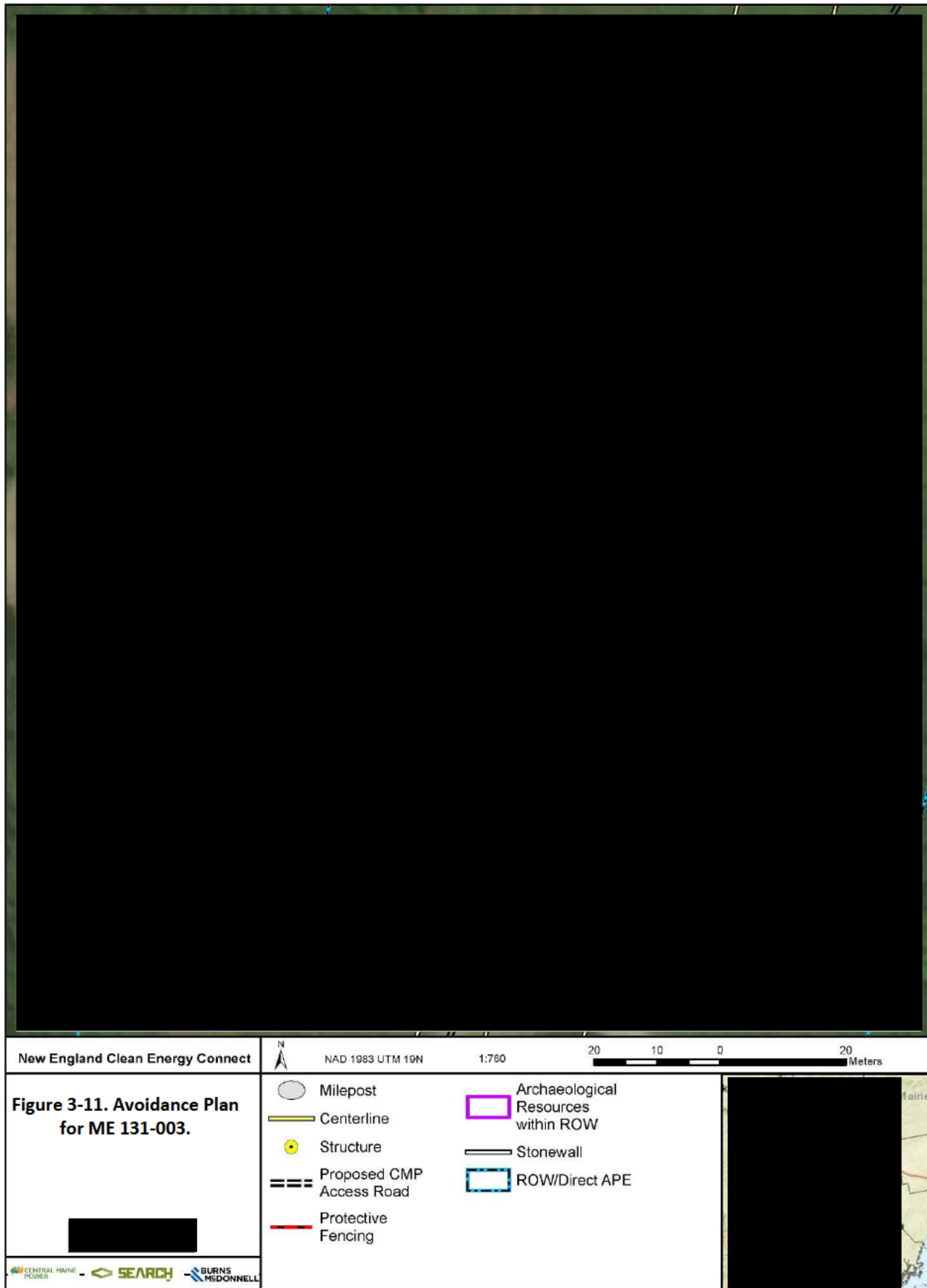
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3.3.11 Site ME 131-003



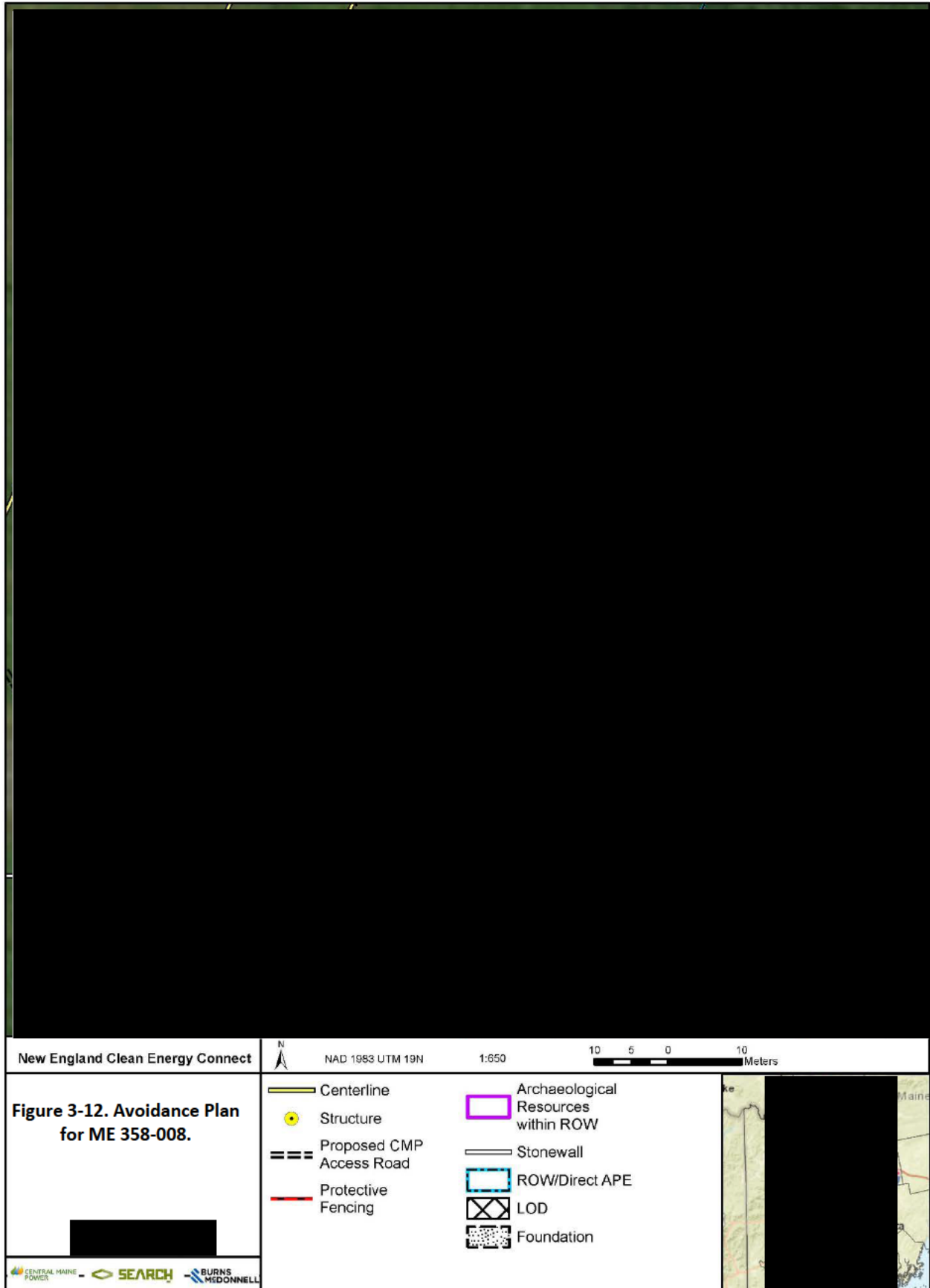


3.3.12 Site ME 358-008

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[REDACTED]

[REDACTED]



3.3.13 Site ME 484-006

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[REDACTED]

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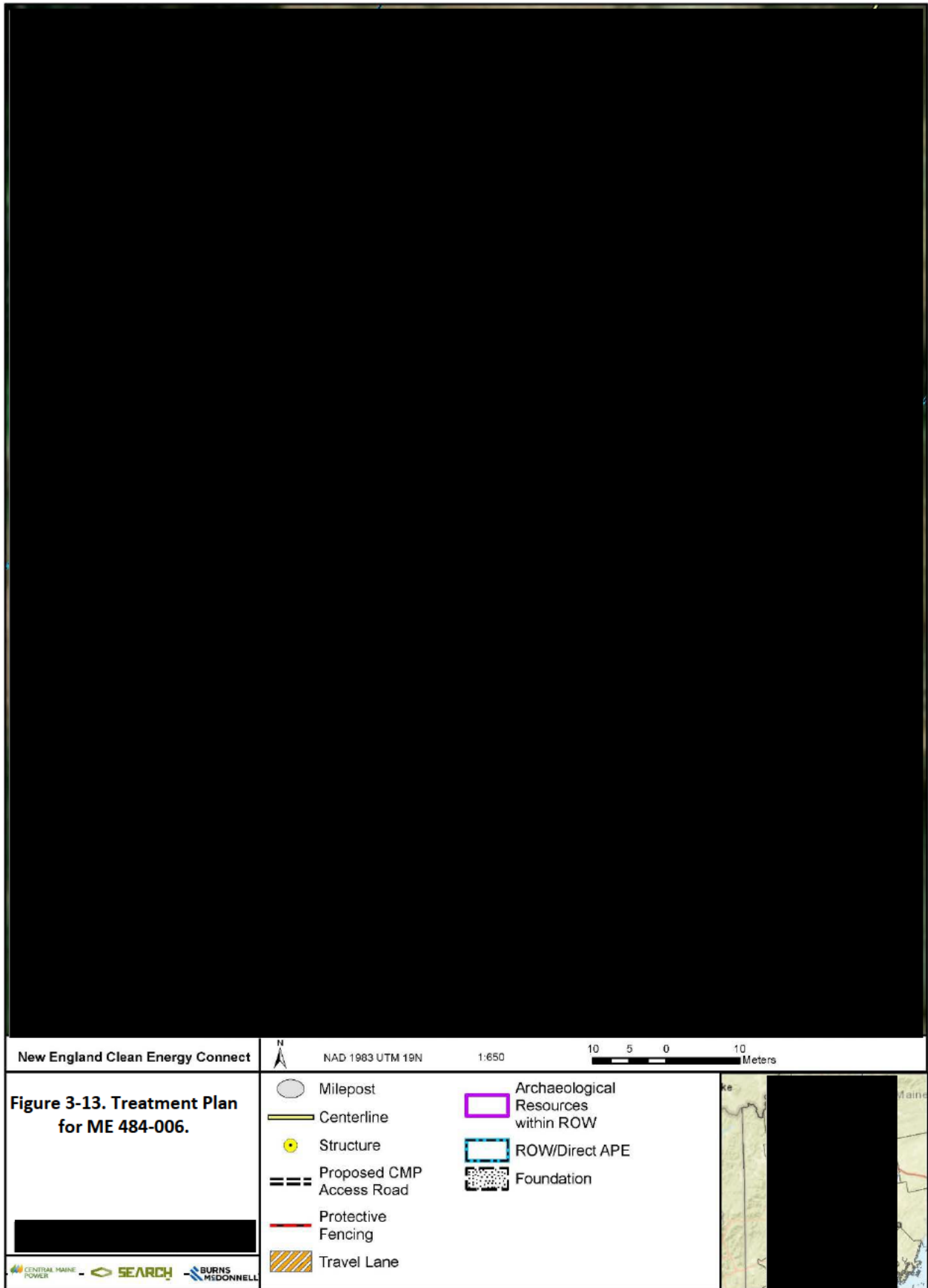
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3.3.14 Site ME 478-006

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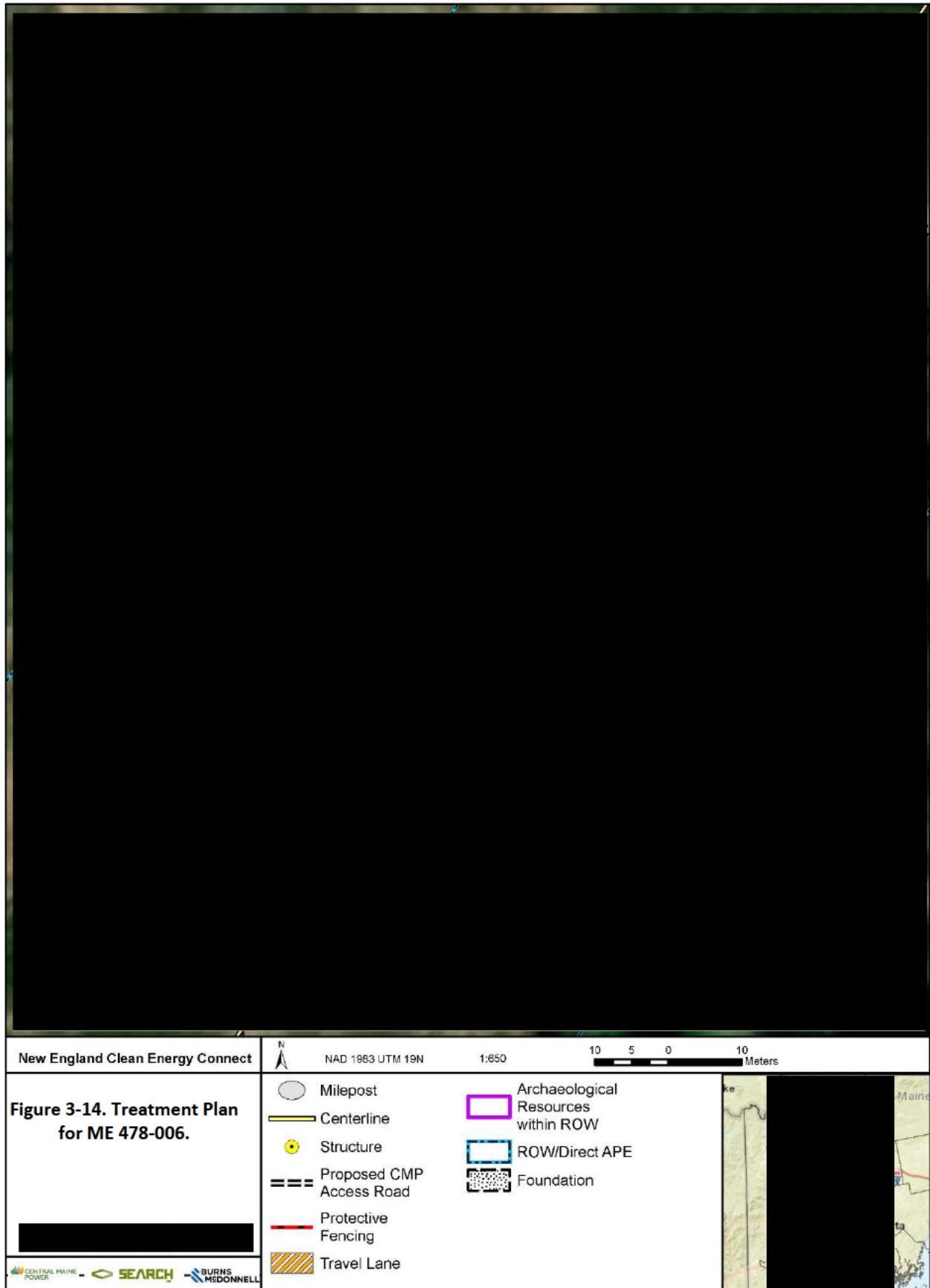
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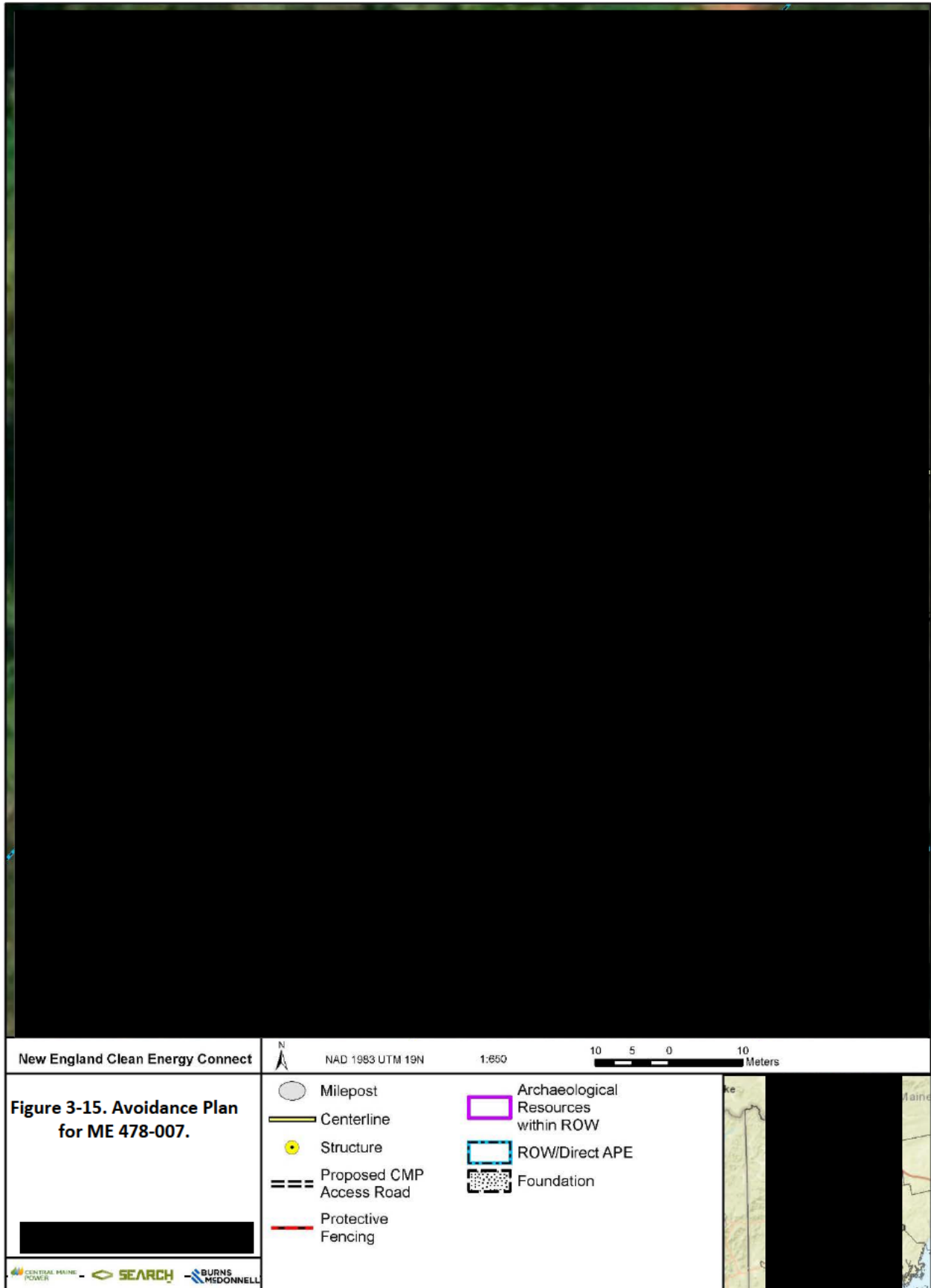


3.3.15 Site ME 478-007

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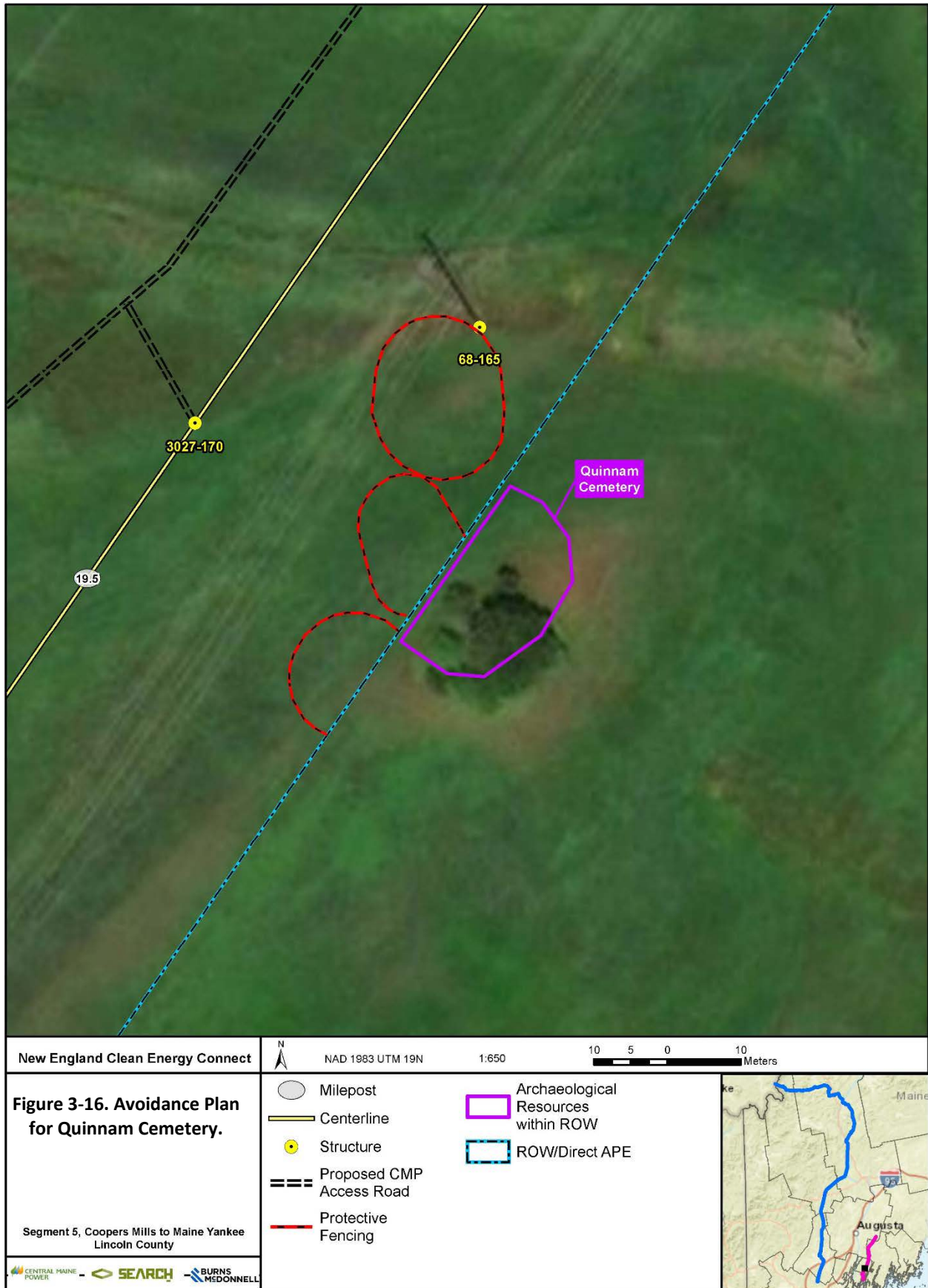


3.3.16 Quinnam Cemetery

Quinnam Cemetery is adjacent to the southeastern edge of the Project ROW at MP 19.5 in Wiscasset, Lincoln County. It is on a small, south facing bluff. Three collapsed markers are within a small stand of trees and brush and a fourth potential marker was identified at the north edge of the landform. The cemetery at present is marked by a small stand of hardwoods within an agricultural field but is unfenced. A grave marker in the cemetery is inscribed with the name John Jones and a death date of 1878. Hopkins and Smith's 1857 *A topographical map of Lincoln Co. Maine: from actual surveys* indicates a structure approximately 100 m (330 ft) northwest of the cemetery with the name John Jones (Hopkins and Smith 1857).

A ground penetrating radar survey of the Project ROW portion, immediately adjacent to the Quinnam Cemetery, identified five anomalies as potentially anthropogenic in origin. Four anomalies are discrete breaks in stratigraphy approximately ranging in size from 1 x 1.5 m to 1 x 2.5 m (3.3 f x 4.9 ft to 3.3 x 8.2 ft). Each of these anomalies exhibits morphology consistent with individual historic shaft graves. A fifth anomaly is significantly larger—approximately 1.5 x 5 m (4.9 x 16.4 ft)—and is characterized by mixed sediment, likely gravels and cobbles, within the area otherwise dominated by stratified fines. This anomaly most likely indicates a feature related to the channel; however, its proximity to the established cemetery suggests it may be the result of larger-scale burial activity.

Anomalies associated with Quinnam Cemetery fall within the Project's direct APE; however, they are outside the Project's LOD and will not be impacted during construction. Proponent will prohibit tree and shrub removal or clearing within the boundary of Quinnam Cemetery. **Figure 3-16** presents the avoidance plan for Quinnam Cemetery.

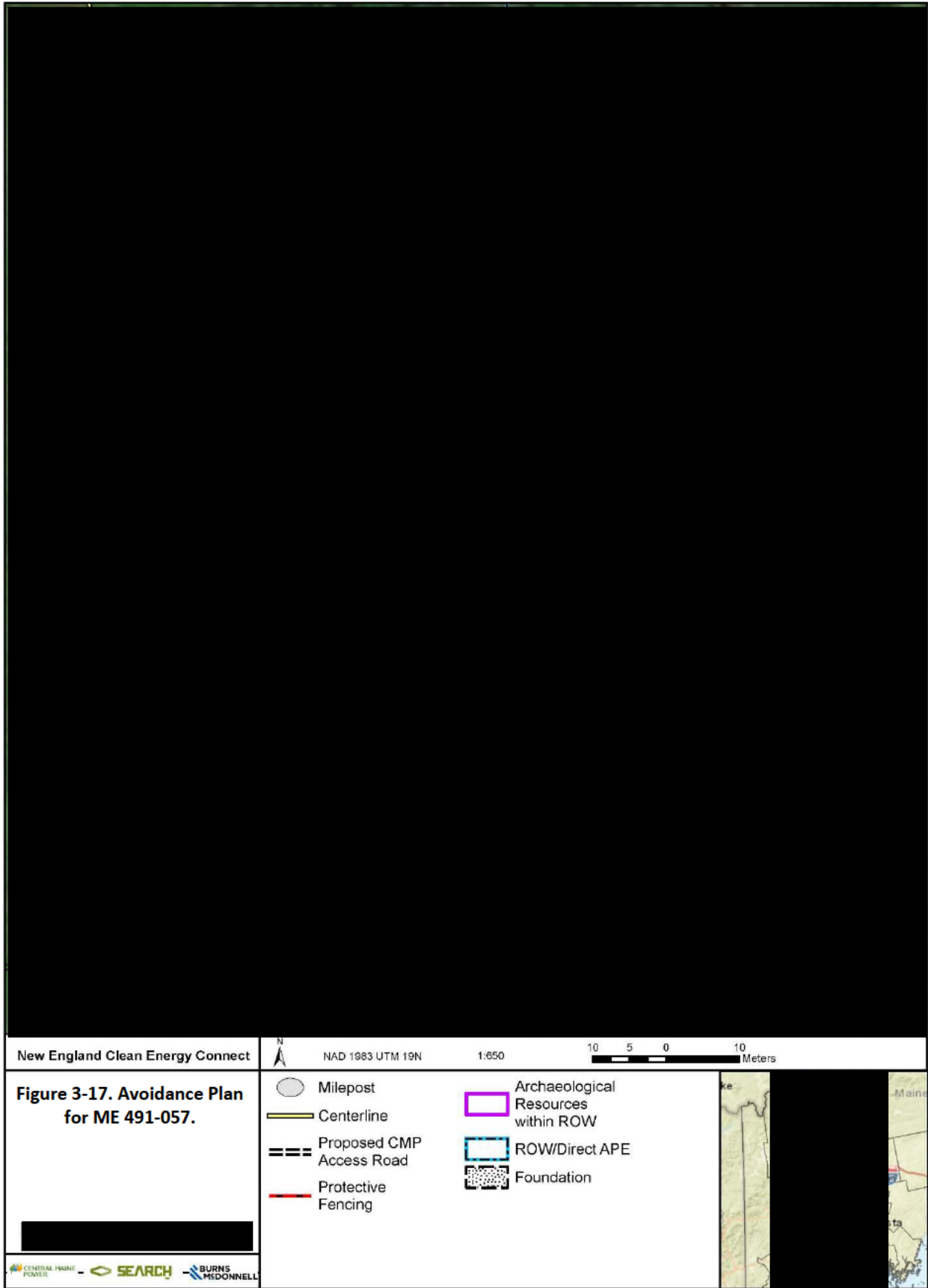


3.3.17 Site ME 491-057

[REDACTED]

[REDACTED]

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4 IMPLEMENTATION SCHEDULE

The Proponent will secure necessary consultants and provide them notice to proceed (NTP) following issuance of federal permits. Specific tasks identified herein will follow the schedule as outlined in **Table 4-1**.

Table 4-1. Avoidance and Treatment Plan Implementation Schedule.

Resource	Task	Start	End
ANST	Non-specular conductors between structures 453 and 529	During construction	Construction completion
	Reduced structure heights west of Moxie Pond	During construction	Construction completion
	Taper vegetation between structures 453 and 458	Initial clearing	Completion of initial clearing and during vegetation maintenance
	ANST relocation to Alternative Route	Following federal permit issuance, completion of cultural and natural resource surveys and permitting and/or mitigation of any impacts to cultural or natural resources	To be determined based on results of cultural and natural resource surveys and resulting route modifications (if necessary)
	Installation/maintenance of vegetative buffers	After NPS approval and by first growing season following Project in-service	N/A for Baker Stream buffer; at relocation to preferred route for Troutdale Road
	Remove structures from 1609 Troutdale Road Parcel	If/when tenant relinquished it rights, and following federal permit issuance	Upon completion of structure removal
	Relocate portion of ANST to Preferred Route across 1609 Troutdale Road parcel	If/when tenant relinquishes rights and structures are removed	Upon completion of ANST relocation
	Reasonable and good faith effort to transfer 1609 Troutdale Road parcel to NPS or its designee	If/when tenant relinquishes its rights, and following federal permit issuance	At execution of transfer documents
	Proponent improvements to ANST parking area	After NPS approval of project plans and following federal permit issuance and during trail relocation to alternate route	Project in-service date
Historic District	Above ground reconnaissance survey and reporting	Following federal permit issuance	1 year following federal permit issuance
Turmel Road Barn			
Bowman Airfield			
Archaeological Sites and Quinnam Cemetery	Installation of signage, flagging, and protective fencing	Prior to construction	Prior to construction
	Pre-construction documentation	Prior to construction	Prior to construction
	Monitoring	During construction	Upon completion of construction and stabilization of work areas in vicinity of sites
	Post-construction documentation	Project in-service	3 months following Project in-service
	Post-construction reporting	Project in-service	3–6 months following Project in-service
	Protection during maintenance	Post-construction	N/A

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ATTACHMENT 1 CORRESPONDENCE

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PAUL R. LEPAGE
GOVERNOR

MAINE HISTORIC PRESERVATION COMMISSION
55 CAPITOL STREET
65 STATE HOUSE STATION
AUGUSTA, MAINE
04333

KIRK F. MOHNEY
DIRECTOR

September 11, 2017

Mr. Jacob A. Freeman
Project Manager
SEARCH Inc
55 Melville Ave
Boston, MA 02124

Project: MHPC # 1148-17 Central Maine Power; NECEC Project (formerly QMI)
Proposed Power Line Construction and Improvements

Town: Various, ME

Dear Mr. Freeman:

In response to your recent request, we have reviewed the information received September 7, 2017 to continue consultation on the above referenced project in accordance with Section 106 of the National Historic Preservation Act, as amended.

The proposed scopes of work for architectural and archaeological surveys outlined in the *Cultural Resources Sensitivity Assessment and Scope of Work* dated September 2017 are acceptable to our office.

We look forward to continuing consultation with you. Please contact Megan M. Hopkin and Dr. Art Spiess of our office if we can be of further assistance in this matter.

Sincerely,

Kirk F. Mohney
State Historic Preservation Officer

PHONE: (207) 287-2132

FAX: (207) 287-2335

From: Spiess, Arthur <Arthur.Spiess@maine.gov>
Sent: Friday, June 22, 2018 11:34 AM
To: Jacob Freedman <jacob@searchinc.com>
Cc: Smith, Leith <Leith.Smith@maine.gov>
Subject: Clean Energy Connect archaeology

Hello Jacob:

I have read the Addendum 1 archaeology reconnaissance survey report and examined the proposed testing strategies (testpit transect locations) for the sensitive areas you have identified. The Phase I **pre-contact/prehistoric testing strategies/scope/testpit transects are approved as you have proposed them.**

The fieldwork/testing strategies/testpit transects for historic sites are an acceptable beginning, but need further addition. The document, on page 9, states that foundations (etc.) will be mapped. Good. And the straight-line testpit transects proposed near the foundations are also acceptable, and will provide some information about artifact scatter. But in addition we like to see judgmentally-placed testpits, or even 1x1 m test units, to gain more information. (This is especially true if a recommendation of "not significant" will be made after the Phase I work.) Moreover, there is an assumption of a minimal level of background research for each historic site (historic maps, _____ checks of town histories, etc.) that is not mentioned (or I missed it). Jessica Fish can communicate directly with Dr. Leith Smith, our historic archaeologist, if she wants to discuss details.

It is OK with us if you proceed with the fieldwork expeditiously, so let's handle the additional work scope as an exchange of emails or letters. No need to revise the overall report.

Sincerely, Art Spiess

Dr. Arthur Spiess
Senior Archaeologist, Maine Historic Preservation
State House Station 65
Augusta, ME 04333
desk phone: 207-287-2789

From: Spiess, Arthur <Arthur.Spiess@maine.gov>
Sent: Wednesday, August 8, 2018 3:33 PM
To: Jessica Fish <Jessica.Fish@searchinc.com>; Jacob Freedman <jacob@searchinc.com>
Subject: NECRC Addendum 2, Larrabee to Surowiec segment, MHPC 1148-17

Hello Jessica and Jacob:

I have read the Addendum 2 archaeology reconnaissance survey report (received here July 25th) and examined the proposed testing strategies (testpit transect locations) for the sensitive areas you have identified. The Phase I **pre-contact/prehistoric and historic archaeological testing strategies/scope/testpit transects are approved as you have proposed them.**

I note that this portion of the NECRC (Larrabee to Surowiec) is subject to "line rebuild" rather than new construction, which I presume will minimize new ground disturbance. As a



Sincerely, Art Spiess

Dr. Arthur Spiess
Senior Archaeologist, Maine Historic Preservation
State House Station 65
Augusta, ME 04333
desk phone: 207-287-2789

From: [Jacob Freedman](#)
To: [Kelly Hockersmith](#)
Subject: FW: NECRC Addendum 2, Larrabee to Surowiec segment, MHPC 1148-17
Date: Wednesday, April 29, 2020 12:17:01 AM

Jacob Freedman, M.A.
Energy Group Leader

SEARCH - SEARCH₂O
55 Melville Avenue, Boston, Massachusetts 02124
207-266-7709 cell
jacob@searchinc.com www.searchinc.com

Archaeology—Maritime Archaeology—Architectural History—History & Archives—Museum Services

From: Spiess, Arthur <Arthur.Spiess@maine.gov>
Sent: Thursday, August 9, 2018 4:01 PM
To: Jacob Freedman <jacob@searchinc.com>
Subject: RE: NECRC Addendum 2, Larrabee to Surowiec segment, MHPC 1148-17

Hello Jacob:

I have completed review of the NECEC Addenda 3 and 4 archaeological reconnaissance survey report. Except for reserving comment on possible additional work at known archaeological sites, I concur with your proposed testpit transect locations, intensity of testing (testpit intervals and array) and locations where you are recommending no archaeological testing. In other words, what you have proposed is acceptable. Please use this email as an approval of the scope of work for the next round of fieldwork on the NECEC segments covered by Addenda 2, 3, and 4.

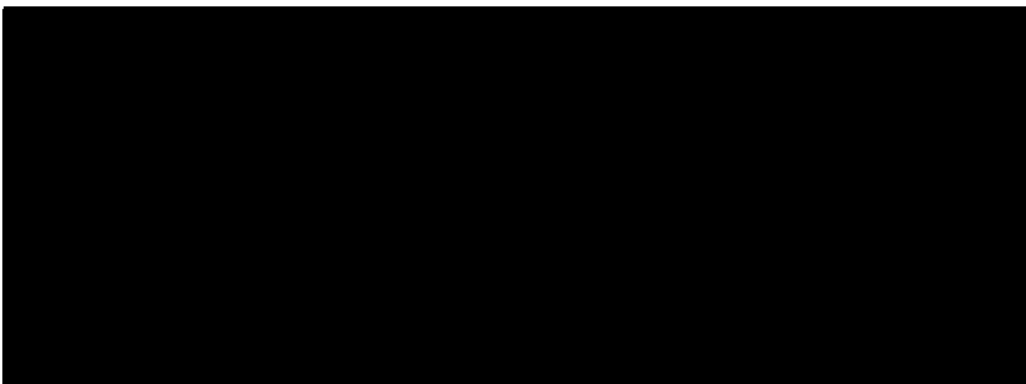
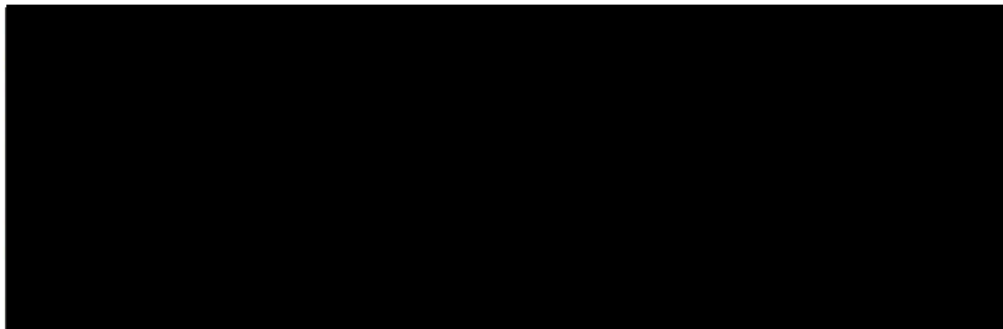
I will double check the existing information, eligibility determinations and possible need for more work for the existing sites, including the ones in the table below. It is likely that I will concur with your recommendations, but won't know until I complete that review.

Sincerely, Art Spiess

Dr. Arthur Spiess
Senior Archaeologist, Maine Historic Preservation
State House Station 65
Augusta, ME 04333
desk phone: 207-287-2789

From: Jacob Freedman [<mailto:jacob@searchinc.com>]
Sent: Thursday, August 09, 2018 11:58 AM
To: Spiess, Arthur <Arthur.Spiess@maine.gov>
Subject: RE: NECRC Addendum 2, Larrabee to Surowiec segment, MHPC 1148-17

Art,



For newly identified sites we have been conducting additional testing to establish the boundaries using double negatives STPs at 5 m intervals. Testing on the interior portions of sites remains at the 10 m interval. My thinking was that tightening up the interval at the site boundary would provide us with solid data which CMP can use to avoid these resources (which they have indicated is their preference). Once artifact analysis is complete, I am sure there will be some resources recommended not eligible. For the remaining resources we will recommend avoidance or Phase II evaluation if avoidance is not feasible.

Does this sound like a reasonable course of action? Would you like to touch base on the phone?

Thanks in advance for taking a look at this stuff!

Jacob Freedman, M.A.
Project Manager, Health & Safety Officer

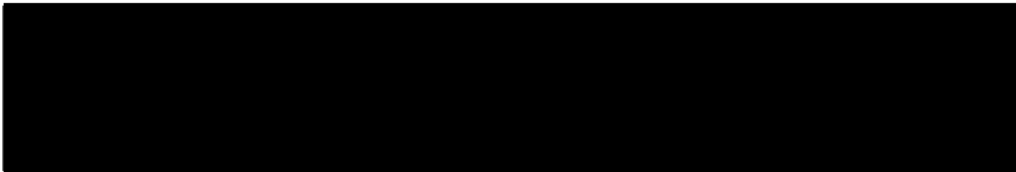
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- Guam

Archaeology—Maritime Archaeology—Architectural History—History & Archives—Heritage Design

From: Spiess, Arthur [<mailto:Arthur.Spiess@maine.gov>]
Sent: Thursday, August 09, 2018 11:08 AM
To: Jacob Freedman <jacob@searchinc.com>
Subject: RE: NECRC Addendum 2, Larrabee to Surowiec segment, MHPC 1148-17

Hello Jacob:



Art

Dr. Arthur Spiess
Senior Archaeologist, Maine Historic Preservation
State House Station 65
Augusta, ME 04333
desk phone: 207-287-2789

From: Jacob Freedman [<mailto:jacob@searchinc.com>]
Sent: Wednesday, August 08, 2018 3:42 PM
To: Spiess, Arthur <Arthur.Spiess@maine.gov>; Jessica Fish <Jessica.Fish@searchinc.com>
Subject: RE: NECRC Addendum 2, Larrabee to Surowiec segment, MHPC 1148-17

Art,

Thank you for reaching out to offer comment on the Addendum 2 report.

Where there are known sites (pre- and post- contact) that were surveyed at the Phase I and/or Phase II level for the MPRP project we will be using the results of that consultation to make recommendations relative to the NECEC undertaking. All previously identified sites that have been determined eligible or have not been evaluated for eligibility will be avoided by NECEC. If the project cannot avoid one of these resources then either Phase II or mitigation will be recommended.

These sites, and those newly identified during NECEC Phase I survey, will be considered as part of a full Phase I report. We expect this document to be submitted in late September. Currently, NECEC has indicated that they plan to avoid all sites which would require either Phase II or mitigation. Avoidance plans for these resources will be presented for MHPC review as part of the Phase I report.

All the best.

Jacob Freedman, M.A.
Project Manager, Health & Safety Officer

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Florida - South Carolina - North Carolina - DC - Massachusetts - New Hampshire - Midwest - Louisiana
- Guam

Archaeology—Maritime Archaeology—Architectural History—History & Archives—Heritage Design

From: Spiess, Arthur [<mailto:Arthur.Spiess@maine.gov>]

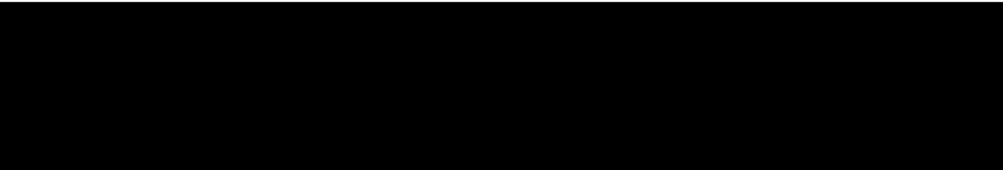
Sent: Wednesday, August 08, 2018 3:33 PM

To: Jessica Fish <Jessica.Fish@searchinc.com>; Jacob Freedman <jacob@searchinc.com>

Subject: NECRC Addendum 2, Larrabee to Surowiec segment, MHPC 1148-17

Hello Jessica and Jacob:

I have read the Addendum 2 archaeology reconnaissance survey report (received here July 25th) and examined the proposed testing strategies (testpit transect locations) for the sensitive areas you have identified. The Phase I **pre-contact/prehistoric and historic archaeological testing strategies/scope/testpit transects are approved as you have proposed them.**



Sincerely, Art Spiess

Dr. Arthur Spiess
Senior Archaeologist, Maine Historic Preservation
State House Station 65
Augusta, ME 04333
desk phone: 207-287-2789



JANET T. MILLS
GOVERNOR

MAINE HISTORIC PRESERVATION COMMISSION
55 CAPITOL STREET
65 STATE HOUSE STATION
AUGUSTA, MAINE
04333

KIRK F. MOHNEY
DIRECTOR

January 18, 2019

Mr. Jacob A. Freedman
SEARCH
55 Melville Ave
Boston, MA 02124

Project: MHPC #1148-17 Central Maine Power; New England Clean Energy Connect (NECEC)
Above Ground Resources; Architectural Survey
Town: Various, ME

Dear Mr. Freedman:

In response to your recent request, I have reviewed the information received December 14, 2018 to continue consultation on the above referenced projects in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

Identification of Historic Properties

The following properties are either listed in the National Register of Historic Places (Register) or were previously determined eligible to be listed in the Register:

- Appalachian National Scenic Trail, crossing at Troutdale Road and Bakers Stream, (SM #66), eligible at a national level of significance (previous determination)
- Wyman Station, Moscow (SM #s 1286-1287), eligible (previous determination)
- Bingham Village Historic District, (SM #s 112-135; 137-147; 149-186; 188-198; 198-218; 232-238; 1546; 1548). Portions of the village were previously determined eligible on a preliminary basis, and the present survey recommends additions to the previous area. Further fieldwork and research will be needed to finalize the boundary of any eligible historic district. However, for the purposes of this review the Commission accepts SEARCH's recommendation – on a preliminary basis – of the boundary shown on the maps and including the surveyed properties noted thereon. NOTE: we do not believe that SM #199, the Rt. 16 Bridge over the Kennebec River, should be considered for inclusion in the HD.
- Benedict Arnold Trail to Quebec, (SM #s 1288,1596), listed
- Garfield School, Kennebec River Road, Concord Twp, (SM #1269), eligible (previous determination)
- 259 Kennebec River Road, Concord Twp (SM #s 1544, 1279-1281), eligible (previous determination)
- Riverside Inn, 172 River Road, Bingham (SM #228), eligible (previous determination)
- Concord Haven, Route 16, Embden (SM #1259), listed
- Carrabasset Inn, 3 Union St, Anson (SM# 1161), listed
- 7 Winter Street, Anson (SM #1192), listed as part of the Temples Historic District
- 4, 9, 11 Madison Street, Anson (SM #s 1204-1208), listed as part of the Temples Historic District

- Henry Hardy Farm, 360 Weeks Mills Road, Farmington (SM #s1517,979-984), eligible (previous determination)
- Farmington Fairgrounds, 292 High Street, Farmington (SM #s, 948, 1609-1610), eligible (previous determination)
- Barn, 40 Turmel Road, Livermore Falls (SM #795), eligible (previous determination)
- Treat Cemetery, Fayette Road, Livermore Falls (SM #781), eligible (previous determination)
- Pleasant Hill Cemetery, Twelve Corners Road, Livermore Falls (SM #779), eligible (previous determination)
- Maine Central Railroad-Rumford Branch at East Livermore, River Road, Livermore Falls (SM# 715), eligible (previous determination)
- New Norland Grange Hall #580, River Road and Androscoggin Bluff Road, Livermore Falls (SM# 716), eligible (previous determination)
- Bowman Airfield, River Road, Livermore Falls (SM # 719), eligible (previous determination)
- Additon Farm, 6 Additon Road, Leeds (SM #s 627-633), eligible (previous determination)
- Valley Cemetery, 0.10 mile north of 343 Route 202, Greene (SM #580), eligible (previous determination)
- 208/308 US Route 202, Greene (SM #s 564-565), eligible (previous determination)
- Jackson's Pine Cone Cabins, 1101 Main Street, Lewiston (SM# 520), eligible (previous determination)
- 374 Randall Road, Lewiston (SM# 387), eligible (previous determination)
- St. Denis Catholic Church, Grand Army Road, Whitefield (SM#s 1368), listed
- Kings Mills Union Hall, 901 Townhouse Road, Whitefield (SM# 1395) listed
- Clough Meeting House, 32 South Lisbon Road, Lewiston (SM# 356), listed
- Dwynell House, 4 Head Tide Road, Alna (SM#1420), contributing resource to the Register listed Head Tide Historic District
- Leslie Farm, 48 Dickinson Road, Wiscasset (SM #s 1447-1449), eligible (previous determination)
- 495 Birch Point Road, Wiscasset (SM #s 1547,1494-1502), eligible (previous determination)

The following properties are new determinations of eligibility:

- Lake Moxie Inn, 1103 Lake Moxie Road, The Forks Plt. (SM #s 14-17), determined by SEARCH
- Lake Moxie Camps, 38 Troutdale Road, The Forks Plt., (SM #s 24-31), determined by SEARCH
- Bakers Station Work Crew Building, 1684 Troutdale Road, Bald Mountain Twp (SM #68), determined by SEARCH
- Bakers Station Work Crew Building, 1688 Troutdale Road, Bald Mountain Twp (SM #69), determined by SEARCH
- 26 Union Street, Anson (SM #s 1169-1170), determined by SEARCH
- 149 Main Street, Anson (SM #1060), determined by SEARCH
- Farmstead, 1294 Hilton Hill (Anson) Road, Starks (SM #s 1022-1033), determined by SEARCH
- Farmstead, 1195 Hilton Hill (Anson) Road, Starks (SM #s 1014-1020), determined by SEARCH.
NOTE: The Commission is of the opinion that this farmstead and the one at 1294 Hilton Hill Road should be evaluated as a potential historic district.
- 177 Shaw Hill Road, Industry (SM #s 1003-1004), determined by SEARCH
- 513-520 Davis Road, Farmington (SM #s 969-972), determined by SEARCH
- 414 Farmington Falls Road, Farmington (SM #s 1524,919, 930-932), determined by SEARCH
- 810 Park Street, Livermore Falls (SM #s 738-739), determined by SEARCH

- Auburn Road, 0.25 mile south of Poland Range Road, Pownal (SM #s 249-250), determined by SEARCH
- Saint Denis Catholic Church Historic District, Grand Army Road, Whitefield (SM# 1367-1371), eligible, determined by SEARCH

The following resources are potentially eligible pending further research. For purposes of the proposed project, these properties will be treated as eligible properties.

- Lost Camp, Lost Camp Road, Moxie Gore (SM #1600). Potentially eligible pending further research and documentation as to date of construction, original use and integrity; determined by SEARCH
- Farmstead, 327 Fahi Pond Road, Embden (SM #s 1251-1252), determined by SEARCH
- 57 North Main Street, Anson (SM #1218), determined by MHPC
- 84 North Main Street, Anson (SM #1222), determined by MHPC
- 905 River Road, Anson (SM #s 1159-1160), determined by SEARCH
- Madison Branch Railroad, Anson (SM #1146), determined by SEARCH
- 27 Hilton Hill Road, Anson (SM #s 1559-1561), determined by MHPC
- 77 Preble Avenue, Anson (SM #1117), determined by SEARCH
- Athearn House, Stark Road, Anson (SM #1035), determined by SEARCH
- Agricultural Outbuilding, 140 Hammond Road, Farmington (SM #878), potentially eligible pending further research as to original function; determined by MHPC
- 104 Belanger Road, Jay (SM #s 846-847), determined by SEARCH
- 65 East Jay Road, Jay (SM #s 1565,840-843), determined by SEARCH
- 197 Campbell Rd, Leeds (SM #686), determined by SEARCH
- Maine Central Railroad, Route 106, Leeds (SM# 699), determined by SEARCH
- 129 Fish Street, Leeds (SM #s 1514,665-666), determined by SEARCH
- Fairview Farm, 530 Fish St, Leeds (SM#s 1513,659-660), determined by SEARCH
- Benjamin Allen Farm, 102 North Mountain Road, Greene (SM#s 1511,617-621), determined by SEARCH
- 196 North Mountain Road, Greene (SM# 615), determined by SEARCH
- 168 Merrill Hill Road, Greene (SM#s 600-601), determined by MHPC
- 316 Route 202, Greene (SM# 568), determined by MHPC
- Pan Am Freight Line, crossing at Merrill Road, Lewiston (SM#s 487-488), determined by SEARCH
- 1237 Sabattus Street, Lewiston (SM# 422), determined by MHPC
- Clough Cemetery, South side of South Lisbon Road at intersection with Old Lisbon Road, Lewiston (SM # 352), determined by SEARCH
- Maine Central Railroad- Lewiston Branch, Lewiston (SM # 1528), determined by SEARCH
- Jeremiah Clough House, 41 South Lisbon Road, Lewiston (SM# 355), determined by SEARCH
- Lewiston Grange #2, 2 Crowley Road, Lewiston (SM # 373), determined by SEARCH
- 117 Royalsborough Road, Durham (SM#s 1529,318-322), determined by SEARCH
- 752 Lawrence Road, Pownal (SM#s 244-246,) determined by MHPC
- North Pownal Village Historic District (SM #s 253-290) potentially eligible pending further research and documentation as to the dates of construction, original owners/builders, and integrity of each of the resources; determined by SEARCH
- 373 Wiscasset Road, Whitefield (SM# 1410,) determined by MHPC
- 714 Wiscasset Road, Whitefield (SM# 1414), determined by MHPC

- 118 Philbrick Lane, Whitefield (SM#s 1387-1389), determined by MHPC
- 587 Townhouse Road, Whitefield (SM #1385), determined by SEARCH
- 116 Vigue Rd, Whitefield (SM# 1365), determined by MHPC
- Howe Road Cemetery, Whitefield (SM #1359), determined by MHPC
- 205 Gardiner Rd (SM#s 1374-1376), determined by MHPC
- 305 Gardiner Road (SM # 1378), determined by MHPC
- Greenlawn Cemetery, Rumerill Road, Wiscasset (SM# 1457), determined by SEARCH
- Rockland Branch Railroad, Two Bridge Road, Wiscasset (SM# 1478), determined by SEARCH

The Commission concludes that the following resources are not eligible for listing in the Register:

- Lake Moxie/Troutdale/Baker Station Historic District, not eligible because it lacks significance
- Over-The-Horizon-Backscatter Radar Transmitter Site, Stream Road, Moscow (SM #071), no longer eligible as antenna arrays have been removed
- Robert Garland Bridge, Main Street over Carrabasset River, Anson (SM #1174)
- 23 Horseback Road, Anson (SM #s 1125-1127)
- 29 Ward Street, Anson (SM #s 1119-1120), not eligible due to lack of integrity and significance
- Athearn Cemetery, Hilton Hill Road, Anson (SM #1034), not eligible due to lack of known significance in accordance with Criteria Consideration D
- 389 Davis Road, Farmington (SM #956)
- 216 Whittier Road, Farmington (SM #904)
- 372 Farmington Falls Road, Farmington (SM #917), not eligible due to lack of integrity and significance
- 293 Farmington Falls Road, Farmington (SM #s 918, 920-922), not eligible due to lack of integrity and significance
- Bailey Hill Dairy Farm, 639 Bailey Hill Road, Farmington (SM #s 1518,956,975-977)
- Barn, 348 McCrillis Corner Road, Wilton (SM #874)
- 481 McCrillis Corner Road, Jay (SM# 870)
- 50 Jones Road, Livermore Falls (SM #s 807-809)
- Souther Family Farm, 52 Souther Road, Livermore Falls (SM #s 788-794), not eligible due to loss of integrity and recent additions
- Haines Corner Cemetery, 890 Park Street (SM # 736), not eligible as it is unclear how the cemetery meets Criterion Consideration D
- 6 Dawns Way, Leeds (SM # 692)
- 201 Strickland Loop Road, Livermore Falls (SM#s 704-705)
- 14 Campbell Road, Leeds (SM # 677)
- Barker Farm, 9 Barker Road, Leeds (SM#s 1516,694-698), potentially eligible in the future but not eligible at present due to recent age of the house and several of the outbuildings
- 6 River Road, Greene (SM#s 543-544)
- Stukas Farm, 144 Ferry Road, Lewiston (SM #s 1530, 335-338)
- 19 Stackpole Road, Durham (SM#s 1527,311-315)
- 28 Durham Road, Durham (SM#s 1509, 291-292)
- 491 Auburn Pownal Road, Durham (SM #s 1510, 299-301)
- Bridge # 3249, South Belfast Road, Windsor (SM # 1304), not eligible
- Calvary Cemetery, 299 Grand Army Road, Whitefield (SM# 1366), not eligible as this cemetery is not historically associated with the existing St. Denis Historic District
- Bridge # 3831, East River Road, Whitefield (SM # 1408), not eligible

- 14 Pittston Road, Whitefield (SM# 1398), not eligible

Findings of Effect

The Commission concurs with SEARCH's finding of adverse effect for the following properties:

- E. Gray Farm, 1294 Hilton Hill (Anson) Road, Starks (SM#s 1022-1033). NOTE: This farmstead and the one at 1195 Hilton Hill Road (Anson) Road (SM#s 1014-1020) should be evaluated as a potential historic district.
- Barn, 40 Turmel Road, Livermore Falls (SM # 795)

The Commission concurs with SEARCH's finding of no adverse effect for the following properties:

- Lost Camp, Lost Camp Road, Moxie Gore (SM # 1600)
- Bakers Station Work Crew Building, 1684 Troutdale Road, Bald Mountain Twp (SM #68)
- Bakers Station Work Crew Building, 1688 Troutdale Road, Bald Mountain Twp (SM #69)
- Wyman Station, Moscow (SM #s 1286-1287)
- Benedict Arnold Trail to Quebec, (SM #s 1288,1596)
- Madison Branch Railroad, Anson (SM # 1146)
- 65 East Jay Road, Jay (SM #s 1565,840-843)
- Treat Cemetery, Fayette Road, Livermore Falls (SM #781)
- Maine Central Railroad, Route 106, Leeds (SM# 699)
- Maine Central Railroad-Rumford Branch at East Livermore, River Road, Livermore Falls (SM# 715)
- Pan Am Freight Line, crossing at Merrill Road, Lewiston (SM#s 487-488)
- Jackson's Pine Cone Cabins, 1101 Main Street, Lewiston (SM# 520)
- Maine Central Railroad- Lewiston Branch, Lewiston (SM # 1528)
- 117 Royalsborough Road, Durham (SM#s 1529,318-322)
- 587 Townhouse Road, Whitefield (SM #1385)
- Rockland Branch Railroad, Two Bridge Road, Wiscasset (SM# 1478)
- 495 Birch Point Road, Wiscasset (SM #s 1547,1494-1502)
- Lake Moxie Camps, 38 Troutdale Road, The Forks Plt., (SM #s 24-31)
- Bingham Village Historic District, (SM #s 112-135; 137-147; 149-186; 188-198; 198-218; 232-238; 1546; 1548)
- Garfield School, Kennebec River Road, Concord Twp, (SM #1269)
- 259 Kennebec River Road, Concord Twp (SM #s 1544, 1279-1281)
- Riverside Inn, 172 River Road, Bingham (SM #228)
- Concord Haven, Route 16, Embden (SM #1259)
- Farmstead, 327 Fahi Pond Road, Embden (SM #s 1251-1252)
- 905 River Road, Anson (SM #s1159-1160)
- 149 Main Street, Anson (SM #1060)
- Henry Hardy Farm, 360 Weeks Mills Road, Farmington (SM #s 1517,979-984)
- Farmington Fairgrounds, 292 High Street, Farmington (SM #s 948, 1609-1610)
- 414 Farmington Falls Road, Farmington (SM #s 1524,919, 930-932)
- 104 Belanger Road, Jay (SM #s 846-847)
- New Norland Grange Hall #580, River Road and Androscoggin Bluff Road, Livermore Falls (SM# 716)
- 197 Campbell Rd, Leeds (SM #686)

- 129 Fish Street, Leeds (SM #s 1514,665-666)
- Fairview Farm, 530 Fish St, Leeds (SM#s 1513,659-660)
- Additon Farm, 6 Additon Road, Leeds (SM #s 627-633)
- Benjamin Allen Farm, 102 North Mountain Road, Greene (SM# s1511,617-621)
- 374 Randall Road, Lewiston (SM# 387)
- Clough Cemetery, south side of South Lisbon Road at intersection with Old Lisbon Road, Lewiston (SM # 352)
- Auburn Road, 0.25 mile south of Poland Range Road, Pownal (SM #s 249-250)
- North Pownal Village Historic District, Pownal (SM #s 253-290)
- Kings Mills Union Hall, 901 Townhouse Road, Whitefield (SM# 1395)
- Dwyneil House, 4 Head Tide Road, Alna (SM# 1420)
- Leslie Farm, 48 Dickinson Road, Wiscasset (SM #s 1447-1449)

The Commission has determined that the proposed project will have no effect on the following properties:

- 7 Winter Street, Anson (SM #1192)
- 4, 9, 11 Madison Street, Anson (SM #s 1204-1208)
- Carrabasset Inn, 3 Union St, Anson (SM# 1161)
- 26 Union Street, Anson (SM #s 1169-1170)
- 77 Preble Avenue, Anson (SM #1117)
- 177 Shaw Hill Road, Industry (SM #1003-1004)
- Pleasant Hill Cemetery, Twelve Corners Road, Livermore Falls (SM #779)
- 810 Park Street, Livermore Falls (SM #s 738-739)
- 196 North Mountain Road, Greene (SM# 615)
- Valley Cemetery, 0.10 mile north of 343 Route 202, Greene (SM #580)
- Clough Meeting House, 32 South Lisbon Road, Lewiston (SM# 356)
- Lewiston Grange #2, 2 Crowley Road, Lewiston (SM # 373)
- St. Denis Catholic Church, Grand Army Road, Whitefield (SM# 1368)
- St. Denis Catholic Church Historic District, Grand Army Road, Whitefield (SM#s 1367-1371)
- Greenlawn Cemetery, Rumerill Road, Wiscasset (SM# 1457)

In order to make a finding of effect for the following properties, we request that you provide visual simulations of the proposed project within their respective viewsheds:

- 1195 Hilton Hill Road (Anson) Road (SM#s 1014-1020). These simulations should take into consideration our conclusion that the farmstead at 1195 Hilton Hill Road and the one at 1294 Hilton Hill Road are a potential historic district.
- Bowman Airfield, River Road, Livermore Falls (SM # 719)
- 513-520 Davis Road, Farmington (SM #s 969-972)

In addition, please make a finding of effect for the following properties that were found to be potentially eligible by the Commission, but that were determined ineligible by SEARCH:

- 57 North Main Street, Anson (SM #1218)
- 84 North Main Street, Anson (SM #1222)
- 27 Hilton Hill Road, Anson (SM #s 1559-1561)
- Agricultural Outbuilding, 140 Hammond Road, Farmington (SM #878)
- 168 Merrill Hill Road, Greene (SM#s 600-601)
- 316 Route 202, Greene (SM# 568)
- 1237 Sabattus Street, Lewiston (SM# 422)

MHPC #1148-17
NECEC Project
7

- 752 Lawrence Road, Pownal (SM#s 244-246)
- 373 Wiscasset Road, Whitefield (SM# 1410)
- 714 Wiscasset Road, Whitefield (SM# 1414)
- 118 Philbrick Lane, Whitefield (SM#s 1387-1389)
- 116 Vigue Rd, Whitefield (SM# 1365)
- Howe Road Cemetery, Whitefield (SM #1359)
- 205 Gardiner Rd (SM# 1374-1376)
- 305 Gardiner Road (SM # 1378)

With regard to the Appalachian Trail, please submit any comments received concerning the effects of the proposed project on this resource. We will continue our review of the project's effect on this resource following your response to our request for more information.

We look forward to continuing the consultation with you. If you have any questions, please contact Megan M. Rideout of this office at megan.m.rideout@maine.gov.

Sincerely,



Kirk F. Mohny
State Historic Preservation Officer



JANET T. MILLS
GOVERNOR

MAINE HISTORIC PRESERVATION COMMISSION
55 CAPITOL STREET
65 STATE HOUSE STATION
AUGUSTA, MAINE
04333

KIRK F. MOHNEY
DIRECTOR

February 11, 2019

Mr. Jacob A. Freedman
SEARCH
55 Melville Ave
Boston, MA 02124

Project: MHPC #1148-17 Central Maine Power; New England Clean Energy Connect (NECEC)
Archaeological sites
Town: Various, ME

Dear Mr. Freedman:

In response to your recent request, Dr. Leith Smith and Arthur Spiess have reviewed the information in the Phase I Archaeological Survey Report received about December 14, 2018 to continue consultation on the above referenced projects in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The revised final Phase I archaeological survey report, dated December 2018, is acceptable as written. We concur with the findings (as summarized in the Management Summary) of 29 sites located, fourteen historic and one prehistoric not eligible for listing in the National Register, and fourteen sites requiring avoidance during construction. We concur that there may be no adverse effect for the six sites listed in Table 1 (p ii) if the treatment plans summarized in Table 1 are followed. The plans for site avoidance and treatments as in Table 1 and site monitoring during and after construction should be detailed in a project MOA.

We look forward to continuing the consultation with you. If you have any questions, please contact Megan M. Rideout of this office at megan.m.rideout@maine.gov.

Sincerely,

Kirk F. Mohney
State Historic Preservation Officer



JANET T. MILLS
GOVERNOR

MAINE HISTORIC PRESERVATION COMMISSION
55 CAPITOL STREET
65 STATE HOUSE STATION
AUGUSTA, MAINE
04333

KIRK F. MOHNEY
DIRECTOR

March 26, 2019

Mr. Jacob A. Freedman
SEARCH
55 Melville Ave
Boston, MA 02124

Project: MHPC #1148-17 Central Maine Power; New England Clean Energy Connect (NECEC)
Above Ground Resources; Architectural Survey
Town: Various, ME

Dear Mr. Freedman:

In response to your recent request, I have reviewed the information received March 1, 2019 to continue consultation on the above referenced projects in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

Findings of Effect

Pursuant to 36 CFR Part 800.5(a)(2), the Commission has determined that the proposed project will have an adverse effect on the following historic properties:

- 1195 Hilton Hill Road (Anson) Road (SM#s 1014-1020). This farmstead and the one at 1294 Hilton Hill Road are a potential historic district.
- Bowman Airfield, River Road, Livermore Falls (SM # 719)

The Commission concurs with SEARCH's finding of no adverse effect for the following historic properties:

- 57 North Main Street, Anson (SM #1218)
- 84 North Main Street, Anson (SM #1222)
- 27 Hilton Hill Road, Anson (SM #s 1559-1561)
- 1237 Sabattus Street, Lewiston (SM# 422)
- 118 Philbrick Lane, Whitefield (SM#s 1387-1389)
- 714 Wiscasset Road, Whitefield (SM# 1414)

The Commission concurs with SEARCH's finding of no effect for the following historic properties:

- Agricultural Outbuilding, 140 Hammond Road, Farmington (SM #878)
- 168 Merrill Hill Road, Greene (SM#s 600-601)
- 316 Route 202, Greene (SM# 568)
- 752 Lawrence Road, Pownal (SM#s 244-246)
- Howe Road Cemetery, Whitefield (SM #1359)
- 373 Wiscasset Road, Whitefield (SM# 1410)
- 116 Vigue Rd, Whitefield (SM# 1365)
- 205 Gardiner Rd (SM# 1374-1376)

- 305 Gardiner Road (SM # 1378)

The Commission has determined that the proposed project will have no effect on 513-520 Davis Road, Farmington (SM #s 969-972).

With regard to the Appalachian Trail, the Commission encourages CMP and its consultant to consult with the National Park Service's Appalachian National Scenic Trail Headquarters in Harper's Ferry, West Virginia regarding the proposed project's impact to the Appalachian Trail.

Based on the information that has been provided, the Commission concludes that the proposed project will have an adverse effect on the Appalachian Trail.

In accordance with 36 CFR Part 800.6(a), the responsible agency must seek ways to avoid, minimize or mitigate the adverse effects on these historic properties. If an ACOE permit is needed, we request that the responsible agency enter into a Memorandum of Agreement (MOA) with our office for this undertaking which includes stipulations for mitigation for this project.

Per the Section 106 regulations, the ACOE must notify the Advisory Council on Historic Preservation (ACHP) of our adverse effect finding and invite them to participate in consultation pursuant to 36 CFR Part 800.6(a)(1). They must include with their notice to the ACHP all the documentation specified in 36 CFR Part 800.11(e). There is a 15-day period for their review from day of receipt.

We look forward to continuing the consultation with you. If you have any questions, please contact Megan M. Rideout of this office at megan.m.rideout@maine.gov.

Sincerely,



Kirk F. Mohnney
State Historic Preservation Officer



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

Regulatory Division
CENAE-RDC
Application No. NAE-2017-01342

May 15, 2019

Gerry Mirabile
Central Maine Power Company
83 Edison Drive
Augusta, Maine 043336

Dear Mr. Mirabile:

This refers to your application, number NAE-2017-01342, for a Department of the Army permit to place temporary and permanent fill in numerous waterways and wetlands between Beattie Township at the Maine/Quebec border and Lewiston, Maine in order to construct a new High Voltage Direct Current (HVDC) electrical transmission line and related facilities capable of delivering up to 1,200 megawatts of electrical power from hydroelectric sources in Quebec to the New England Control Area. As you are aware, our Public Notice describing the proposed activity has expired.

The enclosed correspondence was received in response to the Public Notice. It is being forwarded to give you the opportunity to furnish us with your proposed resolution or rebuttal. You may wish to contact the writer directly in an attempt to reach a mutual understanding. While many of the letters, both in favor and opposed, are somewhat generic and repetitive, we strongly suggest that CMP specifically respond to at least the more voluminous and detailed letters of objection.

As a result of our review of the responses received, the administrative record, and the testimony provided at the state public hearings, the following specific information is required in addition to your rebutting comments before making a final decision on your application:

1. We still await the drafting by CMP of a biological assessment (BA) to be used in the consultation process with the U.S. Fish & Wildlife Service pursuant to Section 7 of the Endangered Species Act. I remind you that Section 7 consultation must be completed prior to any final decision on the application.
2. One commenter raised the issue of the project's potential impacts to bald and golden eagles. The USFWS raised this same point in previous interagency discussions. It is our understanding that the CMP team was providing the Service with additional information. What is the status of this exchange?

3. To date, 79 of those responding in opposition to the project also requested public hearing. While I believe our participation in the State's hearings will play a substantial role in our future determination on whether to hold a federal hearing, we also ask you to summarize any other public information meetings, hearings, or outreach sessions that CMP has had to date. It would be helpful to know, if possible, if any of these same individuals or interest groups attended and/or if their specific concerns were addressed at the time.
4. On April 19, 2019 the Maine DEP requested additional information following the state hearings held the week of April 1. Please provide the Corps with a copy of the full response to DEP. Similarly, if DEP or LUPC makes additional requests for information following the supplemental hearing on May 9, 2019, please furnish us a copy of your response as well.
5. We previously requested that CMP assist in developing a specific response to the request for additional information on alternatives and a breakdown of the project impacts from the U.S. EPA. We appreciate your willingness to provide this information. The analysis of alternatives is best framed up relative to the Section 404(b)(1) Guidelines which are common to both Corps and EPA regulations. In other words, alternatives should be discussed as to their availability, practicability, and comparative environmental impact after considering the project purpose. I remind you that any alternative dismissed as economically impracticable needs to be framed up relative to the overall cost of the project, including the cost of compensatory mitigation and any other concessions made to appease public interest concerns, compared to anticipated revenue.
6. Please discuss the fire hazard risk of the proposed installation relative to best available information within the industry. What strategies are available or will be adopted to address this risk?
7. For the record we remind you that no Corps permit decision may be made until after a state water quality certification has been issued. In Maine, this certification is tied to the state permit. Please furnish a copy of this certification should it become available. Please also furnish copies of your PUC decision and the LUPC decision, should it become available.
8. Those in opposition of the project consistently point to the project's lack of demonstrable reduction in greenhouse gas emissions and fossil fuel consumption, particularly relative to deforestation effects from corridor clearing and construction, and sourcing from hydro-electric dams in Canada. Please respond to this issue from an industry perspective. We also understand that the Maine Legislature has taken up this issue and may also request further study. Should this come to pass, CMP may wish to consolidate any study results with its own findings into a single response. The regional environmental benefits of the project are after all one of the linchpins of your arguments in favor of the project.
9. The U.S. Dept. of Interior has requested specific information relative to Land & Water Conservation Fund Sites and potential impacts to the Appalachian Trail. Please respond directly to their request and furnish the Corps with a copy of your response. Concerning the Trail, we are

aware that this issue is linked to the review of the project by the Maine Historic Preservation Commission (MHPC). It may be most beneficial for CMP to orchestrate a meeting between the Park Service, MHPC, the Corps and your team to discuss how best to address this specific issue.

10. The Maine Natural Areas Program (MNAP) still has unresolved comments concerning small whorled pogonia and Jack pine along the project corridor. They've also requested an Invasive Species Control Plan. We are aware that CMP's team is addressing these items. Please furnish us with any response to MNAP and their final determination. Presumably any update on the pogonia will also feed the draft of the BA for endangered species consultation.

11. The Corps is aware that CMP is using SEARCH, Inc. as their representative for purposes of historic coordination and that quite a bit of information has changed hands relative to effect determinations on various historic sites. CMP's team recently submitted additional information to the DEP relative to a possible adverse effect determination. Please be advised that from our perspective, the effect determination is MHPC's to make. If ultimately one or more historic sites are adversely affected, the Corps and by association, the Dept. of Energy, are the agencies obliged to work with MHPC to avoid, minimize or mitigate those effects. And if a Memorandum of Agreement (MOA) is deemed an appropriate mechanism for addressing the effects, it'll have to be the Corps, working in association with MHPC and CMP, who develops the MOA. So while we continue to encourage CMP and its team to work closely with MHPC, it will eventually be necessary to loop the Corps in pursuant to our obligations under Section 106 of the Historic Preservation Act. Again, it may be wise for CMP to orchestrate a meeting with MHPC, the Corps and your team to discuss how best to address this specific issue.

12. As an attachment to one letter of opposition, there are comments from the Jackman Utility District with specific concerns for the water supply located at Big Wood Pond. Please address potential impacts to this source, if any, and any best management practices (BMPs) proposed to minimize risk to this source.

13. Several letters of objection and some hearing testimony identified the health risk of electromagnetic radiation emanating from the proposed transmission line. I believe this risk has been debated for years. Please discuss the state of the science and the risk to public health for this line specifically. Are there available and practicable minimization measures that would help minimize any risk from this line?

14. CMP testified at the recent supplemental public hearing that ALL waterbodies that are deemed cold water fisheries streams will unilaterally have 100' buffers placed on them. CMP needs to clarify for the record exactly what this buffer means in terms of initial clearing/construction and long-term maintenance. Discussions between Trout Unlimited and CMP's team would indicate that an update of the application's stream table(s) may be in order to more accurately reflect those streams that support brook trout and other cold water fisheries. It may also be necessary to update the Vegetation Management Plan.

15. Additional Hearing Questions.

a. Discuss additional actions to avoid, minimize or mitigate for habitat fragmentation. This may include, but not be limited to, additional co-location, additional vegetation tapering, selective increases in pole heights to allow the retention of more understory growth, increasing the number of wildlife travel corridors proposed, revised vegetation clearing/management plans to minimize initial clear cuts within the corridor (thereby 'jumpstarting' recovery of at least scrub/shrub cover within the corridor), and additional preservation lands. The Nature Conservancy for example, recommended an additional 40,000 to 100,000 acres of forested habitat preservation as compensation for habitat fragmentation impacts.

b. Herbicide and pesticide application has been identified as a concern by many, not only relative to brook trout and other aquatic life, but also to general water quality and human health and welfare. It is our understanding from the testimony provided at the May 9, 2019 supplemental public hearing for the project that CMP has fully committed to eliminating the application of chemical treatments throughout the entire corridor. Are there any possible future circumstances where you would seek to change this position? Presumably this change in right of way management warrants a change in the Vegetation Management Plan; please furnish the Corps with an updated plan.

c. CMP maintains that trenching or HDD installations over the entire 53 mile section of new corridor are not economically practicable. We understand that you have furnished additional information to the state on the potential environmental impact of these installations as well. Quantifying these impacts, even generally, would better flesh out the discussion of this alternative and we ask that you furnish the same information to the Corps.

e. Accepting for the moment that trenching the entire 53 mile section of new corridor is not economically or environmentally practicable, a number of key focus areas were identified during the hearings where trenching or HDD installation on a smaller scale may be appropriate to consider. For example, the other Outstanding River segments and the Appalachian Trail crossings. Please furnish to the Corps any additional analysis of the practicability and comparative environmental impact of alternative installations at these or other locations identified during the hearing process.

d. What additional available and practicable measures exist for avoiding or minimizing direct and indirect impacts to cold water fisheries streams, particularly those identified as key resources of concern by Trout Unlimited?

e. It is our understanding that discussions with the Appalachian Mountain Club relative to relocating a segment of the trail to avoid one or more of the existing trail crossings and NECEC's widening of those crossings may have stalled, at least temporarily. We ask CMP to renew those discussions or otherwise analyze the practicability of this alternative. Not only would an agreeable solution potentially help address the concerns of the Club and the Park

Service, it would also potentially mitigate MHPC concerns relative to the National Register eligible landmark.

f. The use of location-specific, non-reflective conductor wires was identified as an additional possible minimization measure for the line's visual impact. Discuss the practicability of deploying this option over the entire 53 mile length of Section 1 and over the full length of the project.

g. A number of project opponents suggest that CMP's ownership of a 300' wide ROW virtually guarantees a build out to the full width with multiple future lines and their associated cumulative environmental and socio-economic impact. CMP needs to address the likelihood and timing of such a build out.

h. During the hearings the landscape through which the corridor will pass was regularly referred to as a 'mosaic' of timber management lands (in various stages of harvest), timber management roads, cover types, etc. Is it possible for CMP to quantify, using available resource information, the relative percent of lands crossed by the corridor that meet the 'mosaic' description versus those which are unfragmented habitat blocks? How many unfragmented forested blocks and of what size range will be crossed by the corridor? At the supplemental hearing, cover type analysis by Dr. Simons-Legarde appeared to rely on more accurate baseline maps than those used by CMP. Please rationalize the apparently disparate data.

i. During the hearings, a number of vista points were identified that may not have been fully evaluated in the visual impact analysis, specifically the view toward Tumbledown Mountain from Rock Pond, Colburn Mountain, the Route 201 Scenic Byway, Greenlaw Cliffs, and Route 201 to the intersection with Spencer Road. Are there additional available and practicable measures that can be taken to further reduce the visual impacts of the project from/to these vistas.

j. What are CMP's plans for deploying the conductor(s) - by ground or by air or both? Would greater utilization of air deployment enable CMP to reduce the extent of ROW clear cutting (in order to facilitate ground access)? Discuss the practicability of this installation technique.

k. Trout Unlimited (TU) appears to have suggestions for alternative/supplemental preservation lands that could potentially further off set at least indirect impacts to brook trout habitat. The Tomhegan Stream area was specifically referenced. We ask CMP to reach out directly to TU staff to determine what areas they recommend and then to discuss the availability and practicability of such additional preservation. We caution you that any discussion of additional compensation, whether for potential impacts to brook trout habitat or for other natural resource impacts, should be presented relative to availability and practicability, much like the discussion of project alternatives. Testimony provided by CMP's team during the supplemental public hearing implied that while major increases in project cost, e.g. from full burial of Section

1, might be economically impracticable, the presumably lesser cost of additional compensation has not been fully evaluated to date.

16. Alternatives.

a. The alternative of co-locating the corridor with either the Route 201 or Route 27 corridors must be analyzed for practicability and comparative environmental impact. Testimony was provided at the recent supplemental public hearing on the availability, practicability and environmental impact of at least the Route 201 alternative. At the same time, opponents of the project clearly testified that co-locating within either of these corridors would significantly reduce the environmental and socio-economic impacts of the project and greatly appease a number of public interest concerns. Presumably compensatory mitigation costs and other concession costs would be substantially reduced as well. Please furnish the Corps with your analysis and if it did not address Route 27 as well, please do so. We caution you to be as detailed as possible. For example, it may not be sufficient to assume Maine DOT doesn't allow occupation of the paved travel way, it may be necessary to actually provide documentation from DOT.

b. Co-locating along Spencer Road has been identified as a possible avoidance/minimization measure. Please discuss its availability, practicability, and environmental impact. Allegedly the previous landowner declined to allow co-location, but the new landowner has not been approached. It may be necessary to do so in order to fully dismiss this alternative.

c. Perhaps a tongue in cheek comment, but none-the-less, it was suggested that MA should produce its own renewable energy and not rely on outside sources that require transmission through neighbor states. Provide insight for the record and the eventual NEPA analysis as to the suite of alternatives that MA reviewed, including in-state generation, before selecting the NECEC project. A detailed summary should be sufficient.

d. At the recent supplemental hearing, the "Jackman Tie Line" alternative was identified as a possible route option. Please furnish the Corps with an analysis of the availability, practicability, and comparative environmental impact of such an alternative.

e. During and following the public hearings, a great deal of discussion and analysis has occurred relative to "tapering" of vegetation and installation of taller poles, mostly to minimize the extent of right of way clearing and its associated visual and ecological impact. CMP needs to fully describe what each of these options means in terms of short-term construction impacts (e.g. extent of clearing), if any, relative to long-term benefits. Any savings from reduced future right of way maintenance and reduced compensatory mitigation requirements should be factored into this discussion if possible. How practicable are these techniques in targeted applications and/or over the entire length of Section 1? Taller poles will clearly be more visible in some locations and so presumably there's a tradeoff between potential environmental benefits and increased visual impact, but as noted at the supplemental hearing, perhaps diminished cutting within the

right of way through use of taller poles mitigates the visual impact of the poles? And to be more specific, could taller poles with non-specular conductors be used in all locations with the exception of those that are particularly sensitive to visual impacts?

f. Related, it is clear that a key environmental and socio-economic issue is the presence on the landscape of a 150' wide clear cut right of way. Irrespective of CMP's intent to allow some modest cover to re-establish itself with the right of way, there are numerous examples throughout Maine where even after many years, regrowth within utility corridors is marginal at best. It may not be sufficient in this case to allow the standard approach to utility corridor construction to occur – clear cut and assume regrowth. It may be necessary to utilize a variety of techniques and creative thinking to achieve the goal of minimizing clear cuts, maximizing retention of existing cover types, minimizing abrupt edge effects, maintaining and/or increasing wildlife corridors and vegetated stream buffers, and in so doing, also reduce visual impacts. CMP appears willing to think out of the box to address project concerns, e.g. prohibiting chemical treatments, and we encourage the same thinking on this issue.

17. Mitigation.

a. For the Corps record, please quantify the full suite of compensatory mitigation for the project. This includes compensation for unavoidable direct and indirect impacts to aquatic resources as well as to other natural resources and concessions that CMP has otherwise made to address public interest concerns. This has undergone enough evolutions where an up to date quantification for the record is appropriate. A standalone compensation plan makes a good reference for any future permit decision(s) too.

b. CMP must attempt to quantify the proposed culvert replacement component of the mitigation plan. We encourage CMP to work directly with IF&W, TU and TNC to identify specific culvert locations where the greatest environmental benefit can be achieved. It is otherwise difficult to conclude that the proposed compensation is sufficient and practicable. Although the Corps has some minor latitude with permit conditioning, our preference would be to capture what will presumably be some level of jurisdictional activity for this culvert work within any permit decision for the NECEC project. This would require location-specific scopes of work and at least conceptual project plans. Similarly, we encourage CMP to carefully review its construction plans and if you anticipate the need to upgrade any existing culverts or bridges to facilitate construction access, those actions, if jurisdictional, should be captured in the current permit application.

c. The letter from Royal River Land Trust identifies the possibility for more focused compensatory mitigation (preservation lands) in southern Maine compared to what a more general ILF contribution might offer. The Corps is not necessarily opposed to alternative mitigation measures in this region if they otherwise comply with the national Mitigation Rule and our District guidance. We encourage CMP to contact the Land Trust directly to determine

whether their ideas for localized preservation are available and practicable and advise the Corps and the DEP accordingly.

18. FERC approval is listed as a requirement of the project. Is this due to the tie in at Wyman Station? What is the timeline for the FERC decision?

19. ISO New England approval is also listed as a requirement. What is the timeline for this process?

The application process for this project has been somewhat unique in that there are by my count three state regulatory agencies, three federal regulatory agencies, and ISO New England, each with its own application requirements and review criteria. CMP has understandably focused much of its initial energies on the state processes while doing its best to keep federal agencies up to date. However, the sheer number of state data requests and CMP updates virtually guarantees that federal agency files are incomplete. So while many of the requested items above may be repetitive to information already supplied to the state processes, the key point to remember is that it was provided to the state. Speaking for just our process, our administrative record must thoroughly reflect the pre-application and application review history between CMP and its team and the Corps. Toward that end we suggest a meeting to identify any information gaps in the administrative record that need to be filled.

Please respond within 30 days from the date of this letter. If you require additional time to gather this information, please notify us within the 30-day time frame.

No work may be started until a permit signed by the District Engineer or his authorized representative has been received.

If you have any questions on this matter, please contact me at 207-623-8367 at our Augusta, Maine Project Office.

Sincerely,



Jay L. Clement
Senior Project Manager
Maine Project Office

Enclosures

Copies Furnished (without enclosures):

Melissa Pauley – DOE
Jim Beyer – Maine DEP
Bill Hinckel – Maine LUPC
Mark Goodwin – B&M



JANET T. MILLS
GOVERNOR

MAINE HISTORIC PRESERVATION COMMISSION
55 CAPITOL STREET
65 STATE HOUSE STATION
AUGUSTA, MAINE
04333

KIRK F. MOHNEY
DIRECTOR

June 12, 2019

Mr. Jacob Freedman
SEARCH
55 Melville Ave
Boston, MA 02124

Project: MHPC #1148-17 Central Maine Power ; NECEC
Merrill Road Converter Station
Town: Lewiston, ME

Dear Mr. Freedman:

In response to your recent request, I have reviewed the information received June 3, 2019 to continue consultation on the above referenced project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The Phase I archaeological report is acceptable as written. There is no archaeological concerns within the proposed location of the Merrill Road Converter Station.

With regards to architectural resources, please submit the newly surveyed property in CARMA and provide a hard copy of the survey form, an addendum to the survey report, matrix and location map.

We look forward to continuing consultation with you. If you have any questions, please contact Megan M. Rideout of this office at megan.m.rideout@maine.gov or (207) 287-2992.

Sincerely,

A handwritten signature in black ink that reads 'Kirk F. Mohney'.

Kirk F. Mohney
State Historic Preservation Officer

PHONE: (207) 287-2132

FAX: (207) 287-2335



**MEETING MINUTES:
NEW ENGLAND CLEAN ENERGY CONNECT
SECTION 106 CONSULTATION MEETING**

Date/Time: July 15th from 3:00 to 5:00 PM EST
Location: CMP General Office, Edison Drive, Augusta

ATTENDEES

Jay Clement (JC), United States Army Corps of Engineers
Kirk Mohney (KM), State Historic Preservation Officer
Gerry Mirabile (GM), NECEC Permitting Manager, Central Maine Power Company
John Carroll (JHC), Communications Director, Central Maine Power Company
Jacob Freedman (JF), Project Manager, SEARCH
Chad Blackwell (CB), Senior Architectural Historian, SEARCH
Mark Goodwin (MG), Senior Environmental Scientist, Burns & McDonnell
Tony Barrett (TB), Maine Appalachian Trail Club
Wendy Janssen (WJ), National Park Service
Denise Nelson (DN), National Park Service
Mary Krueger (MK), National Park Service
David Uschold (DU), National Park Service
Sarah Quinn (SQ), National Park Service
Julie Smith (JS), United States Department of Energy
Melissa Pauley (MP), United States Department of Energy
Jim Boyle (JB), Boyle Associates

ACRONYMS/ABBREVIATIONS

AIR – Additional Information Request
ANST – Appalachian National Scenic Trail
ARPA – Archaeological Resource Protection Act of 1979
ATC – Appalachian Trail Conservancy
CMP – Central Maine Power
DOE – Department of Energy
EA – Environmental Assessment
EIS – Environmental Impact Statement
HD – Historic District
LUPC – Maine Land Use Planning Commission
MATC – Maine Appalachian Trail Club
MDEP – Maine Department of Environmental Protection
MOA – Memorandum of Agreement

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NEPA – National Environmental Policy Act
NPS – National Park Service
PA – Programmatic Agreement
Project – New England Clean Energy Connect Project
ROW – Right-of-Way
Section 106 – Section 106 of the National Historic Preservation Act of 1966, as amended
USACE – United States Army Corps of Engineers

MEETING SUMMARY

1. Meeting Open and Roll-Call

JF – Brief meeting welcome and roll call of attendees.

2. Overview of Project and Overall Schedule

MG – Maine DEP hearing and field visits for state permits. Decision expected late October. USACE decision expected 2-3 months following.

DN – USACE decision 2-3 months; when would environmental impact statement (EIS) be released?

JC – Clarified that USACE decision on permit expected 2-3 months following Maine DEP and Maine Land Use Commission permit decisions. Early 2020. USACE does not typically release EA. USACE will consider requests from other agencies to review. DOE is only other consulting agencies for EA review currently.

JF – Clarification on applicant engagement in parallel permitting processes. State and Federal. State permitting process is proceeding ahead of federal permitting.

WJ – Field visit purpose and scope and who was involved.

JB – One day visit on June 27 conducted by MDEP and LUPC to review areas of primarily visual/aesthetic concern for the Project. No public, federal, applicant, or intervener involvement.

3. Section 106 Consultation Process & Schedule

JF – Highlights that there are different definitions for non-agency involvement in the state vs. federal process and that there are many interveners in the state permitting process who do not have standing under Section 106.



JC – The USACE and DOE have regulatory responsibilities under NHPA. DOE has acknowledged that USACE is the lead federal agency for this undertaking and USACE has been communicating with DOE regarding Section 106 milestones relative to NEPA, etc. USACE sees undertaking as partnership with Applicant (CMP). USACE has requested that CMP take the lead in drafting mitigation measures, MOA, data requests etc. as part of the project under USACE supervision. Federal process is what USACE is focused on. The DOE has limited the scope of its review to the area of the project in the vicinity of the border crossing; therefore, USACE has taken lead because of their broader jurisdictional over the undertaking.

MP – Concurred with JC summary of Section 106/NEPA responsibilities relative to the undertaking.

JF – Have consulting/interested parties to Section 106 been formally identified?

JC – Not formally, although these parties are readily apparent and engaged in consultation at this point in the process:

Consulting Parties: USACE; DOE; CMP; MHPC

Interested Parties: NPS; ATC; MATC

JF - Brief summary of material submitted to USACE as part of Section 106 consultation process documenting completion of identification and evaluation surveys:

Phase I Archaeological Report and Avoidance Plans

MHPC Concurrence Phase I Archaeological Report and Avoidance Plans

Architecture History Reconnaissance Results and Finding of Effects

MHPC Comments on Architecture History Results/Effects

Supplemental Report for Architecture History Finding of Effects

MHPC Comments on Supplemental Report

Merrill Road Converter Station Technical Memo

MHPC Concurrence Merrill Road Converter Station Technical Memo

KM – Indicated that MHPC has received all materials necessary for him to issue recommendations regarding NRHP eligibility, and finding of effects for all resources except the ANST. Additional input would be needed from NPS as the managing agency to develop minimization and mitigation measures for the ANST.

WJ – NPS has only received consultation material in the form of a letter from CMP in December of 2018. Would like a Section 106 consultation package prepared that compiles material specific to the ANST.

MK – Indicated that the Land and Water Conservation Fund Sites could be subject to Section 106 if their status is converted (change in official status with NPS); however, it does not appear that this would happen as part of the undertaking currently proposed. No concern regarding these sites from a historic resource perspective.



MP – Indicated that DOE would like a full Section 106 consultation package for the project in digital format.

CB – Provided overview of results of architecture history survey, NRHP evaluation, and finding of effects studies and MHPC's recommendations pursuant to these studies. Impacted historic properties per MHPC recommendations are:

- Bowman Airfield, Livermore Falls
- Barn at 40 Turmel Road, Livermore Falls
- Hilton Hill Road (1195 and 1294) HD, Starks
- ANST

JF – Effects are visual in nature and cannot be avoided/minimized given the scope and linear nature of the undertaking. JF gave brief overview of draft treatment options that SEARCH and MHPC have been corresponding about with reference to the historic properties at the Bowman Airfield, Barn at 40 Turmel Rd, and Hilton Hill HD.

KM – Indicated that MHPC has provided feedback regarding their preference for alternative mitigation to take the form of additional reconnaissance survey in the towns of Starks and Livermore Falls. KM indicated that MHPC is awaiting a draft treatment plan that will provide details on this option from CMP/SEARCH.

JHC/TB – Provided overview of coordination that has taken place between CMP and MATC/ATC on potential options for trail relocation as well as possible contribution of funds or activities during construction to enhance the hiker experience in this section of the trail. This coordination has been recorded as part of a draft letter from CMP to MATC/ATC. The current alignment of the ANST crosses the existing and proposed transmission line right of way in three locations. A revised alignment would consist of a single crossing. These options would enhance the setting and feel of the ANST in this location. The construction of a parking area at a new trailhead was also part of the CMP MATC/ATC discussions.

TB – Indicated that the preferred location for the ANST would involve the future purchase of an area that is currently under lease to a private party by CMP. If purchased there would be an interim relocation followed by a permanent relocation.

WJ – Noted her concern that the applicant has not been actively coordinating with NPS and that only communication had been a letter in late 2018 and that the Project appears to be moving forward with regard to the ANST without proper consultation with NPS. WJ also inquired as to whether there had been a response to the recent NPS letter regarding project consultation.

MG – Indicated that CMP had responded to the AIR received from NPS and USACE on June 14, 2019.

DU – Requested that NPS be provided Section 106 consultation materials, including condensed information packet for ANST.



JF – Clarified that Section 106 consultation had been recently initiated by USACE and that this meeting was intended to bring all parties together as part of formal consultation. JF emphasized that it was not the applicant’s intent to marginalize NPS in this process and that discussions with MATC/ATC had taken place outside the Section 106 framework. JF asked if NPS was willing to continue a general discussion of applicant efforts to minimize and mitigate adverse effects to the ANST.

WJ – Indicated that NPS felt that further discussion of the ANST was premature and that the draft letter described above by JHC/TB was out ahead of the process.

JC – Indicated that USACE, as lead the federal agency, thought it was appropriate to continue a discussion of the ANST especially as it relates to mapping out next steps in the consultation process.

JF – Provided brief summary of the types of minimization measures which CMP has indicated are possible as part of the undertaking: tapering (which would maintain the tree cover in the area of the trail crossing, structures with reduced height, funds/material support to relocate trail (from three to one crossing), and planting of vegetative buffers. The relocation of the trail would also enhance the setting and feel of the hikers experience through Project area; therefore, it represents a possible mitigation measure. JF asked if, in principal, these could be considered minimization and mitigation measures under Section 106.

KM – Stated that in order for MHPC to offer comment on these measures a summary would need to be submitted to his office that identifies the existing and proposed conditions at the new crossing. In addition, the other measures identified would need to be better defined and mapping provided. Photosimulations consistent with the prior submittals was requested.

DN – Indicated that NPS would like an opportunity to review the proposed locations for the photosimulations prior to them being produced. DN also asked if the areas for the trail relocation had been the subject of cultural resource survey and inquired if the ownership status for these areas was known.

JF – Responded that only the portions of the proposed trail relocation that are within the CMP ROW have been surveyed for cultural resources as part of the Project.

JHC – Responded to DN inquiry that areas outside of the CMP ROW are managed by NPS.

DN – Noted that these areas would need to be surveyed as part of the undertaking. If they are on NPS managed lands then an ARPA permit would be required. ARPA permits are handled by a different office of the NPS and there is typically a 60-day turn-around on applications.

WJ – Stated that NPS would like to review the proposed minimization and mitigation measures in order to be able to have input into the process and methodology for evaluating the effect of



these actions relative to project impacts. For example, WJ noted that NPS will likely have input on the locations of proposed photosimulations.

JC – Stated that he would like to see a graphic which clearly identifies the location of the proposed reroute, tapering, and vegetative screening.

KM/DU/JC – Discussion of applicability of a PA vs. MOA for the project. Specifically as it relates to funds set aside for future relocation of the trail contingent on property acquisition. Consensus was that if funds are set aside for future action then a PA would be necessary to close Section 106.

JC – Stated that it was his preference that a viable ANST relocation for the purposes of minimizing and mitigation project impacts under Section 106 be part of the current consultation. JC emphasized that in order to address public concerns regarding the immediate (construction and operation) related impacts from the project he feels it is necessary to have a substantial proposal to address project impacts to the ANST. Applicant measures to address impacts should not be dependent on future actions.

JC – Indicated that the applicant (CMP) will be responsible for compiling an outline of a draft work plan describing materials proposed for consideration of ANST minimization/mitigation efforts, revised Section 106 consultation schedule, and draft treatment plans.

DN – Inquired about when additional project submittals can be expected and if there will be a follow-up consultation meeting scheduled.

JF – Proposed that the schedule for consultation be designed around the early 2020 USACE issuance of a permit decision.

JC – Stated that due to the multiple overlapping timelines associated with the Project he would like to move the Section 106 consultation process along sooner rather than later. Specifically, the meeting minutes, outline of a mitigation proposal, viewshed methods/locations, and revised consultation schedule within 2-3 weeks.

JF – Indicated that SEARCH would prepare minutes, plan outline, and revised consultation schedule targeting early August for distribution and mid-August for a follow up consultation call.

JF – Asked if any parties wished to discuss archaeological consultation status and/or avoidance measures as part of this call. No parties felt that discussion was necessary.

KM – Confirmed that MHPC recommends a finding of no adverse effect to archaeological resources if the avoidance measures and monitoring plans identified in the Phase I archaeological report are implemented. KM indicated that these measures/plans should be part of the USACE permit and/or the MOA/PA for the project.



ACTION ITEMS

SEARCH/CMP

- Meeting minutes
- Photosimulations of ANST vicinity after NPS location concurrence
- Revised Section 106 consultation schedule
- Outline of treatment plan and viewshed locations/methods for ANST
- Identify areas for vegetative screening
- Treatment plan for other architectural resources
- Consolidated information packet for ANST for NPS
- Digital copies of Section 106 consultation materials for DOE and NPS if they chose
- Preparation of ARPA permit for survey on NPS managed lands
- Development of detailed mapping for ANST proposal



JANET T. MILLS
GOVERNOR

MAINE HISTORIC PRESERVATION COMMISSION
55 CAPITOL STREET
65 STATE HOUSE STATION
AUGUSTA, MAINE
04333

KIRK F. MOHNEY
DIRECTOR

September 26, 2019

Mr. Mark Christopher
TRC
14 Gabriel Drive
Augusta, ME 04333

Project: MHPC# 1285-19/ 1148-17 NECEC
Merrill Strip Twp Alternative Corridor
Town: Franklin County, ME

Dear Mr. Christopher:

In response to your recent request, I have reviewed the information received September 23, 2019 to initiate consultation on the above referenced project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

Based on the information submitted, I have concluded that there will be no historic properties (architectural or archaeological) affected by this proposed undertaking, as defined by Section 106.

Please contact Megan Rideout at (207) 287-2992 or megan.m.rideout@maine.gov if we can be of further assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads 'Kirk F. Mohney'.

Kirk F. Mohney
State Historic Preservation Officer



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
NEW ENGLAND DISTRICT, CORPS OF ENGINEERS
696 VIRGINIA ROAD
CONCORD, MASSACHUSETTS 01742-2751

Regulatory Division
CENAE-RDC

March 10, 2020

Kirk Mohney, Director
Maine Historic Preservation Commission
65 State House Station
Augusta, Maine, 04333-0065

SUBJECT: Request for Concurrence on Determinations of Eligibility and Effects under Section 106 for the New England Clean Energy Connect (NECEC) Project; Corps File No. NAE-2017-01342

Dear Mr. Mohney:

The U.S. Army Corps of Engineers (Corps) is the lead federal agency for compliance with Section 106 of the National Historic Preservation Act (NHPA) for the New England Clean Energy Connect (NECEC) project. Central Maine Power Company (CMP) is proposing to construct approximately 200 miles (322 kilometers) of new and rebuilt transmission lines from the Canadian border to the Surowiec Substation in Pownal and a second line extending from Coopers Mill Substation in Windsor to the Maine Yankee Substation in Wiscasset. The undertaking requires a permit from the Corps under Section 10 of the Rivers & Harbors Act of 1899 for the crossing of the Kennebec River and under Section 404 of the Clean Water Act for the temporary and permanent filling of waters of the United States. The project also requires a Presidential permit from the U.S. Department of Energy (DOE). Additionally, the project crosses and will affect the Appalachian National Scenic Trail (ANST) administered by the National Park Service (NPS) and managed in cooperation with the Appalachian Trail Conservancy (ATC) and other organizations and agencies.

The proponent of the undertaking, CMP, conducted cultural resource investigations in 2018 and 2019 to comply with Maine's Site Law permitting process. Recommendations of eligibility for National Register of Historic Places (NRHP) and potential effects from the project on historic properties (those eligible for or listed in the NRHP) were made by CMP's cultural resources contractor, SEARCH, Inc., in summary reports and addenda for archaeological and architectural surveys and submitted to the Maine Historic Preservation Commission (MHPC) for review and comment. These reports were made available electronically to consulting parties as a Section 106 information packet on 28 October 2019.

Determinations of Eligibility and Effects

The Corps has reviewed and concurs with the recommendations of NRHP eligibility presented in the aforementioned reports, the delineation of the Area of Potential Effects (APE), and the determinations of NRHP eligibility presented in the summary reports and subsequent correspondence with MHPC. For a full accounting of historic properties in the APE (i.e. those

previously identified that are listed in or eligible for listing in the NRHP; newly identified properties determined to be eligible for NRHP listing; and newly identified properties determined as Unevaluated but treated eligible for Section 106 for this undertaking), please refer to correspondence between MHPC and SEARCH dated January 18, 2019 and March 26, 2019 included in the aforementioned previously distributed Section 106 information packet.


The Corps has determined the NECEC undertaking will have an adverse effect on historic properties. Specifically, the following historic properties will be adversely affected by the undertaking:

- Appalachian National Scenic Trail (SM #66), Bald Mountain Township
- Rural Agricultural Historic District (ID-1028), composed of E. Gray Farm, 1294 Hilton Hill Road/Route 43, and B.F. Hilton Farm, 1195 Hilton Hill Road/Route 43, Starks
- Barn at 40 Turmel Road (ID-795), Livermore Falls
- Bowman Airfield (ID-719), River Road, Livermore Falls

The Corps requests your comment and/or concurrence regarding these determinations of eligibility and effect regarding this undertaking. Additionally, the Corps will continue consultation to resolve the determined adverse effects from this undertaking on the above listed historic properties and requests your involvement in that consultation. Toward that end, we suggest a meeting with you and the CMP team to strategize a path forward. This may include, but not be limited to, a Memorandum of Agreement detailing actions to avoid, minimize or mitigate potential adverse impact to historic resources.

If you have any questions concerning this matter, please contact Jay Clement at 207-623-8367 at our Augusta, Maine Project Office.

Sincerely,


Frank J. Del Giudice
Chief, Permits & Enforcement Section
Regulatory Division

Copies Furnished:
Melissa Pauley – DOE
Wendy Janssen – NPS
Jacob Freedman – Search, Inc.



**MEETING MINUTES:
NEW ENGLAND CLEAN ENERGY CONNECT
SECTION 106 DETERMINATION OF ELIGIBILITY AND MITIGATION**

Date/Time: March 26, 2020 from 12:00 to 2:00 PM EST
Location: Conference Line: +1 407-349-4855, 1177313364#

ATTENDEES

Jay Clement (JC), United States Army Corps of Engineers
Kirk Mohney (KM), State Historic Preservation Officer
Megan Rideout (MR), State Preservation Coordinator, Review and Compliance
Gerry Mirabile (GM), NECEC Permitting Manager, Central Maine Power Company
Jacob Freedman (JF), Project Manager, SEARCH
Hannah Dye, (HD), Architectural Historian, SEARCH
Mark Goodwin (MG), Senior Environmental Scientist, Burns & McDonnell
Tony Barrett (TB), Maine Appalachian Trail Club
Hawk Metheny (HM), Appalachian Trail Conservancy
Denise Nelson (DN), National Park Service
Mary Krueger (MK), National Park Service
David Uschold (DU), National Park Service
Melissa Pauley (MP), United States Department of Energy

ACRONYMS/ABBREVIATIONS

AIR – Additional Information Request
ANST – Appalachian National Scenic Trail
ARPA – Archaeological Resource Protection Act of 1979
ATC – Appalachian Trail Conservancy
CMP – Central Maine Power
DOE – Department of Energy
EA – Environmental Assessment
EIS – Environmental Impact Statement
FONSI – Finding of No Significant Impact
HD – Historic District
LUPC – Maine Land Use Planning Commission
MATC – Maine Appalachian Trail Club
MATLT – Maine Appalachian Trail Land Trust
MDEP – Maine Department of Environmental Protection
MOA – Memorandum of Agreement
NEPA – National Environmental Policy Act

www.searchinc.com



NPS – National Park Service
PA – Programmatic Agreement
Project – New England Clean Energy Connect Project
ROW – Right-of-Way
Section 106 – Section 106 of the National Historic Preservation Act of 1966, as amended
USACE – United States Army Corps of Engineers

MEETING SUMMARY

1. Meeting Open and Roll call

JF – Brief meeting welcome and roll call of attendees.

JF – Meeting purpose and goals. Review project timeline; discuss USACE Determinations of Eligibility and Effects, MHPC response, and other consulting parties' comments (if any); provide overview of draft Treatment Plans; discuss plan for draft MOA/PA submittal and review.

2. Overview of Project and Overall Schedule

JF – Requests CMP update group on overall project and project timeline.

GM – Clarifies will keep overview to Land-Use and Environmental approvals.
January 8, 2020: LUPC approved a Site Law Certification for the Project.
March 13, 2020: MDEP issued draft approval under Natural Resource Protection Act, Site Location and Development Act and Water Quality Certification Law for the Project.
Original comment deadline of March 27, 2020 has been extended to April 10. DEP will receive comments and forward to CMP. Estimate a late April decision from DEP.
Working on USACE approval process including Section 106 (this meeting), and Section 7 (Endangered Species Act). Additionally, working on an AIR from early March from the USACE that also incorporates an AIR from the DOE with a deadline of April 2, 2020.
Presidential Permit from DOE applied for in July 2017; as part of AIR request, updating Presidential Permit application to reflect current scope.
Project passes through 24 organized municipalities; received approval from Moscow Maine on January 8, 2020 with six additional permits pending. Will apply for remaining permits over next several months; this has been slowed down by Covid-19.

JF – Inquired about the pre-Covid-19 target for construction.

GM – MDEP and USACE approval are pre-requisites for starting construction. Have LUPC approval for the unorganized townships, so with exception of Beattie Pond which effects the Presidential Permit jurisdictional area, CMP could start in unorganized townships as soon as MDEP and USACE approvals are received. Organized towns (assuming have approval from MDEP and USACE), will



start construction in towns as approvals are received. Overall estimate for start of construction is Summer/Fall of 2020, but timelines are currently uncertain for several reasons.

JF – Inquired as to if USACE or DOE would like to comment on the federal permitting schedule.

JC – GM covered most of the milestones still in progress. From the USACE viewpoint, still need DEP final Water Quality Certification, need to complete Section 7 consultation process with Fish and Wildlife, need to conclude Section 106 process, write EA, and ultimately work towards a permit decision. Trying to get as much completed as possible considering current slow-down caused by Covid-19.

MP – Adds that DOE has committed to a 30-day comment period on the draft EA.

DU – Inquired as to if there is an estimated schedule for public review of EA and if a FONSI will be signed.

JC – USACE does not publish EA's. Currently have a rough draft that is under revision which will include a statement of findings. These support permit decisions so there is no additional time clock for public review.

3. Section 106 Consultation Process & Schedule: Bowman Airfield, Barn at 40 Turmel Road, and Hilton Hill Historic District

JF – Given the USACE Determination of Eligibility and Effects concerning four architectural properties (Bowman Airfield, Barn at 40 Turmel Road, Hilton Hill Road Historic District, and the Appalachian National Scenic Trail [ANST to be discussed in more detail]) and MHPC concurrence with those findings, inquired as to if any other agencies or consulting parties have comments on those findings.

JC – (to CMP and CMP team) Inquired as to if the latest draft decision from the MDEP and its various conditions have altered the potential effects (either reduced or added new effects).

JF – MDEP decision has a different interpretation concerning impacts than the USACE (under 106) and has concluded that none of the resources will be “unreasonably adversely effected by the Project.” MDEP conditions were limited to following the avoidance plans as outlined in the Phase I Archaeological report. A reroute has been filed since the initial survey (Merrill Strip of Beattie Pond Alternative); no archaeological or architectural resources were within the footprints of the alternative, which was concurred by the MHPC. Slight alterations in Project design, but no changes in effects to historic properties.

KM – Would like to be provided with the MDEP language.

GM – Posted on MDEP website, can send link.



JC – Has .pdf document, will send

JF – State findings will not affect Federal and can be different but will not affect the 106 process. Inquires if anyone would like to comment on the USACE Determination of Eligibility and Effects.

DU – NPS and ATC staff have not specifically discussed, is one required if in concurrence or only respond if have comments.

JC – If do not intend to comment, an email is enough to bring closure.

DU – Will talk to Wendy Janssen (WJ; National Park Service superintendent) and see if NPS would like to submit something.

JF – Inquired as to if NPS concurs with the findings concerning the Appalachian Trail. If NPS has a different view, that should be addressed as a part of the Section 106 consultation process.

DN – NPS will likely concur but, ultimately need to confer with WJ

JF – Considering there will be adverse effects, suggests a MOA with Treatment Plans attached for the four architectural resources that are being adversely affected by the Project. Inquires whether anyone would like to discuss the mitigation measures for the Airfield, barn, and district. Consultation with MHPC indicated an alternative form of mitigation as opposed to a traditional HABS/HAER for the individual properties. This would be additional reconnaissance level survey in the towns associated with the resources. Rough level of effort outlined approximately 150 – 200 resources documented. Inquires whether MHPC representatives feel that is a sufficient level of effort.

MR – Inquired about how the number of properties was decided upon based on 1400 hours of survey (i.e., 10 days of survey).

JF – SEARCH took estimates of a HABS Level 3 documentation of the three properties and came up with 1400 hours. Then SEARCH determined how much time was spent on all the resources identified for NECEC and used an hourly rate to generate the 150 – 200 resources (based on 1400 hours of time being spent on the Project for reconnaissance survey).

KM – Believe the reconnaissance approach is appropriate but would like to have further discussions with SEARCH as to what areas should be focused on an whether 1400 or 1600 hours is appropriate.

JC – Inquired as to if this may all be framed up in a pertinent fashion within a MOA (something that is verifiable) – would like the MOA to bind CMP clearly.

JF – SEARCH should consult with MHPC to develop a detailed treatment plan that would be attached to the MOA.



KM – Agreed.

HD – MHPC suggested additional reconnaissance level-survey should be focused in areas where no existing survey coverage was present in these towns, i.e., not survey the entire locality, but look at what is existing and cover areas that have not previous survey.

MR – Agreed, Livermore Falls and Stark have limited previous surveys; MHPC can offer guidance.

4. Section 106 Consultation Process & Schedule: Appalachian National Scenic Trail

JF –SEARCH and CMP ANST mitigation Treatment Plan includes: minimize impacts by relocating the trail from three ROW crossings to one crossing (both ATC and MATC have indicated this is a favorable outcome), CMP will taper the height of vegetation within the corridor near the ANST to limit the visual impact, and lastly a vegetative buffer where ANST meets Troutdale Road to try and decrease the visibility of the corridor along the trail.

HM – Inquired if TB can discuss what the ATC and MATC have been working on to minimize impacts.

TB – Started conversations with CMP once Northern Pass was denied in New Hampshire to discuss how to minimize/avoid impacts. There is also vegetative screening at the easternmost crossing, which is the most critical. Concerned about use of herbicides and would like to discuss with CMP not using herbicides in this area. Lastly, CMP is supposed to reduce tower heights between structures 529 and 458 from potentially 100' to 70', but this was only conferred verbally.

GM – Inquired as to whether structures viewable from ANST W of Troutdale road and W of Moxie Pond part of pending proposal and if changes were made.

DN – Inquired about the reduced height of towers in the vicinity of the ANST.

GM – Does not have those numbers on hand, but believes the heights are close to the heights of extant structures in Section 222.

DN – Inquired as to if the photo simulations provided reflect these revised heights.

MG – Confirmed that simulations for that section of the corridor reflect the lowered heights and are a part of the record.

JF – MG implied that the reduction in tower height has been planned for some time and not a new condition from the MDEP.

MG – MDEP meant to recognize those structures would be reduced in height from the original proposal.



GM – Even if CMP had not proposed it, it would have been a special condition in the MDEP draft order, and it wasn't.

JC – Inquired as to if GM can continue discussion concerning herbicide use and other vegetative screening

GM – Knows TB has discussed these issues with others at CMP, but not with GM – certainly willing to consider it. Vegetative plantings are proposed along Troutdale Road co-located with the ANST. Less developed is the planting plan along the eastern most crossing as it depends on the final approved re-route and approved by ATC, MATC, and NPS. A conceptual plan of planting has been provided and needs to be finalized.

JC – Inquired as to if the three parts of the Treatment Plan as introduced by JF, plus additional concerns from TB that need to be decided upon, are the framework for the MOA specific to the ANST are acceptable to CMP. Pole height already in the record, so that is agreed upon, but the remaining parts, CMP needs to decide upon or facilitate decisions.

TB – Use of non-specular conductors (p. 48 of draft MDEP order) should be a parallel discussion to the tower height.

JF – Appropriate to add all these conditions to minimize impact to the ANST and have CMP commit to them.

GM – If required in order, CMP will commit to them.

JF – Inquired as to whether requested additional photo simulations locations are appropriate and if coverage is sufficient or do present parties feel different locations would be more appropriate or different locations than the ones provided.

JC – Inquired as to if group feels additional photo simulations are necessary. If group concurs no additional photo simulations are necessary, then this will speed up the timeline.

KM – Would still like to see them. Inquired as to if re-route of ANST has been approved by the MATC, ATC, and NPS.

JF – Understanding is the MHPC and CMP worked collaboratively to create the re-route and are still waiting for comment from the NPS.

DN – In general, NPS agreed with the reduction of the crossing, but the ANST is a unique resource and the NPS relies heavily on cooperative partners concerning any changes; wants to ensure that the MATC and ATC support the re-route. Current re-route stays off private land and is on NPS land. Still needs to be analyzed concerning impacts to other resources.



DU – Agreed with DN and stressed that the re-route does not affect wetlands, etc. which the NPS will need to document.

JC – Inquired as to if CMP team can provide previous environmental surveys covered these areas.

JF – Clarifies map symbology – yellow line is the current ANST, and the black and pink line is the proposed re-route. The point of the re-route that is within the ROW in the northern part of the map is a tapered area where the trail meets Troutdale Road. It continues along Troutdale Road before crossing a narrow at Joe’s Hole and Baker Stream. From there the re-route follows a more westerly course before crossing the ROW once in the southern part of the map.

GM – (to MG) Inquired as to if environmental surveys included areas outside of the ROW as the cultural surveys did, i.e., did the environmental surveys include the re-route.

MG – Not confident the environmental surveys went passed the ROW as surveys are required– will check data.

GM: Previous environmental surveys were confined to the ROW, and did not include the ANST re-route

DN – If a re-route is settled upon, then agencies need to work with CMP to complete compliance responsibilities.

GM – Inquired as to whether that is the responsibility of CMP or NPS to conduct resource surveys if not already done.

JC – CMP should take that one – fastest way forward.

DN – Depending on the type of survey, ARPA for archaeological or Special Use for environmental survey – need to have some discussion focused on what is needed to meet compliance responsibilities

DU – To conduct these surveys, will need a special use permit that perhaps could cover all the environmental surveys, and potentially an ARPA permit for archaeology. Should have discussions soon to facilitate getting these permits through.

JF – (to NPS) Inquired as to whether this would first be an internal discussion within the NPS, then with the NPS, Burns & McDonnell, CMP, and SEARCH in terms of the additional permits that need to be filed to complete necessary surveys so NPS can assess environmental impacts to re-route? Or meet directly with CMP, SEARCH, and Burns & McDonnell.

DU – NPS should first have discussions with HM and TB to ensure all parties agree with the proposed re-route and all mitigation proposals. Then, all the groups can get together and discuss the next steps. Conversations also need to happen with WJ present.



TB -Agreed with DU, and initial discussion could just be with DU and DN and schedule with WJ later.

HM – Agreed with DU, additional considerations for the proposed re-route on the west side of Troutdale Rd. Need to make sure location of proposed re-route is understood. January letter from CMP concerning the acquisition of a property at that location had a camp that has now collapsed. This would expand options for the re-route.

JC – Concerning natural resource surveys; the window to conduct these surveys is fast approaching and is short.

GM – Agreed and feels confident can get a call next week.

KM – MHPC does not need to necessarily need to be a part of the discussions between the NPS, ATC, and MATC. Still a Section 106 process and the MHPC would like to be kept in the loop concerning agency and consulting parties' decisions. Re-route could affect archaeological resources and resource is NRHP eligible. Additional concerns over two points where the ANST comes very close to the Federal Land boundary – has anyone considered the implications of something happening outside that boundary and how that effects the hiker experience. Anything that can be done to expand buffer?

HM – ATC has been studying the concept of buffers especially where it concerns the portion on the west side of Troutdale Road – there is a pinch point between private property, NPS land, and the CMP corridor; options are limited. Sections on the east side, ATC will provide a better alignment.

DU – Concerning the parcel acquired by CMP along Troutdale Road, if it were transferred (does not believe CMP plans to hold it long term) – couple options: it could go to NPS or MATLT for example. This would provide additional protection whether federal land or held by a land trust.

JF –Earlier in process, the current leaseholder of that parcel was not interested in transferring the property. When the re-route was developed, it did not include that piece of land. Having a viable re-route was a priority so that there was an action item that could be accomplished for a variety of reasons, but most importantly for the hiker experience and, during construction, fewer crossing will be preferable. JF and GM can inquire as to the status of that parcel unless GM that information available.

GM – Does not have that information readily available.

JF – Will investigate the status of that parcel and will send an email to the group. SEARCH and CMP feel that that the land being transferred to the MATLT is the best option to protect the setting and feeling of the trail, protection that would be permanent and ultimately transferring the land (and any additional parcels) to the MATLT is easier logistically instead of transferring to



Federal control. Inquires of the NPS whether this is an appropriate way to mitigate effects to the trail versus having them under NPS jurisdiction.

DN – At this time, NPS would likely concur that this solution is preferable to the NPS taking on additional ownership.

HM – May be complications with the camp lease, even though the camp has collapsed. It would be more complicated for the NPS than MATLT. Inquires of TB whether there have been any recent discussions at the MATLT about taking the land transfer?

TB – Both the MATLT and the MATC are apprised of these discussions and both in concurrence with these potential possibilities.

DU – NPS, MATC, and ATC will meet sometime next week to discuss the reroute.

JF – Any other data that you would need to assist the analysis?

DN – Would like shapefiles and KMZ

JF – Will send all pertinent data to the group.

JC – October report still probably up to date, but after July 15th meeting, CMP consultant went on-site, so CMP has prepared more accurate depictions of the crossings. These are attached to the commitment letter draft.

JF – Will also circulate these along with the digital data. Inquires about the proposed parking lot expansion in conjunction with the ANST reroute is that considered an appropriate mitigation effort under 106 or do folks have comments. It will potentially also involve natural and cultural resource review like the reroute.

DN – If it is not minimizing impacts under 106, (not opposed to the parking area if there is a need for it) then it doesn't fit as a minimization measure.

JF – Conceived more as an alternative mitigation approach to the projects impacts.

DN – Something to discuss in the internal meeting with MATC and ATC.

TB – Since the parcel lease on Troutdale Road was not going to be resolved in a timely manner, agreed to an interim alternative route (although route through parcel is route of preferred trail, sometime in the future). The future routing comes out at what is now an informal parking area, which is why it would be impacted. CMP, has offered to pull out stumps and lay down gravel. In that sense it is a minimization and not a mitigation effort.



HM – A better defined parking lot that is maintainable is better in the long-term. Informal parking areas tend to cause more problems. So, the expansion of the parking lot is an added benefit.

JF – Inquired whether parties feel a PA (more complicated) versus an MOA is most appropriate for the Project.

JC – USACE would prefer the MOA

DU – NPS agrees

JF – Inquires whether the minimization and mitigation efforts are sufficient to address adverse effects to the ANST and can consulting parties and CMP move forward with an MOA (which has Treatment Plan for the ANST as a condition) understanding there are details concerning the final points of the routing that may still be worked out for the ANST re-locations.

KM – If the NPS, ATL, and MATC are ok with that then the MHPC is.

JC – Would like guidance from NPS

DN – NPS representative cannot give definitive answer without WJ present but does feel the efforts discussed are sufficient.

HM – Been studying proposal for awhile and have more details to sort out, but taken as a package, do agree the efforts are sufficient.

DU – Inquired as to whether DN, HM, and TB schedules will allow for a meeting early next week.

TB – Inquired as to whether DU, DN, TB, and HM could stay on the line following the meeting to discuss a meeting time.

JC – Looks at applicant and their team to frame the MOA, then USACE, DOW, NPS, ATC will have an opportunity to provide edits.

JF – Will happily support USACE with the MOA and Treatment Plans as soon as possible. It will be a formal document that everyone can comment on. Hopefully get to agreed upon Treatment Plans suitable for everyone's signature.

DN – Inquired as to if SEARCH will be able to provide digital data soon?

JF – Yes, SEARCH has that data in-house and will provide to NPS.



ACTION ITEMS

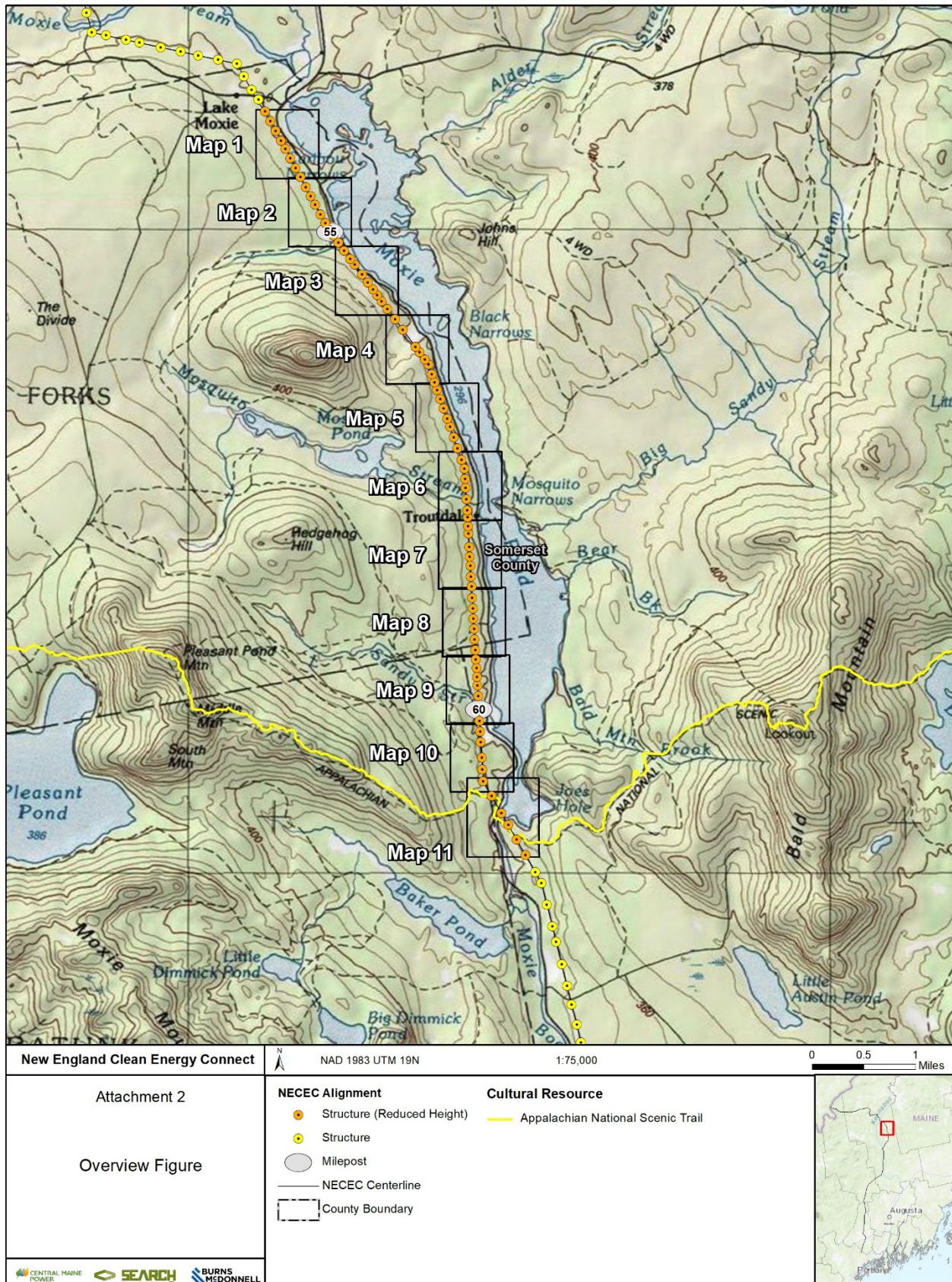
SEARCH/CMP

- Meeting minutes
- Provide NPS with additional information so they can assess the trail (shapefiles and KMZ)
- Investigate current status of parcel 1609 at Troutdale Road in terms of current viability as an alternative ANST route
- Investigate the herbicide and additional vegetation barrier plantings concerns brought up by TB
- Generate additional photo simulations and circulate ASAP
- Coordinate with NPS concerning approach, timing, scope, and permits required to conduct additional surveys.
- Status of the commitment letter between ATC and CMP.

NPS/MATC/ATC/USACE

- Wait for update from NPS, MATC, and ATC (next week) as to the appropriateness of these measures for development of the treatment plan for the ANST
- USACE, with treatment plans for all resources discussed, will circulate document following comments

ATTACHMENT 2
ANST MINIMIZATION AND MITIGATION AREA

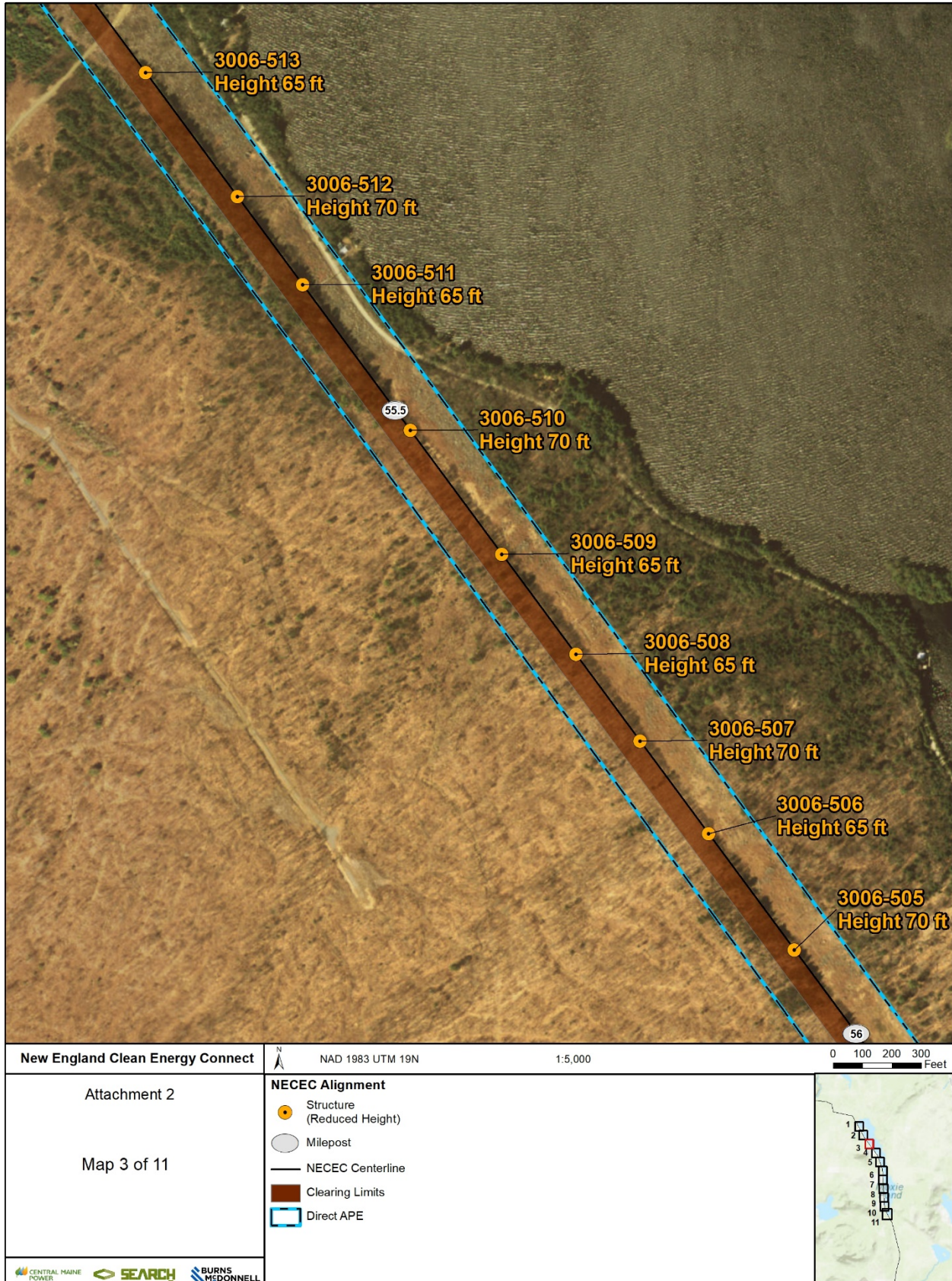




<p>New England Clean Energy Connect</p>		<p>NAD 1983 UTM 19N</p>	<p>1:5,000</p>	<p>0 100 200 300 Feet</p>
<p>Attachment 2</p>	<p>NECEC Alignment</p> <ul style="list-style-type: none"> ● Structure (Reduced Height) 54 Milepost — NECEC Centerline Clearing Limits Direct APE 			
<p>Map 1 of 11</p>				

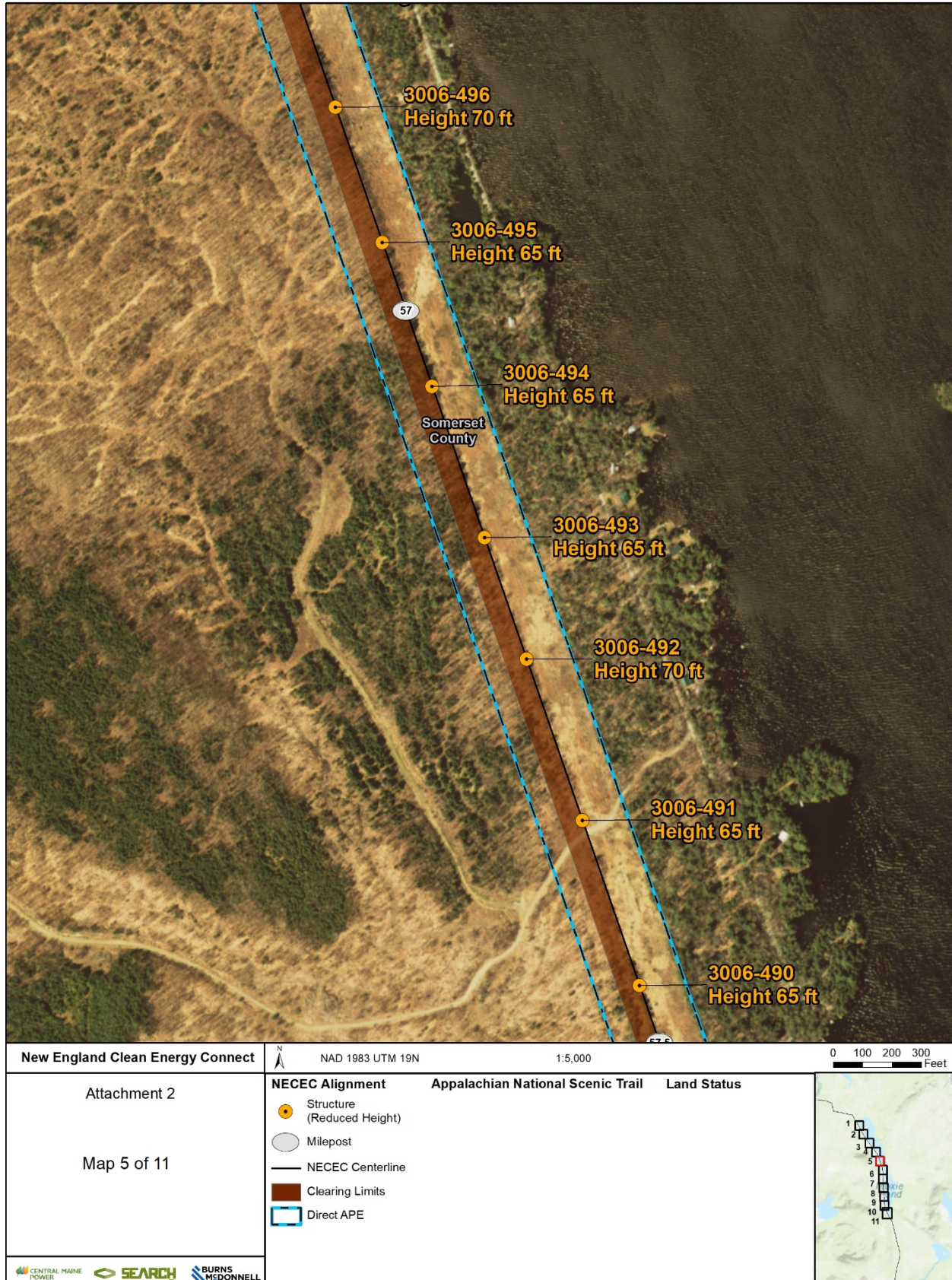


New England Clean Energy Connect		NAD 1983 UTM 19N	1:5,000	0 100 200 300 Feet
Attachment 2	NECEC Alignment ● Structure (Reduced Height) ○ Milepost — NECEC Centerline ■ Clearing Limits □ Direct APE			
Map 2 of 11				





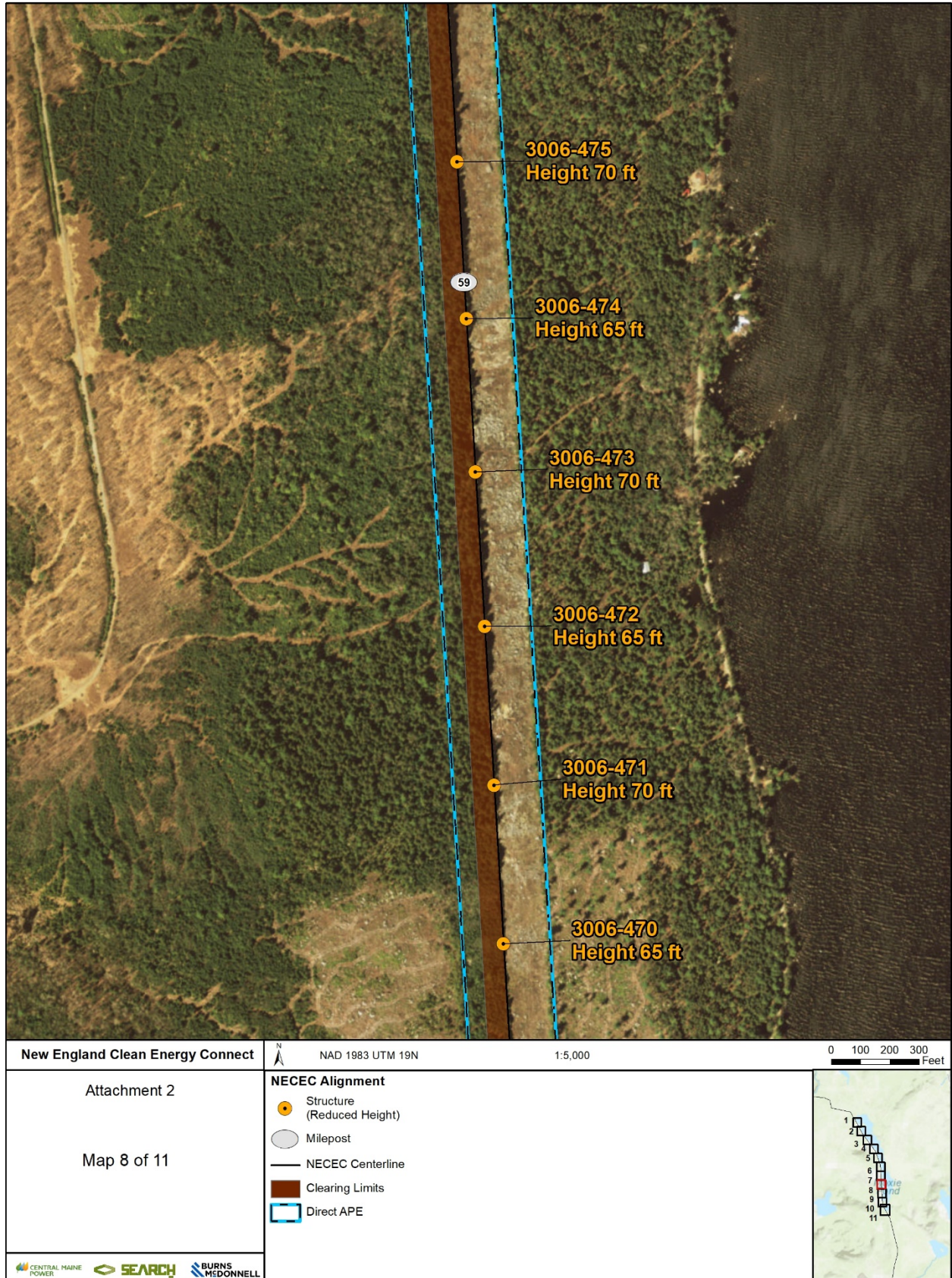
New England Clean Energy Connect		NAD 1983 UTM 19N	1:5,000	0 100 200 300 Feet
Attachment 2	NECEC Alignment			
Map 4 of 11	● Structure (Reduced Height) ○ Milepost — NECEC Centerline ■ Clearing Limits □ Direct APE			





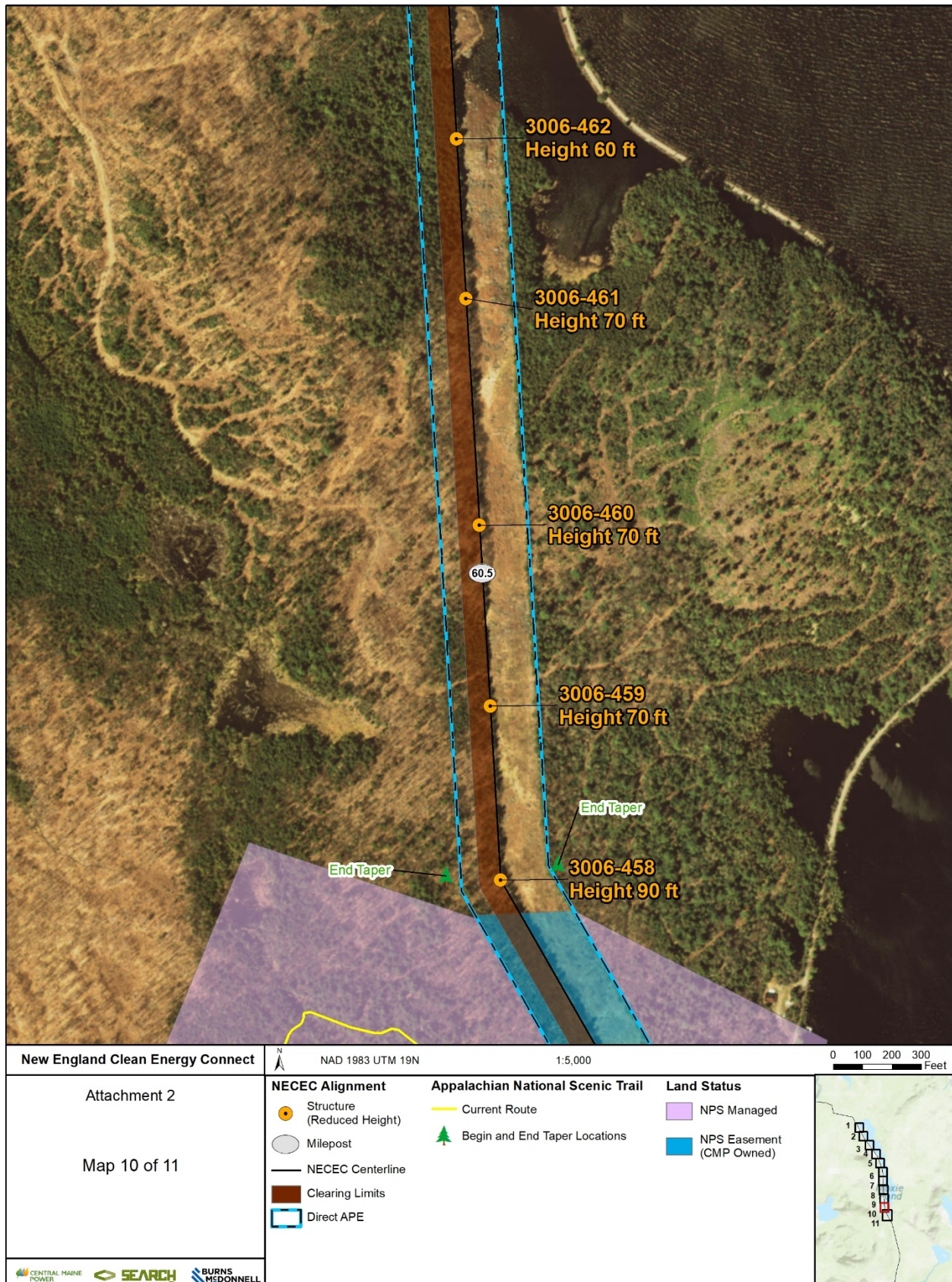


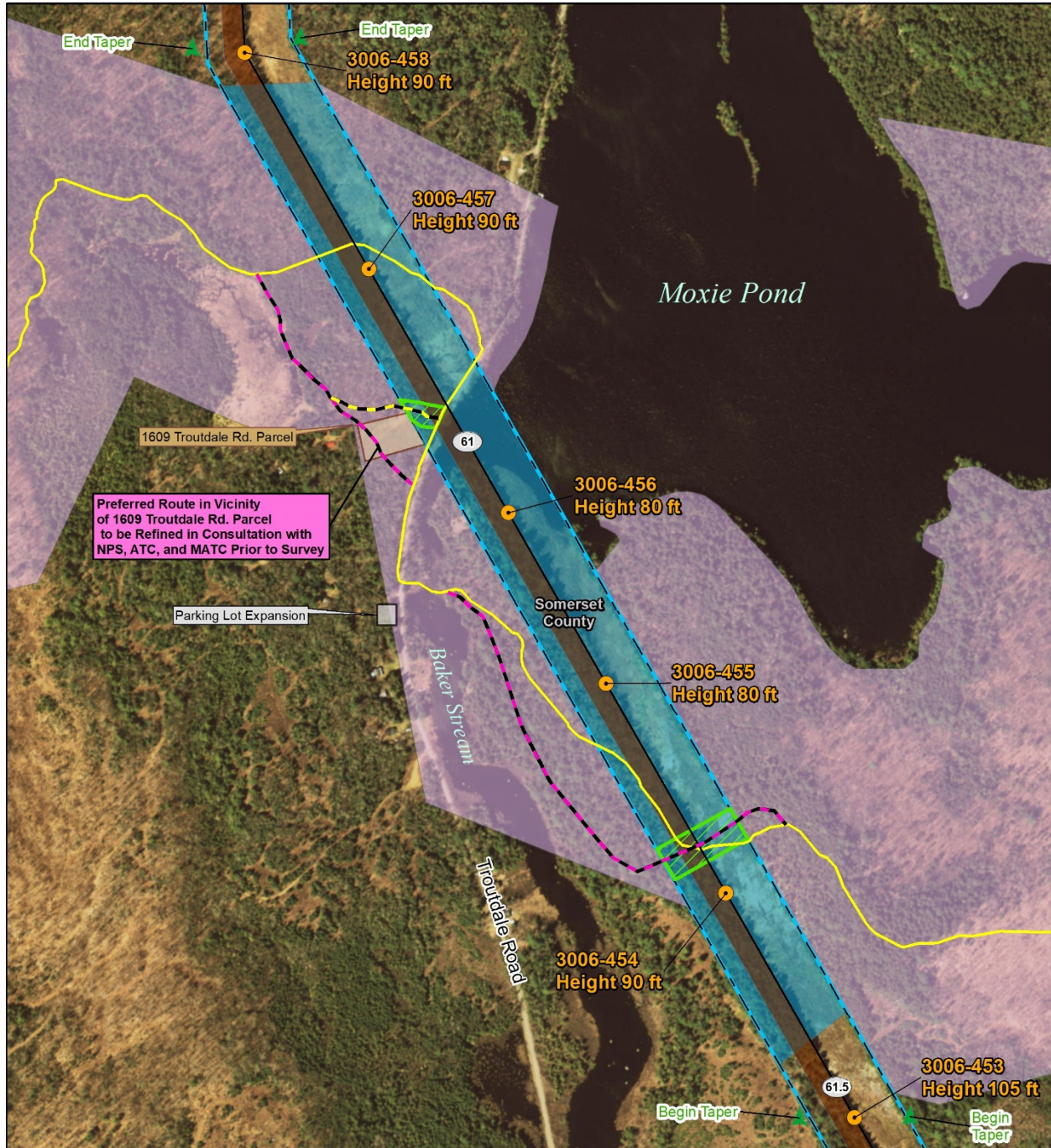
<p>New England Clean Energy Connect</p>		<p>NAD 1983 UTM 19N</p>	<p>1:5,000</p>	<p>0 100 200 300 Feet</p>
<p>Attachment 2</p>	<p>NECEC Alignment</p> <ul style="list-style-type: none"> ● Structure (Reduced Height) Milepost — NECEC Centerline Clearing Limits Direct APE 			
<p>Map 7 of 11</p>				





New England Clean Energy Connect		NAD 1983 UTM 19N	1:5,000	0 100 200 300 Feet
Attachment 2	NECEC Alignment ● Structure (Reduced Height) ○ Milepost — NECEC Centerline ■ Clearing Limits □ Direct APE			
Map 9 of 11				





New England Clean Energy Connect		NAD 1983 UTM 19N	1:5,750	0 100 200 300 Feet
Attachment 2 Map 11 of 11	NECEC Alignment	Appalachian National Scenic Trail	Land Status	
	<ul style="list-style-type: none"> Structure (Reduced Height) Milepost NECEC Centerline Clearing Limits Direct APE 	<ul style="list-style-type: none"> Current Route Preferred Route Alternative Route Begin and End Taper Locations Approximate Vegetative Buffer 1609 Troutdale Rd. Parcel Parking Lot Expansion 	<ul style="list-style-type: none"> NPS Managed NPS Easement (CMP Owned) 	