

Q195 Transmission Line Replacement

Waterford and Concord, VT

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1

Introduction

Public Service of New Hampshire doing business as Eversource Energy ("Eversource") has identified the need to reconstruct its Q195 Line. The purpose of the Q195 Reconstruction Project ("Project") is to fully reconstruct the existing Q195 Line, a 115,000 volt ("115-kV") electric transmission line, located within existing transmission line rights of way in the states of New Hampshire and Vermont. The Q195 Line is owned by Public Service of New Hampshire, an electric utility doing business as Eversource Energy ("Eversource"). The Q195 line is a ± 17.42 -mile line which runs between two Eversource substations: Whitefield Substation, located in Whitefield New Hampshire, and Littleton Substation, located in Littleton, New Hampshire. The Q195 Line also connects to a National Grid Station: Moore Substation in Littleton, New Hampshire, which is located to the north of Littleton Substation. Approximately 9 miles of the Q195 transmission line are located in Vermont, traversing through the municipalities of Waterford and Concord.

The Q195 Line, including structures, conductor, and static wire, was initially constructed in 1958, with a newer "tap" portion constructed in 1987. Subsequent to this initial construction, the line has been subjected to routine maintenance, including certain storm hardening modifications in 2015¹ and the addition of supplemental lighting arrestors in 2019.² The Q195 transmission line, in total, is supported by 227 wood or weathering steel single-circuit H-frame structures. There are 115 structures supporting the line in Vermont (114 on Q195 line and 3 on the Q195-Tap).

In Vermont, Section 248 of Title 30 requires a Project obtain a certificate of public good ("CPG") from the Public Utility Commission ("PUC") before beginning site preparation or construction of electric transmission facilities, electric generation facilities, and certain gas pipelines within the state.

As part of the PUC's review, Section 248 of Title 30 requires the PUC to make a finding that the Project will not have an undue adverse effect on historic sites. This is called a "positive finding." As defined in 10 V.S.A. § 6001(9), and as applied to the PUC process, "historic site" is defined as any site, structure, district, or archaeological landmark that has been officially included in the National Register of Historic Places ("National Register") and/or the State Register of Historic

¹ Vermont Public Service Board Docket No. 8487, Order of 5/17 2015.

² Vermont Public Utility Commission Case No. 20-3431, Order of 1/20 2021.

Places ("State Register"), or which is established by testimony of the Vermont Advisory Council on Historic Preservation as being historically significant and thereby eligible for State Register listing.

The purpose of this Historic Resources Assessment ("Assessment") is to assist the Vermont Division for Historic Preservation ("DHP") in its review. To guide its review and to provide the PUC with a positive finding, the DHP relies on Rule 4 (Historic Sites and the Act 250 Process) of the Vermont Historic Preservation Rules. Those rules consider both State Register listed and State Register eligible properties and require that a project be reviewed for direct effects on historic sites as well as indirect effects within a project's Area of Potential Effect ("APE") defined in Section 3.2 below.

This Assessment describes the proposed Project; explains the methodology employed to identify historic sites within or in the vicinity of the Project; assesses the integrity of the historic sites identified; and recommends a determination of effect on both above-ground historic sites and archaeological resources.

Archaeological resources were evaluated by Gray & Pape Heritage Management ("Gray & Pape"). A Phase IA Archeological Assessment and Reconnaissance Survey was prepared in 2020. A subsequent Phase IB investigation was conducted along a portion of the project in 2022-23. An Archaeological Resources Assessment for off-right-of-way access roads associated with the Project was completed in 2024. The archaeological findings have been incorporated into Section 5.0 of this Assessment.

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Methodology

To prepare this Historic Resources Assessment, DHP standards were followed as outlined in Section 1 of this Assessment. These standards are modeled on the regulations established by the Advisory Council on Historic Preservation to implement Section 106 of the National Historic Preservation Act (36 CFR 800).

Existing literature used to complete this Assessment included the resources available at the DHP's Online Resource Center; specifically, the Vermont Historic Sites & Structures Survey ("VHSSS")³ and the National Register and State Register listings.⁴ Using these resources, VHB identified known historic sites within the Project area to determine the effects of the proposed Project on these historic sites, if any.

Following the review of existing literature, VHB conducted field visits of the Project site to confirm the desktop research, confirm the APE, and review potential effects. After conducting fieldwork, literature review, and a review of site plans and equipment specifications provided for the Q-195 Transmission Line replacement, the Project's potential effects to above-ground historic sites were assessed based upon the guidance document developed by DHP, *Criteria for Evaluating the Effect of Proposed Telecommunications Facilities, Transmission Lines, and Wind Power Facilities on Historic Resources*.⁵

This guidance was established to avoid adverse or undue adverse effects caused by direct or indirect impacts from these categories of installations.

The DHP Criteria are explained as follows:

"The installation of telecommunications facilities, transmission lines, wind power facilities and other similar projects may affect historic resources directly and indirectly. Evaluations of project impacts are made on an individual case-by-case basis and focus on direct and indirect impacts of a substantial nature. Use of this criteria further implements any applicable state and federal review standards" [such as the abovementioned Act 250 criteria].

³ The VHSSS is also now referred to as the Vermont Architectural Resource Inventory (VARI)

⁴ www.orc.vermont.gov

⁵ https://outside.vermont.gov/agency/ACCD/ACCD_Web_Docs/HP/Resources_Rules/Telecom%20Criteria.pdf

For this Project, the APE for direct effects is the Project footprint – i.e., a geographic area encompassing the physical structures to be impacted and all areas of potential ground disturbance. The APE for indirect effects is more comprehensive and consists of a one-half mile geographical area from either side of the ROW. More detailed descriptions of the APE are included in Section 3 of this Assessment, and the APE is depicted on the Area of Potential Effect Map included as **Appendix A**.

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Project Description and Area of Potential Effect

The Q195 transmission line is a roughly 17.5-mile 115-kV transmission line, located within an existing right-of-way (“ROW”) which stretches from the Littleton Substation in Littleton, New Hampshire⁶, to a 115-kV substation in the town of Whitefield, New Hampshire. Traveling northeast from the hydroelectric station, the line passes through a rural and largely forested landscape in the towns of Waterford and Concord, VT for roughly 9 miles before turning east and crossing the Connecticut River and entering the town of Dalton, NH. From Dalton, the line continues east to the Whitefield, NH substation.

Within Vermont, the Q195 transmission line occupies an approximately 150-foot-wide cleared ROW. For approximately 5.4 miles, northeast from the Moore hydroelectric station in Vermont, the Q195 transmission line shares the ROW with an electrical transmission line owned by National Grid. Along this portion of the line, the transmission line ROW is approximately 300 feet wide. The Q195 Line structures consist primarily of wood H frames, although there are a small number of three-pole towers scattered along the line. See **Appendix A** – Area of Potential Effect Map and **Appendix C** (Photographs 4 and 24-27).

Project Description

The proposed Project is part of an Eversource reliability initiative to add reliable high-speed, high-capacity intra-system communications to all Eversource substation and transmission facilities over the next six years to facilitate outage response and reliability objectives. Specific to transmission lines, this means replacing the current static wire, located at the top of the structures, and used for lighting protection, with Optical Ground Wire (“OPGW”). OPGW will replace the function of the existing static wire, as well as providing fiber for intra-system communications. As a result of the OPGW installation, Eversource Engineering has determined that the existing, aged wood H-frame structures cannot support the additional loading caused by

⁶ A 1,250 foot “transmission tap” also connects to the Samuel C. Moore Hydro Station, also located in Littleton.

the installation of the OPGW, as OPGW is heavier than the existing static wire. Consequently, the existing structures will need to be replaced. The wood H-frame structures will be replaced with weathering steel H-frames. Currently, some of the structures exhibit cross bracing. The replacement structures will also have cross bracing. No additional cross bracing will be added.

The average height of the existing structures in Vermont is 45.3 feet. The average height of the proposed replacement structures in Vermont is 56.6 feet. Height increases range from 1.2 feet to 28.7 feet, with one proposed structure in Concord to increase 35.9 feet. Height increases are driven by the need to adhere to the current National Electrical Safety Code clearance requirements and Eversource standards. Variation in height increases is primarily due to terrain and/or crossings.

As part of the proposed work, the existing, aged conductor will also be replaced. The transmission line's existing lightning arrestors will be transferred to the new conductors. No new lightning arrestors will be added.

The work will entail the construction of new access roads, both in ROW and off-ROW, in certain locations to avoid sensitive environmental conditions and achieve construction efficiencies, though existing access roads will be utilized to the extent possible. Existing access roads may need to be improved (hardened and/or widened) to accommodate construction vehicles. Gravel or matted work pads at structure locations will also be required, to provide a safe, level work area. At the completion of the Project, matted work pads and matted access roads will be removed and disturbed areas restored. Gravel work pads and new access roads will remain to facilitate future maintenance work.

APE Description

The APE, as defined by 36 CFR 800.16(d), revised August 5, 2004, is:

*"the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if such properties exist. The area of potential effects is influenced by the scale and undertaking and may be different for different kinds of effects caused by the undertaking."*⁷

The APE for this Project includes the transmission line ROW and a geographic area extending one-half mile to either side of the ROW. The APE subject of this Assessment was established in consultation with the DHP.

APE – Direct Effects

The APE for direct effects consists of geographic area encompassing the replacement Q195 transmission line infrastructure and all areas of potential ground disturbance associated with the Project, as depicted on the map in **Appendix A**, which is generally confined to the existing maintained ROW.

⁷ Note "historic properties" are synonymous with "historic sites" as defined by DHP.

APE – Indirect Effects

Based on the nature and scope of the Project, there is potential for indirect effects encompassing visual impacts and additional, reasonably foreseeable impacts associated with this Project that could be indirect and/or occur later in time or be further removed in distance. The APE for indirect effects is defined as a one-half mile geographical area from either side of the ROW. It consists largely of forested land interspersed with residential development. The APE for indirect effects is partially reduced from the defined half-mile to the south and east by the Connecticut River which forms the boundary between Vermont and New Hampshire.

The complete APE for the Project that encompasses both the APE for direct effects and indirect effects is depicted on the map in **Appendix A**.

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Historic Resources

Above-Ground Resources

Within Vermont, there are a total of 42 properties with buildings or structures in the direct and indirect APE that are listed in **Appendix B** – Cultural Resources Survey. These properties were surveyed in the field and are identified by alphabetical labels on the map in **Appendix A**. None of these properties had been previously surveyed and/or listed in or determined eligible for the State Register or National Register, with the exception of the Fifteen Mile Falls Historic District (described below). Eight of the properties in the APE, including the previously documented historic district, are recommended eligible for the State Register and/or National Register due to their historic and/or architectural significance and therefore are considered historic sites for the purpose of Section 248 review. The remaining 34 properties are recommended ineligible for the State Register due to their age (less than 50 years old) and/or lack of historic or architectural significance.

The portion of the Q195 Transmission Line within Vermont was evaluated for State Register eligibility and recommended by VHB as ineligible for listing in the State Register. A Vermont Architectural Resource Inventory Form ("VARI") and Determination of Eligibility Form ("DOE") were completed by VHB and submitted to the DHP on June 5, 2023. On June 28, 2023, the DHP concurred with VHB's recommendation that the Q195 Transmission Line within Vermont is not eligible for listing in the State Register. For more information, please refer to the VARI and DOE forms that are included in **Appendix D**.

Table 1 below is a summary of all properties in the APE that are recommended eligible for the State Register. Additional information about these properties is included in the full survey inventory in **Appendix B**. Photographs of these properties are included in **Appendix C**. A brief analysis regarding the eligibility of Fifteen Mile Falls Historic District follows Table 1.

Table 1 Summary of State Register Eligible Properties in APE

Map ID	Address	Photo Nos.	Date of Construction	State Register ("SR") Eligibility Notes
8	809 Cozy Nook Road	1, 2	Ca. 1870	Eligible under Criterion C as a vernacular Greek Revival residence. Alterations include sympathetic 2/2 replacement windows and modern doors. Retains all seven aspects of integrity.
13	Overlook Cemetery, Cozy Nook Road	3, 5	Ca. 1900	Eligible under Criteria Consideration D as a town cemetery whose creation and community reflect the broad spectrum of the community's history and culture. Retains all seven aspects of integrity
14	Old Overlook Cemetery	6, 7	Ca. 1820	Eligible under Criteria Criterion Consideration D as a town cemetery whose creation and community reflect the broad spectrum of the community's history and culture. Retains all seven aspects of integrity
23	198 Walker Pit Road	8-10	Ca. 1900	Eligible under Criteria A and C as an example of a farmstead as defined in the "Agricultural Resources of Vermont" Multiple Property Documentation Form ("MPDF"). Alterations include some replacement windows, exterior concrete chimneys. Retains integrity of settling, location, design, feeling and association. Barns retain all seven areas of integrity. Garage ineligible due to age.
29	Gilman Picnic Area & Boat Launch	11-13	Ca. 1956	Recreational enhancement resource associated with National Register eligible Fifteen Mile Falls Hydroelectric Project and included in the historic district documentation for the Fifteen Mile Falls Historic District.

30	Riverside Cemetery, Intersection of Route 18	14-16	Ca. 1953, 1995 addition	Eligible under Criteria Consideration D for its significant link to patterns of development of the hydroelectric facility. The cemetery was built by New England Power Company in 1953. It is a conglomeration of Upper Waterford, Riverside, and Old Pike Cemeteries which were moved to avoid inundation when the Moore Dam was constructed. New burials are also here. The cemetery consists of 551 memorials on a triangular, level grassy plot. Retains all seven aspects of integrity.
41	5655 County Road South/Waterford Boat Launch	17-20	Ca. 1960	Recreational enhancement resource associated with Fifteen Mile Falls Hydroelectric Project and included in the historic district documentation for the Fifteen Mile Falls Historic District.
42	Samuel C. Moore Hydro Station	21-23	1956	Meets criteria for registration under MPDF <i>Hydroelectric Generating Facilities in Vermont</i> . Part of Fifteen Mile Falls Hydroelectric Project Federal Energy Regulatory Commission ("FERC") Number P-2077, DHP Number: MC-96-0002. See below for additional comments.

Fifteen Mile Falls Historic District

The Fifteen Mile Falls Hydroelectric Station Historic District consists of the Samuel C. Moore Hydro Station (#42) in New Hampshire, the Comerford Development, and the McIndoes Falls Development along the Connecticut River, both of which straddle the state line between Vermont and New Hampshire. These three hydroelectric facilities, built between 1928 and 1956, were determined eligible for the NR in 1997. The Fifteen Mile Falls Hydroelectric Station Historic District is significant in the areas of industry, engineering, and architecture. It meets National Register Criterion A for its association with the extensive growth of the hydroelectric power industry in New England during the 1920s. It also meets Criterion C as illustrative of facilities built (beginning in the 1920s) specifically to provide peaking power. The historic district includes the hydroelectric infrastructure and shoreline of the Connecticut River in this area and includes in its boundary recreational resources such as the Gilman Picnic Area and Boat Launch (#29) and the

South/Waterford Boat Launch (#41). The VARI and DOE forms in **Appendix D** contain additional information about the Fifteen Mile Falls Historic District.

Archaeological Resources

In the Phase IA Archaeological Assessment and Reconnaissance Survey conducted by Gray & Pape in 2020, a total of three Post Contact archaeological sites were recorded within the APE. These include the N. Hardy Farmstead (VT-ES-0052), the Kellogg/Curby Dwelling and Sawmill (VT-ES-0053), and the S. Church Farmstead (VT-ES-0080). Field reconnaissance also identified the locations of 38 stone walls, eight (8) stone piles, two (2) foundations, and one (1) boulder quarry within the Q195 Line ROW. Given their proximity to stone walls and/or historical roads, the eight (8) identified stone piles are likely related to Post Contact, historical land clearing and boundary maintenance practices.

In 2023 – 2024, Gray & Pape conducted a Phase IB archaeological identification survey of the 24 archaeological sensitivity areas identified in 2019 by Gray & Pape during the Phase IA archaeological assessment. The intensive field survey consisted of the excavation of 823, 50-by-50-centimeter (cm) (20-by-20-inch [in]) shovel test pits (STPs) within the designated archaeological sensitivity areas to determine the presence or absence of archaeological resources. Shovel tests were excavated on a 10-m (32.8-foot) gridded pattern and the testing grid was staggered so that consecutive transects were offset by 5-meters. All STPs were excavated within 10-cm (3.9-in) arbitrary levels within natural soil strata into undisturbed subsoils, or into the C-horizon. All soil was screened through ¼-inch hardware cloth for artifact recovery. As a result of this testing, Gray & Pape identified three precontact sites and three Post Contact sites. The precontact sites retained little to no stratigraphic integrity. Two of the Post Contact sites, the N. Hardy Farmstead Site (VT-ES-0052) and the Roaring Brook Post Contact Site (VT-ES-0074), a pair of mid to early nineteenth century farmsteads, had poor integrity. Owing to this, Gray & Pape concluded that these two Post Contact sites have little to no potential to provide new or important information about nineteenth-to early twentieth-century agricultural and social history in the upper Connecticut River valley and as such, are not recommended as eligible for the State and National Registers of Historic Places. The J. Smith/A. Smith Farmstead Site J (VT-ES-0073), on the other hand, is recommended as potentially eligible for the National Register due to its good landscape integrity, artifact density, and poor documentary profile, all of which suggest that the site has the potential to yield new information about its occupation.

In 2024, Gray & Pape conducted an Archaeological Resources Assessment for six off-right-of-way access roads and identified five previously unrecorded sites in the town of Concord: M. Parker House north (VT-CA-79) and M. Parker House south (VT-CA_78) on Ruszin Road; and the Surridge Road Mill (VT-CA_83), E.B. Phillips Farmstead (VT-CA-80), N. Pike Farmstead, and M&H Store on Grist Mill Pit Road.

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Recommendation of Effect

Above-Ground Historic Sites

The potential effects of the Project on above-ground historic sites were reviewed using DHP Criteria, described in Section 2.0 above.

Direct Impacts

From the DHP Criteria,

"The installation of a telecommunications facility, transmission line, wind power facility, or other similar project would cause physical damage, alteration or destruction of an historic resource."

There will be no direct impacts to above-ground historic sites. There are no historic sites in the direct APE that would be impacted by the Project. Although the Project will directly impact the Q195 transmission line, the line has been determined by DHP as ineligible for the State Register and is not a historic site. The National Register eligible Samuel C. Moore Hydro Station is proximal to the Q195 transmission line; however, the station is located in New Hampshire and the changes to the Q195 transmission line in Vermont will only have a minimal visual impact on this property.

Indirect Impacts

From the DHP *Criteria for Evaluating the Effect of Proposed Telecommunications Facilities, Transmission Lines, and Wind Power Facilities on Historic Resources* ("Criteria"), Indirect Impacts are evaluated based on the following statement:

"The installation of a telecommunications facility, transmission line, wind power facility or other similar project would cause significant alteration and deterioration of the setting or character of an historic resource."

As listed above in Table 1, there are eight (8) historic sites in the Indirect Impacts APE because they have views of the Q195 transmission line. The following analysis pertains to these properties

and is based upon the Indirect Impact examples in the DHP Criteria document. None of the eight (8) historic sites are a National Historic Landmark ("NHL"), nor are there any rural historic districts or historic landscapes in the APE, so the Indirect Impact Examples #s 4 and 5 are not applicable to this analysis.

Indirect Impact Example #1: If installation of a telecommunications facility, transmission line, wind power facility or other similar project would create a significant intrusion into important public views of an historic building, group of historic buildings, or historic landscapes, especially when those views are identified in municipal or regional plans;

The Project will not be a significant intrusion into the setting of the historic sites. The Project will be located within an existing ROW that Q195 has occupied since its construction ca. 1956 and therefore will not constitute a significant visual change in the setting of these historic sites. The transmission line is largely shielded from public view in many locations due to topography, vegetation, and distance from public roadways. Many resources within the APE are wholly or partially screened from the ROW by vegetation. See **Appendix A**; and **Appendix C**, Photographs 4, 24-27.

Indirect Impact Example #2: If installation of a telecommunications facility, transmission line, wind power facility or other similar project would create a significant intrusion into a hillside backdrop of an important historic building or group of buildings;

The Project will not create a significant intrusion into the hillside backdrop of the historic sites located within the APE. The Project involves the rebuild of an existing transmission line to be located within the existing ROW that Q195 has occupied since its construction. Although the rebuilt Q195 transmission line will be visible from some of the historic sites within the APE, it will replace an existing line in the same location that has been extant for at least 67 years. As such, it will not create a significant visual change in the setting of these properties. See **Appendix A**; and **Appendix C**, Photographs 4 and 24-27.

Indirect Impact Example #3: If the siting of a telecommunications facility, transmission line, wind power facility or other similar project would create a focal point that would overwhelmingly disrupt and distract from the elements of an historic landscape and the public's ability to appreciate it;

As described in Example #1 above, the Project will be located in the existing ROW, which is largely shielded from public view in many locations due to topography, vegetation, and distance from public roadways. In addition, it is replacing an existing transmission line in the same location. As such, it will not overwhelmingly disrupt and distract from the public's ability to appreciate the forested landscape surrounding the Connecticut River and the historic sites.

Indirect Impact Example #6: If installation of a telecommunications facility, transmission line, wind power facility or other similar project would significantly impair a vista or viewshed from an historic resource if that vista or viewshed is a significant component of the character of the historic resource and its history of use (e.g. the home of an important artist whose work portrayed the vista or viewshed landscape);

As described in Example #1 above, the Project will be located in the existing ROW Q195 has occupied since ca. 1956. The ROW is largely shielded from public view in most locations due to topography, vegetation, and distance from public roadways. As a result, the ROW is not highly visible from the nearby historic sites. The Project will not significantly impair the vista or viewshed from any historic sites as Q195 and the ROW have been extant for at least 67 years.

Indirect Impact Example #7: If installation of a telecommunications facility, transmission line, wind power facility or other similar project would significantly interfere with the public's ability to interpret and appreciate the qualities of a historic cultural facility, including impairment of the vista or viewshed if experiencing the view from the site is an important part of experiencing the site;

The nearest historic cultural facility is the Samuel C. Moore Hydro Station, located in New Hampshire at the western end of the APE. Because it is the type of infrastructure commonly associated with a dam and powerplant, the Q195 transmission line does not interfere with the public's ability to interpret this electrical generating station.

Indirect Impact Example #8: If installation of a telecommunications facility, transmission line, wind power facility or other similar project would introduce a structure that would be dramatically out of scale with and would visually overwhelm an historic resource or its setting;

The Project will replace existing wood transmission line structures with weathering steel structures which will be similar in appearance to the existing structures. The replacement structures will not be dramatically out of scale with or visually overwhelm the surrounding historic sites and their setting.

Indirect Impact Example #9: If installation of a telecommunications facility, transmission line, wind power facility or other similar project would isolate a historic resource from its historic setting, or introduce incongruous or incompatible new uses, or new visual, audible or atmospheric elements to a historic setting.

As described in Example #1 above, the Project will be located in the existing ROW Q195 has occupied since its construction ca. 1956. The ROW is largely shielded from public view in most locations due to topography, vegetation, and its distance from public roads. The replacement of the existing wood structures with weathering steel structures will not isolate historic resources from their historic setting, nor will it

introduce incongruous or incompatible new uses, or new visual, audible, or atmospheric elements to a historic setting.

Based on the analysis above, there will be no undue indirect impacts to above-ground historic sites because the salient components of the Project will be consistent with the existing transmission line and the context of the existing utility corridor, will be largely shielded from the eligible properties, and the Project will not negatively impact the integrity of the properties' settings and viewsheds.

Archaeological Resources

One archaeological resource potentially eligible for listing in the National Register was identified within the APE for direct effects during the archaeological identification survey: the J. Smith/A. Smith Farmstead Site J (VT-ES-0073). To avoid construction-related impacts, Gray & Pape recommends relocating Structure 101 50 meters west to an area containing no artifacts or cultural features and installing construction matting and high visibility exclusion fencing around the well and barn foundation during Project construction.⁸

Recommendation of Effect

Based on the foregoing assessment, VHB recommends that the proposed Project will result in **No Adverse Effect** to above-ground historic sites and archaeological resources.

⁸ Gray & Pape Heritage Management, *Archaeological Identification Survey Eversource Line Q195 Rebuild Project Waterford and Concord, Caledonia and Essex Counties, Vermont, and Dalton, Coos County, New Hampshire*, September 2024.

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