8.0 HISTORIC SITES

SEARCH, Inc. conducted a desktop assessment and prepared a scope of work for cultural resource identification level efforts related to the NECEC Project. That report gathered information regarding known historic properties and considered the Project's direct and indirect area of potential effect ("APE") for the purpose of follow-up field surveys and site significance evaluations. Architectural, archaeological, and traditional cultural properties surveys will be completed to finalize the NECEC Project related cultural resources identification efforts.

8.1 Introduction

Development of the NECEC Project will require approvals and permits from federal, state, and local entities. The Project will need to be reviewed for federal actions under Section 106 of the National Historic Preservation Act ("NHPA") (16 U.S.C. § 470-f) and for State purposes under Chapter 375(11) of the Maine Department of Environmental Protection's rules. Section 106 of the NHPA requires federal agencies to take into account, prior to authorizing an undertaking, the effect of that undertaking on cultural resources listed, or eligible for listing, in the National Register of Historic Places (NHRP) (36 C.F.R. § 60). Agencies must also afford the Advisory Council on Historic Preservation the opportunity to comment on undertakings. The Section 106 process is coordinated at the state level by the State Historic Preservation Officer (SHPO), represented in Maine by the Maine Historic Preservation Commission (MHPC). The issuance of agency approvals will depend, in part, on obtaining comments from the Maine SHPO.

No formal APE for direct or indirect Project impacts has been established at this time, but, preliminary guidance from the MHPC indicated that the expected size of the indirect APE would be a 0.8-kilometer (km) (0.5-mile [mi]) buffer around the Project. The direct APE is assumed to be composed of the entire ROWROW width or facility footprint where ground-disturbing activities could take place. SEARCH's desktop review identified 144 areas of archaeological sensitivity and 13 areas where the NECEC could intersect a previously identified archaeological site. Five of these archaeological sites have not been evaluated for NRHP eligibility, and eight have been determined to be ineligible for NRHP listing. A total of 405 previously identified historic architectural resources were documented within the expected indirect APE. Within this group, are seven NRHP-listed resources, 107 resources that have been determined NRHP eligibility.

Discussions with MDEP and the MHPC regarding review criteria of completed reports resulted in the determination to submit sensitive and confidential findings only to the MHPC. *"The New England Clean"*

Energy Connect Cultural Resources Sensitivity and Phase I Scope of Work" report was submitted to the MHPC on August 22, 2017. An update to this report, based on comments by MHPC, was provided to the MHPC on September 7, 2017. On September 11, 2017, the MHPC provided a letter response, "The proposed scope of work for architectural and archeological surveys outlined in the *Cultural Resources Sensitivity Assessment and Scope of Work* dated September 2017 are acceptable to our office." A copy of the letter is provided in **Exhibit 8-1**.

8.1.1 Tribal Consultation

The Section 106 compliance process will require formal tribal consultation, typically conducted by a federal agency. CMP contacted the five tribes in Maine, outside of formal agency consultation, to gauge their preliminary interest in the NECEC Project and to inquire about any concerns they may have about traditional cultural properties ("TCPs") and other resources that may be important to them within or near the Project area. On August 3, 2017, letters were emailed to the Tribal Historic Preservation Officers (THPO) of the Houlton Band of Maliseet Indians, the Passamaquoddy Tribe at Pleasant Point and Indian Township Reservations, the Aroostook Band of Micmacs, and the Penobscot Nation. One response was received from the THPO of the Penobscot Nation on August 28, 2017, concluding that "this project appears to have no impact on a structure or site of historic, architectural or archaeological significance to the Penobscot Nation as defined by the National Historic Preservation Act of 1966, as amended." Correspondence with the tribes is provided in **Exhibit 8-2**.

During formal tribal consultation, each of the tribal entities in Maine will need to be notified by letter of the scope and survey methods planned for the NECEC Project. Listings of significant pre-European contact cultural finds will likely need to be provided to the tribal offices once survey work and MHPC review are completed. Likewise, tribes should also be consulted in advance of archaeological excavations at any pre-contact archaeological sites where evaluations are deemed necessary to determine NRHP eligibility.

8.1.2 Agency Consultation

SEARCH, Inc. consulted with SHPO staff to obtain preliminary guidance on the configuration of the APE. As the NECEC Project proceeds, formal and informal contacts will be maintained with MHPC and the lead federal agency in order to reach agreement on the definition of the APE, study methodologies and scope, reporting requirements, determinations of effect, and development of any Memoranda of Agreement regarding treatment of significant sites (**Exhibit 8-1**). Consultation will also involve conditions for the avoidance, protection, and mitigation of any NRHP-eligible properties that may be adversely affected by NECEC.

8.2 Cultural Resource Surveys

Three different kinds of cultural resource surveys will be completed for the NECEC Project. An archaeological survey will attempt to locate pre-contact and post-contact cultural resources that are generally in the ground. A TCP survey will attempt to define and locate locations that might be eligible for inclusion in the NRHP based on associations with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community. A historic architecture survey will examine standing buildings, structures, objects, districts, etc. that are more than 50 years old, and will assess their potential eligibility for listing on the NRHP.

8.2.1 Archeology Survey

Archaeologically sensitive areas were defined, based on desktop review and background research, as locations where there is a sufficient likelihood for archaeological remains to be present to justify a reconnaissance survey. These areas were defined in consultation with the MHPC in regard to previously recorded archaeological resources and previous archaeological surveys in the Project area. Data derived from historical background research, historic map overlays, soil analysis, slope, proximity to water or relict water sources, bedrock geology, and surficial geology data were also considered in defining potential survey areas.

A Phase I (reconnaissance-level) survey will be conducted in archaeologically sensitive areas within the Project's APE. The Survey will be conducted in a tiered approach, comprised of field reconnaissance followed by sub-surface testing where necessary. The reconnaissance phase of the survey will include inspection of the defined sensitivity areas and all previously identified archaeological sites located within the Project's direct APE. Should agency consultation revise the anticipated direct APE, the extent of each sensitivity area and associated field activities will be adjusted accordingly.

In general, archaeological investigation follows a three-tiered approach. Phase I archaeological survey defines the nature of any sites encountered and makes preliminary assessments of NRHP eligibility. It may become necessary to formally determine eligibility of some sites by means of Phase II (intensive-level) survey, otherwise known as archaeological test excavation. Phase III excavations may be required to mitigate damage at NRHP-eligible sites that cannot otherwise be avoided. Results of all Phase I, II, and III work would be presented in reports to be submitted for review by MHPC and the lead federal agency. Memoranda of Agreement may need to be developed to address the terms of avoidance or mitigative actions at specific NRHP-eligible sites.

8.2.2 Historic Archeology Survey

Because of its spatial extent, the Project should be considered likely to have potential impacts to TCPs and a TCP survey will therefore be performed. The effort to identify and evaluate TCPs will be led by a qualified ethnographer, who will be responsible for completing the four elements of the TCP survey. These elements are: (1) contacting tribal representatives to determine if they identify with the Project corridor, (2) conducting background research (including informant interviews) at tribal, local, and state repositories, (3) conducting visits to the APE (if necessary) to field check potential TCP locations, and (4) preparing a TCP survey report. That report will be provided to relevant tribal representatives and Tribal Historic Preservation Officers. After receipt of their comments, the report will be revised to address those comments and forwarded to MHPC and the lead federal agency for review and concurrence.

8.2.3 Historic Architecture Survey

Based on the known architectural resources along the proposed Project route, an identification survey for architectural resources will be performed. The level of effort required to complete identification work will be determined through consultation and discussions with MHPC and the relevant federal agencies.

The architectural resource identification survey will confirm the location of previously recorded architectural resources and identify previously undocumented historic-age (50-years or older) architectural resources within an established APE for visual effects. Fieldwork will identify previously unrecorded historic-age architectural resources, to confirm the integrity and NRHP status of previously recorded resources, and to identify additional areas for further intensive survey, including potential historic districts or landscapes. Newly identified architectural resources will be documented on the appropriate MHPC survey form and entered digitally into the Cultural Architectural Resource Management Archive system. Updated MHPC survey forms will be prepared for previously identified architectural resources. An architectural history survey report assessing both eligibility and effect for all historic-age architectural resources within the APE will be prepared and submitted to MHPC and the lead federal agency for review.

8.3 Conclusion

Through implementation of the cultural resources surveys described above, and consultation with state, federal, and tribal agencies, the NECEC Project will avoid, minimize, or mitigate adverse effects on historic properties eligible for listing on the National Register of Historic Places. The NECEC Project will meet the standards of Chapter 375.11(C) and will not have an adverse effect on the preservation of historic sites either on or near the development site.

Exhibit 8-1: MHPC Consultation



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

PAUL R. LEPAGE GOVERNOR 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

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,

Central Maine Power; NECEC Project (formerly QMI) Proposed Power Line Construction and Improvements

Kilf. Mohney

Kirk F. Mohney J State Historic Preservation Officer

.



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

PAUL R. LEPAGE GOVERNOR

KIRK F. MOHNEY DIRECTOR

August 28, 2017

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

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

Town: Various, ME

Dear Mr. Freedman:

In response to your recent request, our office has reviewed the information received August 23, 2017 to initiate consultation on the above referenced project in accordance with Section 106 of the National Historic Preservation Act.

Above Ground Resource Comments- M. Hopkin

With regard to above ground resources, the initial identification of previously surveyed properties in the Scope of Work report was not performed in accordance with Maine Historic Preservation Commission (MHPC) above ground resource survey standards. The proposed scope of work, Section 5.0 & 5.1 does not conform to MHPC's *Review and Compliance Above Ground Cultural Resource Survey Manual Revised 2013.* Survey submitted that does not follow the SOP and survey guidelines as provided in the manual cannot be accepted. Our office recommends that the architectural historians involved with the project should review MHPC's survey manual.

Importantly, the initial assessment does not include previously surveyed resources that have not been uploaded to CARMA. As stated in the CARMA disclaimer at http://www.maine.gov/mhpc/carma disclaimer.html,:

"Users of CARMA should keep in mind that it does not include information on all historic properties in Maine. Due to the volume of old survey material already on file, this database does NOT contain all the National Register listed or eligible properties in the state. Properties are added weekly to this database; and eligibility assessments are subject to change based on additional information obtained by the Commission and reviewed by the State Historic Preservation Officer.

The absence of a survey form for a specific property is no indicator of whether or not a property has been recorded or documented by the Commission. The act of checking this database does not substitute for compliance with applicable local, state or federal laws and regulations as the relate to the identification and protection of historic property."

Not all National Register listed properties are uploaded into the database either. For example, the National Register listed Wiscasset Village Historic District is not on the map of Lincoln County and is not included in the count of resources. It would be in SEARCH's best interest to schedule a visit to MHPC's office to complete a search of the commission's inventory forms and to further research the National Register listed properties not captured in CARMA.

Furthermore, SEARCH's staff architectural historian or qualified persons completing the architectural survey for this project should be retrained or trained on CARMA database.

Our office recommends that the Phase I Scope of Work be revised to be in compliance with MHPC survey guidelines including but not limited to:

- 1) Have staff members who meet the Secretary of Interior's Standards as an Architectural Historian retrain on utilizing the CARMA database.
- 2) Include the area of potential effects (APE) on the topographic maps. Direct and indirect APEs must be established in order for the above ground architectural survey.
- Complete a file search at Maine Historic Preservation Commission office to identify previously surveyed resources and National Register Listed properties that have a potential to be affected by the proposed undertaking.
- 4) Please revise Table 5-1 to follow the standards outlined by MHPC's survey manual in regards to previously surveyed properties as well as guidelines for properties that have not been previously surveyed or had no prior determination.

In addition to these recommendations for above ground survey, please make the following clarifications regarding the proposed project as outlined in the Phase I scope of work documentation.

- 1) On page 4, 2nd paragraph 2nd sentence, "entire row width or facility footprint." Please clarify what "row" is referencing- is it Right-of-Way or row, like a row of poles?
- 2) Page 31, Section 4.3 Somerset County, Appleton is not located in Somerset County. Appleton is located in Waldo County.
- 3) Page 72, Section 5.0, please note that an identification level survey is known as a reconnaissance level survey per MHPC's survey guidelines.
- 4) Page 72, Section 5.1, please clarify what is meant by preliminary survey forms?

Archaeology Comments- A. Spiess

These comments are relevant to the archaeological survey work proposed in the New England Clean Energy Connect cultural resources "Sensitivity Assessment and Phase I Scope of Work" by SEARCH, Inc., dated August 2017. We will not comment on the adequacy of the proposed survey work for Traditional Cultural Properties, which is a matter for Federal Agency-Tribal/THPO consultation.

This document is *not a Phase I archaeological survey scope of work*, which would specify the locations, intensity, size and number (or range of number) of archaeological testpits (transects) to be dug. This document is a proposal to do a walkover survey to then determine the locations, intensity, size and number of archaeological testpits. The document then states that a consultant archaeological team will proceed to dig the testpits, without a step in the process for MHPC to review the adequacy and appropriateness of the proposed testpit (transect) locations. We cannot comment on potential effects of the project upon historic and prehistoric archaeological sites based on this document as it now stands.

While this document is generally adequate as a guide to the areas that require further archaeological consideration (called SA or "sensitive areas" in the document), there are a couple of errors in the document that also need consideration. Firstly, the testpit strategy on page 75, although it states that it will conform to MPHC standards, fails to mention the need for deeper, 1x1 m square testpits as a sample of testpits in alluvial soils.

Secondly, the mapping reference standard for preliminary review of areas that might contain significant historic archaeological sites are the 1850s and 1880s series county maps and atlases. The methodology (p43) of digitizing various USGS topographic maps (dating from 1892 to 1932) is mostly irrelevant, with perhaps the exception of the new HVDC segment from the Quebec border through Franklin and Somerset counties. For the rest of the project the approximate locations of structures shown on the 1850s and 1880s series county maps should have been transferred to recent mapping and used to guide historic SA selection. The statement on page 44 that these "earlier county and atlas maps (are) ... impractical to produce digital data that are useful at the scale required for sensitivity analysis" is not correct. One has simply to deal with the issue of resolution of location that might have an error of several hundred yards.

In general, MHPC needs Phase I archaeological testing results and (if warranted) Phase II testing on possibly NR eligible sites before making a determination of project effect on archaeological sites. This document does not even produce a Phase I field methodology that we can review (which would include testpit transect locations, and the size, number and spacing of testpits). *It is not a Phase I scope of work*, which would follow the proposed walkover examination of the archaeologically sensitive areas.

Please contact Megan M. Hopkin of our staff at megan.m.hopkin@maine.gov if you have any questions regarding the above ground resource comments. Please contact Dr. Arthur Spiess of our staff at arthur.spiess@maine.gov if you have any questions regarding the archaeology comments.

Sincerely,

Christia G. Witchell

Christi A. Mitchell Deputy State Historic Preservation Officer

Exhibit 8-2: Tribal Consultation Letters



August 3, 2017

THPO & Environmental Planner Houlton Band of Maliseet Indians 88 Bell Road Littleton, Maine 04730

Re: New England Clean Energy Connect Transmission Line and Related Facilities Project

Dear THPO & Environmental Planner:

Central Maine Power Company (CMP) proposes to construct the New England Clean Energy Connect (NECEC) Project, a transmission line and related facilities delivering electric generation from Quebec to the New England Control Area (Attachment A). The NECEC is in response to the Request for Proposals for Long-Term Contracts for Clean Energy Projects issued by the Massachusetts Department of Energy Resources and the Electric Distribution Companies of Massachusetts. The NECEC is designed to provide a cost-effective and environmentally friendly transmission path to deliver Clean Energy to New England, which is expected to reduce greenhouse gas emissions from fossil-fueled thermal generation in New England, enhance electric reliability, and reduce the wholesale cost of electricity generation for the benefit of retail customers across the region.

We are respectfully requesting that you review the enclosed information and provide your input regarding traditional cultural properties or other resources important to you near the NECEC Project so that potential impacts to these resources may be avoided or mitigated during the routing process. At this time, we are not establishing formal tribal consultation required by Section 106 of the National Historic Preservation Act. Rather, this outreach is a result of CMP's desire to include interested tribes in the early stages of the NECEC Project.

The NECEC Project is composed of the following components:

- An approximately 145.3-mile high voltage direct current (HVDC) transmission line.
- A DC to AC converter station, a substation, and associated transmission lines less than a mile long.
- An approximately 27-mile 345kV transmission line.
- Two 115kV transmission line rebuilds, as well as other minor rebuilds/relocation of existing transmission structures.
- Additional equipment installation and upgrades at six existing substations.

A more detailed description of each project component is provided below and an overview map is included in Attachment A. All projects components are within the State of Maine.



THPO & Environmental Planner Houlton Band of Maliseet Indians August 3, 2017 Page 2

HVDC Transmission Line

This new, approximately 145.3-mile transmission line from Beattie Township on the Canadian border to Merrill Road in Lewiston is made up of several sections. The portion of the line from the Canadian border to The Forks will be located within an existing, previously undeveloped, 300-foot-wide corridor. From The Forks to the Wyman Hydropower Station in Moscow, the new line will be located within an existing, partially developed 300-foot-wide transmission corridor. The new line from Moscow to Lewiston will be located within an existing, partially developed 400-foot-wide transmission corridor. A 1-mile transmission line corridor will require a 300-foot widening of an existing 400-foot transmission line corridor in Livermore Falls.

Converter Station and Fickett Road Substation

The new DC to AC Converter Station will occupy approximately 7 acres in Lewiston. A new 1.2-mile transmission line within an existing, partially developed 400-foot wide transmission line corridor will be required to connect the Converter Station with the Larrabee Road Substation. The new Fickett Road Substation will occupy approximately 6 acres in Pownal. A new 0.3-mile transmission line will be required to connect Fickett Road Substation to Surowiec Substation.

345kV Transmission Line

A new, approximately 27-mile, 345kV transmission line is proposed to be constructed within an existing 270-foot-wide transmission line corridor, to be widened to 550 feet, between Coopers Mills Substation in Windsor and Maine Yankee Substation in Wiscasset.

Two 115kV Rebuilds and Minor Rebuilds and Relocations of Existing Transmission Line Structures

The NECEC will require the rebuilding of an existing 115kV transmission line between Larrabee Road Substation in Lewiston and the Surowiec Substation in Pownal (approximately 16.1 miles). The NECEC will also require the rebuilding of an approximately 9.3-mile existing 115kV transmission line between Crowley's Substation in Lewiston and Surowiec Substation in Pownal.

Substation Modifications and Upgrades

Modifications to the existing Coopers Mills Substation in Windsor, Larrabee Road Substation in Lewiston, Crowley's Substation in Lewiston, Maine Yankee Substation in Wiscasset, Surowiec Substation in Pownal, and Raven Farm Substation in Cumberland will be required. None of these modifications will necessitate yard expansions.



THPO & Environmental Planner Houlton Band of Maliseet Indians August 3, 2017 Page 3

Please review the enclosed information. If you have any questions about the NECEC Project, please contact John Fulmer with Burns & McDonnell Engineering Company, Inc. at (816) 822-3986 or via email jfulmer@burnsmcd.com.

Sincerely,

John Fulmer, Cultural Resources Section Manager Burns & McDonnell Engineering Company, Inc.

Attachment A – Overview Map

cc: Mark Goodwin, Burns & McDonnell Engineering Company, Inc.
Gerry Mirabile, CMP Environmental Compliance Manager
Jay Clement, U.S. Army Corps of Engineers Project Manager
Marybeth Richardson, Maine Department of Environmental Protection Project Coordinator



August 3, 2017

THPO Passamaquoddy Tribe of Indians Indian Township Reservation P.O. Box 301 Princeton, Maine 04668

Re: New England Clean Energy Connect Transmission Line and Related Facilities Project

Dear THPO:

Central Maine Power Company (CMP) proposes to construct the New England Clean Energy Connect (NECEC) Project, a transmission line and related facilities delivering electric generation from Quebec to the New England Control Area (Attachment A). The NECEC is in response to the Request for Proposals for Long-Term Contracts for Clean Energy Projects issued by the Massachusetts Department of Energy Resources and the Electric Distribution Companies of Massachusetts. The NECEC is designed to provide a cost-effective and environmentally friendly transmission path to deliver Clean Energy to New England, which is expected to reduce greenhouse gas emissions from fossil-fueled thermal generation in New England, enhance electric reliability, and reduce the wholesale cost of electricity generation for the benefit of retail customers across the region.

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A more detailed description of each project component is provided below and an overview map is included in Attachment A. All projects components are within the State of Maine.



THPO Passamaquoddy Tribe of Indians August 3, 2017 Page 2

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Converter Station and Fickett Road Substation

The new DC to AC Converter Station will occupy approximately 7 acres in Lewiston. A new 1.2-mile transmission line within an existing, partially developed 400-foot wide transmission line corridor will be required to connect the Converter Station with the Larrabee Road Substation. The new Fickett Road Substation will occupy approximately 6 acres in Pownal. A new 0.3-mile transmission line will be required to connect Fickett Road Substation to Surowiec Substation.

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THPO Passamaquoddy Tribe of Indians August 3, 2017 Page 3

Please review the enclosed information. If you have any questions about the NECEC Project, please contact John Fulmer with Burns & McDonnell Engineering Company, Inc. at (816) 822-3986 or via email jfulmer@burnsmcd.com.

Sincerely,

John Fulmer, Cultural Resources Section Manager Burns & McDonnell Engineering Company, Inc.

Attachment A – Overview Map

cc: Mark Goodwin, Burns & McDonnell Engineering Company, Inc.
Gerry Mirabile, CMP Environmental Compliance Manager
Jay Clement, U.S. Army Corps of Engineers Project Manager
Marybeth Richardson, Maine Department of Environmental Protection Project Coordinator



August 3, 2017

THPO Passamaquoddy Tribe of Indians Pleasant Point Reservation PO Box 343 Perry, Maine 04667

Re: New England Clean Energy Connect Transmission Line and Related Facilities Project

Dear THPO:

Central Maine Power Company (CMP) proposes to construct the New England Clean Energy Connect (NECEC) Project, a transmission line and related facilities delivering electric generation from Quebec to the New England Control Area (Attachment A). The NECEC is in response to the Request for Proposals for Long-Term Contracts for Clean Energy Projects issued by the Massachusetts Department of Energy Resources and the Electric Distribution Companies of Massachusetts. The NECEC is designed to provide a cost-effective and environmentally friendly transmission path to deliver Clean Energy to New England, which is expected to reduce greenhouse gas emissions from fossil-fueled thermal generation in New England, enhance electric reliability, and reduce the wholesale cost of electricity generation for the benefit of retail customers across the region.

We are respectfully requesting that you review the enclosed information and provide your input regarding traditional cultural properties or other resources important to you near the NECEC Project so that potential impacts to these resources may be avoided or mitigated during the routing process. At this time, we are not establishing formal tribal consultation required by Section 106 of the National Historic Preservation Act. Rather, this outreach is a result of CMP's desire to include interested tribes in the early stages of the NECEC Project.

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THPO Passamaquoddy Tribe of Indians August 3, 2017 Page 2

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THPO Passamaquoddy Tribe of Indians August 3, 2017 Page 3

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Sincerely,

John Fulmer, Cultural Resources Section Manager Burns & McDonnell Engineering Company, Inc.

Attachment A – Overview Map

cc: Mark Goodwin, Burns & McDonnell Engineering Company, Inc.
Gerry Mirabile, CMP Environmental Compliance Manager
Jay Clement, U.S. Army Corps of Engineers Project Manager
Marybeth Richardson, Maine Department of Environmental Protection Project Coordinator



August 3, 2017

THPO Aroostook Band of Micmacs 7 Northern Road Presque Isle, Maine 04769

Re: New England Clean Energy Connect Transmission Line and Related Facilities Project

Dear THPO:

Central Maine Power Company (CMP) proposes to construct the New England Clean Energy Connect (NECEC) Project, a transmission line and related facilities delivering electric generation from Quebec to the New England Control Area (Attachment A). The NECEC is in response to the Request for Proposals for Long-Term Contracts for Clean Energy Projects issued by the Massachusetts Department of Energy Resources and the Electric Distribution Companies of Massachusetts. The NECEC is designed to provide a cost-effective and environmentally friendly transmission path to deliver Clean Energy to New England, which is expected to reduce greenhouse gas emissions from fossil-fueled thermal generation in New England, enhance electric reliability, and reduce the wholesale cost of electricity generation for the benefit of retail customers across the region.

We are respectfully requesting that you review the enclosed information and provide your input regarding traditional cultural properties or other resources important to you near the NECEC Project so that potential impacts to these resources may be avoided or mitigated during the routing process. At this time, we are not establishing formal tribal consultation required by Section 106 of the National Historic Preservation Act. Rather, this outreach is a result of CMP's desire to include interested tribes in the early stages of the NECEC Project.

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A more detailed description of each project component is provided below and an overview map is included in Attachment A. All projects components are within the State of Maine.



THPO Aroostook Band of Micmacs August 3, 2017 Page 2

HVDC Transmission Line

This new, approximately 145.3-mile transmission line from Beattie Township on the Canadian border to Merrill Road in Lewiston is made up of several sections. The portion of the line from the Canadian border to The Forks will be located within an existing, previously undeveloped, 300-foot-wide corridor. From The Forks to the Wyman Hydropower Station in Moscow, the new line will be located within an existing, partially developed 300-foot-wide transmission corridor. The new line from Moscow to Lewiston will be located within an existing, partially developed 400-foot-wide transmission corridor. A 1-mile transmission line corridor will require a 300-foot widening of an existing 400-foot transmission line corridor in Livermore Falls.

Converter Station and Fickett Road Substation

The new DC to AC Converter Station will occupy approximately 7 acres in Lewiston. A new 1.2-mile transmission line within an existing, partially developed 400-foot wide transmission line corridor will be required to connect the Converter Station with the Larrabee Road Substation. The new Fickett Road Substation will occupy approximately 6 acres in Pownal. A new 0.3-mile transmission line will be required to connect Fickett Road Substation to Surowiec Substation.

345kV Transmission Line

A new, approximately 27-mile, 345kV transmission line is proposed to be constructed within an existing 270-foot-wide transmission line corridor, to be widened to 550 feet, between Coopers Mills Substation in Windsor and Maine Yankee Substation in Wiscasset.

Two 115kV Rebuilds and Minor Rebuilds and Relocations of Existing Transmission Line Structures

The NECEC will require the rebuilding of an existing 115kV transmission line between Larrabee Road Substation in Lewiston and the Surowiec Substation in Pownal (approximately 16.1 miles). The NECEC will also require the rebuilding of an approximately 9.3-mile existing 115kV transmission line between Crowley's Substation in Lewiston and Surowiec Substation in Pownal.

Substation Modifications and Upgrades

Modifications to the existing Coopers Mills Substation in Windsor, Larrabee Road Substation in Lewiston, Crowley's Substation in Lewiston, Maine Yankee Substation in Wiscasset, Surowiec Substation in Pownal, and Raven Farm Substation in Cumberland will be required. None of these modifications will necessitate yard expansions.



THPO Aroostook Band of Micmacs August 3, 2017 Page 3

Please review the enclosed information. If you have any questions about the NECEC Project, please contact John Fulmer with Burns & McDonnell Engineering Company, Inc. at (816) 822-3986 or via email jfulmer@burnsmcd.com.

Sincerely,

John Fulmer, Cultural Resources Section Manager Burns & McDonnell Engineering Company, Inc.

Attachment A – Overview Map

cc: Mark Goodwin, Burns & McDonnell Engineering Company, Inc.
Gerry Mirabile, CMP Environmental Compliance Manager
Jay Clement, U.S. Army Corps of Engineers Project Manager
Marybeth Richardson, Maine Department of Environmental Protection Project Coordinator



August 3, 2017

THPO Penobscot Nation Cultural and Historic Preservation Dept. 12 Wabanaki Way Indian Island, Maine 04468

Re: New England Clean Energy Connect Transmission Line and Related Facilities Project

Dear THPO:

Central Maine Power Company (CMP) proposes to construct the New England Clean Energy Connect (NECEC) Project, a transmission line and related facilities delivering electric generation from Quebec to the New England Control Area (Attachment A). The NECEC is in response to the Request for Proposals for Long-Term Contracts for Clean Energy Projects issued by the Massachusetts Department of Energy Resources and the Electric Distribution Companies of Massachusetts. The NECEC is designed to provide a cost-effective and environmentally friendly transmission path to deliver Clean Energy to New England, which is expected to reduce greenhouse gas emissions from fossil-fueled thermal generation in New England, enhance electric reliability, and reduce the wholesale cost of electricity generation for the benefit of retail customers across the region.

We are respectfully requesting that you review the enclosed information and provide your input regarding traditional cultural properties or other resources important to you near the NECEC Project so that potential impacts to these resources may be avoided or mitigated during the routing process. At this time, we are not establishing formal tribal consultation required by Section 106 of the National Historic Preservation Act. Rather, this outreach is a result of CMP's desire to include interested tribes in the early stages of the NECEC Project.

The NECEC Project is composed of the following components:

- An approximately 145.3-mile high voltage direct current (HVDC) transmission line.
- A DC to AC converter station, a substation, and associated transmission lines less than a mile long.
- An approximately 27-mile 345kV transmission line.
- Two 115kV transmission line rebuilds, as well as other minor rebuilds/relocation of existing transmission structures.
- Additional equipment installation and upgrades at six existing substations.

A more detailed description of each project component is provided below and an overview map is included in Attachment A. All projects components are within the State of Maine.



THPO Penobscot Nation August 3, 2017 Page 2

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Converter Station and Fickett Road Substation

The new DC to AC Converter Station will occupy approximately 7 acres in Lewiston. A new 1.2-mile transmission line within an existing, partially developed 400-foot wide transmission line corridor will be required to connect the Converter Station with the Larrabee Road Substation. The new Fickett Road Substation will occupy approximately 6 acres in Pownal. A new 0.3-mile transmission line will be required to connect Fickett Road Substation to Surowiec Substation.

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THPO Penobscot Nation August 3, 2017 Page 3

Please review the enclosed information. If you have any questions about the NECEC Project, please contact John Fulmer with Burns & McDonnell Engineering Company, Inc. at (816) 822-3986 or via email jfulmer@burnsmcd.com.

Sincerely,

John Fulmer, Cultural Resources Section Manager Burns & McDonnell Engineering Company, Inc.

Attachment A – Overview Map

cc: Mark Goodwin, Burns & McDonnell Engineering Company, Inc.
Gerry Mirabile, CMP Environmental Compliance Manager
Jay Clement, U.S. Army Corps of Engineers Project Manager
Marybeth Richardson, Maine Department of Environmental Protection Project Coordinator





PENOBSCOT NATION CULTURAL & HISTORIC PRESERVATION 12 WABANAKI WAY, INDIAN ISLAND, ME 04468

CHRIS SOCKALEXIS – TRIBAL HISTORIC PRESERVATION OFFICER E-MAIL: <u>chris.sockalexis@penobscotnation.org</u>

NAME	Amber Javers
ADDRESS	Burns & McDonnell Engineering Company, Inc.
	9400 Ward Parkway
	Kansas City, MO 64114
OWNER'S NAME	Central Maine Power
TELEPHONE	(816) 333-9400
FAX	
EMAIL	ajavers@burnsmcd.com
PROJECT NAME	New England Clean Energy Connect Project – Transmission
	Line from Quebec to the New England Control Area
PROJECT SITE	Maine
DATE OF REQUEST	August 3, 2017
DATE REVIEWED	August 28, 2017

Thank you for the opportunity to comment on the above referenced project. This project appears to have no impact on a structure or site of historic, architectural or archaeological significance to the Penobscot Nation as defined by the National Historic Preservation Act of 1966, as amended.

If Native American cultural materials are encountered during the course of the project, please contact my office at (207) 817-7471. Thank you for consulting with the Penobscot Nation Tribal Historic Preservation Office with this project.

Chris Sockalexis, THPO Penobscot Nation