

Kirk F. Mohny  
Director, State Historic Preservation Officer  
Maine Historic Preservation Commission  
55 Capitol Street  
65 State House Station  
Augusta, Maine 04333-0065

April 6, 2018

**RE: MHPC# 1148-17 Central Maine Power Company  
New England Clean Energy Connect (NECEC) Project  
Site Location of Development Act & NRPA Permit Applications**

Dear Mr. Mohny:

On behalf of Central Maine Power Company (CMP), SEARCH has prepared the following response to your October 11, 2017, letter to Mr. Gerry J. Mirabile, regarding the New England Clean Energy Connect (NECEC) project. This response is intended to update the Maine Historic Preservation Commission (MHPC) on the progress of cultural resource studies to date, to clarify the language used in Section 8.0 (Historic Sites) of the Site Location of Development Act (Site Law) Permit Application, and to outline CMP's plan for continued consultation under Section 106 of the National Historic Preservation Act (NHPA).

To date, the MHPC has reviewed and provided comments on the following project submittals:

- 1) NECEC Sensitivity Assessment – Received by MHPC, August 23, 2017
  - MHPC response letter August 28, 2017
- 2) Revised NECEC Sensitivity Assessment – Received by MHPC, September 7, 2017
  - MHPC response letter September 11, 2017
    - Scope of Work (SOW) for archaeological and architectural history field reconnaissance surveys approved
- 3) NECEC Site Law and Natural Resources Protection Act Permits – Received by MHPC, September 27, 2017.
  - MHPC response letter October 11, 2017

MHPC's October 11, 2017, correspondence asks that SEARCH provide the information requested in the above-referenced August 28, 2017, letter. Following clarification on this topic provided by Ms. Megan Hopkin (personal communication, October 19, 2017), SEARCH understands this to be a request that the results of the identification surveys for historic architectural (reconnaissance results) and archaeological (Phase I results) resources be submitted.

While CMP does intend to move forward with the surveys for the identification and evaluation (if necessary) of cultural resources within the NECEC direct and indirect Areas of Potential Effects (APEs), these surveys have not yet been performed. The first step in this process will be the performance of the reconnaissance surveys referenced above.

Section 8.0, Historic Sites, of the NECEC Site Law permit application references the *No Adverse Environmental Effect Standard* of the *Site Law*, 06-096 CMR 375.11. As stated in the permit application



and emphasized here, it is CMP’s intention to perform these surveys; continue consultation with state, federal, and tribal agencies; take all reasonable measures to avoid impacts to historic properties; and mitigate any adverse effects to historic or cultural resources that cannot be avoided. CMP acknowledges that the MHPC will require completion of surveys to identify and evaluate cultural resources within the direct and indirect APEs before MHPC provides comments on whether the NECEC meets this standard. The projected schedule for completion of these surveys is given in **Table 1**.

**Table 1. Projected Historic Properties Compliance Schedule.**

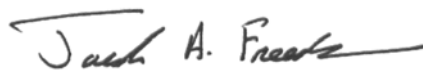
Activity	Schedule
Reconnaissance Field Survey	April 2018
Draft Addendum Report and Phase I Archaeology and Intensive Architecture History SOW to MHPC	May 2018
MHPC Review and Approval of Phase I/Intensive SOW by MHPC	June 2018
Phase I Archaeology and Intensive Architectural Field Survey	July 2018
Draft Phase I Archaeology and Intensive Architecture Survey Report to MHPC	August 2018
MHPC Review and Approval of NRHP Evaluation SOW	August/September 2018
Phase II Archaeological Investigations and Architectural History Evaluation Fieldwork/Research	September/October 2018
NRHP Eligibility Evaluation Report to MHPC	November/December 2018
Memorandum of Agreement Execution	January 2019

CMP and SEARCH believe that a meaningful dialog, i.e., a Maine Department of Environmental Protection hearing regarding the project’s potential impacts to significant cultural resources, cannot take place until the completion of the Phase I archaeological and intensive architectural surveys, and until MHPC has reviewed and commented on the results of these surveys. The results of these surveys will be available for agency review as early as August 2018.

On behalf of CMP and SEARCH, I would like to thank you for taking the time to consider this schedule and for MHPC’s continued prompt and professional consultation.

If you have any questions, please do not hesitate to contact me directly by phone at 207-266-7709 or by email at [jacob@searchinc.com](mailto:jacob@searchinc.com).

Sincerely,



Jacob A. Freedman, MA  
SEARCH Project Manager

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|-------------------------------------|-------------------------------|
| cc: Jay Clement (USACE)             | Samantha Horn (LUPC)          |
| Jim Beyer (MDEP)                    | Bill Hinkel (LUPC)            |
| Christina Hodgeman (MDEP)           | Christopher Lawrence (USDOE)  |
| Gerry J. Mirabile (CMP)             | Melissa Pauley (USDOE)        |
| Mark A. Goodwin (Burns & McDonnell) | Matt Manahan (Pierece Atwood) |