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Sappi North America

S.D. Warren Company  
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Westbrook, ME 04098

**Filed Electronically**

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

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January 20, 2016

**RE: 2015 Report On Historic Properties Management Plans for:  
FERC Project Nos. P-2942, P-2931, P-2941, P-2932, & P-2897**

Dear Ms. Bose,

Please find enclosed S.D. Warren Company's (Warren), Annual Report of findings, dated January 20, 2016, relative to the Archaeological and Historical Sites identified in Section 4.0 of the Historic Property Management Plans<sup>1</sup> filed with the Maine Historic Preservation Commission (MHPC) on October 4, 1994, for the Dundee, Gambo, Little Falls, Mallison, and Saccarappa FERC licensed projects<sup>2</sup>(Projects).

With this letter Warren confirms that it has not conducted any ground breaking activities since its last annual report dated January 19, 2015, other than the installation of two utility poles set at the Saccarappa site (MHPC #0537-14), as recorded in Warren's October 2, 2015 Autumn Report<sup>3</sup>. Your office confirmed by electronic correspondence dated July 22, 2015, that the pole installation has no adverse effect on the Historic Property.

For the remainder of this letter, Warren summarizes its monitoring and assessment activities related to the identified historic sites at the Projects.

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<sup>1</sup> The HPMPs were approved by FERC Order, dated August 8, 2005. See 112 FERC ¶ 62,113

<sup>2</sup> Dundee P-2942, 105 FERC ¶ 61,009 (Article 412); Gambo P-2931, 105 FERC ¶ 61,010 (Article 412); Little Falls P-2941, 105 FERC ¶ 61,012 (Article 410); Mallison P-2932, 105 FERC ¶ 61,011 (Article 411); and Saccarappa P-2897, 105 FERC ¶ 61,013 (Article 410)

<sup>3</sup> The Programmatic Agreement of July 15, 2002, requires Warren file a report on HPMP activities with the MHPC and the Penobscot Nation on the license anniversary, October 2.



In Warren's last Annual Report to MHPC, dated January 19, 2015, Warren included a report by Dr. Richard Will of TRC Solutions, dated January 15, 2015, on monitoring completed in 2014 for the Projects. Based on his review of monitoring completed in 2013 and 2014, including a comparison to the 2011 baseline observations, Dr. Will recommended extending the period between monitoring observations from annual to biannual. Consequently, except for erosion monitoring subsequent to a flood event, no monitoring was conducted in 2015. Dr. Will further recommended that monitoring for the Oriental Powder Mill complex be modified to post flood monitoring only. Dr. Will's recommendations were supported by the MHPC, in correspondence from Dr. Art Spiess dated February 4, 2015.

S.D. Warren has scheduled monitoring of sites 8.19, 8.20, 13.50, and 13.5, for 2016 and will submit a report by January 31, 2017.

## **Saccarappa<sup>45</sup>**

### **Background**

On December 31, 2013, Warren filed a surrender application with the Federal Energy Regulatory Commission (FERC). The MHPC issued comments relative to the surrender application, requesting additional information, more specifically, a Phase 1 historic archaeological survey of the Island, east dam, and east channel; a finding that the removal of the dam(s) will have adverse impact on the Saccarappa Station<sup>6</sup>, and a recommendation to assess Sections 9 and 15 of the Cumberland & Oxford Canal to evaluate the potential for erosion at those sites once lower water levels have been established subsequent to dam removal.

On April 9, 2014, the FERC issued a findings letter subsequent to Warren's March 28, 2014 filing of a non-capacity amendment, and a request to stay the surrender application proceedings so that Warren could explore fish passage alternatives.<sup>7</sup> The FERC, in Appendix 1 of the letter, requested additional information regarding plans and proposals submitted with Warren's surrender application as it relates to Cultural Resources, and

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<sup>4</sup> Warren filed a surrender application for the Saccarappa Project, P-2897, on December 31, 2013 and withdrew the application on September 4, 2014, subsequent to the FERC Order (148 FERC ¶ 62,086) granting a two year extension for implementing fish passage at the Project.

<sup>5</sup> Warren filed a new surrender application with the FERC on December 2, 2015.

<sup>6</sup> Saccarappa Station was found eligible for listing in the National Register of Historic Places during the relicensing process.

<sup>7</sup> The application included documentation of consultation and agreement with the U.S. Fish & Wildlife Service, Maine Department of Marine Resources, City of Westbrook, Friends of the Presumpscot, and the Conservation Law Foundation.



engage in Section 106 NHPA consultation with the Advisory Council and the MHPC.

**2015 Activities:**

By electronic mail dated September 25, 2015, Warren notified Dr. Mohny of the MHPC that Warren would be submitting a new license surrender application, which would include removing both the east and west spillways, as well as altering the tailrace. On October 14, 2015, MHPC issued Warren a Schedule of Documentation, Maine Historic Engineering Record (MHER #62) with which Warren could proceed in developing a Historic Engineering Record for the Saccarappa building, dams, and appurtenant structures.

Warren's consultants, TRC Solutions (Dr. Will), Independent Archaeological Consultants (Dr. Kathleen Wheeler); and Sutherland Conservation & Consulting (Scott Hanson), have completed pre-contact, post-contact, and Historic Architecture studies and filed draft reports with Warren. Dr. Will is compiling the reports and will conduct the Section 106 Consultation with the MHPC and the Advisory Council on Historic Preservation.

If you have any questions concerning this matter, please contact me at 207-856-4083 or by e-mail at Brad.Goulet@SAPPI.com.

Sincerely,

A handwritten signature in blue ink that reads "Brad Goulet".

Brad Goulet  
Hydro Manager/Utilities Engineer

cc: *electronically*  
Dr. Kirk Mohny SHPO  
Dr. Richard Will, TRC Solutions  
William Ball, Acheron Engineering  
Matt Manahan, Pierce Atwood  
N.J.Skancke, NJS Law PLC

Attachments:  
Winter Report to SHPO, (January 13, 2016)  
Autumn Report to SHPO (October 2, 2015)  
Autumn Report to Penobscot Nation (October 2, 2015)