



TECHNICAL SUMMARY
NEW ENGLAND CLEAN ENERGY CONNECT
PHASE I CULTURAL RESOURCE SURVEY OF THE
ANDROSCOGGIN, CUMBERLAND, FRANKLIN, LINCOLN
SAGadahoc, SOMERSET, AND KENNEBEC COUNTIES, MAINE

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CLIENT:	Central Maine Power Company
DATE:	November 2018
SEARCH PROJECT #:	3943-17087ET

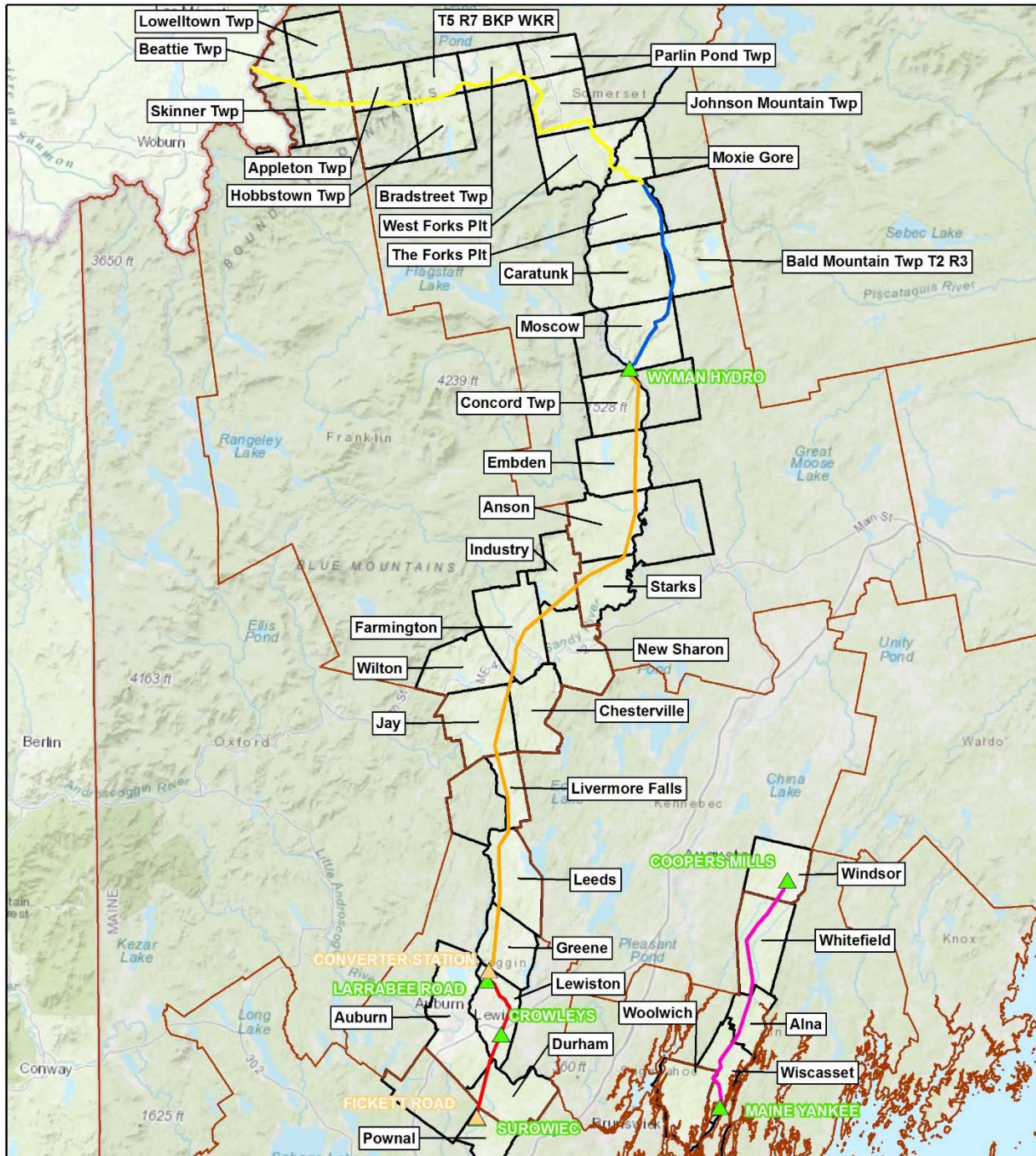
INTRODUCTION

In 2017 and 2018, SEARCH conducted a Phase I archaeological survey for the New England Clean Energy Connect (NECEC) Project (Project) proposed by the Central Maine Power Company (CMP). The NECEC was proposed in response to the Request for Proposals for Long-Term Contracts for Clean Energy Projects dated March 31, 2017, issued by the Massachusetts Department of Energy Resources and the Electric Distribution Companies of Massachusetts. NECEC is proposed to deliver renewable energy from Quebec-based sources to the New England Control Area for Massachusetts customers.

The proposed linear extent of the Project is approximately 200 miles (322 kilometers), crossing seven counties, 24 municipalities, and 15 unorganized areas within the State of Maine. A combination of new and rebuilt transmission lines that extend from the Canadian border to the Surowiec Substation in Pownal, crossing Franklin, Somerset, Androscoggin, and Cumberland Counties in Western and Central Maine, comprise majority of the proposed Project area. A second proposed transmission line would extend from the Coopers Mills Substation in Windsor to the Maine Yankee Substation in Wiscasset, crossing Kennebec, Lincoln, and Sagadahoc Counties in Coastal Maine.

PROJECT SUMMARY

The proposed Project consists of three distinct pieces of electric transmission infrastructure. The first extends from the Canadian border to Lewiston; the second extends from Lewiston to Pownal; and the third is between Windsor and Wiscasset (**Figure 1**). The Project begins at the Canadian border with a high voltage direct current (HVDC) transmission line running from Beattie Township to a proposed DC to



New England Clean Energy Connect

NAD 1983 UTM 19N 1:900,000 25 12.5 0 25 Kilometers

**Figure 1:
Overview of the NECEC Project**

- Segment 1, New ROW
- Segment 2, The Forks to Wyman Hydro (HVDC Existing ROW)
- Segment 3, Wyman Hydro to Larrabee Road (HVDC Existing ROW)
- Segment 4, Rebuilds
- Segment 5, AC (New 345 kV)
- ▲ Existing Substation
- ▲ Proposed Substation
- County Boundary
- Town Boundary





AC converter station near Merrill Road in Lewiston. A new 345 kilovolt (kV) transmission line will connect the converter station to the existing Larrabee Road Substation in Lewiston. South of the Larrabee Road Substation, two existing 115 kV transmission lines (Sections 62 and 64), terminating at the Surowiec Substation in Pownal, will be rebuilt. A new substation will be constructed adjacent to the Surowiec Substation on Fickett Road and a 345 kV transmission line will connect the two substations. Additionally, a new 345 kV transmission line is proposed from the Coopers Mills Substation in Windsor to the Maine Yankee Substation in Wiscasset. Several substations will require upgrades and modifications within their existing developed footprints, and several existing transmission line structures will need relocation to make room in existing corridors for the new infrastructure. These proposed activities, existing conditions, and area (or right-of-way [ROW]) width are summarized below by line from north to south in **Table 1**.

Table 1 Project Summary.

Component	Segment	Area/ROW Width	Existing Conditions	Length
Coopers Mills Substation	Coopers Mills to Maine Yankee	N/A*	Existing Substation	N/A*
345 kV Line	Coopers Mills to Maine Yankee	167 m (550 ft)	Partially developed ROW	42.6 km (26.5 mi)
Maine Yankee Substation	Coopers Mills to Maine Yankee	N/A*	Existing Substation	N/A*
Section 64 Rebuild	Larrabee to Surowiec	107 m (350 ft)	Existing Corridor	15.0 km (9.3 mi)
Section 62 Rebuild	Larrabee to Surowiec	122 m (400 ft)	Existing Corridor	25.9 km (16.1 mi)
Fickett Road Substation	Larrabee to Surowiec	2.5 ha (6.1 ac)	New Facility	N/A*
345 kV Line	Larrabee to Surowiec	122 m (400 ft)	Partially developed ROW	0.4 km (0.3 mi)
Surowiec Substation	Larrabee to Surowiec	N/A*	Existing Substation	N/A*
HVDC Line	Wyman to Larrabee Road	122 m (400 ft)	Partially developed ROW	115.1 km (71.5 mi)
HVDC Line	Wyman to Larrabee Road	232 m (700 ft)	Partially developed ROW	1
Converter Station	Wyman to Larrabee Road	2.8 ha (7.0 ac)	New Facility	N/A*
345 kV Line	Wyman to Larrabee Road	122 m (400 ft)	Partially developed ROW	1.9 km (1.2 mi)
Larrabee Road Substation	Wyman to Larrabee Road	N/A*	Existing Substation	N/A*
HVDC Line	Quebec to Wyman	91 m (300 ft)	New Corridor	86.3 km (53.6 mi)
HVDC Line	Quebec to Wyman	91 m (300 ft)	Partially developed ROW	35.2 km (21.9 mi)
Wyman Hydro	Quebec to Wyman	N/A*	Existing Hydropower Station	N/A*
Raven Farm Substation	Transformer installation	N/A*	Existing Substation	N/A*
<i>Total (Area)</i>		<i>5.3 ha (13.1 ac)</i>	<i>Total (Length)</i>	<i>322.4 km (200.4 mi)</i>

*Existing facility—no ground disturbance outside existing footprint. No impact to cultural resources. Not considered further in this report.



METHODS

SEARCH conducted the Phase I archaeological survey in three phases. First, a desktop review of the entire Project APE (Freedman et al. 2017) identified Sensitive Areas (SAs) where archaeological sites were likely to occur. SAs were identified as pre-contact, post-contact, or both (areas with pre-contact and post-contact sensitivity). Sensitivity for pre-contact SAs was based on a number of environmental factors, including proximity to water resources, soil drainage, elevated or otherwise attractive landforms, and slope. Post-contact SAs were typically associated with historic houses and farmsteads or locations where these once stood, but were also associated with other historic structures or their remains, such as schools, churches, mills, transportation corridors, or other historical locations. A total of 148 SAs were identified, with a combined length of 100.7 miles, or approximately 50 percent of the total Project APE. The mean SA length was 1,095 m (3,591.2 ft), with a median length of 480 m (1,574.8 ft) and a standard deviation (s.d.) of 1,669 m (5,474.2 ft). Five SAs were identified based on pre-contact sensitivity, 33 were identified based on post-contact sensitivity, and the remaining 110 SAs were identified based on both pre- and post-contact sensitivity.

Following SA identification, SEARCH conducted pedestrian reconnaissance survey of each SA targeting and establishing specific locations where subsurface testing would be undertaken in order to identify significant archaeological resources that may be impacted by the Project (Clement et al. 2018). The goals of the reconnaissance survey were to:

- Confirm the presence/absence of environmental variables that defined a SA:
 - Establish the areal extents of testing within each sensitivity SA identified by the desktop review.
 - Locate and document the portions of each landform that would require subsurface testing.

For pre-contact SAs, variables utilized to target specific locations for subsurface testing included, but were not limited to, proximity to water, elevated or otherwise favorable landforms, soil drainage, and slope. For post-contact SAs, the reconnaissance survey also identified evidence of historic development or use to target specific locations for subsurface testing such as foundation remnants, cellar holes, chimney falls, trash scatters, wells, stone walls, cemeteries, etc. SAs identified by the desktop review that provided no evidence of occupation or notable landform sensitivity during field reconnaissance, were eliminated from further archaeological survey.

Field reconnaissance identified a total of 203 Test Areas (TAs) in 99 of the 148 SAs examined, and recommended a total of 3,442 shovel tests (STs) for subsurface testing.¹ Additional work was also recommended at several locations that did not involve shovel testing:

- A GPR transect near a marked historic cemetery to ensure it does not extend into the APE.
- An identified surface collection area with high pre-contact sensitivity.
- Four geomorphological study areas in floodplains with the potential for deeply buried archaeological surfaces.
- Two locations with observed rhyolite outcrops to inspect for presence of tailings or other evidence of quarrying.

¹ During the fieldwork, additional STs beyond those recommended by the reconnaissance survey were excavated as deemed necessary in the field based on findings; there were 4,537 STs excavated during the Phase I survey.



No additional work was recommended for 49 SAs.

Following review and acceptance of the desktop review (Freedman et al. 2017) and the archaeological reconnaissance survey (Clement et al. 2018) reports by the Maine Historic Preservation Commission (MHPC), SEARCH conducted subsurface testing at transect locations identified therein. Where conditions were favorable for settlement and preservation (i.e., where soils are present, relatively intact, and well drained), 10 m interval STs were excavated. Where soils were found unfavorable, excavation was limited in scope to demonstrate the persistence of unfavorable conditions along each proposed transect, and documentation of the conditions leading to this conclusion were gathered. In some instances, soils and topographic settings conducive to Paleoindian settlement were anticipated. These locations were tentatively identified during the desktop review (e.g., alluvial and glacial outwash contexts on elevated landforms overlooking the Sandy River [Freedman et al. 2017:56]); additional locations were identified on terrace landforms overlooking the Androscoggin River. Where Paleoindian sensitivity was identified, a 5 m interval of subsurface investigation was implemented.

Furthermore, locations where historic house sites, outbuildings, or other evidence of historical occupation was identified were revisited during the subsurface survey. These were systematically examined and mapped in detail, and then subjected to systematic and judgmental subsurface testing to determine their extent and to recover artifacts to determine temporal placement as well as facilitate functional interpretation. Test units measuring 1 x 1 m or judgmental STs were employed in situations where straight-line transects of STs were insufficient to make a recommendation of significance. Interpretation and evaluation of historic sites was augmented by background research including (but necessarily limited to) consultation of historic maps as well as town and county histories.

Fieldwork conformed to accepted practices in Maine. STs were 50 x 50 cm excavations to facilitate artifact recovery and identification of soil stratification, as well as any present subsurface features. Site boundary was defined by consecutive negative 5 m interval STs or, where present, slopes, wetlands or streams, and other topographic features. No STs were excavated outside the Project APE, and portions of sites extending beyond this limit were not examined. Soils were screened through 1/4 in (6.4-millimeter [mm]) hardware cloth to enhance artifact recovery. ST locations were recorded through GPS technology using mobile devices with external antennae and Global Navigation Satellite System (GNSS) GPS receivers capable of sub-meter accuracy.

The 50 x 50 cm STs were suitable for assessing subsurface depths to approximately 100 to 120 cm below surface (cmbs), depending on conditions. Where STs indicated that the potential for alluvial, eolian, or other deeply buried deposits existed, STs were further subjected to a program of deep testing where a bucket auger was utilized at the base of the ST to access and sample more deeply buried portions of a landform. Auger testing was implemented to determine if conditions were favorable for the preservation of deeply buried cultural horizons below the depth accessible by ST excavation alone. Where such locations were identified, the depth of sensitivity for cultural deposits was evaluated in consultation with a geomorphologist. Where sampling of sediments below 100 cmbs was determined necessary in consultation with the geomorphologist, up to 25 percent of STs were expanded into 1 x 1 m excavations to this depth (100 cmbs). A quadrant of the 1 x 1 m excavation was then selected for continued excavation up to a maximum depth of 200 cmbs.



RESULTS

A total of 4,537 ST locations were investigated by SEARCH to determine presence of significant archaeological sites that will be impacted by the proposed Project. The 440 positive STs excavated defined a total of 47 archaeological resources, including 29 archaeological sites and 18 isolated finds. Additionally, 16 previously recorded sites were identified as within the Project APE based on information provided by the MHPC, although they were not investigated by the present project. Archaeological resources identified in the Project APE by the Phase I survey are summarized in **Table 2**.

The 18 isolated finds consist of individual artifacts, or small numbers of related artifacts from a single ST with no nearby associated material, and are considered not eligible for NRHP listing because they have no research significance.

Table 2. Summary of Archaeological Resources Identified in the Project APE.

Site No.	Segment	Type	Subtype	Area (sq m)	Positive STs	Artifacts	County
ME 431-035	Segment 2 The Forks to Wyman Hydro	Site	Fish hatchery	538	9	171	Somerset
ME 293-015		Site	Farmstead	1706	23	300	Somerset
ME 293-016		Site	Farmstead	1735	23	211	Somerset
Isolate-01		Isolate	N/A	N/A	1	1	Somerset
Isolate-02		Isolate	N/A	N/A	1	9	Somerset
ME 293-017		Site	Agricultural outbuilding	227	4	27	Somerset
ME 293-018		Site	Farmstead	1883	20	399	Somerset
Isolate-03		Isolate	N/A	N/A	1	1	Somerset
Isolate-04		Segment 3 Wyman Hydro to Larrabee Road	Isolate	N/A	N/A	1	2
ME 013-003	Site		Agricultural outbuilding	6157	32	409	Somerset
ME 013-002	Site		Domestic	480	9	334	Somerset
ME 414-004	Site		Field scatter	522	5	19	Somerset
Isolate-05	Isolate		N/A	N/A	1	1	Somerset
ME 154-009	Site		Farmstead	2241	30	310	Franklin
ME 154-012	Site		Possible historic walkway	197	1	4	Franklin
ME 154-011	Site		Field scatter	280	3	5	Franklin
ME 154-010	Site		Field scatter	8924	34	84	Franklin
Isolate-06	Isolate		N/A	39	1	1	Franklin
Isolate-07	Isolate		N/A	39	1	7	Franklin
Isolate-08	Isolate		N/A	39	1	1	Franklin
Isolate-09	Isolate		N/A	39	1	1	Franklin
Isolate-10	Isolate		N/A	39	1	18	Franklin
Isolate-11	Isolate		N/A	39	1	1	Franklin
Isolate-12	Isolate	N/A	39	1	1	Franklin	
ME 217-002	Site	Domestic	391	9	175	Franklin	



Table 2. Summary of Archaeological Resources Identified in the Project APE.

Site No.	Segment	Type	Subtype	Area (sq m)	Positive STs	Artifacts	County
ME 217-003	Segment 3 Wyman Hydro to Larrabee Road	Site	Farmstead	2188	23	256	Franklin
ME 51-09*		Site	Pre-contact	N/A	N/A	N/A	Franklin
ME 51-10*		Site	Pre-contact	N/A	N/A	N/A	Franklin
Isolate-13		Isolate	N/A	39	N/A	3	Franklin
ME 36-53*		Site	Pre-contact	N/A	N/A	N/A	Franklin
ME 217-001 ¹		Site	Farmstead	3749	38	293	Franklin
ME 36-52*		Site	Pre-contact	N/A	N/A	N/A	Franklin
ME 36-51*		Site	Pre-contact	N/A	N/A	N/A	Franklin
ME 36-50*		Site	Pre-contact	N/A	N/A	N/A	Androscoggin
ME 36-54*		Site	Pre-contact	N/A	N/A	N/A	Androscoggin
ME 36-44*		Site	Pre-contact	N/A	N/A	N/A	Androscoggin
ME 180-003		Site	Farmstead	259	6	39	Androscoggin
ME 180-001*		Site	Domestic	N/A	N/A	N/A	Androscoggin
ME 180-004		Site	Farmstead	466	7	184	Androscoggin
ME 24-43*		Site	Pre-contact	N/A	N/A	N/A	Androscoggin
ME 24-42*	Segment 4 Rebuilds	Site	Pre-contact	N/A	N/A	N/A	Androscoggin
ME 236-012		Site	Historic scatter	1726	24	445	Androscoggin
ME 24-41*		Site	Pre-contact	N/A	N/A	N/A	Androscoggin
ME 24-40*		Site	Pre-contact	N/A	N/A	N/A	Androscoggin
ME 131-003*		Site	Farmstead	N/A	N/A	N/A	Androscoggin
Isolate-14		Isolate	N/A	N/A	1	2	Androscoggin
ME 14-161*		Site	Pre-contact	N/A	N/A	N/A	Androscoggin
ME 131-002*		Site	Farmstead	N/A	N/A	N/A	Androscoggin
ME 358-008	Site	Farmstead	235	7	48	Cumberland	
ME 484-006	Segment 5 AC	Site	Domestic	1,844	16	323	Kennebec
ME 478-006		Site	Farmstead	2,899	37	1,016	Lincoln
ME 478-009		Isolate	N/A	N/A	1	8	Lincoln
ME 38-102		Site	Pre-contact	24	1	5	Lincoln
Isolate-15		Isolate	N/A	N/A	0	30	Lincoln
ME 478-007		Site	Domestic	872	14	148	Lincoln
ME 478-008		Site	Field scatter	181	4	26	Lincoln
Isolate-16		Isolate	N/A	N/A	1	1	Lincoln
Isolate-17		Isolate	N/A	N/A	1	2	Lincoln
Isolate-18		Isolate	N/A	N/A	1	2	Lincoln
ME 491-054		Site	Field scatter	346	4	11	Lincoln
Isolate-19		Isolate	N/A	N/A	1	1	Lincoln
ME 491-055		Site	Field scatter	1,330	22	281	Lincoln
ME 491-056		Site	Field scatter	204	6	30	Lincoln
ME 491-057		Site	Domestic	446	10	160	Lincoln

*Previously identified archaeological resource ¹Previously identified archaeological site investigated as part of the NECEC Phase I survey



The 45 archaeological sites in the Project APE are summarized in **Table 2**. The 16 previously recorded sites that were not investigated include seven that were previously determined not eligible for NRHP listing during work on and review of the previous project(s), seven that with additional research were found to not be in the Project APE, and two that will be avoided by the Project and will not be impacted. One of these latter two sites is eligible for NRHP listing, whereas the other one is potentially significant. Because these 16 previously recorded sites were not investigated by the present Project, site type and period of occupation are not included in **Table 2**.

Of the 29 sites investigated by this Project, 28 are historic and one is prehistoric. The prehistoric site, ME 38-102, consists of five pieces of Kineo-Traveler rhyolite debitage, including two that were made into expedient tools, from a single ST. Ordinarily groups of related artifacts from a single ST are considered isolated finds, but in consultation with the Maine SHPO ME 38-102 is treated as a site because it may extend outside the Project ROW. Kineo-Traveler rhyolite was rarely utilized by Paleoindian groups, and ME 38-102 is dated to a post Paleoindian timeframe.

The historic sites include:

- Two agricultural outbuildings.
- Five domestic sites that contain evidence of residential use but no evidence of agricultural practices.
- Ten farmsteads with evidence of both a residence and agricultural use.
- Eight field scatters with historic artifacts but no evidence of a structure.
- One fish hatchery built by the State of Maine.
- One possible walkway associated with a possible fieldstone wall remnant and a historic artifact scatter.
- One historic scatter associated with a domestic structure or farmstead that was not present in the Project row.

Historic sites recorded in the NECEC ROW date from the eighteenth century to the twentieth century based on the artifacts recovered; however, the prevalent occupation is from the mid- to late-nineteenth century through the early twentieth century. Some sites show evidence of occupation both before and after these dates, but that evidence is not extensive.

In addition to the archaeological sites and isolated finds discussed above, one previously unrecorded historic cemetery was identified adjacent to the Project APE. GPR survey within the adjacent ROW revealed the presence of four probable unmarked graves and a fifth possible unmarked grave, and prompted the establishment of an avoidance area around these features.



Table 3-2. Summary of Archaeological Sites in the Project APE, with Recommendations.

Site No.	Site Type	Period of Occupation	NRHP Rec.	Treatment Rec.
ME 013-002	Domestic	Nineteenth and twentieth century	Additional work	Avoid
ME 013-003	Domestic	Nineteenth and twentieth century	Additional work	Avoid
ME 014-161	Lithic and calcined bone scatter	General prehistoric	Determined not eligible	No further consideration
ME 024-40	Buried living surface, discontinuous	Late Ceramic	Additional Work	Avoid
ME 024-41	Lithic scatter	General prehistoric	Determined not eligible	No further consideration
ME 024-42	Isolated artifact	Archaic	Determined not eligible	No further consideration
ME 024-43	Lithic scatter	General prehistoric	Determined not eligible	No further consideration
ME 036-44	Ceramic scatter	General ceramic	Not in the Project area	No further consideration
ME 036-50	Lithic scatter	General prehistoric	Determined not eligible	No further consideration
ME 036-51	Lithic scatter	General prehistoric	Not in the Project area	No further consideration
ME 036-52	Artifact scatter	General prehistoric	Not in the Project area	No further consideration
ME 036-53	Lithic and calcined bone scatter	General prehistoric	Not in the Project area	No further consideration
ME 036-54	Lithic scatter	General prehistoric	Not in the Project area	No further consideration
ME 051-09	Lithic scatter	General prehistoric	Not in the Project area	No further consideration
ME 051-10	Lithic scatter	General prehistoric	Not in the Project area	No further consideration
ME 131-002	Farmstead	Nineteenth century	Determined not eligible	No further consideration
ME 131-003	Farmstead	Nineteenth century	Eligible	Avoid
ME 154-009	Farmstead	Nineteenth century	Additional work	Avoid
ME 154-010	Field scatter	Twentieth century	Not eligible	No further consideration
ME 154-011	Field scatter	Twentieth century	Not eligible	No further consideration
ME 154-012	Possible walkway	Nineteenth or twentieth century	Additional work	Avoid
ME 180-001	Domestic	Nineteenth century	Determined not eligible	No further consideration
ME 180-003	Agricultural Outbuilding	Nineteenth and twentieth century	Not eligible	No further consideration
ME 180-004	Farmstead	Nineteenth and twentieth century	Not eligible	No further consideration



Table 3-2. Summary of Archaeological Sites in the Project APE, with Recommendations.

Site No.	Site Type	Period of Occupation	NRHP Rec.	Treatment Rec.
ME 217-001	Farmstead	Nineteenth and twentieth century	Additional work	Avoid
ME 217-002	Domestic	Nineteenth and twentieth century	Not eligible	No further consideration
ME 217-003	Farmstead	Nineteenth and twentieth century	Additional work	Avoid
ME 236-012	Historic scatter	Late eighteenth to twentieth century	Not eligible	No further consideration
ME 293-015	Farmstead	Late nineteenth to early twentieth century	Additional work*	Avoid
ME 293-016	Farmstead	Nineteenth and twentieth century	Additional work*	Avoid
ME 293-017	Agricultural Outbuilding	Undetermined	Not eligible	No further consideration
ME 293-018	Farmstead	Nineteenth and twentieth century	Not eligible	No further consideration
ME 358-008	Farmstead	Nineteenth and twentieth century	Additional work	Avoid
ME 38-102	Lithic scatter	Post Paleoindian	No significant deposits in Project APE	No further consideration
ME 414-004	Field scatter	Late nineteenth century	Not eligible	No further consideration
ME 431-035	Fish Hatchery	Twentieth century	Additional work	Avoid
ME 478-006	Farmstead	Nineteenth century	Additional work	Avoid
ME 478-007	Domestic	Eighteenth and nineteenth century	Additional work	Avoid
ME 478-008	Field scatter	Nineteenth and twentieth century	Not eligible	No further consideration
ME 478-009	Domestic	Nineteenth century	Not eligible	No further consideration
ME 484-006	Domestic	Late eighteenth to twentieth century	Additional work	Avoid
ME 491-054	Field scatter	Undetermined	Not eligible	No further consideration
ME 491-055	Field scatter	Undetermined	Not eligible	No further consideration
ME 491-056	Field scatter	Undetermined	Not eligible	No further consideration
ME 491-057	Domestic	Nineteenth century	Additional work	Avoid

* Possible contributor to potential rural landscape or historic district.



Treatment Recommendations

Of the 29 shovel-tested sites, 28 are historic and one is prehistoric. Fourteen are recommended not eligible for NRHP listing. Due to SHPO concurrence, no further consideration is required for these 14 sites. One site may extend beyond the Project APE, but does not contain any significant deposits within the Project APE. Due to SHPO concurrence, no further consideration is required for this site within the Project APE. The remaining 14 sites are recommended for avoidance because their potential significance and NRHP eligibility cannot be determined based on the present data. For these sites, monitoring and fenced exclusion areas or additional work sufficient to make a final determination of eligibility is recommended. Monitoring while ground disturbing activities take place in the vicinity of each site and the establishment of exclusion areas will ensure that unintentional impacts do not occur. Possible unmarked graves within the Project APE that are associated with the Quinnam cemetery will also be avoided. Monitoring during ground disturbing activities is also recommended at the cemetery to ensure that unintentional impacts do not occur. Seven of the 14 sites recommended for avoidance may be potentially impacted by the Project. A finding of No Adverse Effect for these seven sites is recommended, based on the treatment plans summarized in **Table 3-3**.

Table 3-3. Potentially Impacted Sites Recommended for Avoidance, with Summary of Anticipated Treatment.

Site No.	Summary of Treatment
ME 013-003	Site impacts will be limited to traversing the existing roadway. This portion of the site is extensively disturbed and would not contribute to site significance. A travel lane across the site limited to the currently disturbed roadway will be defined with temporary construction fencing.
ME 154-009	Site is outside Project limits of disturbance. To prevent inadvertent site impacts during construction the site area will be marked with temporary construction fencing. No tree clearing will be conducted in the vicinity of this site.
ME 217-001	Site impacts will be limited to traversing the existing roadway. This portion of the site is extensively disturbed and would not contribute to site significance. A travel lane across the site limited to the currently disturbed roadway will be defined with temporary construction fencing.
ME 217-003	Access across the site, if needed, will utilize the existing roadways which traverse the center of the site where disturbance was noted and where no cultural material or surface features were identified. This portion of the site is extensively disturbed and would not contribute to site significance. A travel lane across the site limited to the currently disturbed roadway will be defined with temporary construction fencing. Clearing impacts cannot be avoided. An archaeological monitor with stop work authority will be onsite while clearing is conducted and the construction team will implement hand-cutting or reach-in techniques for vegetation removal. Following vegetation removal the site area will be marked with temporary construction fencing
ME 293-016	Access across the site, if needed, will utilize the existing roadways which traverse the center of the site where disturbance was noted and where no cultural material or surface features were identified. This portion of the site is extensively disturbed and would not contribute to site significance. A travel lane across the site limited to the currently disturbed roadway will be defined with temporary construction fencing. Clearing impacts cannot be avoided. An archaeological monitor with stop work authority will be onsite while clearing is conducted and timber mats placed in consultation with the archaeological monitor will prevent subsurface disturbance and will avoid sensitive archaeological features or areas with surficial deposits.



Table 3-3. Potentially Impacted Sites Recommended for Avoidance, with Summary of Anticipated Treatment.

Site No.	Summary of Treatment
ME 478-006	<p>Site impacts will be limited to traversing the existing roadway. This portion of the site is extensively disturbed and would not contribute to site significance. A travel lane across the site limited to the currently disturbed roadway will be defined with temporary construction fencing.</p> <p>Structures 3027-28 and 392-197 are in close proximity to the site. Subsurface testing will verify that planned pole and anchor locations do not contain significant deposits prior to structure installation. An archaeological monitor with stop work authority will be present during construction activities.</p>
ME 484-006	<p>One structure is within an interior portion of the site that is in a disturbed context adjacent to existing roadways, devoid of both cultural material and surficial cultural features, and does not contribute to significance. Travel and work area will be defined with temporary construction fencing, and will be limited to currently disturbed portions of the ROW.</p> <p>Archaeologists will verify through subsurface testing that planned pole and anchor locations do not contain significant deposits prior to structure installation. An archaeological monitor with stop work authority will be present during construction activities.</p> <p>Potentially significant portions of the site will be marked with temporary construction fencing to prevent inadvertent site impacts.</p>

REFERENCES CITED

- Clement, Christopher, Bertrand Pelletier, Jennifer Ort, and Jacob Freedman
2018 Archaeological Reconnaissance Survey: Androscoggin, Cumberland, Franklin, Lincoln, Sagadahoc, Somerset, and Kennebec Counties, Maine. Report prepared for Central Maine Power Company, Augusta, Maine.
- Freedman, Jacob A., Jenna Dunham, Jessica Fish, Tricia Peone, Robert Ingraham, Christopher Clement, and Jennifer Ort
2017 New England Clean Energy Connect Cultural Resources Sensitivity Assessment and Scope of Work for Reconnaissance Surveys Androscoggin, Cumberland, Franklin, Lincoln, Sagadahoc, Somerset, and Kennebec Counties, Maine. Report prepared for Central Maine Power Company, Augusta, Maine.

MHPC Review Comments and Recommendations



MAINE HISTORIC PRESERVATION COMMISSION
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GOVERNOR

Mr. Jacob Freedman
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November 6, 2018

KIRK F. MOHNEY

DIRECTOR

Dear Mr. Freedman:

Thank you for producing a useful Phase I archaeology report for the New England Clean Energy Connect project, with good graphics. I have reviewed the report, and have some specific comments and requests for revision below. *There is enough information in the report to state that Phase I archaeological survey is complete and adequate for both prehistoric and historic sites.*

Dr. Leith Smith, the Commission historic archaeologist, has not had a chance to review the report and he may not have the time for another week or two. When Leith does review this report, he will be dealing with the issue of NR eligibility on the 15 new historic sites with potential significance, and he will review the avoidance plans and No Adverse effect recommendations for those sites. Please also work with him directly to submit historic archaeological site card/form information in digital format.

In general, for most or all of the sites, we can accept the principal of archaeological site avoidance to minimize or avoid adverse effect during construction. When we dealt with a previous major powerline construction project (MPRP) some years ago, it was evident that avoidance of adverse effect meant archaeological monitoring during construction, and several rounds of post-construction archaeological monitoring. I think we will want the same approach with this project. Since archaeological monitoring need only be applied to potentially significant sites, there may be some cost savings involved in further field or historic records work to try to make determinations of "not eligible" for some sites. (As mentioned above, Leith will review the issue on a site-by-site basis. And I have comments below on the new prehistoric site.)

On a related issue, I suggest a change in wording in the Management Summary (p1). In paragraph 4 you discuss "16 previously recorded sites" and that seven "have been determined not eligible." Perhaps it would be clearer if you state that the SHPO concurrence as not eligible occurred during work on and review of the previous project(s), not for this project. Of course we stand by our previous determinations, but changing the language would clarify that issue.

I have assigned site number 38.102 to the new prehistoric site in Whitefield. A draft site form accompanies this letter. Please supply additional information, including the UTM. It would be quite useful for me to see either high quality photographs of the 5 flakes/utilized flakes, or the objects themselves (by mail?). The issue here is possible identification as Paleoindian. If we can eliminate the possibility of a Paleoindian identification, then management of the site would likely mean my concurrence with your determination of not eligible and no more fieldwork being necessary. *However, a Paleoindian identification means further consideration.* Note that the language in your 2.4 Eligibility Assessments section is not accurate (pp. 2-6 to 2-9) for Paleoindian sites. There are site attributes for each time period in Maine prehistory that we use to determine eligibility. See Table 5 and the full text links on the following web page:



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

PAUL R. LEPAGE
GOVERNOR

KIRK F. MOHNEY
DIRECTOR

p2 Spiess to Freedman November 6, 2018

<http://www.maine.gov/mhpc/archaeology/professional/contexts.html> . A Paleoindian site may be NR eligible even if the stone material that marks the site is entirely contained within a plowzone. Moreover, there have been many times in the last 30 years of Maine fieldwork where a Paleoindian site was detected by a few flakes in one testpits, with testpits dug at 5 or 10 m intervals, only to find one or more loci or concentrations of stone tools with dimensions of 3 or 4 m upon further excavation during Phase II testing. Thus, it is possible that Phase II work around the 38.102 site location will be necessary, despite the shovel testpits excavated so far. So, let's please clear up this issue by starting with photographs of the objects from this site, and if necessary getting me the objects themselves for examination.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arthur Spiess'.

Arthur Spiess, PhD
Senior Archaeologist

arthur.spiess@maine.gov

Jacob Freedman

From: Smith, Leith <Leith.Smith@maine.gov>
Sent: Thursday, November 15, 2018 3:38 PM
To: Jacob Freedman
Cc: Chris Clement
Subject: RE: [EXTERNAL SENDER] NECEC Report Comments

Project: MHPC #1148-17, New England Clean Energy Connect, Review of Report on results of Phase I Archaeological Survey of proposed and existing powerline corridors. SEARCH Inc.
Location: Androscoggin, Cumberland, Franklin, Lincoln, Sagadahoc, Somerset and Kennebec Counties, Maine

Dear Jacob,

Art suggested an email response from me would suffice for the review of the historic component of the above referenced report. The survey was well conducted and the report was a pleasure to review as it is extremely well organized even down to helpful headings, excellent site information including helpful and well done plans and site overview photos and feature photos. A lot of work went into this and it shows, and I am greatly appreciative having produced them myself in the past. I agree with all of your conclusions and recommendations for isolated finds and identified sites. The avoidance measures for identified sites is adequate and location specific testing once pole locations are known makes sense. Thank you for submitting the report. It will be added to our site report archive.

Sincerely,

Leith Smith

J.N. Leith Smith Ph.D.
Maine Historic Preservation Commission
65 State House Station
Augusta, Maine 04333
leith.smith@maine.gov
O: 207-287-8304
C: 508-517-0107

From: Jacob Freedman [mailto:jacob@searchinc.com]
Sent: Thursday, November 15, 2018 2:33 PM
To: Smith, Leith <Leith.Smith@maine.gov>
Cc: Chris Clement <Chris.Clement@searchinc.com>; Matt Manahan <mmanahan@pierceatwood.com>; 'Mirabile, Gerry J.' <Gerry.Mirabile@cmpco.com>; Goodwin, Mark <magoodwin@burnsmcd.com>; Spiess, Arthur <Arthur.Spiess@maine.gov>
Subject: [EXTERNAL SENDER] NECEC Report Comments

Leith,

Art let me know that you will likely have comments on NECEC completed today. It would be very helpful if you could e-mail a copy of the comment letter so that we can begin any necessary work on the report before a hard copy would arrive.

In addition, if there are any questions about the report which Chris or I could answer to aid in your review please do not hesitate to reach out.

Thanks for your attention to the report and help getting the comment letter over to us as expediently as possible.

All the best.

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

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

Jacob Freedman

From: Smith, Leith <Leith.Smith@maine.gov>
Sent: Thursday, December 06, 2018 8:34 AM
To: Spiess, Arthur; Jacob Freedman
Subject: RE: [EXTERNAL SENDER] RE: NECEC Phase I archaeology report

Good Morning Jacob,
The monitoring/avoidance language sounds good to me as well. We look forward to receiving the final revised report.

Leith

J.N. Leith Smith Ph.D.
Maine Historic Preservation Commission
65 State House Station
Augusta, Maine 04333
leith.smith@maine.gov
O: 207-287-8304
C: 508-517-0107

From: Spiess, Arthur
Sent: Tuesday, December 04, 2018 2:28 PM
To: Jacob Freedman <jacob@searchinc.com>
Cc: Smith, Leith <Leith.Smith@maine.gov>
Subject: RE: [EXTERNAL SENDER] RE: NECEC Phase I archaeology report

Hello Jacob:

Leith won't be in until Thursday. Protective measures language for site ME 431-035 for the report is acceptable to MHPC as written. (We will, of course, want this language referenced in the Army Corps permit, or whatever permits are issued for the project. But that is a later step.)

If there have been report pagination changes, we would appreciate another hard copy and digital copy.

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: Tuesday, December 04, 2018 11:41 AM
To: Spiess, Arthur <Arthur.Spiess@maine.gov>
Subject: RE: [EXTERNAL SENDER] RE: NECEC Phase I archaeology report

Art,

We have worked through all requested edits in the report and most are straightforward. These revisions did result in changes to pagination and figure sequencing which I think justify submission of a final version in hard copy along with the digital appendices. There were minor technical edits to the appendices.

We have worked with CMP to revised the proposed monitoring language and would appreciate your input so that there are no surprises upon submission. Below is monitoring language from Site ME 431-035. This language is consistent with that presented for all sites in the report.

“In consultation with CMP, ME 431-035 will be protected during construction of the Project. Although this site falls within the Project’s direct APE, it is outside the Project’s limits of disturbance (LOD) and will not be impacted during construction. To prevent inadvertent site impacts during construction, (i.e., the excavation of soil, placement of spoil piles, or the driving or parking of construction equipment) the site boundary will be marked with temporary construction fencing (**Figure 3.2.1-4**).

An archaeological monitor with stop work authority will be present during ground-disturbing construction activities within 50 m (164 ft) of the site boundary and will document its pre- and post-construction condition. When construction crews are in the vicinity of the site but not performing ground-disturbing activities, i.e. when crews are traveling up or down the project corridor, a Qualified Individual (QI) (defined in the MPRP Memorandum of Agreement [Desista et al. 2010] 2016 amendment (McCarthy et al. 2016), in part, as an individual who is either Certified in Erosion Control Practices by the Maine Department of Environmental Protection, or who is certified by Envirocert International, Inc. as a Certified Professional In Erosion & Sediment Control (CPESC); **and** who has reviewed, and is familiar with, all sites), will be responsible for ensuring that protective fencing 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 site’s final condition will be documented by a QI.”

Please let me know if you have any questions and if I should also forward this revised language to Leith.

All the best.

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

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

From: Spiess, Arthur [<mailto:Arthur.Spiess@maine.gov>]
Sent: Thursday, November 15, 2018 11:10 AM
To: Jacob Freedman <jacob@searchinc.com>
Subject: RE: [EXTERNAL SENDER] RE: NECEC Phase I archaeology report

Jacob:

Replying to your bullet points, point by point.

- 1) Thanks for pointing out the PDF copies of the site forms (in Appendix E). Leith is going to try to work with them (extract text to transfer to our site files). He will get back to you if that does not work. (No reason it should not.)
- 2) Site avoidance and mitigation language. Of course I want to review the revised language before it goes into the report (and will probably ask Leith for his input as well). If the new language won’t fit on a revised page

(or roughly the same size as existing text) to insert into the report, then it should be submitted as some sort of report addendum.

- 3) Please revise paragraph 4 and submit a revised page. (single page PDF and paper copy). We will insert it into the file paper and digital copy. (And hopefully the same approach will work for #3).
- 4) Site 38.102. Clearly and obviously these flakes are Kineo-traveler rhyolite. That is a material very rarely used by Paleoindians, and the forms of the flakes are NOT diagnostic of Paleoindian age sites. So we can safely say that the site is Archaic or Ceramic in age. That removes the NR eligibility issue. The text can be revised by does not need that much revision.

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, November 15, 2018 8:13 AM
To: Spiess, Arthur <Arthur.Spiess@maine.gov>
Cc: Matt Manahan <mmanahan@pierceatwood.com>; 'Mirabile, Gerry J.' <Gerry.Mirabile@cmpco.com>; Goodwin, Mark <magoodwin@burnsmcd.com>; Chris Clement <Chris.Clement@searchinc.com>
Subject: [EXTERNAL SENDER] RE: NECEC Phase I archaeology report

Art,

Thank you for providing comment on the NECEC Phase I report. I am glad to hear that you found the document useful and adequate for identification purposes. We look forward to Leith's comments in the near future. Below are responses to the requests in your comment letter.

- We will work with Leith directly to ensure he has digital copies of the historic site forms. Digital copies were included for reference on the CD enclosed with the report.
- Site Avoidance – we are in the process of producing revised language for monitoring and avoidance procedures. Would you like us to submit these as part of a revision to the existing Phase I report or would a separate submittal consisting of a tech. memo be preferable. Once we develop revised language would you be open to reviewing the general language and approach via. e-mail prior to a hard copy submission?
- Management Summary Paragraph 4 – We will revise the language as suggested in your letter. How would you like to include the revised page with the overall report?
- Site 38.102 - Attached here is a picture of the requested artifacts. Below is the catalog entry that corresponds to these specimens. Let us know if you would like to physically inspect the artifacts. Once we have cleared up this issue we will prepare a revised site form for 38.102

Site Number	Cat#	ST#	Level	Strata	Depth (cmbs)	Additional Provenience	Description	Count	Weight (g)
38.102	16.01	1-6		I	0-28		Flake fragment; chert; proximal, cortex present	1	0.15
38.102	16.02	1-6		I	0-28		Flake; chert; Complete flake broken into two pieces, quartzite; >1", Complete, 26-50% cortex	2	5.8
38.102	16.03	1-6		I	0-28		Flake tool, Unifacial flake; informal; chert; Possible drill or perforator, quartzite, complete, 0% cortex	1	3.01

38.102	16.04	1-6		I	0-28	Flake tool, Unifacial flake; informal; chert; complete, 26-50% cortex Worked edge, quartzite	1	5.39
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Thanks again for your prompt review of the report.

All the best.

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

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

From: Spiess, Arthur [<mailto:Arthur.Spiess@maine.gov>]
Sent: Tuesday, November 06, 2018 3:12 PM
To: Jacob Freedman <jacob@searchinc.com>
Subject: NECEC Phase I archaeology report

Hello Jacob:

Comments and draft prehistoric site form attached. I am passing the report along to Leith Smith for his review.

Art Spiess

Dr. Arthur Spiess
Senior Archaeologist, Maine Historic Preservation
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