



September 21, 2010

Edna Feighner
Archaeologist and Review and Compliance Coordinator
and
Nadine Peterson
Preservation Planner
New Hampshire Division of Historical Resources
State Historic Preservation Office
19 Pillsbury Street
Concord, New Hampshire 03242

Re: McLane & Goldman Dams Removal and River Restoration Feasibility Study
Project Review Form Addendum
PAL #2506

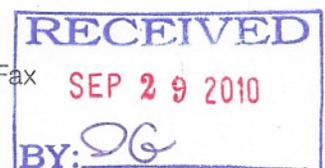
Dear Ms. Feighner and Ms. Peterson:

The Town of Milford is exploring the option of dam removal for the McLane and Goldman Dams (Project) located on the Souhegan River in Milford, New Hampshire. The Project is being conducted with the support of the National Oceanic and Atmospheric Administration (NOAA), and is therefore subject to cultural resources review under Section 106 of the National Historic Preservation Act, as amended (36 CFR Part 800). For the purposes of Section 106, NOAA will act as the lead federal agency for the Project.

The Town of Milford submitted a Request for Project Review (RPR) form to your office providing a description of the project, a summary history of the McLane and Goldman dams, and identifying the architectural and archeological work completed within downtown Milford to date. NHDHR reviewed the RPR and commented that

Not only archaeological assessment required but also inventories on the dams. Please contact Nadine Peterson to discuss information required for review (Edna Feighner, Archaeologist and Review and Compliance Coordinator, July 15, 2010).

To address this comment, PAL is providing for your review the attached technical approach and methodology statement for completing the historic property identification effort for the Project in accordance with the NHDHR's *Generalized Guidelines for Research and Reporting: Scope of Work for Proposed Dam Removals Pertaining to Historical and Archaeological Resources*. Following your review of our technical approach, we would appreciate the opportunity to speak with you in detail about the cultural resources component of the project.



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We look forward to working with NHDHR on this project, and would like to begin investigations as soon as possible. If you have any questions or concerns, please feel free to contact Stephen Olausen, Senior Architectural Historian, or me at your convenience. Thank you in advance for your time and attention to this matter.

Sincerely,



Kristen Heitert
Senior Archaeologist/Principal Investigator

cc: Mark Wamser, Gomez and Sullivan Engineers (w/ encl.)
Eric Hutchins, NOAA (w/ encl.)
Eric Derleth, USFWS (w/ encl.)
Leah O'Neill, EPA (w/ encl.)
Deborah Loiselle, NHDES (w/ encl.)
Steve Landry, NHDES (w/ encl.)
Brian Graber, American Rivers (w/ encl.)
Guy Scaife, Town of Milford (w/ encl.)
Dawn Griska, Town of Milford (w/ encl.)

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McLANE AND GOLDMAN DAMS Technical Approach and Methodology Phase 1A Archaeological Survey and Phase 1 Historic/Architectural/ Engineering Survey

The Town of Milford is exploring the feasibility of removing the McLane and Goldman Dams (Project) located on the Souhegan River in Milford, New Hampshire. The McLane Dam, originally constructed in 1846, is owned by the Town of Milford, and the Goldman Dam, built in 1810, is owned by the Estate of Helen Goodwin. Before the introduction of electric motors, the McLane and Goldman dams provided water to power the McLane Furniture Mill and the Milford Cotton and Woolen Mill, respectively. The McLane Mill is no longer extant and an elderly housing complex occupies its former site. The Goldman Mill has been converted into affordable senior citizen/disabled housing.

In recent years, Milford has experienced multiple floods of historic measure. The Souhegan Valley Boys and Girls Club and several buildings of workforce housing were heavily damaged in the 2007 flooding with additional concerns for the elderly housing that now occupies the space where the mills once operated. It is hoped that with the removal of these dams that the Town of Milford will be better able to ensure the protection and uninterrupted access to these areas/services.

In addition, the New Hampshire Department of Environmental Services (DES) has deemed that the areas impounded behind the McLane and Goldman dams have water quality issues significant enough to require action. The dams are also preventing the movement of migratory and resident fish by acting as barriers and their removal would restore an additional 6 miles of free-flowing riverine conditions.

The New Hampshire Division of Historical Resources (NHDHR) has reviewed a Request for Project Review for the Project and has requested additional information about its potential to impact historic properties, including archaeological sites and aboveground architectural resources. In accordance with the NHDHR's *Generalized Guidelines for Research and Reporting: Scope of Work for Proposed Dam Removals Pertaining to Historical and Archaeological Resources*, PAL is pleased to present the following technical approach and methodology statement for completing a Phase IA archaeological reconnaissance survey and a Phase I historic/architectural/engineering survey for the Project.

Coordination, Consultation, and Meetings

A senior archaeologist/principal investigator will serve as PAL's point of contact for all coordination and communication throughout the project. The senior archaeologist will coordinate the research, site visits, and preparation of reports, and be responsible for

insuring the quality and timely submittal of all products. The architectural survey will be overseen by a senior architectural historian.

PAL will assist in determining the APE for historic and archaeological resources (see below). Lead PAL project staff including the senior archaeologist and senior architectural historian will coordinate with Gomez and Sullivan Engineers, P.C. (Gomez and Sullivan), the Town of Milford, National Oceanic and Atmospheric Administration (NOAA), and other designated Project Partners to ensure that the project objectives and schedules are achieved. PAL lead personnel will be available throughout the project for consultation and/or coordination with NHDHR, or provide technical support/information for that purpose.

Research

The research program for the project will be conducted to assist with the sensitivity assessment for pre- and post-contact archaeological resources upstream and downstream of the dams in areas that may be affected by their removal, and to develop predictive statements for the types and locations of such resources. The research also will be used to document the historical development of the dams and associated aboveground architectural resources.

The research will consist primarily of a review of primary and secondary histories of the Town of Milford; the examination of historic maps and photographs; a review of the available ecological and engineering data about the Souhegan River and McLane and Goldman dams; and a review of the archaeological and historic site files (including National Register nominations) and cultural resource management reports housed at NHDHR.

Field Survey

PAL staff including a project archaeologist and architectural historian will conduct a pedestrian survey to become familiar with the dam structure and adjacent properties where work may occur including dam removal, bank restoration, access routes, and staging areas. The architectural assessment methodology will include notes on and digital photographs of the appearance and dimensions of the dam structure and upstream and downstream river banks. The assessment also will verify the location of properties identified during the research, locate potentially significant properties that have not been previously documented, and refine the boundaries of the APE (see below).

The archaeological survey will identify any surface remains that might be indicative of historic period archaeological sites, and intact landforms that have the potential to contain pre- or post-contact period sites. Notes and photographs will be taken to describe the project area and provide illustrations for the report. All identified properties included in the survey and areas of archaeological sensitivity will be recorded on a base map.

Delineation of the Direct and Indirect APE

Using engineering and environmental data, the results of the site file and historical research, and the results of the site visit, a recommended APE for the project will be developed in consultation with the Town of Milford, NOAA, Project Partners and NHDHR. The APE will be based on anticipated direct and indirect effects associated with the dam removal. These effects may include, but are not limited to: the dams, subsurface and structural disturbances related to the dam removal and construction staging and access areas; erosion; increased resource visibility due to lowered water levels; and visual impacts to surrounding historic resources and/or districts.

Work Products

Phase IA Archaeological Survey Technical Memorandum

Upon completion of the research and site visit, PAL will prepare a Phase IA Archaeological Reconnaissance Survey technical memorandum following guidelines established by the National Park Service in the *Recovery of Scientific, Prehistoric, Historic, and Archeological Data* (36 CFR Part 66 Appendix A) and NHDHR's *Generalized Guidelines for Research and Reporting: Scope of Work for Proposed Dam Removals Pertaining to Historical and Archaeological Resources*. The report will include a USGS map showing the location of the project and previously identified pre- and post-contact period archaeological resources within a 1-mile radius of existing dams; a detailed project map illustrating the recommended APE and existing archaeological resources; a methodology statement; the results of the background research and site visit with accompanying photographs and maps; and recommendations for additional archaeological survey work as required. NHDHR Archaeological Inventory Forms also will be included as an appendix. A copy of the technical memorandum will be submitted to Gomez and Sullivan, Town of Milford, NOAA and Project Partners for review and comment before submission to NHDHR.

Phase 1 Architectural Survey: Individual Inventory Forms

An Area Form for the Downtown Milford Commercial, Civic, and Residential Historic District (Area MIL-CCR) was produced for the South Street and Downtown Traffic and Sidewalk Improvement Project in 2009 (Preservation Company 2009). The Area Form is an expansion of the 1994–1995 Union Square Commercial and Civic Historic District that was evaluated as eligible for listing in the National Register under criteria A and C. The McLane and Goldman dams are identified as contributing properties within the district. The existence of this recently prepared and comprehensive documentation, which establishes that the dams are eligible for listing in the National Register, obviates the need to prepare a Project Area Form as required in the NHDHR guidelines.

PAL will prepare individual inventory forms for the McLane and Goldman Dams in order to provide a more in-depth assessment of their current condition and historical

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development. The forms will include a narrative description, history of development, and comparable evaluation of similar dams in accordance with NHDHR guidelines.

Personnel

The key PAL staff assigned to the project will be Kristen Heitert, Principal Investigator/Senior Archaeologist, and Stephen Olausen, Senior Architectural Historian. The assigned staff has more than 20 years of combined experience in the field of New England cultural resources management, with an emphasis on historic dam/mill sites and dam removal projects in Connecticut, Massachusetts, Rhode Island, and New Hampshire. All PAL staff meet the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation.