



NEW HAMPSHIRE DIVISION OF HISTORICAL RESOURCES

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Eric Hutchins
Gulf of Maine Habitat Restoration Coordinator
National Oceanic and Atmospheric Administration (NOAA)
National Marine Fisheries Service, Northeast Region
55 Great Republic Drive
Gloucester, MA 01930-2276

RE: McLane and Goldman Dams; Milford, NH; NHDHR #2245

Dear Mr. Hutchins:

The New Hampshire Division of Historical Resources (NHDHR) would like to thank you for the opportunity to provide additional comments regarding the New Hampshire individual inventory forms and additional information prepared for the McLane and Goldman dams by the Public Archaeology Laboratory (PAL). The NHDHR would like to commend NOAA for the manner in which it, as lead Federal agency, is handling the resolution of two "competing professional opinions" and its consultant PAL for providing back-up information and well-thought out reasoning for their argument. Please note for the future that any additional information related to inventory forms submitted for review must be submitted in inventory form continuation sheet format.

The comprehensive submission provided the NHDHR Determination of Eligibility Committee (DOE) with much to discuss. However, after extensive discussion the DOE Committee holds to the opinion that confirms the 2010 determination that both the Goldman Dam and the McLane Dam are contributing elements of the Downtown Milford Commercial, Civic, and Residential Historic District. PAL's approach—their context for assessing integrity—is much more narrowly defined than the DOE Committee's. While individual eligibility is not in question by either the NHDHR or PAL, it appears that PAL's assessment of integrity is more closely related to an individual eligibility assessment. PAL's well-intentioned point-by-point integrity assessment for each dam individually seems to have precluded a more nuanced historic district assessment.

Fitting into the spectrum of arguments made in the past regarding New Hampshire dams in historic districts and National Register guidance, the NHDHR takes a more holistic approach. This includes evaluating the dams differently, looking at their function of holding water vs. solely a direct association with extant elements of industry and hydropower; and in relation to the historic district as a whole rather than just their immediate surroundings. The DOE Committee also discussed the dams and the district in terms of a cultural landscape.

The development of Milford as a community relied on the engineered elements of the river system and how the water was harnessed for various uses by the community. Taking into consideration the integrity of the historic district as a whole, the dams and their physical impact on the river in the district are



important. The impoundment of water, and the spatial relationship of water to the historic district, is intact despite the diminished integrity of original dam designs.

The DOE Committee disagreed with some of PAL's direct assertions and felt some were made too narrowly. Regarding previous evaluations, it is likely that both previous responses from the NHDHR in 1985 and 1999 were based on an individual evaluation, not in relation to a larger district. In any event, NHDHR's Survey Policy requires re-evaluation for any determination older than 10 years precisely because such determinations could be outdated for a variety of reasons. Regarding resource-specific assertions, there was general consensus, for example, that filled-in stretches of canal does not necessarily undermine integrity. Rather, intact stretches of power canal currently obscured by fill could be considered an archaeological element. In addition, there are extant above-ground industry-associated elements in the historic district that PAL does not address that would contribute to association, such as nineteenth-century mill worker housing.

Like many engineering structures, design changes to the McLane Dam are inherent in its history. There is a pattern of changes to the dam to maintain its utility over time. In addition, changes to the Goldman Dam represent another context, one related to scenic elements of the water impoundment and the community. Once the 1966 alterations reach 50 years of age, the Goldman Dam could also be contributing to the historic district under community planning and development. The 1966 project indicates that even in the 1960s Milford recognized a relationship between the water impoundment and the community.

In summary, following a broader context and approach in defining integrity the NHDHR DOE Committee maintains the original 2010 determination that the Goldman Dam and the McLane Dam are contributing elements to the Downtown Milford Commercial, Civic, and Residential Historic District.

Thank you for the opportunity to comment. Should you have any additional questions, please contact me at 603-271-6628.

Sincerely,



Nadine Peterson
Preservation Planner

NMP:lsb

cc: Deb Loiselle, DES
PAL

