

HARVEY RESEARCH AND CONSULTING

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25 October 2023

Andy McMillan
Vermont Transco, LLC
366 Pinnacle Ridge Road
Rutland, Vermont 05701

RE: Vermont Electric Company, St. Johnsbury Substation Project

Dear Andy,

Harvey Research and Consulting, under subcontract to the Northeast Archaeology Research Center, Inc. (NE ARC), has completed a historic resources survey of the proposed Vermont Transco, LLC St. Johnsbury Substation Project located at 397 Higgins Hill Road, St. Johnsbury, Caledonia County, Vermont (Figures 1 and 2). The work was undertaken on behalf of Vermont Transco LLC (VT Transco) as part of the Vermont Public Utility Commission Section 248 review process. The requirements of US Army Corps of Engineers (USACE) permit applications and potential subsequent Section 106 submittals for potential expansion, modifications and/or improvements to the substation are also germane.

The Vermont Electric Power Company Inc. (VELCO) St. Johnsbury Substation was originally built in 1972, with various modifications and improvements occurring over the subsequent nearly fifty years of service. VELCO conducted a condition assessment of the Substation and identified the need to replace some of the equipment due to condition. VELCO identified deficiencies in equipment such as the control building, 220 circuit switcher, and the substation fence. VELCO proposes to address most of the Substation concerns by replacing the existing control building with a larger control building, replacing the existing 220 circuit switcher with a new K220 SF6 gas circuit breaker, and replacing the substation fence with an expanded fence. VELCO also plans to reconstruct and widen the existing driveway. The proposed improvements to the substation will require the installation of a temporary 115/34.5 kV substation adjacent to the existing Saint Johnsbury Substation on land owned by VELCO, with associated facilities including an extended GMP 12.47 kV distribution line along the existing substation driveway, temporary 115kV line tap, temporary GMP 34.5 kV lines, a permanent reroute of one GMP 34.5 kV line, and replacement of various GMP poles to maintain clearance for the temporary access road and site grading. Tree clearing will be conducted to accommodate the new infrastructure and site drainage will be improved.

This undertaking has the potential to affect historic properties, as defined in 36 CFR 800.16. In compliance with instructions from the Vermont Division for Historic Preservation, which serves the State Historic Preservation Office (SHPO), Harvey Research and Consulting has photographically documented all of the buildings and structures that lie within the Area of Potential Effects (APE), which has been defined in consultation with the Vermont Division of Historic Preservation (VDHP) as the area that has the potential to be visually impacted by the proposed undertaking. The circuitous path taken by Higgins Hill Road to the east and the west of the project site, the density of vegetation, and the topography of the project site itself limits the potential for impacts.

The APE contains ten properties along Higgins Hill Road with improvements. Two of these properties contain structures—the substation itself, and a water tower—that were built at least 45 years ago, and the remaining eight contain single-family residences. Two properties are set back from Higgins Hill Road and were not available for physical inspection and photography; one was built in 1997, the other in 2022. Of the six buildings that were available for physical inspection, one was built in 1991, the other five were built at least 45 years ago. One of these buildings had been surveyed in 1982 by the State Historic Preservation Office. According to the earlier survey form, this house was built in approximately 1835 in the Greek Revival style and was updated substantially in the late 19th century with Queen Anne elements. No recommendation regarding eligibility for the State or National Register of Historic Places had been made at the time of the original survey. Harvey Research and Consulting recommends that this building is eligible for the State Register of Historic Places. It is recommended that all other resources within the APE not eligible for the State or National Register of Historic Places. Harvey Research and Consulting has completed Vermont Architectural Resource Inventory Forms for the five buildings and two structures that are at least 45 years old.

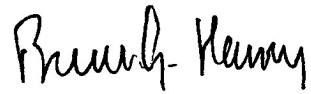
In summary, the Project APE contains seven historic resources that are at least 45 years old: two structures and five buildings. One of these resources, a house located approximately 0.25 miles east of the St. Johnsbury Substation on Higgins Hill Road, has been recommended eligible for the State Register of Historic Places. This building was first identified in 1982 by the SHPO and assigned the survey number 0311-417. The proposed replacement of the St. Johnsbury Substation will have no direct impact on site 0311-417, and given the distance and topography, will not indirectly impact the property.

All of the remaining six historic resources are recommended not eligible for the State or National Register of Historic Places due to a combination of a loss of integrity and lack of historical or architectural significance. The Project will therefore have no adverse effect on historic properties as defined in 36 CFR 800.5.

As noted above, photographs of all except two of the properties within the APE were photographed and are attached below.

Thank you for the opportunity to conduct the work and please do not hesitate to contact us with any questions.

Yours truly,

A handwritten signature in black ink that reads "Bruce G. Harvey". The signature is written in a cursive style with a large initial 'B' and 'H'.

Bruce G. Harvey
Principal, Harvey Research and Consulting

St. Johnsbury Substation replacement
Photographs of Buildings in Survey Area
August 15, 2023
Bruce G. Harvey

Caption List:

1. 163 Higgins Hill Road, c. 1900. Looking northeast.
2. 163 Higgins Hill Road, c. 1900. Looking northwest.
3. 228 Higgins Hill Road, 1991. Looking southeast.
4. 246 Higgins Hill Road, 1971. Looking southeast.
5. 261 Higgins Hill Road, 1972. Looking northeast.
6. 261 Higgins Hill Road, 1972. Looking northwest.
7. 266 Higgins Hill Road, c. 1900. Looking southeast.
8. 266 Higgins Hill Road, c. 1900. Looking southwest
9. 397 Higgins Hill Road, 1972. Driveway looking north.
10. 397 Higgins Hill Road, 1972. Looking northeast.
11. 397 Higgins Hill Road, 1972. Looking west.
12. 397 Higgins Hill Road, 1972. Looking east along south fence.
13. 397 Higgins Hill Road, 1972. Looking northwest from Higgins Hill Road.
14. 510 Higgins Hill Road, c. 1975. Looking southwest
15. 510 Higgins Hill Road, c. 1975. Looking east.
16. 659 Higgins Hill Road, 1997. Looking northeast. Main building inaccessible, no photograph available.
17. 715 Higgins Hill Road, c. 1835. Looking northeast.
18. 715 Higgins Hill Road, c, 1835. Looking northwest.
19. 715 Higgins Hill Road, c. 1835. Garage detail.



Photo locations, 1-7

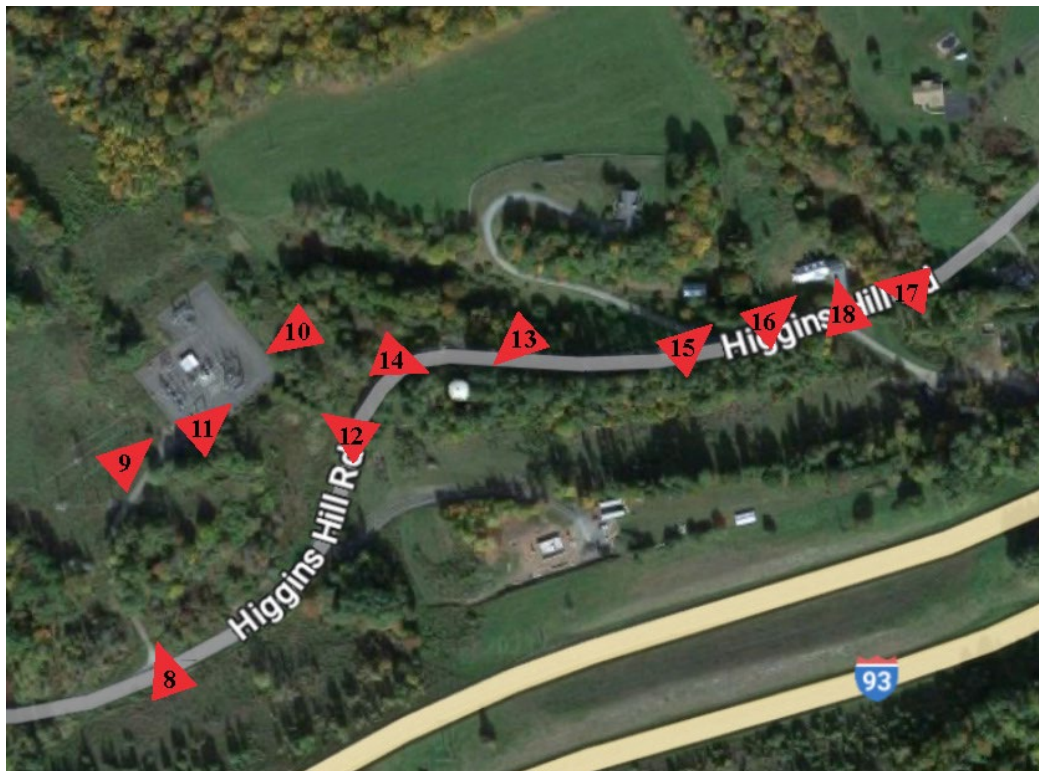


Photo locations, 8-18



1. 163 Higgins Hill road looking northeast



2. 163 Higgins Hill road looking northwest



3. 228 Higgins Hill Road looking southeast



4. 246 Higgins Hill road looking southeast



5. 261 Higgins Hill Road looking northeast



6. 261 Higgins Hill Road looking northwest



7. 266 Higgins Hill Road looking southeast



8. 266 Higgins Hill Road looking southwest



9. 397 Higgins Hill Road driveway looking north



10. 397 Higgins Hill Road looking northeast



11. 397 Higgins Hill Road looking west



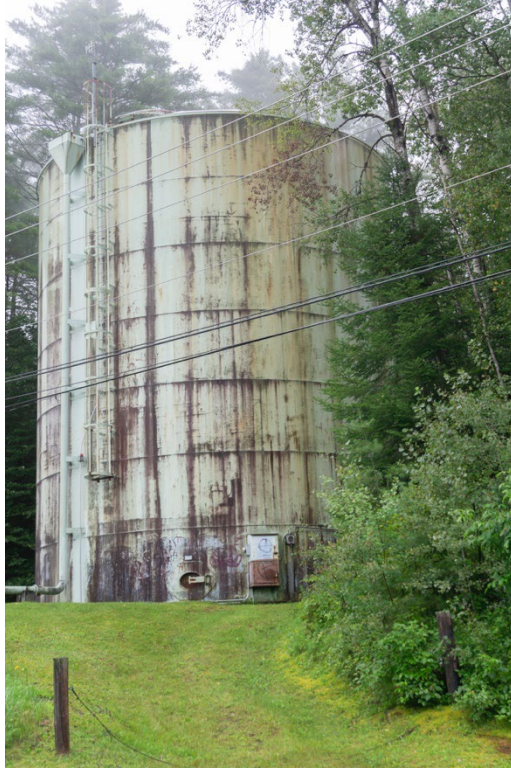
12. 397 Higgins Hill Road south fence looking east



13. 397 Higgins Hill Road looking northwest from Higgins Hill Road



14. 510 Higgins Hill Road looking southwest



15. 510 Higgins Hill Road looking east



16. 659 Higgins Hill Road looking northeast



17. 715 Higgins Hill Road looking northeast



18. 715 Higgins Hill Road looking northwest



19. 715 Higgins Hill Road garage detail