# BUREAU OF ENVIRONMENT CONFERENCE REPORT

SUBJECT: Monthly SHPO-FHWA-ACOE-NHDOT Cultural Resources Meeting DATE OF CONFERENCES: October 14, 2021 LOCATION OF CONFERENCE: John O. Morton Building Due to the Covid 19 Event, this meeting was a scheduled Zoom Meeting

#### **ATTENDED BY:**

#### NHDOT

Jason Ayotte Chris Carucci Sheila Charles Jill Edelmann Jon Evans Ron Kleiner Rebecca Martin Jennifer Reczek John Stockton **NHDHR/NHDNCR** Laura Black David Trubey

ACOE Mike Hicks

**JACOBS** Steve Halloran John Wilson **PRESERVATION CO.** Lynne Monroe

**QUANTUM** Jim Bouchard Samuel Cheney Anna Giraldi

**TROY, Planning Department** Henry Underwood

#### **PROJECTS/PRESENTATIONS REVIEWED THIS MONTH:**

(minutes on subsequent pages)

Antrim 14942 (No federal number)	
Troy 40370 (No federal number)	
Troy 40471, X-A004(374)	
Alstead 43566 (No federal number)	

#### Antrim 14942 (No federal number)

#### High Street Bridge over Great Brook (174/070)

Participants: Jim Bouchard, Samuel Cheney, Anna Giraldi, Quantum; Mike Hicks, ACOE; Ron Kleiner, NHDOT

Initial consultation on the High Street over Great Brook bridge rehabilitation or replacement. Anna Giraldi, Quantum Construction Consultants, LLC, (QCC) presented the project, via Zoom link, which proposes to rehabilitate/replace the High Street Bridge over Great Brook. The existing bridge is a 13-foot span Metal Pipe Arch (MPA) founded on stone abutments with concrete caps and built in 1960. The purpose of this project is to correct structural deficiencies of the existing bridge crossing and provide safe, year-round, vehicular passage on High Street over Great Brook. This project is being funded through the State-Bridge-Aid (SBA) program, and construction is authorized for fiscal year 2023. Anna explained that the bridge has been rated in poor condition and is structurally deficient with a sufficiency rating of 59.1%. The bridge is currently on the NHDOT Municipal Redlist and is in need of rehabilitation or replacement.

Anna began the presentation by screen-sharing the New Hampshire Division of Historical Resources (NHDHR) Request for Project Review (RPR) form and supportive documentation. Anna reviewed the locus maps & aerial images to provide an overview of the project location, and presented site photographs depicting existing conditions. The photographs showed areas of concrete spalling on the abutments, severe corrosion and deterioration of the MPA, and efflorescence and corroded rebars on the superstructure. Photographs of the downstream impoundment area/dam and upstream stone retaining walls were additionally presented.

The draft engineering plans identify the proposed structure, which will either be a concrete rigid frame or precast concrete slab bridge. The proposed roadway geometrics will replicate the horizontal and vertical alignment of the existing roadway. Anna explained that excavation will be required at the bridge crossing for construction of the abutments and wingwalls. Downstream elevation and section views of the bridge (depicted as a rigid frame) were also shown. The elevation view identified that the downstream wingwalls are parallel to the roadway due to steepness of existing grades.

At this point, Anna concluded the presentation and inquired if there were any questions/comments from the other meeting participants.

Jill Edelmann (NHDOT Cultural Resources) asked the NHDHR members if they had a chance to review the RPR submission and associated documentation.

Laura Black (NHDHR) stated that the NHDHR has not yet had an opportunity to review of the RPR submission. She explained there are two key things that need to be determined for NHDHR to provide a complete review of the proposed project: 1) what the boundaries of the Antrim Historic District are and, in particular, whether the bridge/associated features might contribute to it, and 2) if there is a smaller complex or resource immediately around the bridge including associated features, i.e. the stone wall remnants on the upstream side of the crossing. If these two key questions are answered, the project can move forward under Section 106.

Mike Hicks (Army Corps. of Engineers (ACOE) reviewed the plans and inquired if there are any structures within the permit area that are potentially eligible for the National Register of Historic Places. Laura replied that there is the potential for historic structures within a probable Antrim Historical District, but individual resources have not been identified yet. As ACOE is the lead federal agency on the project, Mike noted that ACOE is not be responsible for historical structures located outside the permit area. He added that more progress needs to be made relative to identifying potential impacts to historical remnants before the ACOE can make a determination. Mike asked if the bridge had the potential to cause adverse impacts within the permit area, to which Laura replied that potential impacts cannot be determined at this time without more information. Mike recommended that the project be continued to a future Cultural Resource Agency Coordination Meeting once more information has been determined, and the NHDHR concurred.

Jill Edelmann stated that a historic district area form would most likely not be required for this project. The NHDOT has in their possession a letter from 1981 that contains a Historic Bridge Inventory form. An EMMIT search of the site found no eligible structures within the project's Area of Potential Effect (APE). Laura concurred that a full historic district area form would most likely not be required, but that *if* a village district likely still exists and *if* that district likely extends to include the APE then a form would

be recommended to complete an area form to holistically understand the historic district with contributing/non-contributing details limited to features in the APE. She added that she has not been to Antrim personally, and inquired as to whether anyone had thoughts on that matter currently. Similarly, an initial field assessment regarding the possibility of the bridge and other features contributing to a smaller adjacent resource would guide the necessity of preparing a separate inventory form for that resource. There may be nothing of note relative to the cultural landscape. Of particular interest to NHDHR are the stonewalls just upstream of the bridge crossing.

Laura Black stated the project needs to be looked at holistically. It needs to be determined if the project is located within an obvious historical district, and community input relative to the project needs to be provided. An appropriate scope of work needs to be outlined.

Jim Bouchard (QCC) said that QCC would reach out to Lynne Monroe of Preservation Company to perform a site evaluation in order to determine if there are any historical resources within the project area and potential for a Antrim Historical District. Jill & Laura concurred, and Jill reiterated that a clear scope of work should be defined before proceeding. After her site visit, Lynne will define the scope of work required. The findings of Lynne's site visit will be shared and reviewed at a future NHDOT Cultural Resource Agency Meeting, as a continuance of today's discussions.

David Trubey (NHDHR) performed an EMMIT search near the project location and identified a former Grist Mill area just to the south of the project area. It was noted that there is a discrepancy between the EMMIT search results and the 1970's form filed at the NHDHR. The Grist Mill area is further south than is shown on EMMIT, east of Route 202. Upon reviewing the project area, David anticipates that no further archaeological assessments/testing should be required due to the lack of available room for testing.

Sheila Charles (NHDOT Cultural Resources) had concerns about the adjacent retaining walls. Referencing site photograph #7 from the RPR submission, the steepness and verticality of the slopes indicate that these structures could be an element of the former grist mill area. Sheila stated that a Phase 1-A Archaeological Survey should not be undertaken until the results of Lynne's site visit are discussed and shared at a subsequent meeting. The area near the retaining walls needs to be explored because there could have possibly been a historical mill landing at that location. Both Sheila and David agreed that the area shown in photograph #7 should be explored during Lynne's site visit.

All meeting participants agreed that the findings of Lynne Monroe's site visit will be utilized to develop a scope of work at a subsequent meeting. This preliminary landscape evaluation needs to be performed so NHDHR can effectively determine what historic resource identification efforts will be necessary to proceed with this project.

Anna Giraldi asked Ron Kleiner if the additional historical resources work could be covered under two contract amendments, to which Ron replied that it could. The first amendment will be for Lynne Monroe to visit the site and determine if it is within the known historic district and/or a smaller adjacent resource to develop the scope of work, and the second amendment will be for additional work required after the scope of documentation work has been determined at the follow-up meeting.

A continuing discussion for the High Street over Great Brook project will be scheduled for a future Cultural Resource Agency Coordination Meeting following the findings of Lynne Monroe's site visit, once a clear scope of work has been identified and outlined.

## Troy 40370 (No federal number)

#### NH 12 over South Branch Ashuelot River (Br. No. 089/114)

Participants: Steve Halloran, John Wilson, Jacobs; Lynne Monroe, Preservation Co.; Henry Underwood, Troy Planning; Mike Hicks, ACOE; Rebecca Martin, Jennifer Reczek, John Stockton, NHDOT

Presentation of the preferred alternative and continued consultation. A former Cultural Resources Meeting took place on March 12, 2020.

The meeting opened with a brief discussion regarding the funding source for this project. J. Reczek identified that current funding is through SB 367, however that may change to FHWA funding as the project progresses. J. Edelmann stated that the Section 106 review is applicable either way. M. Hicks advised coordination with J. Sikora should the funding source change.

Steve Halloran presented an introduction and project overview for the bridge site and summarized the meeting agenda. The project was last reviewed by this meeting on March 12, 2020. The study phase of the project is completed, and the design team has arrived at a preferred alternative which was presented today. The project involves the replacement of a NH Red List bridge that carries NH Route 12 over the South Branch Ashuelot River. The bridge is located between Lawrence Road and Old Keene Road. The project purpose and need are to improve public safety and remove the bridge from the State Bridge Red List due to continuing deterioration of the bridge structure. A brief project schedule and status was identified including completion of Bridge Rehabilitation Study (5/2020), Phase 1B Archaeological Study (7/2020), Public Informational Meeting (10/2020), and Type, Span & Location Study (2/2021). The project is currently in Preliminary Design. Final design is scheduled for 2022 and Construction in 2023.

The current bridge is a single span concrete rigid frame structure built in 1941 and rehabilitated in 1977. The bridge crosses the South Branch Ashuelot River with a clear span of 32'-0". The bridge supports a northbound and southbound traffic lane for NH Route 12 with no sidewalks. The existing bridge is not eligible for National Register.

The preferred alternative was presented and includes new superstructure and substructure, phased construction with no impacts to the Cheshire Rail Trail, a new wider bridge constructed within the ROW, no temporary bridge or roadway detour impacts are needed. A review of previous alternatives identified the need for a temporary bridge and roadway detours for management of traffic during construction which included impacts and other construction related issues. A decision to utilize phased construction and maintain one lane of alternating direction traffic on NH 12 allows construction to stay within the ROW and eliminate the impacts. The proposed bridge has a longer (50') span based on requirements of State Stream Crossing Guidelines. The new abutments are proposed to be set back behind the location of existing abutments. The design includes rip rap protection sloping upward from the streambed at the existing abutment location to the new abutment location on each side of the river.

A potential impact to the Forristall Historic District was identified due to the area of stone riprap needed on the riverbank at the southwest quadrant. It was also identified that the Phase 1B Archaeological study identified certain architectural features that may have historic significance. One of these features is within the project area in the form of a remnant of stone abutment on the south side of the river from a previous alignment of NH Rt 12. The preferred alternative includes partial removal of the upper portion of the stone abutment, but the remainder would be incorporated in the new riprap slope. On the north side of the river, a stone wingwall constructed from the former bridge northern abutment would be removed down to the new riprap slope with the remainder incorporated into the riprap. A brief explanation of the construction phasing and management of traffic was presented showing the traffic in one lane while half of the bridge is constructed at a time.

An overview of the cultural resources near the project area was presented including historic properties and the Forristall Historic District. Further description was given of the area of riprap construction in front of a proposed wingwall which crosses over the historic district boundary line. The existing NH 12 bridge was identified as not eligible. Troy Blanket Mills Picker House (TRO0207) at the Northeast corner of the bridge is not eligible for the national register and no impacts are identified based on the preferred alternative. The Frank B. Forristall House (TRO0208) at the Southwest corner of the bridge is considered eligible for the national register. The Hornichak House (TRO0209) at the Southeast corner of the bridge is considered not eligible due to age. It was noted that the preferred alternative poses no impacts to the stone wall at the Hornichak property boundary with NH12 and Old Keene Road.

A review of the Phase 1B Archaeological investigation identified no further archaeological study was required, which was confirmed by NHDHR. The Phase 1B study identified historic architectural features and recommends architectural review of some elements identified.

### Concerns/Comments:

D. Trubey confirmed that no further archaeological studies were required.

L. Black noted that the preferred alternative minimizes impacts most of the previous concerns discussed are moot.

- The Cheshire RR is assumed to be eligible but there are no impacts, therefore there are no concerns.
- The NH 12 bridge is a roadway bridge so DHR is not concerned with remnant stone abutments. Therefore, the preferred alternative minimizing impacts is a good approach.
- Reviewing a photo of the area where riprap extends over the historic district boundary doesn't seem like an effect.

L. Monroe noted that no resources were identified in the area of proposed riprap crossing the historic district boundary when she inventoried the district.

S. Halloran identified that currently the area in question consists of stone riverbank protection and the appearance of the proposed riprap would be similar.

J. Reczek provided a photo of the area and described the riprap around the wingwall.

L. Black commented that It would be easy to make the argument of no historic properties effected. The current riverbank slope consists of random rocks and vegetation. The proposed riprap would be no problem.

J. Edelmann identified that no historic properties are affected.

### Troy 40471, X-A004(374)

### NH 12 over the Cheshire Rail Trail (NHRR, ABD) (Br. No. 096/091)

Participants: Steve Halloran, John Wilson, Jacobs; Lynne Monroe, Preservation Co.; Mike Hicks, ACOE; Rebecca Martin, Jennifer Reczek, John Stockton, NHDOT

Presentation of the preferred alternative and continued consultation. Steve Halloran presented an introduction and project overview for this bridge site and summarized the meeting agenda. The project was last reviewed by this meeting on March 12, 2020. The study phase of the project is completed, and the design team has arrived at a preferred alternative which was presented today. The project site involves the rehabilitation and replacement of a NH Red List bridge that carries NH Route 12 over the abandoned NH Cheshire Railroad corridor, which is currently the Cheshire Rail Trail, in Troy just north of the town common. The project purpose and need are to improve public safety and remove the bridge from the State Bridge Red List due to continuing deterioration of the bridge structure. A brief project schedule and status was identified including completion of Bridge Rehabilitation Study (5/2020), Public Informational Meeting (10/2020), and Type, Span & Location Study (2/2021). The project is currently in Preliminary Design. Final design is scheduled for 2022 and Construction in 2023. A Phase 1A Archaeological study identified that no further archaeological study is required for this bridge site. Some of the elements of the preferred alternative include developing the design to minimize physical impacts, restrict bridge construction to within the NH12 ROW and minimize changes to the structure footprint.

The current bridge is a two-span structure with a concrete deck supported by steel beams on stone masonry abutments and a concrete pier. The bridge was built in 1957 and incorporated modifications to stone abutments which were part of a previous bridge. The bridge crosses the Cheshire Rail Trail on a severe skew with a main span of 38'-6" and a second span of 24'-0". The bridge supports a northbound and southbound traffic lane for NH Route 12 and a sidewalk on each side. Elements of the existing bridge were described including stone abutments that were part of the original 1848 bridge construction. The remaining bridge features were built in 1957 including concrete bearing seat caps on top of the stone abutments, a reinforced concrete pier structure, steel beam and reinforced concrete superstructure. Photos of the underside of the bridge and approach roadways at the site were presented. A cross section of the existing bridge was presented noting the overall width to be 41'-4".

The preferred alternative was presented which includes replacement of the superstructure with new steel beams, concrete deck, sidewalks and new railing. The proposed superstructure width is 45'-0" and the curb-to-curb width is proposed to be 1 foot wider on each side to accommodate wider roadway shoulders. The existing stone abutments are proposed to remain with reconstruction of the concrete abutment caps to support the new superstructure. Rehabilitation and lengthening of the existing concrete pier are also proposed in order to support the wider superstructure. Using phased construction and maintaining one lane of alternating direction traffic on NH 12 allows construction to stay within the ROW and eliminate some of the impacts that previous alternatives studied included. The preferred

alternative eliminates the need for temporary bridges or roadway detours. The preferred alternative requires a temporary detour of the Cheshire Rail Trail during construction.

A brief description of required substructure rehabilitation was presented including removing and reconstructing a portion of the concrete abutment bearing seat caps and widening and strengthening of the existing pier structure. It was noted that subsurface investigation and geotechnical information would be incorporated in the preliminary design when received.

An overview of the cultural resources near the project area was presented. No impacts are anticipated to historic properties adjacent to the bridge side due limiting the work to be within the ROW. The bridge is within two historic areas: Troy Village Historic District (TRO-00TV) and the Cheshire Railroad (ZMT-0CRR). The bridge is a contributing resource within the historic district. The preferred alternative proposes to retain the existing stone abutments and rehabilitate concrete portions of the bridge built in 1957. No physical changes to the Cheshire Rail Trail are proposed. The only impact proposed is temporary closure of the rail trail during construction for public safety reasons. The Kendall/Baker House property (TRO0182), 2 Central Square is very close to the southeast corner of the bridge and is eligible within the District. The preferred alternative proposes to keep work within the ROW. 1 Central Square (TRO0075A) at the Southwest corner of the bridge is not eligible and is within the area where the proposed sidewalks and curb will be transitioning back to meet existing conditions. Railroad House (TRO0185), 3 No. Main St. at the northeast corner of the bridge is eligible within the Historic District and is also within an area where proposed sidewalks and curb will be transitioning back to meet existing conditions. Hawkins/Bemis/Burpee House (TRO0183), 2 North Main Street at the northwest corner of the bridge is eligible within the Historic District. The project proposes minor work at the intersection with Prospect Street adjacent to the historic property, but work will be within the ROW.

The project archaeological resource investigation was reviewed identifying a recommendation of no further survey required. NHDHR has concurred with the recommendation of no further study required.

The need to temporarily close the rail trail below the bridge during construction was presented. Three alternatives for temporary detours of rail trail traffic were presented identifying that there may be additional and preferable temporary routes based on input from the Town of Troy as the project progresses.

### Concerns/Comments:

The scope of proposed grading impacts at the Kendall/Baker House was questioned. J. Reczek identified that the work will include some tree clearing along the roadway and utility relocation.

J. Edelmann stated that a reduction of impacts for both the Historic District and the Rail Trail is great based on the phased construction proposed in the preferred alternative. The rail trail will have minimal impacts as the bridge will not be significantly widened. After construction the rail trail will have a similar look and feel. For Historic District impacts, a little more information may be required including a larger scale plan showing and describing the work at the various quadrants.

J Edelmann noted that the period of significance for the historic districts pre-dates the construction of the current superstructure. Any new construction within the historic districts should be compatible with

the Secretary of Interior's Standards for Rehabilitation Guidelines for new construction; namely that it should not alter the historic character of the district, and that the size, massing and scale of the new superstructure should be taken into consideration. J. Edelmann noted that if the design of new superstructure is done to limit impacts that a no adverse effect can likely be argued.

Discussion relative to effect finding – new construction related to railroad and Troy Village.

L. Black stated that the proposed design changes the 1957 bridge railings significantly. Bridge railing designs similar to the current railing used to be more pedestrian oriented and delicate in nature. The proposed bridge railing system is auto centric/safety centric. There needs to be development of an argument including community input supporting the change.

H. Underwood (Troy Planning Board) asked when and how are findings (such as the railing system) to be shared with the Town.

J. Reczek noted that there is federal funding for this project and the railing design is required to meet federal crash test standards. There are very few options, but we will try to work within the standards.

J. Edelmann stated that typically communicating information regarding the project is done at a public information meeting. This is the forum to present the project status and receive input from the Town. This process can also involve consulting parties. J. Reczek added that these types of projects typically have 1 to 2 public information meetings, and that there would likely be one more public information meeting within the next 4 to 6 months. There may also be a public hearing.

H. Underwood stated that there are some things that the Town would have information or input on including safety. He also noted that the Town had acquired the 1 Central Square parcel at the southwest quadrant adjacent to the bridge and indicated that the parcel location may be suited for a connection to the rail trail. He thought that the building structure on the parcel is scheduled for demolition.

J. Edelmann suggested that at another public meeting, ideas for available options related to the bridge railing would be presented with discussion about what is plausible.

D. Trubey asked if the temporary detour for the rail trail is on existing roads and sidewalks. S. Halloran stated that the 3 alternatives presented use public streets and sidewalks. In some of the alternatives presented, the final connection to the rail trail may include improvements to a current informal connection.

J. Reczek showed a photo of a bridge rail for a NHDOT bridge in Stewartstown that incorporated an aesthetic treatment emulating a railing with a more historic appearance. The railing was the standard galvanized steel tube crash tested bridge railing on the roadway side with painted green panels incorporating vertical picket elements on the outside.

L. Black commented this would be a very useful approach relative to the bridge railings. The railing system respects the required safety at the bridge but also reflects where the bridge is located, recognizing that views from adjacent properties and the rail trail may be important.

### Alstead 43566 (No federal number)

#### NH RT 123A (Acworth Rd) adjacent to the Vilas Pool area

Participants: Mike Hicks, ACOE; Jason Ayotte, Chris Carucci, Rebecca Martin, NHDOT

Initial consultation on the proposed roadway and slope stabilization repair due to storm event on 7/29/2021.

Either the Army Corps of Engineers (ACOE) or the Federal Emergency Management Agency (FEMA) is anticipated to be the lead federal agency for this project. The purpose of the project is to restore the NH Route 123A roadway to two paved lanes of traffic and repair damage that resulted from the July 2021 flood event. The Project Manager, Jason Ayotte explained that the NHDOT does not know if the project will be accepted for FEMA mitigation funding, at this time. Mike Hicks requested that NHDOT inform ACOE how the project will be funded. J. Ayotte explained that the NHDOT Bureau of Highway Maintenance is working with Emergency Management. He noted that the same section of roadway was washed out in 2005 and was replaced in kind. He commented that there is a competitive process to request FEMA mitigation funds for costs above replacing in kind to prevent a future wash out of the same section of roadway. The project will likely be eligible for funding from FEMA to at least replace the roadway back to the condition prior to the wash out.

Laura Black inquired about public involvement. Jill Edelmann explained that she had spoken with someone in the Town about completing the Historic District Area Form for Vilas Pool and that Lisa Mausolf has been tasked to complete the Historic District Area Form. NHDOT will update the Town as we move forward with the design. Lisa Mausolf is coordinating with folks from the Town about the Historic District Area Form.

Chris Carucci explained that the damage from the recent flood is very similar to the flood of 2005. In 2006 NH Route 123A was rebuilt in kind and was not funded by FEMA. There were still some temporary measures in place- such as the concrete Jersey barriers instead of guardrail. C. Carucci described the damage from the July 2021 flood and explained that the cause of the issue is that there is inadequate spillway capacity at the Vilas Pool dam. When water levels become too high, the water spills over and flows onto NH Route 123A. Currently, NHDOT District personnel have put in a temporary repair, one lane of alternating traffic on gravel roadway with Jersey barrier along the river. *\*Note: The one lane of alternating traffic has now been paved*.

C. Carucci showed photos of some of the damage and explained that a dry stone wall previously covered with stone stabilization is now exposed. Immediately adjacent to the dam the Cold River is ledge and this area did not have embankment failure. C. Carucci described the replace in kind option, basically the site conditions would be returned to those that existed before the July 2021 flood event with temporary concrete barriers, 24 feet of pavement (two lanes), stones along the exposed slope in the Cold River for stabilization, and replacement of the cable guard rail with beam guardrail. The cable rail was damaged. This option would not be expected to stand up to another flood event and would cost around \$485,000.

C. Carucci explained another option, Option 1, this option would incorporate a toe wall at the Cold River's edge to hold stone stabilization in place. The same pavement and beam guardrail is proposed as the replace in kind option. If the dam spillway were not fixed, this flooding and failure (stone slope washing away) could happen on Route 123A again, even with the toe wall.

C. Carucci explained another option, Option 2, this option would include a full height concrete retaining wall and would basically establish an area adjacent to the roadway to function like a dam spillway (outside of the roadway). The design team believes that this option would hold up if flooding of the dam occurred again without requiring changes to the dam. If the project is planned for construction soon (next summer), there is not time to make any changes that impact the dam. A more permanent repair that would address the dam capacity problem would require additional study and coordination with the Town. This could not be achieved with the intended March 2022 advertising date.

L. Black commented that while Option 2 is a more permanent solution, it would also have a starker visual effect. She suggested considering adding a sacrificial layer of stone slope over the concrete retaining wall, so that from the Cold River side it would look more natural. C. Carucci noted that a sacrificial wall seems possible, but would require significant additional cost and would not hide the entire wall. C. Carucci explained that the concrete wall would end wherever the project could tie the retaining wall into the existing ledge. At the area where the tie in of the concrete wall would happen, the concrete wall could not be covered.

L. Black asked what alternatives could be used to cover the retaining wall. C. Carucci noted that there are numerous color and texture options for concrete and that these costs were not included in the current estimate. The design team is proposing T-4 Bridge Rail at the top of the concrete wall and showed a photo of this type of bridge rail. Jon Evans inquired about using a liner/form on the concrete wall to make it blend in. Jill Edelmann commented that the exposed ledge would be left in place from the dam down to the area shown. The dam is plain concrete, so a plain concrete wall would actually blend better. Some of the concrete wall would be visible from the park, particularly if folks walked along the Cold River on the opposite side. C. Carucci explained that the toe wall option (Option 1) would have the toe wall starting and ending in the same location as the concrete wall.

C. Carucci explained that a more permanent repair would include a stone lined slope repair along Vilas Pool, replacing and upsizing 3 drainage pipes and other roadwork that would look similar to the pre-flood conditions.

J. Edelmann explained that the project is scheduled to advertise in March 2022. Lisa Mausolf is planning to have the Historic District Area Form prepared for a Determination of Eligibility meeting in December 2021. J. Edelmann noted that if there is an adverse effect and we come to a determination by January or February of 2022, there really won't be much time for the rest of the effort that needs to take place prior to advertising. J. Edelmann asked if we could process this project under a PA? She noted that the project would need a lead federal agency to sign on to the PA. J. Ayotte noted that the replace in kind option would likely receive FEMA funds, but he is less sure about the other Options. M. Hicks noted that if replace in kind is selected and ACOE would be the lead federal agency, ACOE may not require a permit, in which case, there would be no ACOE Section 106 determination. If there is some FEMA funding, FEMA needs to make the Section 106 determination. M. Hicks recommended a call with FEMA and ACOE to discuss.

L. Black noted that a project level PA might require a lot of effort and take away from getting done what we need to do. If a lower impact project is preferred, the project has an easier path to get to no adverse effect, so faster/more efficient. Option 2 would be more complicated. She recommended NHDOT have

Lisa Mausolf thinking about each step of the process, that way Lisa can share her thought as she goesfor example, as she is working through the Historic District form, what would Option 2 do to the view shed?

J. Edelmann explained that no inventory is being completed for the white house and garage south of the project limits because the project alternatives are not proposing significant visual impacts close to those structures, except for the addition of guardrail or bridge rail beginning about 75' north of the garage.