



December 30, 2022

Daniel Goldner, Chairman  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301-2429

Re: DG 22-045

Dear Mr. Goldner,

I write to provide the Commission with a description of the Phase One stabilization work completed at the Gasholder in Concord and other relevant matters.

The N.H. Preservation Alliance's Objectives and Involvement

The N.H. Preservation Alliance is a 37-year-old non-profit organization with a mission and track record of helping strengthen communities and local economies by supporting and encouraging the revitalization and protection of historic buildings and places.

We engaged in efforts to preserve the Gasholder when demolition was suggested, and its future was uncertain. The landmark is considered the last of its kind in the nation and our analysis shows that its preservation and the redevelopment of the Gasholder's property holds strong, catalytic community development potential for the southern gateway of our capital city.

Our strategy, working closely with Liberty, combines our historic preservation expertise with 1) the objective of minimizing financial impact on the ratepayers, 2) meeting the terms of the property's Remedial Action plan approved by NH DES (May, 2015), and 3) meeting the likely requirements of DES in the event of demolition, including an amended Remedial Action Plan, investigation, and mitigation.

Need for Emergency Stabilization

The Concord Gasholder was in a state of structural failure as the result of a tree that fell on top of the roof in 2013 which broke through the roofing and structure creating a large hole in the roof.

Temporary repairs by Liberty were insufficient to prevent the deterioration of the roof framing and more important the tension ring that held the conical shaped, wood framed roof in place on

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top of the brick masonry walls. Snow and rain could enter the building, and the north side of the roof and building were in failure.

#### Summary of Phase One Work

Phase One stabilization included the construction of sixteen spoke beams which bear on the outside foundation wall and an interior masonry pier at the center of the building. Steel I-beams were placed on top of the spoke beams in four circular rings to provide bearing for the shoring. Thirty-two shoring towers were then constructed to the underside of the roof framing. These towers stabilized the roof from settling and/or collapsing. In addition, these towers will serve as the base to jack the existing roof framing members back in to place when Phase Two commences. In addition, steel cables were installed to reinforce the top of the masonry wall that was in failure, serving as a temporary retention ring.

The roof holes were then patched, and an EPDM rubber roof patch was placed on the areas of roof failure. In addition, all windows received temporary painted plywood panels to prevent water intrusion and further deterioration. The roof patch and window panels should last at least ten to twenty years given regular inspection and repair as needed.

The interior stabilization and patching the roof meet the terms of the existing Remedial Action Plan approved by NH DES by keeping it stable and weather tight. Half of the cost of this stabilization and patching work was covered by private philanthropy through the N.H. Preservation Alliance.

This work has stabilized the building, sets-up Phase Two rehabilitation and offers time to complete feasibility analysis, design engineering and fundraising.

#### Phase One Stabilization Team Expertise

The project team for the Gasholder, Phase One Stabilization included highly experienced specialists in work on historic properties and included the following:

John Wathne, President of Structures North, a structural engineer with decades of experience with significant and challenging projects across the country, was responsible for the design and monitoring of the Phase One work.

Structural Consultants  
Structures North Consulting Engineers, Inc.  
60 Washington Street, Suite 401  
Salem, Massachusetts 01970-3517

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Frank Lemay, President of Milestone Engineering & Construction, served as the Construction Manager as Advisor and the primary contact with Liberty throughout the construction process. Milestone has managed and completed many substantial preservation projects in New Hampshire including the New Hampshire Historical Society, Chandler House in Manchester, and North Church in Portsmouth.

Construction Manager as Advisor  
Milestone Engineering & Construction, LLC  
1 Horseshoe Pond Lane, Suite 1  
Concord, NH 03301

Yankee Steeplejack Company performed the bulk of the work during Phase One, described above along with New England Scaffolding.

Steeplejack  
YSC, Inc./Yankee Steeplejack Company  
240 Littleton County Road  
Harvard, MA 01451

Shoring Subcontractor  
New England Scaffolding  
85 Mill Street  
Brockton, MA 02301

Michael Bruss served as the project representative for the Preservation Alliance. He brought decades of construction management experience to this role.

Owner's Project Management Consultant  
Bruss Project Management  
17 Springfield Street  
Concord, NH 03301

#### Liberty's \$2.4 million Request and Haley & Aldrich's Opinion of Probable Costs

Haley & Aldrich, Inc.'s (H&A) offered an opinion of probable cost of the demolition, investigation, and remediation as part of the process of securing a reasonable estimate for Liberty's contribution to the Gasholder project. H&A's analysis is outlined in their Memo dated December 20, 2022 and is included in this submission.

We believe that the \$2,379,492 represented in this filing as Liberty's capped request for reimbursement is a very reasonable and defensible request. We note that \$2,379,492 was supported by H&A as a figure accommodating limitations required by Liberty's consultants

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GZA. As described in page 3 of their Memo, H&A believe that the cost could be significantly higher based on their understanding of site conditions and their experience with similar sites around the country. Bill Haswell of H&A has experience working on over fifty similar sites. In their testimony and report, GZA concurs that the actual costs for remediation are uncertain and could vary significantly from the range they presented for planning purposes.

We believe that PUC's approval of this estimate will add predictability to the process for ratepayers. As described below, the Preservation Alliance also has and will bring additional local, state, and federal sources to this project that meet DES requirements while achieving preservation and community development goals.

Plans for Completing Work to the Gasholder

This initial investment sets up Phase Two rehabilitation of the Gasholder and additional investment and long-term stewardship of the site. A highly competitive \$500,000 federal grant has already been secured by the N.H. Preservation Alliance for this work. Other funds are being sought from the Land and Community Heritage Investment Program, N.H. Community Development Finance Authority, and other sources. This project has attracted leaders of civic, cultural, environmental, and business sectors with large portfolios of successful projects. Our parties have discussed a 20-year easement related to the federal grant; this durable Phase Two rehabilitation work can easily last twice or three times that long with basic maintenance.

Thank you for your consideration. Please let me know if you have any questions.

Sincerely,



Jennifer Goodman  
Executive Director