



## STATE OF VERMONT

## AGENCY OF COMMERCE AND COMMUNITY DEVELOPMENT

August 19, 2003

John B. Kassel  
 Shems Dunkiel and Kassel, PLLC  
 87 College Street  
 Burlington, Vermont 05401

**Re: Proposed Wind Turbine Project, North Concord Air Force Station, East Mountain, East Haven, Vermont.  
 FAA.  
 Preliminary Act 248 Review.**

DEPARTMENT  
 OF HOUSING &  
 COMMUNITY  
 AFFAIRS

Divisions for:

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- Historic Preservation
- Housing
- Planning

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Dear Mr. Kassel:

Thank you for your letter dated July 18, 2003 and received July 21, 2003 concerning the above project having Federal Aviation Administration involvement (DHP #ES03-004). We understand that you are also seeking a Certificate of Public Good from the Vermont Public Service Board under 30 V.S.A. section 248 and not an Act 250 permit, as we had originally discussed in our letter to this project's historic preservation consultant, Chris Quinn, dated June 24, 2003. We apologize for the misunderstanding. All comments made in the June 24, 2003 in reference to Act 250 are still valid and can apply towards the Act 248 Certification process. If you find that you need separate documentation to this effect from our office please do not hesitate to contact the Division.

The Division for Historic Preservation has reviewed this proposed undertaking pursuant to 36 CFR 800.4, regulations established by the Advisory Council on Historic Preservation to implement Section 106 of the National Historic Preservation Act. Project review consists of identifying the project's potential impacts to historic buildings and structures, historic districts, historic landscapes and settings, and to known or potential archeological resources. As discussed above, you are seeking a Certificate of Public Good from the Public Service Board, which uses the Act 250 Criteria to evaluate impacts. The Division also has reviewed this proposed undertaking for purposes of Criterion 8, 10 V.S.A., Chapter 151 (Act 250). The purpose of the Division's review is to provide the Public Service Board with the information necessary for them to make a positive finding under the "historic sites" aspect of Criterion 8. For further information regarding the Division's Act 250 rules, please see our website at [www.dhca.state.vt.us/DHP/general/rules.html](http://www.dhca.state.vt.us/DHP/general/rules.html).

The proposed wind turbine project on East Mountain will adversely affect historic resources and, because of this, we requested in our June letter an opportunity to review any available project alternatives that would allow the project to move forward without adversely affecting any historic resources. In your recent letter you discuss the situation at East Mountain and we concur that the project, as proposed, is a prudent design despite the

loss of the historic resources. Mr. Quinn also informed our office via telephone that the project developer, after much research, determined that East Mountain had the appropriate height and available wind velocities that would allow a wind turbine project of this magnitude feasible.

In our June letter we also requested that we receive documentation that towns and their citizens in the project's area of potential effects had been given an opportunity to offer comment on the project. You describe in your letter how these groups have been given the opportunity to comment and the description appears adequate. In addition, we received a letter dated July 24, 2003 from Marvin Olson, long-time resident of East Haven who served at the USAF base on East Mountain in the 1950's, in support of the project.

Based on the information provided earlier by Mr. Quinn and the information contained in your letter, it is our opinion that the proposed project will have an adverse effect on historic resources but that the adverse effect is reasonable and not undue given the circumstances. We accept the following measures as mitigation against this adverse effect:

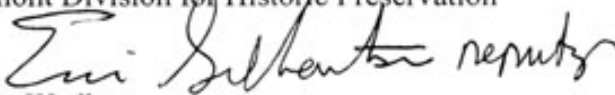
1. Prior to demolition or relocation, the contributing historic properties and associated landscape features shall be recorded in accordance with the Division for Historic Preservation's "Photographic Standards for Historic Structures". Recorded materials shall be archived at the Division for Historic Preservation and at an appropriate local archive to be agreed upon.
2. One of the summit tower structures will be repaired and partially rehabilitated to provide a permanent record of the site's history. In addition, an interpretive exhibit will be constructed that provides a detailed documentation of the site's history, significance and association with the Cold War. Details of the tower rehabilitation and interpretive exhibit will be refined at a later date and made available for review by the Division.
3. Efforts will be made to retain building footprints where feasible to serve as a permanent record of the site's history and facilitate future public interpretation.
4. Although not exclusively a mitigation effort, the proposed plan includes provisions for public access to the site, which has not been permitted since government ownership.

We understand that you will be in contact with the F.A.A. regarding this project and will advise them of our determination. The Advisory Council on Historic Preservation also will need to be contacted in consultation with the F.A.A. and a Memorandum of Agreement will need to be drafted and signed by all interested parties, as discussed in our June letter. Mr. Quinn will be able to assist with drafting the document, if necessary.

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As always, if you have any questions or comments regarding any of the above, please do not hesitate to contact Judith Williams Ehrlich, Environmental Review Coordinator, at (802) 828-3049. We look forward to working with you further on this project.

Sincerely,  
Vermont Division for Historic Preservation

A handwritten signature in cursive script, appearing to read "Emily Wadhams", written in black ink.

Emily Wadhams  
State Historic Preservation Officer

Cc: Aaron Adler, Public Service Board  
Elizabeth Lord, Agency of Natural Resources Planning Division  
Charles Gallagher, District Seven Environmental Coordinator  
Chris Quinn  
Marvin Olson