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January 27, 2006

Judith Ehrlich
Project Review Coordinator
Vermont Division for Historic Preservation
National Life Building
Drawer 20
Montpelier, Vermont 05620-0501

Re: Deerfield Wind Project, Towns of Searsburg and Readsboro, Bennington County, Vermont

Dear Ms. Ehrlich:

At the request of its client, Deerfield Wind, LLC, The Louis Berger Group, Inc. (Berger), is pleased to submit the enclosed project description and *Management Summary*, to initiate consultation with the Vermont State Historic Preservation Office (SHPO) in accordance with 36 CFR 800.3, for Deerfield Wind's proposed Deerfield Wind Power expansion project in Searsburg and Readsboro, Bennington County. This proposed project will require a Special Use Permit from the USDA Forest Service (Green Mountain National Forest); the Forest Service will be preparing an EIS for the project, and has already issued a Letter of Intent and a Scoping notification. The proposed expansion of the Deerfield Wind Power facility thus constitutes a Federal undertaking as defined at 36 CFR 800.16 and requires compliance with Section 106 of the National Historic Preservation Act. In addition, Deerfield Wind LLC will be submitting a Certificate of Public Good Section 248 Petition application to the Vermont Public Service Board in mid-December; the project therefore also requires review under state laws and regulations.

PROJECT DESCRIPTION

The Deerfield Wind Project (Project) would involve construction of 20-30 wind turbines, up to 410 feet high, on National Forest System (NFS) lands in the Manchester Ranger District of the Green Mountain National Forest (GMNF) in the towns of Searsburg and Readsboro, Vermont.

The Project would utilize approximately 80 acres of NFS lands generally lying on two separate ridgelines east and west of Vermont Route 8. Approximately half of the turbines would be placed on the east side of Route 8 on the same ridgeline as the existing Green Mountain Power Corporation (GMP) Searsburg Wind energy facility, which includes 11 turbines on 35 acres of private lands adjacent to GMNF lands. The remaining turbines would be placed along the ridgeline to the west of Route 8 in a northwesterly orientation.

These new larger turbines, capable of producing a combined 30 to 45 megawatts (MW) of electricity (approximately 1.5 to 2.0 MW each), represent the current technology and will efficiently produce about three times the energy as the existing smaller turbines.

For further details about the project, please see the enclosed *Fact Sheet*.

EFFORTS TO IDENTIFY HISTORIC PROPERTIES

As cultural resources consultant to Deerfield Wind LLC, Berger has completed the background research and field reconnaissance for the Phase IA/historic resource screening study for the proposed project, involving site file review at your office, consultation with David Lacy, GMNF archaeologist, and vehicular reconnaissance in Searsburg and Readsboro. Briefly stated, the project area has variable potential for both prehistoric and historic archaeological resources; and a records search found 3 historic districts and 74 individual buildings or structures listed in or eligible for listing on the Vermont or National Registers of Historic Places within a preliminary 10-mile radius of the project. Neither Searsburg nor Readsboro have been comprehensively surveyed for architectural resources; other significant architectural resources may exist within the Area of Potential Effect. There are no recorded historic structures within the immediate Project area. Please see the enclosed *Management Summary* for more information on the results of these preliminary investigations.

PROPOSED STEPS

Identification of Historic Properties. In order to identify historic properties that could be affected by the project, Deerfield Wind LLC proposes to conduct, in consultation with your office, GMNF, and concerned Native American organizations a Phase IB archaeological investigation within areas proposed for ground disturbance (tower construction, access roads, utility corridors), followed, if need be, by Phase II survey to determine the Vermont/National eligibility of archaeological sites that could be affected by the project. Deerfield Wind LLC also proposes to conduct, in consultation with your office and GMNF, a vehicular and pedestrian reconnaissance to locate, identify and evaluate above-ground (e.g., architectural) resources within a landform-calculated viewshed developed by the environmental consultant on the project (see viewshed map enclosed). Both these investigations will be conducted in consultation with your office, as well as with GMNF and concerned Native American organizations. Deerfield Wind LLC understands that your office will wish to review the scopes of work for these investigations prior to their implementation.

Assessment of Project Effects. Results of the cultural resource investigations will be presented in one or more reports prepared in accordance with the reporting standards of your office, and submitted to your office for review, comment and concurrence with findings. Berger will work with Deerfield Wind LLC, GMNF and participate as requested in consultations with your office regarding the effects of the proposed project on historic properties and resolution of any adverse effects.

At this time, on behalf of Deerfield Wind LLC, we request your review of the information available at this time, and a letter response containing any comments or suggestions regarding the project and the proposed steps to identify historic properties and assess project effects outlined above. Please address your response to the project proponent: Ms. Martha Staskus, Deerfield Wind LLC, 1209 Harvey Farm Road, Waterbury Center, Vermont 05677, 802-244-7522, marthas@northeastwind.com.

If you have any questions or require any additional information, please feel free to contact me at (781) 444-3330 (extension 224) (via e-mail at mbowers@louisberger.com) or Dr. Hope Luhman at (518) 432-9545 (via e-mail at hluhman@louisberger.com).

Thank you very much for your consideration.

Sincerely yours,

THE LOUIS BERGER GROUP, INC.

For Martha H. Bowers
Assistant Director, Cultural Resources
Principal Architectural Historian

Enclosures (*Fact Sheet* and *Management Summary*)
cc: H. Luhman, Berger
M. Staskus, Deerfield Wind LLC
File XE-3641

MANAGEMENT SUMMARY

PHASE IA ARCHAEOLOGICAL SURVEY AND HISTORIC RESOURCE SCREENING STUDY
DEERFIELD WIND POWER
TOWNS OF SEARSBURG AND READSBORO
BENNINGTON COUNTY, VERMONT

INTRODUCTION

The Deerfield Wind Project (Project) would involve construction of 20-30 wind turbines, up to 410 feet high, on National Forest System (NFS) lands in the Manchester Ranger District of the Green Mountain National Forest (GMNF) in the towns of Searsburg and Readsboro, Vermont (Figure 1).

The Project would utilize approximately 80 acres of NFS lands generally lying on two separate ridgelines east and west of Vermont Route 8; referred to as the proposed eastern project area and the proposed western project area, respectively. Approximately half of the turbines would be placed on the east side of Route 8 on the same ridgeline as the existing Green Mountain Power Corporation (GMP) Searsburg Wind energy facility, which includes 11 turbines on 35 acres of private lands adjacent to GMNF lands. The remaining turbines would be placed along the ridgeline to the west of Route 8 in a northwesterly orientation. At present, a northern access to the proposed western project area is under consideration and would provide access from Route 8 along an existing town road (Putnam Road) to an existing NFS right-of-way (see Figure 1).

These new larger turbines, capable of producing a combined 30 to 45 megawatts (MW) of electricity (approximately 1.5 to 2.0 MW each), represent the current technology and will efficiently produce about three times the energy as the existing smaller turbines.

The project area is located in the towns of Searsburg and Readsboro on the eastern slopes of the Green Mountains. The Green Mountain physiographic province is situated between the Vermont Piedmont and the Vermont Valley. The project area is located in an area with a rich resource base, is in proximity to areas of known archaeological sensitivity, has good soil preservation and is positioned advantageously to major transportation routes (Lacy 1994:95).

The Green Mountains are 21 miles wide at the Canadian border and 36 miles wide at the Massachusetts border, running generally north to south. The mountains rise to lowlands to the west to an average of 610 meters (2000 feet) with five peaks over 1219 meters (4000 feet). Several passes exist in the mountains running generally east to west. The topography of the Green Mountains province is characterized by steep slopes with narrow valleys dissected by fast flowing streams. Topography in the immediate project area ranges from roughly 610 meters (2000 feet) to 870 meters (2854 feet) above mean sea level (amsl) in the proposed western project area, and from 910 meters (2986 feet) to 960 meters (3150 feet) amsl in the proposed eastern project area.

Soils which characterize the proposed eastern project area are predominantly of the Mundal-Houghtonville association, rolling, very stony (703C) and to a lesser extent Houghtonville-Rawsonville association, hilly, rocky (715D) (Web Soil Survey 2005). Houghtonville-Rawsonville soils are shallow to very deep bedrock, very deep to dense basal till, well drained, moderately steep to very steep soils

on mountains and foothills. Mundal soils are minor soils within these associations existing on backslopes and footslopes.

Soils which characterize the proposed western project area are of the Glebe-Stratton association, very hilly, very rocky (913E) (Web Soil Survey 2005). Stratton soils are very shallow to moderately deep to bedrock, well drained, moderately steep to very steep soils on mountains. Glebe soils exist on shoulders and backslopes within this association.

PHASE IA ARCHAEOLOGICAL SURVEY

The goals of the Phase IA background research with regard to cultural resources were to: (1) determine local chronological sequences; (2) characterize the distribution and type of known sites; (3) summarize environmental characteristics; (4) outline the history of the project area; and, (5) delineate pertinent research issues with which yet-to-be-identified cultural resources may be associated.

Overall, the Phase IA background research involved: examination of archaeological site files, maps, and cultural resource management reports held by the Vermont Division for Historic Preservation (VT DHP) including Berger's (1995a, 1995b) surveys of the existing facility; examination of National Register files, historic architectural documentation, and related materials available at the VT DHP; examination of appropriate Soil Conservation Service (SCS) maps, and surface geology maps. Berger also consulted with David Lacy, Archaeologist with the Green Mountain and Finger Lakes National Forest, who provided GIS mapping of archaeological sites and potential sites on NFS lands (Figure 2).

Prehistoric Sensitivity
Prehistoric background research proceeded along two fronts: previous archaeological work conducted in the area, and paleogeography. To provide a preliminary assessment of the potential for prehistoric archaeological resources the basic predictive modeling used included completion of VT DHP's *Environmental Predictive Model for Locating Archaeological Sites*. This form provides a differential ranking of topographical features and soil associations. Berger also conducted a project area inspection to assess the conditions and noting areas of potential concern.

The proposed eastern and western project areas both possess locations that would be sensitive for prehistoric resources. For example, peaks represent areas with higher probability for prehistoric resources as do vistas and wind-protected, small, flat areas or saddles. In general, prehistoric sensitivity along both project areas is judged to be variable and is predicated on localized variations in topography, the presence of water, and resource base exploitability. Therefore, due to the variable nature of conditions within the project area itself, the prehistoric sensitivity will vary accordingly. Areas with a low sensitivity ranking include those portions of the project area with severe slope (e.g., greater than 15 percent). However, the potential for unknown prehistoric sites remains a serious consideration, due to the project area's location and attributes.

Historic Sensitivity

VT DHP archaeological site files list a total of 22 historic archaeological sites within a four-mile radius of the general Project vicinity with six (6) historic archaeological sites located within a one-mile radius and one (1) within the project area (VT-BE-83/SSG03.00). Two (2) of the sites are kilns reported by Rolando in 1983 (VT-BE-51/RSO54.02 and VT-BE-52/RSO54.01), with the other four (4) representing homestead/farmsteads reported by Record in 1984 (VT-BE-81/RSO55.00, VT-BE-82/SSG04.00, and VT-BE-83/SSG03.00).

NFS GIS maps show an additional five (5) historic sites in close proximity and one (1) site within the project area. A survey conducted by Berger (1995b) identified one (1) historic site (VT-BE-228/RSO 71.00) immediately south of the Crosier cemetery; although this site is not reflected on the Vermont Archaeological Inventory (VAI) maps. SSG06.01, SSG06.02 and SSG06.03 are located 305-610 meters (1,000-2,000 feet) north of the project area on both sides of Route 8. SSG02.00 is located at the juncture of the proposed access road and Route 8 in a proposed preliminary building footprint for the Project.

Historic archaeological sensitivity in the eastern proposed project area is low. The entire alignment sits on a ridge that is removed from the dendritic historic settlement pattern exhibited along watercourses in the region's valleys. Berger previously conducted subsurface testing along the same ridge immediately north of the proposed alignment and found one (1) isolated bottle fragment (Berger 1995b).

Historic archaeological sensitivity for the proposed western project area is high. SSG02.00 is located within the Project's proposed preliminary building footprint. This site is the "S. Crosier" residence indicated on the 1856 Rice and Harwood map and on an 1869 Beers map. Samuel Crosier's father is Joseph Crosier, who is recognized as the first permanent settler of Searsburg. Child (1880) states that the location of Samuel Crosier's homestead was opposite the family cemetery and Aldrich (1889) indicates that upon Joseph Crosier's death his homestead passed to his son Samuel. Thus, the "S. Crosier" residence shown on the 1869 Beers and 1856 Rice and Harwood maps may in fact be Joseph Crosier's original homestead. It is not known if Samuel constructed a new house upon gaining control over the property; however, Child (1880) and Aldrich (1889) both suggest that Joseph's house was made of spruce logs and bark, contributing to its potential significance as a site associated with an early nineteenth-century log cabin and the associated lifeways in rural Vermont (Lacy 2005).

One (1) site (VT-BE-83) – the J. Leroy/Hunt & Co. Site – exists within the proposed access road alignment. Only portions of it (an orchard and a stone wall) lie within the proposed alignment; there is no observable evidence of the cellar hole, well, family cemetery or outbuilding within the project area. This site along with an unnamed site (VT-BE-82/SSG04.00), SSG06.01 (shown as "H. Walker" on Beers 1869 map), SSG06.02 (shown as "S.H." on Rice and Harwood (1856) and/or "A. Hale" on Beers 1869 map, and the potential site of "J. Carley" (Rice and Harwood 1856), further illustrate the high level of sensitivity of this area for archaeological sites reflecting early farmstead/homesteads. This area of sensitivity is between Route 8 and the location of the orchard (VT-BE-83) to the west. No

evidence of historic land use was observed further west (upslope or on top of the ridge) within the project area.

In summary, the project area lies within a region of Vermont that is relatively remote and for which predictive modeling for the presence of cultural resources requires flexibility. These two attributes stress that the potential for cultural resources in the project area must take in to consideration several factors. First, prehistoric sites are known to occur in upland environments, but can be ephemeral in nature, thus making their identification difficult. Nevertheless, prehistoric populations did utilize the rich resource base provided by upland environments, indubitably to a much greater degree than our present record of known sites would suggest. With regard to the potential for historic resources, the presence of structural remnants and ruins in the project area supports the contention that the likelihood of encountering historic resources is high throughout the project area. Dispersed rural mountain farmsteads and homesteads were spread across the environmental landscape, taking full advantage of the available resources. Thus, structural remains and associated activity area features representing historic period occupation may be present at higher elevations. Lastly, the remoteness of the project area suggests that any resources identified in the project area may be relatively undisturbed, and therefore likely to have not suffered from pedoturbation to any significant degree.

Based on these findings, Berger recommends that a Phase IB archaeological survey of the project area, designed in consultation with VT DHP, be conducted to identify additional cultural resources in the project area. Such a survey would indicate whether the project area will impact additional cultural resources, and would provide the basis for determining the need for further work.

HISTORIC RESOURCE SCREENING STUDY

The historic resources screening component involved background research to identify known historic resources in the Area of Potential Effect (APE). A vehicular reconnaissance was conducted to characterize the overall built environment and landscape with regard to potential for visual effects.

Site file research at the VT DHP was conducted on November 8 and November 21, 2005. The National Register of Historic Places and State Register files were consulted for towns within a 10-mile project area radius (see Figure 2). Based on this research, it was determined that there are three National Register of Historic Places historic districts located within the project's APE: the Wilmington Village Historic District, Furnace Grove Historic District in Bennington, and the West Dover Village Historic District. There are four individually listed National Register properties in the APE: the Crow's Nest and the Medburyville Bridge, both in Wilmington, the District No. 1 Schoolhouse in Somerset, and the Tudor House in Stamford. Additionally, there are 70 individually listed State Register properties in seven towns within the 10-mile project radius. Two resources, a residence in Wilmington on Ray Hill Road, and the Deerfield River Hydroelectric Project through the towns of Somerset, Searsburg, Readsboro, and Whitingham are recommended eligible for inclusion in the State and National Registers, respectively.

A vehicular reconnaissance of the APE was completed on November 11, 2005, during which types of historic period resources that have not been evaluated for eligibility for the National or State Registers were identified. Based on field observations, there may be other historic period resources in the APE that may require survey and evaluation to determine whether they are eligible for inclusion in the National or State Register of Historic Places.

SUMMARY

The project area has variable potential for both prehistoric and historic archaeological resources; and a records search found three (3) National Register-listed historic districts, 74 individual National Register/State Register-listed properties, and two (2) potentially eligible properties (not listed in National or State Registers) – the King-Atwood House in Wilmington and the Deerfield Hydroelectric Project within a preliminary 10-mile radius of the project. Neither Searsburg nor Readsboro have been comprehensively surveyed for architectural resources; other significant architectural resources may exist within the APE.

Based on the Phase IA archaeological survey findings, Berger recommends that a Phase IB archaeological survey of the area associated with ground disturbance be conducted to identify additional archaeological resources that could be affected by project construction. This work should be conducted in consultation with the VT DHP. Such a survey would indicate whether the project would impact archaeological sites in addition to those already identified, and would provide the basis for determining the need for further work or mitigation (e.g., Phase II/site evaluation investigation, Phase III/data recovery excavation).

Based on the results of the historic resources screening study, a number of National and State Register-listed and eligible properties are located in the project's APE; however, not all of the historic properties in the APE, have been identified, and to date the potential nature and extent of potential visual impacts of the proposed project on historic buildings, structures and/or districts is still under review. Review of the potential visual impacts will continue, in consultation with the VT DHP. It is important to note that no buildings or structures will be acquired or physically altered or removed by the project, and thus impacts, if any, would be limited to those resulting from the visibility of the Project from the historic structure.

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The Louis Berger Group, Inc. [Berger]
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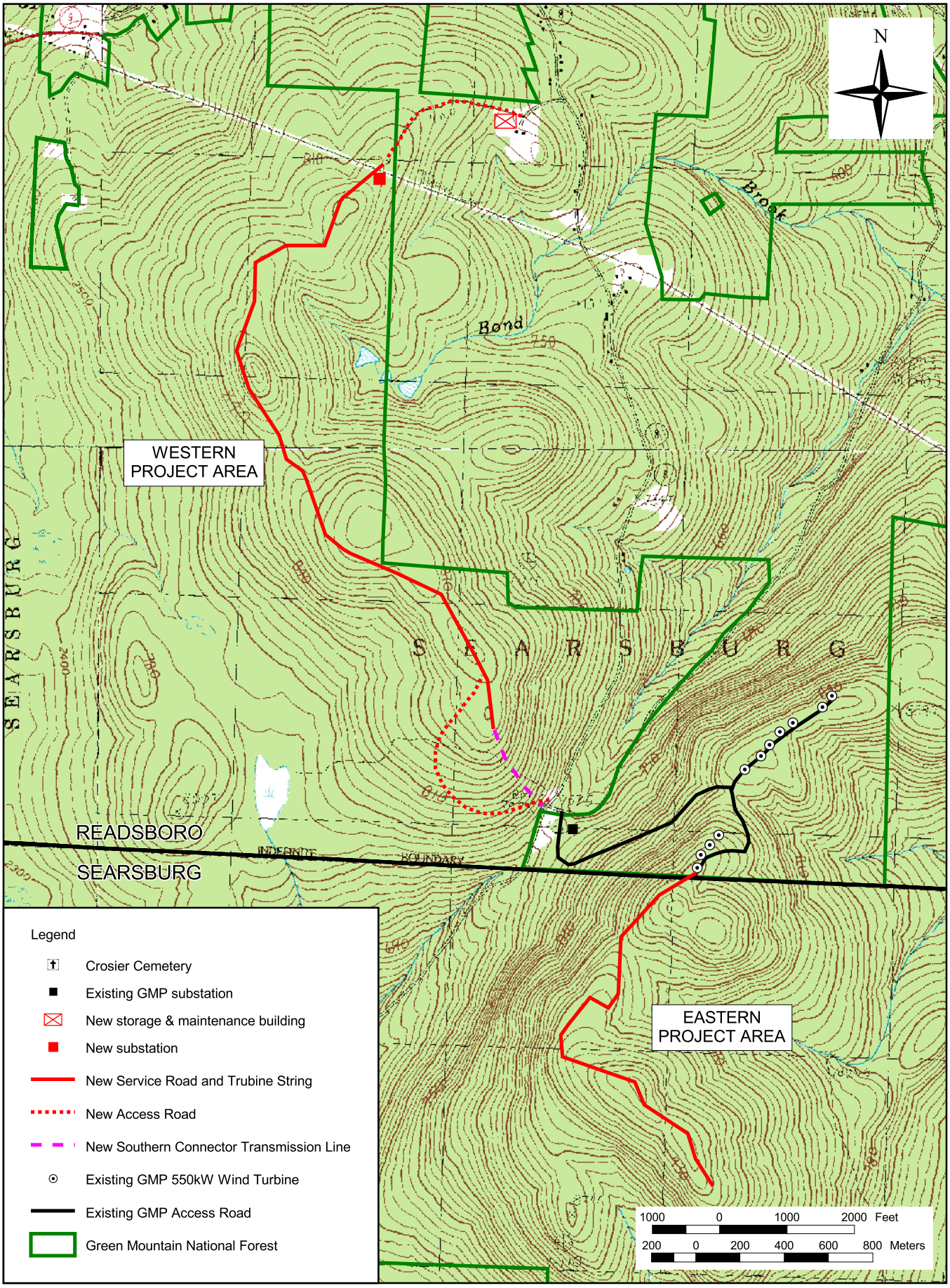

FIGURE 1: Project Location

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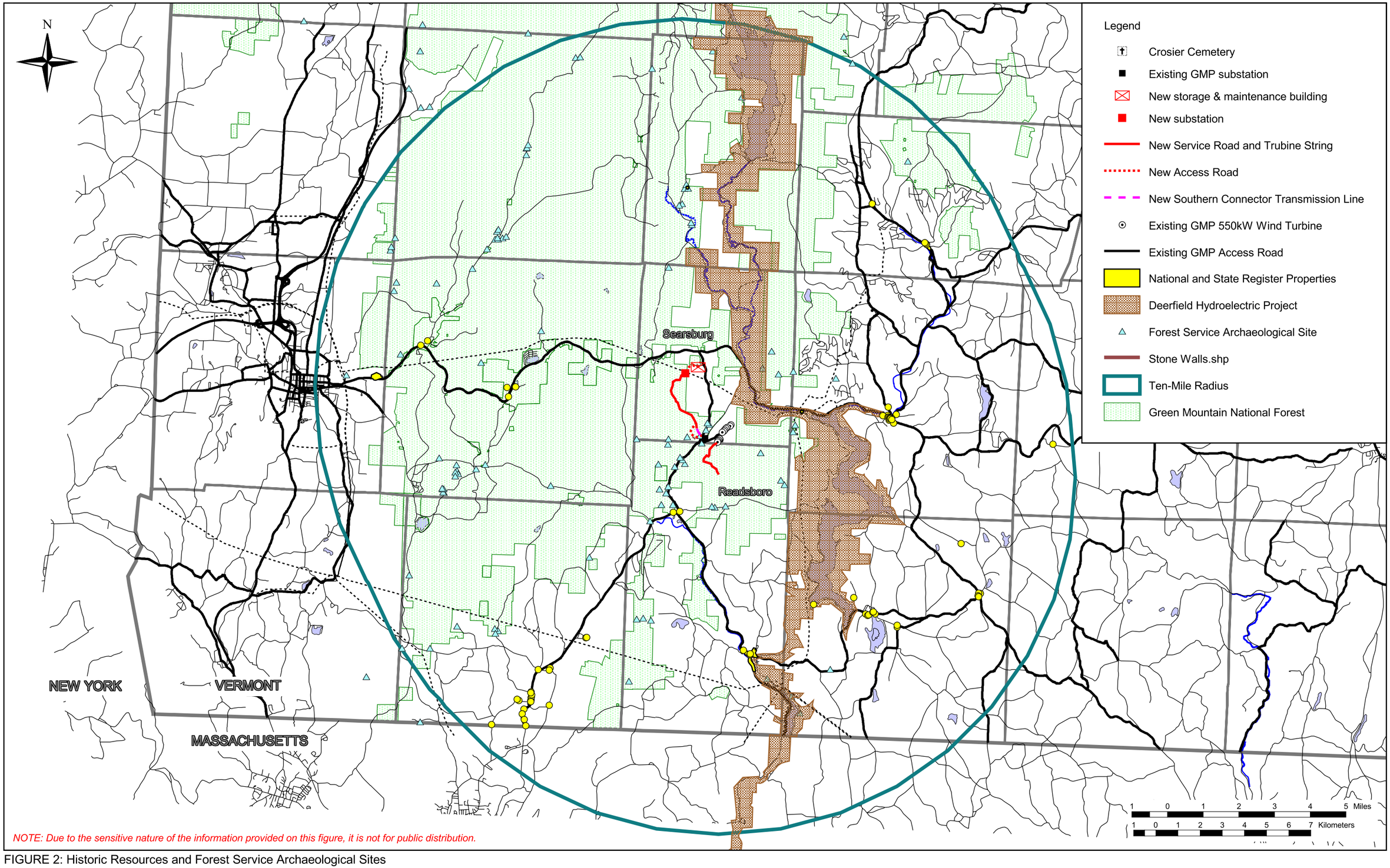

NOTE: Due to the sensitive nature of the information provided on this figure, it is not for public distribution.

FIGURE 2: Historic Resources and Forest Service Archaeological Sites