



VERMONT

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Agency of Commerce &  
Community Development

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XE-3641

April 18, 2006

Hope Luhman  
The Louis Berger Group, Inc.  
20 Corporate Woods Boulevard  
Albany, New York 12211-2370

Re: Deerfield Wind Project, Searsburg and Readsboro, Vermont.

Dear Hope:

Thank you for the opportunity to comment on the above referenced project. This represents preliminary comments on recent submittals to the Division for Historic Preservation (Division) consisting of a management summary of a Phase IA archeological survey and historic resource screening study and a letter dated January 27, 2006 providing further project description and proposed steps for the identification of historic properties and effect assessments.

This project will ultimately require review under 30 V.S.A, Section 248 and Section 106 of the National Historic Preservation Act. In both cases, project review consists of identifying the project's potential impacts to historic buildings, structures, historic districts, historic landscapes and settings, and known or potential archeological resources.

As discussed with you in recent phone conversations, the Division generally concurs with your efforts to date. However, in keeping with the Division's *Guidelines for Conducting Archeology in Vermont* (2002), the Phase IA study should be titled as an Archeological Resource Assessment (ARA); the Phase IA designation is used for those projects that have multiple potential alignments or alternative locations. In addition, while the present study does a good job of describing potential concerns, the absence of detailed project plans prevented the delineation of specific archeologically sensitive areas or known sites relative to the area of potential effect, the major goal of an ARA study.

As also discussed with you, evaluation of the project's effect on historic buildings and districts should take into account the actual visibility of the proposed project components rather than relying on an arbitrary distance factor related to the project location.

The Division looks forward to working with you once you finalize your assessment of the project's effect on historic properties.

Sincerely  
VERMONT DIVISION FOR HISTORIC PRESERVATION

  
Jane Lendway  
State Historic Preservation Officer

Cc: David Lacy, US Forest Service

