

HISTORIC BUILDINGS EVALUATION REPORT

For

Section 248 Review

Sheffield Wind Farm

Sheffield and Sutton, Vermont

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1. INTRODUCTION

Section 248 requires the Public Service Board to make a finding that the proposed Sheffield Wind Farm will not have an undue adverse effect on, among other things, historic sites. This report describes the work undertaken by Liz Pritchett in reviewing historic structures in the vicinity of the proposed Sheffield Wind Farm, her assessment of any potential impacts to identified historic sites, and her recommendations for mitigation, if any is necessary. Ms. Pritchett's conclusion is that the project will not pose an undue adverse impact to any historic sites.

To conduct this review, standards were followed that are used by the Vermont Division for Historic Preservation (VDHP) and have been applied in other Act 250 and Section 248 cases. These standards are essentially borrowed from those set forth in regulations established by the Advisory Council on Historic Preservation to implement Section 106 of the National Historic Preservation Act (36 CFR 800). Project review identifies potential impacts to historic buildings, structures, historic districts, historic landscapes and settings, and to known or potential archeological resources. (See Potential Viewshed Map)

Fieldwork involved site visits to the project area to identify districts or sites with significant historic buildings over fifty years of age, and which were determined to either be within the project's footprint or potentially have views of the turbines. The **Area of Potential Effect (APE)** comprises the towns of Barton, Brownington, Glover, Greensboro, Stannard, Danville, Wheelock, St. Johnsbury, Lyndon, Burke, Newark, Westmore, Sutton and Sheffield, all of which are within a 10-mile radius from the hub of the proposed turbines.

Liz Pritchett drove all major public roads within the 10-mile radius, focusing primarily within a 7-mile radius from the hub of the proposed turbines area on VT Routes 16, 122, 5A, US Route 5, and I-91. The towns of Wheelock, Stannard, Danville, St. Johnsbury and Newark, while within the 10-mile radius, were eliminated from review due to the lack of potential visual impacts of the turbines according to the LandWorks viewshed maps and the towns' distance of generally over five miles from the turbine hub. (The LandWorks report on the viewshed is provided as part of the Section 248 submission.) Within the 5-mile radius, Pritchett drove all public roads. The fieldwork in the 5-mile radius focused on the towns of Sheffield and Sutton, and portions surrounding Sheffield and Sutton in the towns of Glover, Barton, Westmore, Burke, and Lyndon.

Literature review involved research of town files at the VDHP offices in Montpelier, Vermont. The purpose of the VDHP file search was to inventory significant historic sites in the APE that are currently listed on the National Register of Historic Places (NR) and the Vermont Historic Sites and Structures Survey (also called the State Register/ SR), or have been determined NR or SR eligible by the Vermont Advisory Council on Historic

Preservation. Project files previously reviewed by the VDHP for Act 250 or Section 106 within in the APE were also investigated.

Reference materials include information regarding the project provided by UPC Vermont Wind; the *Revised Archaeological Resources Assessment for the Proposed Sheffield Wind Power Facility, Sheffield, Caledonia County, Vermont*, University of Vermont Consulting Archaeology Program (December 19, 2005); *Beers 1875 Map*; *Child's Gazetteer of Caledonia and Essex Counties Vermont, 1764-1887*; *Vermont Atlas and Gazetteer* (1988); and *Wind Energy and Vermont's Scenic Landscape*, Jean Vissering, Landscape Architect.

After conducting the fieldwork, literature review, and review of other relevant materials, the project's potential effects to historic resources were assessed. Although the VDHP has not developed specific guidance or criteria regarding wind projects, it has developed the "Criteria for Evaluating the Effect of Telecommunications Facilities on Historic Resources for both Indirect Impacts and Direct Impacts" (undated). Because of the similarity in many of the issues involved, and based upon discussions with the VDHP, those criteria were considered.

2. DESCRIPTION OF PROPOSED WORK

The proposed Sheffield Wind Farm will consist of the construction and operation of 26 wind turbines in Sheffield and Sutton, Vermont. Six turbines are proposed for the ridge along Hardscrabble Mountain in Sheffield, and just north, twenty are proposed along a ridge between Granby Mountain and Norris Mountain. Fourteen of this group is within Sheffield with the other six located in Sutton. Each 257-foot, tubular, steel tower will carry a nacelle that houses the mechanical components, and three rotor blades, for a total height of approximately 398 feet. The tapered towers will be painted white or light gray, have a base 16 feet in diameter, and rest on an underground concrete foundation (only the attachment point which is approximately 16 feet in diameter and two feet tall will rise above the ground surface). A small equipment building and a substation will be located midway between the two turbine arrays at a location that is also adjacent to an existing VELCO Transmission Line. The project description is discussed in further detail in UPC's overview testimony.

UPC has proposed a lighting plan to the FAA which includes red blinking lights, illuminated only at nighttime, on the turbines at the end of each string and on turbines that are more than ½ a mile apart. The lighting plan and map are provided in UPC's overview testimony. A 34.5kV electrical gathering system will be built underground along the ridgelines between the turbines and then run above ground along the project's access road from the top of the ridge to the substation at the connection point with the VELCO system. Approximately 100± acres of land will be cleared during the construction phase. Of this total, approximately 20± acres will remain permanently cleared for new access roads, power lines, the substation, and a small area around each turbine. The balance of the cleared land will be allowed to naturally revegetate.

According to UPC, the project will be operated continuously over the period of its useful, efficient life, expected to be at least 20 years. At the end of this time, all facilities will either be repowered after regulatory approval, or dismantled and removed and the site restored to its pre-existing conditions according to a plan that would be approved by the PSB.

3. INVENTORY AND SIGNIFICANCE OF ARCHITECTURAL RESOURCES

The architectural resources within the APE are comprised of historic buildings over fifty years of age that represent the various periods of history and local activity in the towns surveyed. However, the scope of this project is not to identify each historic building in all the towns in the APE. While numerous historic buildings, both as historic districts and individual sites were found in the project area during field visits, only those that were identified as both important architectural resources and having the potential to be adversely effected by the proposed wind farm project are inventoried in this report. Overall, few resources met both these criteria – to be significant architectural resources and to be potentially adversely effected by the project due to proximity to the turbines or visual impact by the turbines. Further, the project will not physically impact any existing historic structures during construction or operation.

The towns of Sheffield and Sutton in particular were carefully researched both in the field and during literature review because of the location of the proposed turbines within these two towns. Neither town has historic architectural resources that are listed on either the State or National Registers. However, significant resources exist in these two towns that are typical of much of Vermont's Northeast Kingdom – the villages are small and remain centers for education, public meetings, and church services, while the outlying areas continue to reflect the 19th century character of this northern Vermont landscape. Sheffield is mountainous with gentle slopes and rolling hills. Its historic, wooded landscape remains in many areas, although the historic sawmills that formerly provided an economic base are all but gone. Sutton, with its more level, high plateaus retains its agricultural heritage to some degree, with many open fields still in farm use. Many historic architectural resources remain in both Sheffield and Sutton, primarily vernacular and Greek Revival style buildings from the mid to late 19th century. Sutton has a remarkable number of mid-19th century cape type homes.

Four sites listed below have been identified as both important architectural resources and having the potential to be affected by the proposed wind farm project. See the attached Map for the site locations.

- 1) Crystal Lake State Park, Barton, VT: listed in the National Register on August 30, 2005. Eligible for the State Register. Closest turbine approximately 5.6 miles to the southeast.
- 2) Clark Farm/King George Farm, Sheffield and Sutton, VT: determined by the Vermont Advisory Council on May 20, 1998 eligible for the State Register as a historic district including King George School. Closest turbine approximately 1.1 miles to the south.
- 3) Charles and Gloria Preston Log Cabin, c. 1940, Sheffield, VT: appears eligible for the State Register. Closest turbine approximately 0.5 miles to the northwest.
- 4) Ray Berry Farm, 19th century, Sheffield, VT: appears eligible for the State Register. Closest turbine approximately 0.5 miles to the north.

4. DETERMINATION OF POTENTIAL EFFECT

Based on review of Landworks' Potential Viewshed Map, turbine simulations, fieldwork and literature review, I have made the following determinations.

A. Historic Structures Within a Six to Ten Mile Radius

Historic resources within the 6 to 10-mile radius, and from which the proposed turbines would be visible within a primary viewshed, would not be adversely affected due to their distance from the ridgelines on which the turbines are proposed. A primary viewshed is the view of the landscape from a point adjacent to or within a building at which one can best appreciate the setting of the property – this view is usually from the front elevation of a property's main building, usually a house or public building such as a church. From a distance of 6 to 10 miles the visual impact of the turbines would not be remarkable, if they can be seen at all, as they would be part of a broad landscape that includes many other hills, mountains and ridgelines, and the turbines would not overwhelm the viewer's enjoyment of the landscape.

Examples of historic properties that have primary views of the turbines within a 6 to 10 mile radius are the properties along Darling Hill Road in Lyndon and Burke, such as Burklyn Hall and Mountain View Farm, which were part of the 1,100 acre Elmer Darling Estate that at the turn of the 20th century was one of Vermont's premier gentleman farms. (See LandWorks simulation view 9). In addition, Lyndonville, which is about 9 miles from the turbines, has a number of significant architectural resources in the village. However, from properties that may have views of the turbines, the turbines would appear

very small and insignificant due to their location in the distance or background of the landscape.

B. Historic Structures Within a One to Six Mile Radius

Within the 1-6-mile radius, the views of the turbines move to the middle ground and thus have greater potential for effects. Overall, it appears that the turbines have been sited in a manner that even at this mid-ground distance, significant architectural resources would not be affected. This is because the turbines would be located on ridges that are largely surrounded by wooded land where only a few modern homes have been built. The historic buildings along or near the ridges in the vicinity of the proposed project, which existed during the 19th century, have in most cases been abandoned (UVM Consulting Archaeology Program report). Most occupied, existing buildings are located below the ridgelines so that the turbines would be completely or largely hidden from view due to topography or vegetation. For example, the tops of three turbines (one of which is just a portion of the blade) would be visible from Millers Run School in the village of Sheffield. Given the very limited visibility, the impact on the setting of the village is minimal. (See LandWorks simulation #2). Further, from Main Street (VT Rte. 122), along which a potential historic district exists, the turbines would not be visible at all, based upon LandWorks' visual assessment. From the center of Sutton village, there would be limited to no views of the proposed turbines. Two sites within the approximate 5-mile radius of the proposed project required closer consideration due to potential effects -- Crystal Lake State Park in Barton, and the King George Farm site located in Sheffield and Sutton.

Crystal Lake State Park was entered in the National Register on August 30, 2005 and is eligible for the State Register. The park is approximately 5.6 miles from the closest turbine. The NR nomination describes the importance of the park.

The development of Crystal Lake State Park began in the late 1930s with the acquisition of land from local residents for the construction of a state park. The bathhouse, which stands as the architectural centerpiece of the Crystal Lake State Park, is an important building that was designed as part of a New Deal project in the late 1930s, built by the Civilian Conservation Corps (CCC), and completed in time for recreational use in the summer of 1942; its use continues today. Many of Vermont's state parks were built at this time and government officials emphasized the recreational and environmental importance of the public land...Crystal Lake State Park is historically significant...because of its association with the CCC and the New Deal in Vermont. The bathhouse is similarly significant ...because of its architectural design that combines the rustic architecture so popular with CCC recreational park structures at the time, with the contemporary style of modernism. The Crystal Lake State Park is significant to both the local history of the town of Barton and to the state of Vermont and its New Deal projects.

The nomination also emphasizes the setting of the Park and its views from the shore and bathhouse, which face southerly along the length of Crystal Lake.

The area was ideal for a beach with its natural sandy shore, gradual slope into deeper water, and spectacular views of both the lake and its surrounding mountains.

Crystal Lake State Park represents a significant site for Vermont and the region. The history of its use by the public for over 125 years (that continues today), and the importance of the bathhouse and views of the mountains to the south are well documented in the National Register nomination.

In a simulation prepared by LandWorks (simulation 8) of the view from the beach to the turbine sites approximately 5.6 miles away, at least 15 turbines would be visible, centered in the viewshed directly down Crystal Lake to the mountain ridge between Granby and Norris Mountains. In my opinion, the view of the proposed turbines from Crystal Lake State Park has the potential for an adverse effect, in that the mountain views change from an unaltered landscape to one that contains man-made elements.¹ Undoubtedly, the presence of wind turbines at this location may be objectionable to some but pleasing to others. Whether the effect is so out of context with the State Park and the qualities that make it historic as to be an adverse impact is a close call and rather subjective. In any event there is not an undue adverse effect, because the turbines are substantially diminished in size due to the distance of more than 5 miles. In addition, the mountains along the lakeshore flanking the central view of the turbine sites tend to dominate the viewshed so that the more distant ridge on which the turbines are proposed to be sited recede somewhat in the background.

Clark Farm/King George Farm is the second property that has potential effects due to the locations of the turbines. The closest turbine of the north array is approximately 1.1 miles to the northwest; of the existing King George School campus; the closest turbine of the south array is 1.5 miles to the south. The Vermont Advisory Council on May 20, 1998 determined that the property is eligible for the State Register as a historic district with architectural and historic merit. It is a V-shaped parcel located on the boundary shared by Sheffield and Sutton. The property is associated with the history of lumber production in Vermont because of the large-scale logging operation of former owners. The turbines are proposed to be located northwest and south of the property and its buildings. The King George School is a private, educational facility that comprises two farmsteads each with a c.1840 house and a historic barn, and various non-contributing altered or modern buildings. The two farms are the former King George Farm where the headmaster resides, and the former Clark Farm where residential and administration buildings are located. Between the two farms is the Union House District, which marks a crossroads containing the small c. 1870 Union House School, the 1851 Union House church, and several non-contributing buildings. The owners of the King George School own all these buildings including the Union House School and church.

¹ It is worth noting that Crystal Lake is active during the summer with recreational motorized boats and a nearby RV campground that also introduce man-made elements into the environs of this park.

In the June 8, 1998 letter to Steve Znamierowski, ATC Associates, prepared by Emily Wadhams, former State Historic Preservation Officer (SHPO) regarding Act 250 review for an undertaking for proposed work at the King George School (then owned by North American Boarding Schools), the significance of the property is described:

The proposed 300 acre project area includes a crossroads village (Union House District), two farmsteads, (King George Farmstead and the Clark Farm), and surrounding pasture and woodlands. Together, these resources contribute to our understanding of commercial woodlands and the community life that developed around the working landscape in the 19th and early 20th century.

The undertaking involved interior renovations to the school buildings, and construction of two new student living areas to be located adjacent to and south of existing buildings on the former Clark Farm. The SHPO determined that the proposed work would not have an adverse effect on the historic resources of the property. Ms. Wadhams' statement that the proposed new buildings "appear to be sensitively sited in relation to vista" is important as the site of the new dorms is south of the existing buildings at the former Clark Farm, and does not obscure the vista or primary viewshed from the property and its buildings toward open fields and mountains to the east.²

Also of note are the additional changes to the buildings since the 1998 undertaking, which have diminished the architectural integrity of the structures. These changes include the new, full porch with columns spanning the front of the Clark Farmhouse that replaced a former, small, one-bay porch fronting only the center entrance (see current photo). Changes to the King George Farm (now the Headmaster's house for the school) include the addition of large glass doors on the c. 1890 barn. These recent alterations, coupled with the aluminum siding on most buildings and high percentage of new or altered structures in proportion to historic buildings, has substantially eroded the character and setting of the former farmsteads.

The proposed turbines would be located more than 1.1 miles from the main buildings at the former Clark Farm. The closest turbine of the north array is approximately 1.1 miles to the northwest; the closest turbine of the south array is 1.5 miles to the south. The turbines are proposed to be sited outside of the primary viewshed to the east from Clark Farm where the main buildings are located along the public roadway. This significant viewshed or vista of open fields and mountains to the east is emphasized as important by the SHPO in the letter noted above, and will not be adversely effected by the proposed turbines.

According to LandWorks analysis, several turbines (whole or part) on Hardscrabble Mountain would be visible from the main buildings at the former Clark Farm looking southerly. Looking northerly, several turbines (whole or part) on Norris Mountain would

² The farmhouse sits at an angle on the west side of the road, and appears to be situated to face the eastern valley view.

be visible from the open field just north of the buildings at Clark Farm.³ These views to the south and north are not the primary views of the landscape from the Clark Farm buildings. LandWorks has also indicated that the turbines would not be visible from the Union District where the historic school and church are located, as the topographic elevation of this area is much lower than the farmsteads, and thus topography and vegetation obscure views of the turbines.

Access to the King George farmstead, now the Headmaster's house for the King George School, was not possible due to a *private road* sign on Dareios Road. Therefore, it is difficult to determine the potential effect of the proposed turbines on this farm as the current condition and degree of architectural integrity of the buildings could not be assessed during fieldwork. However, Landworks' viewshed work indicates that several turbines on each of the ridges would be visible, depending upon where the viewer is situated on the property, blockage by trees and structures, etc. Based on this information, the potential effect of the turbines on the King George house and barn could be adverse, particularly if the turbines are in the primary viewshed. (current information suggests it is possible the southern array is in the primary viewshed from the house.) It should also be noted that the existing VELCO transmission line is probably visible south of the buildings. Although the significant buildings at the King George Farm (house and barn) are eligible for the State Register, their architectural integrity has been diminished due to modern alterations described above, to such a degree that the buildings are not considered outstanding examples of their type, and thus the impacts of the proposed turbines would not rise to the level of undue at this site.

With respect to other aspects of the proposed Project that could impact the historic sites, UPC's noise consultant estimates that the maximum sound levels produced by the proposed turbines at this location (~30 to 35 dB) would not be discernable above the ambient background noise. The sound analysis is described in greater detail in the report by HMMH. No potential effect is expected to occur due to noise from the Project.

In sum, some of the turbines would be partially visible to the south and northwest of buildings on the former Clark Farm, a potential effect would occur due to the size and scale of the turbines at this distance of between 1.1 and 1.5 miles. However, because the turbines are proposed south and northwest of the Clark Farm site and are not in the primary viewshed from the main buildings of Clark Farm and along the public road, and would not be visible from the Union House crossroads, the potential effect of the turbine locations does not rise to the level of adverse (and therefore not undue).

C. Historic Structures Within a One Mile Radius

Within a one mile radius, two additional sites were identified during fieldwork as potentially eligible for the State Register, and which have the potential to be affected by

³ Turbines (whole or part) would be visible and come in and out of view depending upon where the viewer is facing and situated on the properties or along the road, and on blockage caused by buildings, trees, or topography.

the proposed wind farm. These sites are the Preston Log Cabin and the Ray Berry Farm, each located approximately 0.5 miles from the closest turbines.

The Preston Log Cabin, was built c. 1940 as a seasonal camp. The small, one-story, gable roof structure was constructed of logs and has old, wood panel doors, two-over-two, double hung windows, a central stone chimney, asphalt shingle roofing, and an attached shed off the back. According to a member of the Sheffield Historical Society, the building was constructed to “look old”. It sits on an untended, one-acre lot and is currently vacant. The condition of the building appears poor, as its windows are broken or missing and some are boarded over. Portions of the turbines on the southern array are clearly visible to the west of the cabin. (See simulation #1). The impact of the proposed turbines on this cabin appears to be adverse because the size and scale of the tall turbines would appear to overwhelm the small, historic cabin. The effect, however, is not undue because the building, though eligible for the State Register, is not highly significant. It is not a remarkable example of a historic log cabin, it is not an early log cabin dating from the 19th century or earlier, it does not represent early construction techniques, and its poor condition has compromised the architectural integrity of the structure.

The Ray Barry Farm, located on Berry Hill Road, is a good example of a small, 19th century farmstead with a vernacular farmhouse and assorted barns and outbuildings. (See attached photograph). The buildings are surrounded by open farmland. The farmhouse faces east toward Sutton and the mountains of Burke beyond. The southern array of turbines will be located on Hardscrabble Mountain north of the farmstead. It is likely that several turbines (whole or part) in the southern array will be visible above the treeline, when viewed from the farm buildings. The effect of the turbines on the farmstead has the potential to be adverse due to the significance of the site being eligible for the State Register. However, the effect does not appear to be undue, because the turbines will not be in the primary viewshed from the buildings, which is to the east as noted above, and although the property appears eligible for the SR, it is not a highly significant site. The buildings are not rare or unusual, and their vernacular appearance does not qualify them as outstanding examples of Vermont architecture.

To summarize the potential effects, the proposed Sheffield Wind Farm involving the construction and operation of 26 turbines in the towns of Sheffield and Sutton has the potential for an effect as described below:

Summary Table of Effects

<i>Historic site</i>	Not Adverse	Adverse Effect	Undue Adverse Effect
Crystal Lake State Park		X	
Clark Farm/King George Farm		possible	
Preston Log Cabin		X	
Ray Berry Farm		possible	

5. ASSESSMENT OF EFFECT USING THE CRITERIA FOR EVALUATING THE EFFECT OF TELECOMMUNICATIONS FACILITIES ON HISTORIC RESOURCES

The project was reviewed using the fourteen criteria developed by the VDHP to determine the effect of telecommunications facilities (see attached) The Criteria state, “Evaluations of project impacts should be made on an individual case-by-case basis and should focus on direct and indirect impacts of a substantial nature.” Thus a project may have an adverse effect when either a “substantial” direct or indirect impact could occur.

A Direct Impact is one that would “*cause physical damage, alteration or destruction of an historic resource.*” The Sheffield Wind Farm would not have a Direct Impact. No extant historic structures are within the project’s construction or operational footprint.

An Indirect Impact is one that would “*cause significant alteration and deterioration of the setting or character of an historic resource.*” Examples of such impacts are provided in items 6-14 of the Criteria.

Example 7 is an indirect impact where “*installation of the [wind farm] facility would create a significant intrusion into a hillside backdrop of an important historic building or group of buildings.*”

- Crystal Lake State Park -- this criterion does not apply as there is no hillside backdrop to the historic structures. The project would not cause a significant intrusion.
- Clark Farm/King George Farm site -- this criterion does not apply as the property is not significant for its hillside backdrop; rather it is the views from the property in the opposite direction (east) that are considered important. The project would not cause a significant intrusion.
- Preston Log Cabin -- this criterion does apply as the proposed turbines will create a significant intrusion into the hillside backdrop of this building that appears eligible for the SR; however, because the building is not highly significant or an outstanding example of its type as described above, the impact is not undue.
- Ray Berry Farm – this criterion does not apply as only a few turbines would be visible from the buildings, and thus would not create a significant intrusion into the hillside backdrop of the site.

Example 11 is an indirect impact where “*installation of the [wind farm] facility would significantly impair the viewshed from an historic resource if that viewshed is a significant component of the character of the historic resource and its history of use (e.g. the home of an important artist whose work portrayed the viewshed landscape.)*”

- Crystal Lake State Park -- given the distance of the turbines from the sandy beach (approx. 5.6 miles), this would not cause a significant alteration, impairment or deterioration of the historic resource, and thus the adverse impact will not be undue.
- Clark Farm/King George Farm site -- as noted above these resources were deemed significant by the SHPO because they “*contribute to our understanding of commercial woodlands and the community life that developed around the working landscape in the 19th and early 20th century.*” The views towards Hardscrabble Mountain and Norris Mountain are not a significant component of the character of this historic resource, which is principally defined by the buildings themselves, pasture land, and immediately surrounding woodlands. Even if such views were deemed to be a significant component, wind turbines can be considered a continuing part of the working landscape, as they harness the wind -- a natural resource -- to generate power. And, as noted above, the predominant view from the former Clark Farm is away from the turbines and towards the fields and mountains to the east.
- Preston Log Cabin – this criterion does not apply as the proposed turbines would not be within the viewshed to the east from this building.
- Ray Berry Farm -- this criterion does not apply as the proposed turbines would not be within the viewshed to the east from these buildings.

Example 13 is an indirect impact where “*installation of the [wind farm] facility would introduce a structure that would be dramatically out of scale with and would visually overwhelm an important historic resource.*”

- Crystal Lake State Park -- this criterion does not apply to the views from Crystal Lake, given the distance involved and the resulting diminished size of the turbines and their reduced scale relative to the surrounding mountains.
- Clark Farm/King George Farm site -- as noted above, the turbines would project above the treeline about 1 mile from the buildings at this site. However, they would still be considered in the middle ground of one’s view – (generally over 0.5 mile to 5 miles), the range at which the turbines would have an increasingly diminished impact on the environment. In addition, they would not be within a primary view that is appreciated from the Clark Farm/King George Farm site, rather the turbines would be sited to the south and northwest of the buildings, outside of the most dramatic views from the property to the mountain ranges and agricultural landscape to the east. Finally, the views of the Clark Farm buildings themselves would not be impacted, as the wind turbines would not be in the foreground of the views. The project thus would not visually overwhelm the historic farm site.

- Preston Log Cabin – This criterion applies somewhat as the proposed turbines would likely appear large and out of scale with this small cabin 0.5 miles from the closest turbine. The significance of the resource, however, is not highly outstanding as noted above, thus the relative impact of the turbines on the site is diminished.
- Ray Berry Farm – Because only portions of the turbines would likely be visible from the Ray Berry Farm structures, they would not visually overwhelm the historic structures.

6. RECOMMENDED MITIGATION MEASURES

To the extent that the VDHP requires that the adverse impacts of the project be lessened or mitigated in some manner, through a formal Memorandum of Understanding and/or through conditions to the PSB's approval, such measures could include the following:

1. Develop a Removal and Reclamation Plan for the turbines that would be implemented at the time the project is decommissioned.
2. A reasonable financial contribution by UPC Vermont Wind in support of a historic preservation or inventorying project in the affected towns. (Sheffield and Sutton could benefit from a survey for listing structures in the Vermont Historic Sites and Structures Survey /State Register).
3. Develop an interpretive exhibit at Crystal Lake State Park or another appropriate location that supports the historic site and/or explains the Sheffield Wind Farm and renewable power generally.

Criteria for Evaluating the Effect of Telecommunications Facilities on Historic Resources

The installation of telecommunications facilities—towers, antennae, etc.—may affect historic resources directly and indirectly. Evaluations of project impacts should be made on an individual case-by-case basis and should focus on direct and indirect impacts of a substantial nature. Projects may have an adverse effect under the following circumstances:

Direct Impact: The installation of the telecommunications facility would cause physical damage, alteration or destruction of an historic resource. For example:

1. If installation of the telecommunications facility would require the whole or partial demolition or abandonment of an historic building;
2. If installation of the tower or accessory structure would cause ground disturbance at the installation site that would impact archeological resources;
3. If construction of access roads or power lines would cause ground disturbance that would impact archeological resources along a corridor leading to the installation site;
4. If attachment of the transmitting device to an historic building would cause immediate or potential structural damage or physical of the building, cause a significant visual intrusion to the architectural character of the building, or pose a proven threat to the continued use of the building;
5. If installation of the telecommunications facility would cause physical damage or destruction of historic features of the landscape surrounding and part of an historic resource, such as stone walls, historic roadways and drives, important tree lines, orchards, etc.

Indirect Impact: The installation of he telecommunications facility would cause significant alteration and deterioration of the setting or character of an historic resource. For example:

6. If installation of the telecommunications facility would create a significant intrusion into important public views of an important historic building or group of buildings, especially when those views are identified in municipal or regional plans;
7. If installation of the telecommunications facility would create a significant intrusion into a hillside backdrop of an important historic building or group of buildings;

Criteria for Evaluating the Effect of Telecommunications Facilities on Historic Resources

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8. If the siting of the telecommunications facility would create a focal point that would overwhelmingly disrupt and distract from the elements of an historic landscape and the public's ability to appreciate it;
9. If installation of the telecommunications facility would create an intrusion in the setting of a National Historic Landmark (which requires additional federal review by the national Advisory Council on Historic Preservation);
10. If installation of the telecommunications facility would create a significant intrusion in a rural historic district or historic landscape with a high degree of integrity, i.e. with little incompatible modern development;
11. If installation of the telecommunications facility would significantly impair the viewshed from an historic resource if that viewshed is a significant component of the character of the historic resource and its history of use (e.g. the home of an important artist whose work portrayed the viewshed landscape);
12. If installation of the telecommunications facility would significantly interfere with the public's ability to interpret and appreciate the qualities of a historic cultural facility, including impairment of the viewshed if experiencing the view from the site is an important part of experiencing the site;
13. If installation of the telecommunications facility would introduce a structure that would be dramatically out of scale with and would visually overwhelm an important historic resource;
14. If installation of the telecommunications facility would isolate a historic resource from its historic setting, or introduce incongruous or incompatible new uses, or new visual , audible or atmospheric elements to a historic setting.



Bathhouse, Crystal Lake State Park, 12/2005



Clark Farm/ King George School: Clark Farmhouse, c. 1840 (right),
Clark Barn, c. 1910 (right background), modern buildings (left),
Hardscrabble Mountain (distance). 10/2005



Preston Log Cabin, c. 1940. 10/2005



Ray Berry Farm, 19th century. Hardscrabble Mountain in distance. 10/2005