



Docket No. 7156  
Exhibit UPC-Cross- EG12  
Admitted: \_\_\_\_\_

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Exhibit Gilbertson-Depo- 10  
Admitted: \_\_\_\_\_

**STATE OF VERMONT**

**AGENCY OF COMMERCE AND COMMUNITY DEVELOPMENT**

October 29, 2002

Bruce M. Peacock, Manager  
Equinox Wind Partners, LLC  
C/o Catamount Energy Corporation  
71 Allen Street, Suite 101  
Rutland, Vermont 05701

**Re: Proposed Equinox Wind Project, Little Equinox Mountain, Manchester, Vermont. FAA. Preliminary Act 248 Review.**

Dear Mr. Peacock:

Thank you for the opportunity to review this project having Federal Aviation Administration involvement (DHP #BE98-017). We understand that you also are seeking a permit from Vermont's Public Service Board.

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. In addition, the Division for Historic Preservation has reviewed this proposed undertaking for the purposes of 22 V.S.A. 14, The Vermont Historic Preservation Act, on behalf of the Vermont Advisory Council on Historic Preservation. 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. The Division is reviewing this project for its potential effects to historic resources only and is not reviewing any issues regarding aesthetics.

The current project involves construction of a windfarm on Little Equinox Mountain in Manchester Vermont. The windfarm will consist of five towers approximately 200 feet in height with 1.8 MW turbines on each tower. The project area at the top of Little Equinox was the site of two previous windpower projects. There is an access road to the proposed project site and the project's required powerline will utilize existing electrical corridors for the much of the project. Approximately one-half mile of the powerline will need to be installed underground. Several generators will be installed along the powerline route. It is our understanding that the Federal Aviation Administration will require lights on each of the towers.

Eric Gilbertson, Deputy State Historic Preservation Officer, and Scott Dillon, Survey Archaeologist for the Division, visited the project site on separate occasions. Mr. Dillon

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reviewed the proposed project for its potential effects on archaeologically sensitive areas and determined that the project area will not likely yield information important to prehistory as much of the project area has been previously disturbed. Further archaeological studies are not required.

As you are aware, Little Equinox Mountain is visible from different locations within the Manchester Village Historic District, including from the backyard of the Equinox Hotel. The Hotel was listed individually on the National Register of Historic Places in 1972 and the Village, which surrounds the Hotel, was later listed in 1984. Mr. Gilbertson toured this area to study the potential impacts of the proposed project on these historic resources. He also visited other areas that may be impacted by the project, including Manchester Center, Wilcox Farm, the Golf Course and along Route 7.

Using the Division for Historic Preservation's "Criteria for Evaluating the Effect of Telecommunications Facilities on Historic Resources" we have concluded that the project would have an adverse effect on historic resources. The following adverse effects criteria, based on the Telecommunications Criteria and which describe indirect effects, are applicable to the current project:

1. Installation of the windfarm will create an intrusion into a hillside backdrop of an important historic building or group of buildings;
2. Installation of the windfarm will introduce structures that will be dramatically out of scale with an important historic resource;
3. Installation of the windfarm will introduce new visual, audible or atmospheric elements to a historic setting.

While we have determined that the installation of the windfarm will have an adverse effect on the surrounding historic resources, we have concluded that the proposed project will not have an undue adverse effect to these resources. We found the adverse impact not to be undue because while the towers are visible from the historic resources, they do not dominate that view and the historic resources can be enjoyed and interpreted with the generators in place.

Two windfarms were previously located on Little Equinox Mountain so a precedence for this type of project has already been established and the towers have already been in the background for these historic resources. In addition, the project is located on Little Equinox, which is at a lower elevation than Equinox Mountain. Equinox Mountain is in the immediate background of the historic resources and therefore more visually predominate than Little Equinox Mountain. The towers are therefore less visible, particularly from the north (Manchester Village and Manchester Center), as they are not located at the highest elevation in the area. Also, the new towers, like the ones previously installed on Little Equinox, will be installed in such a manner that if removed in the future the integrity of the surrounding historic resources will be unimpaired.

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In most cases when there is an adverse impact on historic resources the Division suggests mitigation. In this case the project has been located so that the impacts already have been mitigated by previous construction and the configuration of the land.

If you have any questions or need clarification regarding any of the above, please do not hesitate to contact Judith W. Ehrlich, Environmental Review Coordinator, at (802) 828-3049.

Sincerely,  
VERMONT DIVISION FOR HISTORIC PRESERVATION



Eric Gilbertson  
Deputy State Historic Preservation Officer

Cc: Warren Coleman, Agency of Natural Resources Planning Division