

Connecticut Commission on Culture & Tourism

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May 19, 2011

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SITING COUNCIL

Mr. Mike Libertine
Vanasse Hangen Brustlin, Inc.
54 Tuttle Place
Middletown, CT 06457

ORIGINAL

Historic Preservation
and Museum Division

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Hartford, Connecticut
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Subject: Proposed Wind Energy Facility
Wind Colebrook North
Winsted- Norfolk Road
Colebrook, Connecticut
BNE

Dear Mr. Libertine:

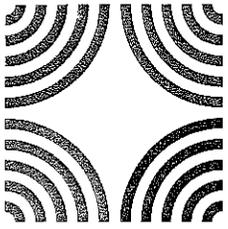
The State Historic Preservation Office thanks you and your client for the additional information submitted for review and comment for the above-referenced project, pursuant to Section 106 of the National Historic Preservation Act.

For the benefit of all parties, we wish to clarify SHPO's role under the National Historic Preservation Act and its implementing regulations, "The Protection of Historic Properties" (36 CFR part 800). Section 106 of the National Historic Preservation Act requires that federal agencies consider the effects of their undertakings on historic properties and affords the Advisory Council for Historic Preservation an opportunity to comment on such undertakings (16 USC 470(f)). SHPO's role in the process, as implemented by 36 CFR part 800, is to represent the State and its citizens in the federal process. The responsibility and authority to determine whether an undertaking will adversely affect an historic property lies with the federal agency. SHPO's role is as a consulting party to the federal agency and our opinions are advisory. We provide the following comments in response to your requests, but note that, to our knowledge, no formal Section 106 process has been initiated by a federal agency to evaluate the effects of the currently proposed Wind Colebrook North project. It is our understanding that the installation of the proposed turbines and associated facilities will require a permit from the U.S. Army Corps of Engineers. If the Corps determines that the permitted activity may affect historic properties, SHPO will consult with that agency in the manner and capacity established by federal law and regulations to assist the Corps in meeting their own responsibilities. We are also providing our comments to the Connecticut Siting Council to assist the Council in their own consideration of the proposed action.

Since the time of our original comment on November 29, 2010, regarding this undertaking, it came to our attention that a property recently listed on the National Register of Historic Places, located within the Area of Potential Effect, was not identified in the submission. Therefore, SHPO requested that VHB provide photographic views, photo-simulations, and a visual analysis for Rock Hall, 19 Rock Hall Road in Colebrook, so we might have an opportunity to revise our comment, if appropriate.

In addition to that and other information provided by VHB and others representing BNE Energy, Inc., SHPO has now reviewed various documents related to Petition 984 for a Declaratory Ruling currently under consideration by the Connecticut Siting Council, and materials submitted on behalf of FairwindCT, Inc. and Stella and Michael Somers (owners

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of Rock Hall). On May 2, 2011, SHPO staff visited the single 1.5 megawatt wind turbine at Jiminy Peak Mountain Resort in Hancock, Massachusetts in the company of Jim Van Dyke, the facility manager. The following week, on May 10, 2011, SHPO staff met with Stella Somers and Glenn Chalder from Planimetrics at Rock Hall; you were also in attendance. At the time of our visit, a helicopter had been retained by Stella and Michael Somers with the stated intent of providing some visual context for the proposed wind turbines in absence of the practicability of a balloon float.

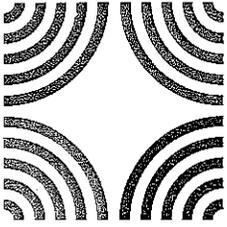
This office notes that while wind projects are a recent supplement to the list of undertakings for which review and comment is requested in accordance with the provisions of Section 106, the framework and experience for assessing the potential "effect" of such a proposed project is well established.

Professional staff has carefully considered all the new information and materials related to the proposed Wind Colebrook South facility and has reviewed the National Register of Historic Places nomination for Rock Hall in detail. The field experience of the wind turbine at Jiminy Peak, with a full appreciation of the differences and similarities between that facility and the one proposed, was also critically evaluated.

In the opinion of this office, the proposed Wind Colebrook North project (whether at 100 meter hub height or 80 meter hub height) has a clear and substantial presence at close proximity to the Rock Hall property. As a result, the undertaking appears to alter directly the characteristics of the historic property that qualified it for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Specifically, this office notes the language in 36 CFR PART 800, subsection 800.5:

- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features.

We note that the Rock Hall historic property encompasses approximately 22.5 acres and includes the main house, gazebo, garage, garage/pool house, gates and landscape elements. These elements in their setting as a whole constitute the historic property that must be considered under Section 106 of the National Historic Preservation Act. As stated in the National Register registration form, Rock Hall's historical significance, in part, derives from the property's association with the "country house movement" of the late nineteenth and very early twentieth centuries. Houses associated with this movement were



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specifically sited in rural settings to allow the owners to enjoy the “stylized country life.” The three turbines proposed directly alter the character-defining location and setting of this historic country house.

Therefore, this office believes that the proposed Wind Colebrook North project will have an **adverse effect** on the Rock Hall historic property.

The State Historic Preservation Office appreciates the opportunity to work with all parties in the responsible conservation of the state’s heritage. Please contact Susan Chandler, Historical Architect, should you have additional questions concerning this matter.

Sincerely,

David Bahlman
Division Director and Deputy
State Historic Preservation Officer

c: Connecticut Siting Council
Attorney Emily Gianquito, Reid and Riege
Corie Rose, USACE, New England