



MAINE HISTORIC PRESERVATION COMMISSION  
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AUGUSTA, MAINE  
04333

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GOVERNOR

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DIRECTOR

March 19, 2007

Brooke E. Barnes  
Woodlot Alternatives, Inc.  
30 Park Drive  
Topsham, Maine 04086

Project: MHPC #2779-06 - Stetson Wind Project, Stetson Mountain,  
Town: T8R4 and T8R3, NBPP, Washington County

Dear Ms. Barnes:

In response to your recent request, I have reviewed the information received February 26, 2007 to continue consultation on the above referenced project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA). Our comments that follow are organized in relation to the three individual technical reports.

Architectural Survey

Given the fact that survey forms for individual properties have not as yet been submitted for our concurrence on eligibility, the Commission's comments at this time are limited primarily to the definition of the APE on page 3, the survey methodology described on pages 5-6, and the approach for assessing effects on page 30.

The Commission concurs with the limits established for potential direct impacts on historic properties. However, with regard to the identification of the 5 and 10 mile indirect APEs, we request further information to understand the rationale behind this approach. What are the potential effects that might be applicable within the indirect APE? Does the methodology consider both visual and audible effects? Was this geographic two-tier approach developed to address the limits of different potential effects? In developing this response, it is important to explain how the visual impact(s) of the proposed undertaking on an historic property is any lesser or greater from five miles than it might be, for example, from six miles or four miles. Inclusion of one or more simulations of the proposed wind complex would be helpful in supporting the rationale for one boundary over another. Our comments below relative to the survey methodology and assessing effects should also be factored into the development and justification of the indirect impact.

We have two comments relative to the survey methodology. The first relates to the decision not to evaluate whether historic properties are present at the end of long driveways,



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private roads, or unmarked dirt or gravel roads. Although it is likely that many such roadways will not lead to or by historic properties, there may be instances where significant resources are present in these areas. We recommend, therefore, that alternative survey techniques (such as comparing different generations of topographic maps with each other and the examination of aerial photographs) be incorporated into the methodology to address this issue. Our second comment pertains to the inconsistency in the field survey approach between the 5 and 10 mile APEs. We generally accept the methodology outlined for the 10 mile indirect APE which, as we understand it, surveyed all potentially eligible properties and all those that were at least 50 years of age that might have views of the constructed wind complex. However, in the field identification process we see no reason to treat potentially eligible properties differently than other surveyed properties if the project is not within their respective viewsheds or unless an audible impact is possible. This methodology should be applied consistently within the indirect impact APE, regardless of distance. In addition, all clusters or potential historic districts need to be field surveyed and recorded following the consistent methodology outlined above and the Commission's survey guidelines.

Defining an APE relates directly to the potential impacts that an undertaking may have on those characteristics that make a property eligible for listing in the National Register. While establishing the APE for direct impacts is relatively straightforward, defining the APE for indirect impacts is more complex. In considering the extent to which such impacts can effect historic properties it is important first to define the limits of the visual setting based on the aspects of integrity (particularly setting), the applicable criteria and the area or areas of significance of those properties. For example, if a property is significant for its architectural characteristics, the potential for indirect effects might be quite restricted. If, on the other hand, the property is a farmstead, the setting and visual context are likely to be more expansive. Finally, if the resource were a sporting camp or resort whose siting was evidently purposeful to take advantage of a distant view of a mountain, there may be a much greater potential for indirect effects. In order to reflect the consideration of the aspects of integrity and significance, the chart on page 31 should include columns for criteria, area of significance, and limits of the setting for any properties found eligible during the recommended intensive level survey.

Precontact Phase I and Euroamerican Phase IA Archaeological Surveys

The scopes of work for both of these surveys are acceptable as presented. Please contact Dr. Arthur Spiess of this office with any questions specific to the archaeological surveys.

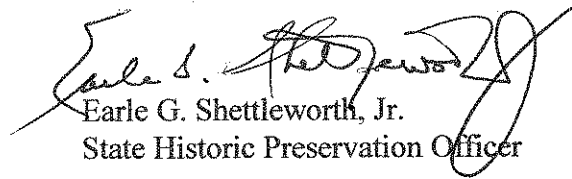
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Once the archaeological survey reports are provided, completed architectural survey forms are received, and the preceding comments regarding the architectural survey are accounted for, we will continue consultation in accordance with Section 106 of the NHPA. Please contact Mike Johnson of my staff if we can be of further assistance in this matter.

Sincerely,



Earle G. Shettleworth, Jr.  
State Historic Preservation Officer