



The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

September 29, 2010

Secretary Ian A. Bowles
Executive Office of Energy & Environmental Affairs
Attn: Deidre Buckely, MEPA Unit
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Douglas Woods Wind Farm, Webster Road, Douglas, MA. MHC #RC.46049. EEA # 14647.

Dear Secretary Bowles:

Staff of the Massachusetts Historical Commission have reviewed the Expanded Environmental Notification Form (ENF) received September 21, 2010, for the project referenced above. The proposed project consists of the construction of eleven wind turbines on 100-meter towers and associated infrastructure on 298-acres in Douglas. MHC has been in consultation with the project proponent since review of a Project Notification Form (PNF) in 2009.

The ENF includes a partial summary of MHC consultation to date in Attachment F and on pages 1-17 and 1-18. The project as presented in the ENF has changed since 2009 and project plans C4.00 through C4.13 reflect a revised layout of wind turbines, construction pads, vegetation clearance zones, access roads, electrical transmission lines, stormwater management control structures and maintenance building. An intensive (locational) archaeological survey (950 CMR 70) has been conducted for the preliminary project design, and MHC understands that additional archaeological testing is proposed to be conducted by JMA, Inc. for the currently proposed project impact area. MHC also understands that JMA, Inc. proposes to develop an archaeological site avoidance and protection plan for identified significant archaeological sites once additional archaeological testing has been completed.

MHC looks forward to reviewing the revised archaeological research design and methodology to be submitted by JMA, Inc., for additional archaeological testing in the proposed project impact area. The State Archaeologist's permit has been modified and extended to allow completion of the archaeological testing for the project as currently proposed.

MHC notes that Attachment F, including JMA's archaeological testing summary figures and maps and existing conditions project plans Figures #5, #5A and #6 include detailed archaeological site locational information. Archaeological site locational information is not a public record (MGL c. 9, ss. 26A & 27C). Sensitive archaeological site locational information should not be published in any public documents to protect the sites. If an Environmental Impact Report is required for the project, the document should include a summary of the results of archaeological investigations conducted for the project in a form which does not include any sensitive archaeological site locational information.

MHC notes that information included in Attachment F includes correspondence between the project proponent and the Douglas Historical Commission (DHC). In correspondence dated July 27, 2009, the DHC requested, "we ask that you keep the Douglas Historical Commission updated as this archaeological process moves forward." However, the ENF distribution list does not include the Douglas Historical Commission.

MHC requests that, as the project has changed, the project proponent provide a copy of the ENF to the DHC and Webster Historical Commissions for concurrent review and comment. Please send any copies of comments from the DHC and the Webster Historical Commission to MHC for our review and inclusion in our files.

These comments are offered to assist in compliance with Massachusetts General Laws, Chapter 9, Sections 26-27C (950 CMR 71), and MEPA (301 CMR 11). If you have any questions concerning this review, please contact Brandee Loughlin or Jonathan K. Patton at this office.

Sincerely,



Brona Simon
Executive Director
State Archaeologist
Massachusetts Historical Commission

xc: Rod Jané, New England Expansion Strategies, Inc.
Maurice Caparotta, President, American Pro Wind, LLC
Doug Vigneau, VHB
Steven Clarke, Mass. Dept. of Energy Resources
Mass. Energy Facilities Siting Board
William Palmer, EOT-PWED Program
Evelyn Jimenez, DCR Forestry East Central Region
DEP-CERO-Wetlands
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Rae Gould, Nipmuc Nation
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Douglas Historical Commission
Douglas Conservation Commission
Martin G. Dudek, JMA, Inc.