



State of Vermont
Division for Historic Preservation

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*Agency of Commerce and
Community Development*

Filed Electronically

March 16, 2020

Jay Strand
Forest Planner and Environmental Coordinator
U.S. Department of Agriculture-Forest Service
Green Mountain & Finger Lakes National Forests
99 Ranger Road
Rochester, Vermont 05767

Re: VT State Historic Preservation Officer (SHPO) Environmental Assessment Comments - Somerset Integrated Resource Project-Green Mountain National Forest, Manchester Ranger District, Dover, Glastenbury, Searsburg, Somerset, Stratton, Wilmington, Woodford, Sunderland, and Wardsboro, Vermont.

Dear Mr. Strand:

Thank you for the opportunity to comment on the above referenced project. The Vermont State Historic Preservation Office (VT SHPO) is providing the United States Department of Agriculture-Forest Service (Forest Service) with the following comments 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 (NHPA). Project review consists of assisting the Forest Service in identifying the project's potential impacts to historic buildings, structures, historic districts, historic landscapes and settings, and known or potential archeological resources that are listed in or may be eligible for inclusion in the National Register of Historic Places.

As initially indicated in our April 29, 2019 comment on the Somerset Integrated Resource Project-Notice of Proposed Action, the VT SHPO supports the Forest Service's overall approach to evaluate Project effects to heritage resources for this undertaking. *Section 3.9 Heritage* of the Environmental Assessment (EA) accurately articulates the process for implementing Section 106 of NHPA, identifies a likely 10-year span during which the direct and indirect effects analysis will be completed, summarizes the known heritage resources in the Area of Potential Effect, and provides a statement that additional archaeological surveys will be completed annually based on the location of proposed ground disturbing management activities to be implemented each year.

While the above framework is a good start, VT SHPO notes that review of effects to above ground structures such as buildings, culverts, campground structures, and bridges will also have to occur. As indicated in *Section 3.9.4.2 Alternative B: Proposed Action* and other sections of the EA, the Forest Service will be initiating consultation regarding restoration/maintenance of the Somerset School House, but other standing structures could be affected by Project components and historic resource identification and potential for effects will need to be addressed in review documents. We also believe that the statement on cumulative effects



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in *Section 3.9.5* is premature pending the results of the anticipated heritage resource review processes. Although VT SHPO understands and supports the Forest Service default practice to avoid direct impacts to heritage resources as implied in *Section 3.9.5* and referenced in *Appendix B Mitigation Measures*, mitigation measures will be determined on the basis of specific review findings and could involve a wider range of outcomes based on the consultation process.

The mitigation measures outlined in the heritage section of *Appendix B*, including the establishment of standard or customized buffer zones protecting known heritage sites, limiting stone wall/fence breaches, and project coordination, represent standard practices provided that appropriate cultural resource review has been completed and approved. However, the implementation of harvest practices in over-snow or frozen ground conditions without prior review is no longer an accepted practice. The increased frequency of freeze/thaw cycles and rapidly fluctuating temperatures even in mid-winter months make it more likely that conditions conducive to heritage resource site protection will not persist during the harvest interval. Any proposed use of these methods to avoid impacts in un-surveyed archaeologically sensitive areas will require project specific consultation with VT SHPO to ensure that appropriate monitoring and work cessation protocols are in place.

We look forward to additional consultation as the Somerset Integrated Resource Project moves forward and anticipate the receipt of cultural resource review documentations related to individual undertakings for review and concurrence. Thank you for your cooperation in protecting Vermont's irreplaceable historic and archeological heritage. R. Scott Dillon and Elizabeth G. Peebles reviewed this project and prepared this letter. I concur with the findings and conclusions described above.

Sincerely:

VERMONT DIVISION FOR HISTORIC PRESERVATION

Laura V. Trieschmann
State Historic Preservation Officer

