



To: ER Dunsmore, LLC

Date: April 9, 2025

Memorandum

Project #: 57818.02

From: Britta Tonn and Kaitlin O'Shea, Preservation Planners Re: ER Dunsmore Solar Historic Resources Assessment

Introduction

At the request of ER Dunsmore, LLC ("Petitioner"), VHB conducted a historic resource assessment in support of a planned a 4.95-megawatt ("MW") alternating current ("AC") ground-mounted solar project ("Project"). The Project array is sited on approximately 30 acres of land within an overall 114-acre Project parcel, at 2642 Dunsmore Road in Saint Albans Town, Vermont (see Attachment 1, Area of Potential Effect Map). The purpose of the historic resource assessment is to evaluate if the development of the Project would affect historic sites as defined in the Methodology section below. This assessment addresses aboveground resources only.¹

Project Description

The Project will consist of the installation and operation of a solar electric generation facility, capable of generating up to 4.95 MW AC. Project components will include:

- Approximately 12,425 photovoltaic panels installed on ground-mounted racking systems, across approximately 30 acres of the site. The solar panels will be coated with a non-reflective glazing to reduce glare from the array, on ground-mounted racking systems, approximately ten to fifteen feet off the ground at their highest point;
- A network of string-inverters dispersed across the array connected with underground cables installed in protective conduit;
- Approximately 5,285 feet of agricultural-style perimeter fence, seven to eight feet in height;
- Temporary staging/laydown areas for delivery and short-term storage of materials;
- Widening, re-aligning and improving an existing access driveway to provide access to the solar site and extending the road approximately 1,200 feet with a turnaround areas;
- Replacing two existing culverts with a 45-foot modular steel bridge and precast concrete abutments;
- An extension of overhead 3-phase power to the site for interconnection with the existing Green Mountain Power ("GMP") distribution system along on Dunsmore Road;

¹ Archaeological resources were evaluated by the University of Vermont Consulting Archaeology Program through a Phase II Site Evaluation in Spring 2024 and are addressed in the testimony of Taegen Kopfler.

- Two 2,500 KVA pad-mounted transformers with secondary oil containment providing 110% of the equipment oil volume with freeboard for 5 inches of rain; and
- Up to approximately 0.2 acres of tree or brush clearing will be necessary to facilitate improvements to the access road.

Methodology

The Project is subject to review under Section 248 of Title 30, which requires applicants to obtain a Certificate of Public Good ("CPG") from the Public Utility Commission ("PUC") before beginning site preparation or construction of electric transmission facilities, electric generation facilities, and certain gas pipelines within Vermont. To issue the CPG, the PUC must make a finding that the project will not have an undue adverse effect on historic sites. As defined in 10 V.S.A. § 6001(9), and as applied to the PUC process, "historic site" is defined as any site, structure, district, or archaeological landmark which has been officially included in the National Register and/or the State Register of Historic Places ("National Register" and "State Register"), or which is established by testimony of the Vermont Advisory Council on Historic Preservation as being historically significant. The Vermont Division for Historic Preservation ("VDHP") relies on Rule 4 (Historic Sites and the Act 250 Process) of the Vermont Historic Preservation Rules to guide its review and provide its finding to the PUC. Those require that a project be reviewed for direct effects on historic resources (*i.e.*, historic sites), as well as effects within a project's Area of Potential Effect ("APE").

The work required to complete this evaluation was undertaken by VHB Preservation Planners Britta Tonn and Kaitlin O'Shea, both 36 CFR 61 qualified architectural historians. VHB conducted a desktop review, completed a site visit focused on documenting the area surrounding the Project area, and reviewed Project plans. For the desktop review, VHB consulted historic aerials photographs and maps, online property records, online real estate listings, and other sources as needed. Using this information, an Area of Potential Effect ("APE") was developed and an assessment of Project effects on historic sites within the APE was conducted.

Area of Potential Effect

The APE is defined by 36 CFR 800.16(d), revised August 5, 2004, as: *"the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if such properties exist. The area of potential effects is influenced by the scale and undertaking and may be different for different kinds of effects caused by the undertaking."*

Determining the APE consists of a consideration of the nature and full extent of the Project, including, but not limited to, the Project description and setting, the proposed Project's use, all locations of ground disturbance, the Project's construction methods, the presence of existing infrastructure, all locations from which the Project may be visible. The APE consists of all direct and reasonably foreseeable indirect effects based on the nature of the Project.

Based on the criteria above, and a review of the Project site plans, the direct APE consists of all areas of ground disturbance for the Project, including any areas of construction access and staging. Based on the criteria above, review of the Project site plans, and the environment surrounding the area as observed during the site visit, the APE includes properties primarily along Dunsmore Road, Lower Newton Road, and Perry Road. The Project will constitute a visual change in the setting of the APE as existing agricultural fields will be developed with a solar panel array and other utility infrastructure. The APE boundary is influenced by the Project's surrounding environment which generally

consists of agricultural fields, rural residential and agricultural development, dense patches of woodland, scattered brush, and dense treelines and hedgerows delineating fields and parcels. Topography is generally level throughout the APE, although Dunsmore Road sits on a slight rise in the eastern portion of the APE. See Attachment 1 – Area of Potential Effect Map.

The area surrounding the Project site, within and surrounding the APE, was sparsely settled in the mid-1800s by families who owned large parcels and multiple properties and practiced subsistence farming. By the early 20th century, agricultural activity was consolidated into larger dairy farms. Beginning in the late 20th century (1970s) and into the present, the agricultural land has been subdivided and slowly developed into residential properties. Although the area can still be characterized as rural, the late 20th to 21st century development of this era can be seen across the landscape.

Identification of Historic Sites

As discussed above, “historic sites” are defined by Vermont Historic Preservation Act Rule 4.1.8: as “any sites, structure, district, or archaeological landmark which has been officially included in the National Register and/or the State Register of Historic Places, or which is established by testimony of the Vermont Advisory Council on Historic Preservation as being historically significant, as defined in 10 V.S.A Section 6001(9).

If a building or structure exists within the APE that has not yet been listed in or evaluated for listing in the State Register or National Register, this property must be evaluated for its State Register eligibility to determine if it would be considered a historic site. Properties not yet 50 years old at the time of this evaluation would not be eligible for listing in the State Register due to their age.

The review of files for Saint Albans Town on the VDHP ORC website resulted in the identification of three existing historic sites within the APE, all of which are listed in the State Register. Each of these properties was recorded on a Vermont Historic Sites and Structures Survey (“VHSSS”) form in 1985 and listed in the State Register in 1988. They include:

- 2167 Dunsmore Road – #0613-5²
- 2684 Dunsmore Road – #0613-21³
- 2789 Dunsmore Road – #0613-22.⁴ Since the State Register listing in 1988, this property has been significantly altered to the point that it no longer retains integrity. This property is discussed in more detail below Table 1.

VHB recorded a total of 37 properties in the APE, including the three State Register listed properties above. Based upon research using property records, historic maps, and historic aerial photographs, 31 of these properties were determined to be less than 50 years old.⁵ VHB identified three previously unrecorded properties within the APE that have the potential to be considered historic sites and require further evaluation because they are over 50 years of age. Table 1 below is a list of the six properties within the APE that are 50 years or older, including the three already State

² https://accdservices.vermont.gov/ORCDocs/SaintAlbansTown_StateRegister_NominationForm_00000002.pdf pg. 21-26.

³ *Ibid*, pg. 96-102

⁴ *Ibid*, pg. 103-107

⁵ Research resources included Town of Saint Albans property records, online real estate listings, <https://www.historicaerials.com/>, <https://vintageaerial.com/>, 1962 aerial photographs available on VCGI, 1857 H.F. Walling Map of Franklin County, and 1871 F.W. Beers Atlas of Franklin & Grand Isle Counties.

Register listed. The properties are identified by number keyed to the APE Map (see Attachment 1), Address, Photographs (see Attachment 2), and State Register listing (if applicable). The table includes comments regarding State Register eligibility. Properties warranting further discussion are described following Table 1.

Table 1 Properties Over 50 Years Old in the APE

Map ID	Address	Photo(s)	Date of Construction	State Register Listing	State Register Eligibility Notes
1	2162 Dunsmore Rd	2-3	ca. 1830	0613-5 "Cox House"	1.5 story, gable front 3x4 vernacular Greek Revival brick house with return cornices, large gable windows, a gable roof wall dormer, set on a stone foundation. A rear 1.5-story, partial brick and partial wood-frame wing has gable wall dormers, side porch, garage bays, and an attached rear shed. One ca. 1830 10'x15' wood frame, gable roof barn set southeast of house. One barn set east of the house has been removed since the time of the State Register survey (1985). Retains historic integrity.
2	2296 Dunsmore Rd	5-7	ca. 1850 (house) Early to mid-20 th century (barn)	N/A	Recommended ineligible due to loss of integrity. See discussion below.
3	2551 Dunsmore Rd	8-9	ca. 1850 (house) Late 19 th century (barn)	N/A	2.5 story, gable roof, eaves front, wood-frame residence that is heavily altered by materials and fenestration. The associated barn is heavily altered as well, with many additions and modifications. house with barn. Barn is addressed as 2519 Dunsmore Rd. Recommended ineligible due to loss of integrity.

Map ID	Address	Photo(s)	Date of Construction	State Register Listing	State Register Eligibility Notes
4	2684 Dunsmore Rd	10-13	ca. 1880	0613-21 "Yandow Farm"	2.5 story, wood-frame, gable roof, Italianate style house with unique and intact 2-story gabled porch, 1-story bay window on side elevations, cornice brackets, rear 2-story wood-frame ell, and complex of barns. Retains historic integrity. Barns built 1979. Earlier ca. 1880 demolished ca. 1990. Retains historic integrity as an example of an Italianate farmhouse.
5	2789 Dunsmore Rd	16-20	1927	0613-22 "Lamothe Farm"	Recommended ineligible due to loss of integrity. See discussion below.
6	557/578 Perry Rd	21-22	Ca. 1900 (house) Ca. 1900 (barn)	N/A	1.5 story, gable roof, wood-frame with hipped roof full width front porch. Alterations to materials and fenestration, porch addition, and the removal of a 1-story gable roof wing. Rectangular, gable roof barn appears to have been altered ca. 2000 (large wings removed). Recommended ineligible due to alterations and lack of architectural significance.

2296 Dunsmore Rd

2296 Dunsmore Road is a 1.5 story, gable roof, eaves front, wood-frame, 4x2 bay house with a 1.5 story gable roof and wood-frame rear ell. Details include overhanging eaves, cornerboards, wood siding, one remaining kneewall window on the façade which is a non-historic single-light fixed wood window, exterior end chimney, and stone foundation. Windows throughout are replacement 6/6 vinyl sash, and the primary entrance is a vertical wood plank door with decorative iron strapping. A secondary entrance with a projecting gable roof portico constructed of heavy timbers, added sometime after 2012, has been added to the southern elevation of the ell, along with a non-historic bay window. A large, 1-story, shallow gable roof barn with sliding paired doors and wood board and batten siding sits to the southeast of the house. The date of construction of this barn is unknown, although based on a historic aerial photograph, it was built sometime before 1962 as an addition to an older, gambrel roof barn that has since been removed (see Figure 1).

This small, vernacular Greek Revival house was built prior to 1857 (ca. 1850). The existing barn is the shallow gable roof addition to an older, gambrel roof barn that was removed sometime after 1966. On the 1857 Walling Map and 1871 Beers Map, the house was occupied by members of the Skinner family, who also occupied the property slightly north at 2551 Dunsmore Road. In the mid- to late-19th century, the area was sparsely populated presumably with farms, with several families owning more than one property along Dunsmore and Lower Newton Roads. The rural and agricultural nature of the area persisted into the 1970s, when some of the large farms were subdivided to support increased residential development.

2296 Dunsmore Road is an example of a farmhouse that was built during the first wave of 19th century agricultural development on Dunsmore Road. Its Greek Revival design is slightly visible with the presence of one kneewall window on the façade and the eaves-front form evoking a Classic Cape typology. However, numerous alterations have resulted in a loss of integrity of the house's character-defining features. Alterations include possible removal of kneewall windows on the façade; replacement of the one kneewall window with a single-light fixed wood window; vinyl replacement windows; alterations to the roofline; replacement wood trim; and a large, incompatible, heavy timber frame portico sheltering the secondary entrance on the south elevation of the ell (it was added sometime after 2012). These alterations have resulted in a loss of integrity of design, materials, workmanship, and feeling. The gambrel roof main barn has been removed, leaving only the one-story large, shed addition; as a result, the property's association with 19th century and early 20th century agriculture has been erased. Due to a loss of integrity resulting in the property's inability to convey its feeling and association as a mid-19th century Greek Revival house and farmstead, the property is recommended ineligible for listing in the State Register.



Figure 1: 2296 Dunsmore Road, 1966 aerial photograph. Note the former gambrel roof barn attached to the existing barn, since removed. Source: Vintage Aerial, <https://vintageaerial.com/photos/vermont/franklin/1966/QFR/22/11>.

2789 Dunsmore Rd – SR 0613-22

2789 Dunsmore Road is a 2.5 story, hipped roof, Colonial Revival style house with irregular massing. The main block is a modified hipped roof Four-Square with a 2-story hipped roof rear wing. A 2-story, gable roof, polygonal bay projects at the northeast corner of the façade and 2.5-story gable roof rectangular bay projects from the north elevation at the northeast corner. These two projecting bays create an L shape at the northeast corner of the house. On the south elevation is a clipped corner hood on the first story where the rear block projects beyond the main block. The hipped roof front porch is supported by pressured treated lumber with plank and post balustrades. The house sits on a stone foundation and is clad in aluminum siding, other than a portion of the rear block. Wood siding can be seen in places where the aluminum is in need of repair. Throughout the building, windows vary. Most of the windows are vinyl replacement 1/1, 6/6, and 8/8. Some Colonial Revival style multi-windows remain such as in the rectangular bay and the front fixed window. An interior brick corbelled chimney rises from the north side of the main hipped block.

Alterations to the 1927 house include changes in materials (siding and windows), addition of the front porch after 1966 (see Figure 3), and subsequent replacement of the Tuscan columns with the current pressure treated lumber. While some character defining features of a Colonial Revival style house remain (such as the Colonial Revival/Queen Anne style windows) and the clipped window hood, other details have been lost due to alterations. The current front door cannot be identified through the storm door, although 2012 Google Street View shows an incompatible fiberglass replacement door. These alterations have resulted in a loss of integrity of design, materials, workmanship, and feeling.

There are two small outbuildings south of the house: a ca. 1960 gable front, two-car garage and a shed built into a rise near the road sometime after 2012 on an earlier structure's foundation.

Based on the VHSS form which was informed by an interview with the property owner at the time the property was recorded (1985), the house was built in 1927. There are two barns across the street which were reportedly associated with the house but are currently on a separate parcel; the house is no longer functioning as a farmstead. Historic aerial photographs from the 1960s (see Figures 4 and 5) and information in the VHSS form show that the larger of the two barns was built ca. 1965 while the smaller of the two barns was built ca. 1970, replacing an older gabled barn at this location (see Figure 5).

The alterations to the house have resulted in a loss of integrity of design, materials, workmanship, and feeling as an example of Colonial Revival architecture. The alterations described above were done after the property was documented and listed in the State Register. The removal and addition of barns and the division of parcels have resulted in diminished association as an early to mid-20th century farmstead. Due to a loss of historic integrity resulting in the property's inability to convey its feeling and association as a mid-20th century Colonial Revival house and farmstead, the property is recommended ineligible for listing in the State Register.



Figure 2: 1962 aerial photograph with 2789 Dunsmore Road circled in red. Note that the two barns across the street have not yet been built. Source: VCGI

https://maps.vcgi.vermont.gov/gisdata/vcgi/imagery/HISTORIC/1960s/1962/62H/NONGEOREFERENCED/62H_1962_20-241_nongeoref.jpg



Figure 3: 2789 Dunsmore Road, 1966 aerial photograph. Note the lack of a front porch on the house. Source: Vintage Aerial <https://vintageaerial.com/photos/vermont/franklin/1966/QFR/22/5>.



Figure 4: 2684 Dunsmore Road, 1966 aerial photograph. The “Yandow House” listed in the State Register (#0613-21) is at right. The barn at far left at the time was associated with 2789 Dunsmore Road. The second, smaller barn associated with 2789 Dunsmore Road replaced the gabled barn at center left ca. 1970. Source: Vintage Aerial [Vintage Aerial | Vermont | Franklin County | 1966 | 22-QFR-13](#).



Figure 5: 2789 Dunsmore Road in 1985 from the VHSSS form. Note the porch with Tuscan columns that was built sometime after 1966; the porch posts have been replaced.

Assessment of Effects

Based on the assessment above, there are two aboveground historic sites within the APE, both of which are listed in the State Register. The Project effects on each of these properties is discussed below.

- 2162 Dunsmore Road – #0613-5 (see Attachment 2, Photo 4)

At its nearest point, 2162 Dunsmore Road is approximately 0.75 miles southeast of the proposed array and is separated from the Project by a treeline on Dunsmore Road and several deciduous hedgerows delineating several agricultural fields. The Project may be slightly visible from the main house during leaf-off conditions, but at a substantial distance which would render it a very minor alteration to the property's setting. Due to its location on the east side of Dunsmore Road, the property and the Project will not be visible within the same field of view when seen from Dunsmore Road. Based on the above facts, the Project will not adversely impact the agricultural setting and character-defining features of the property that render it State Register eligible, as described in the VHSS form.

- 2684 Dunsmore Road – #0613-21 (see Attachment 2, Photo 14)

2684 Dunsmore Road is located on a rise on the east side of Dunsmore Road, approximately 1,500 feet east of the proposed array. It is mostly separated from the Project by hedgerows and a thick stand of trees lining the west side of Dunsmore Road. There is also a non-historic house (2589 Dunsmore Road) situated between 2684 Dunsmore Road and the access road to the south. The Project will be slightly visible from the house and southerly barn during leaf-off conditions. However, based on the breadth of the intervening stand of trees, the Project will be mostly masked and therefore it would only be a very minor alteration to the property's setting. Due to its location on the east side of Dunsmore Road, the property and the Project will not be visible within the same field of view when seen from Dunsmore Road. Based on the above facts, the Project will not adversely impact the agricultural setting and character-defining features of the property that render it State Register eligible, as described in the VHSS form.

In summary, VHB concludes that the Project will have no adverse effect due to the minimal visibility of the Project from each of these two properties. The intervening distance and/or dense vegetation between the Project and these properties will effectively serve as a screening device that will prevent the Project from impacting the agricultural setting and character-defining features of the properties that render them State Register eligible.

Conclusion

Based upon the above analysis, VHB concludes that the proposed Project will result in **No Adverse Effect** to aboveground historic sites.

Attachments

Attachment 1 – Area of Potential Effect Map

Attachment 2 – Photographs

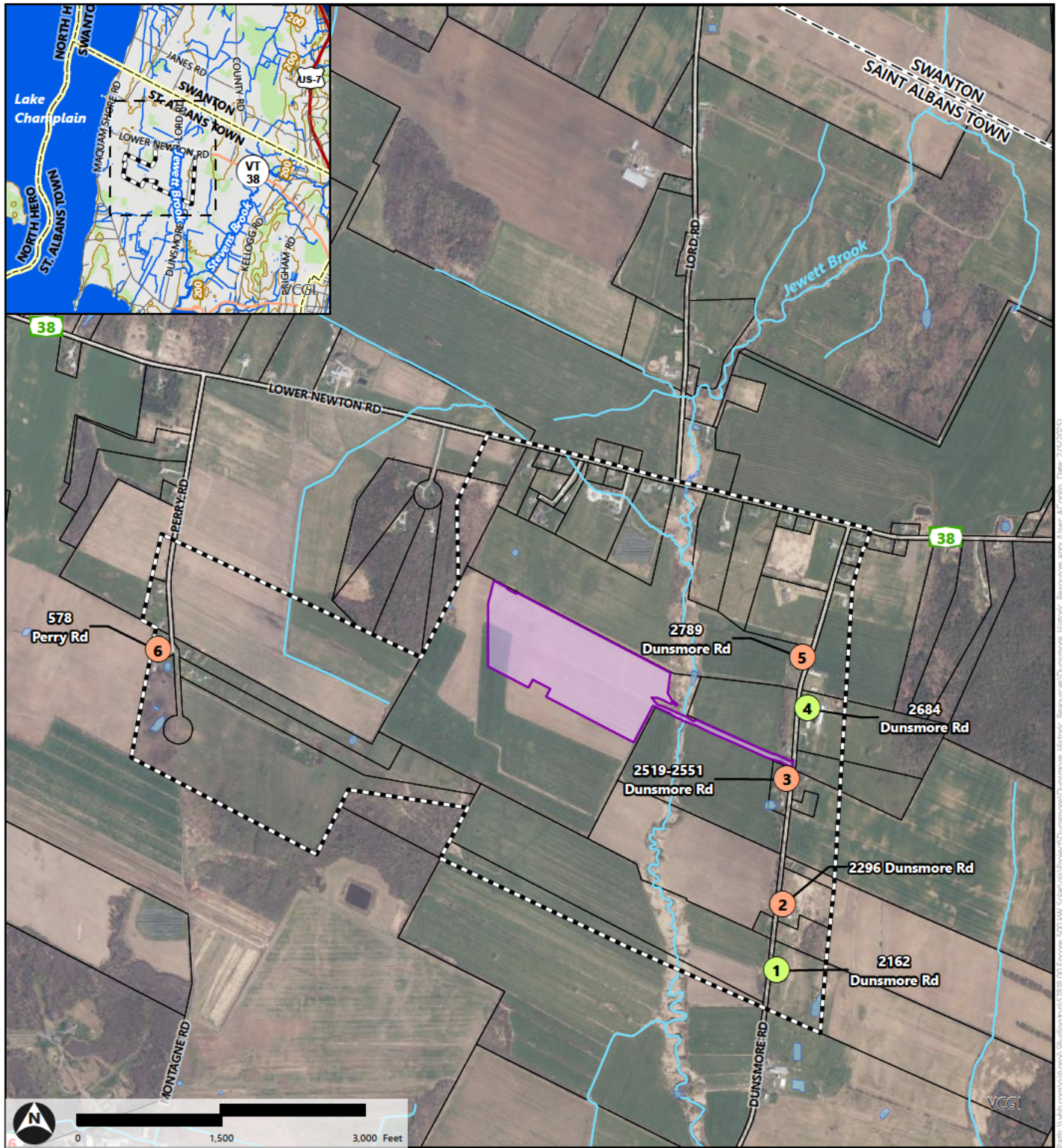
Attachment 1

Area of Potential Effect & Historic Properties

ER Dunsmore Solar | St. Albans, Vermont



DRAFT February 05, 2025



- | | | | |
|--|-------------------------------------|--|------------------------|
| | Historic Site (VHB) | | VHD Stream (VCGI) |
| | Ineligible Property (VHB) | | VHD Waterbody (VCGI) |
| | Area of Potential Effect (APE; VHB) | | Parcel Boundary (VCGI) |
| | Proposed Limit of Work (VHB) | | |

Attachment 2

Photographs taken by Britta Tonn and Kaitlin O'Shea, VHB Preservation Planners, on 1/30/25



Photograph 1: Access road viewed from Dunsmore Road, looking east. The Project will occupy the back field in the center of the photograph.



Photograph 2: 2162 Dunsmore Road, listed in the State Register (0613-5). Looking northeast.



Photograph 3: 2162 Dunsmore Road, listed in the State Register (0613-5). Looking east.



Photograph 4: Looking northeast from 2162 Dunsmore Road toward the Project, approximate location indicated by the red arrow.



Photograph 5: 2296 Dunsmore Road, looking northeast.



Photograph 6: 2296 Dunsmore Road, looking east.



Photograph 7: Barn at 2296 Dunsmore Road, looking east.



Photograph 8: 2551 Dunsmore Road, looking northwest.



Photograph 9: Barn associated with 2551 Dunsmore Road (addressed as 2519 Dunsmore Road), looking southwest.



Photograph 10: 2684 Dunsmore Road, listed in the State Register (#0613-21) showing house at left and barns, looking east.



Photograph 11: 2684 Dunsmore Road, looking east-southeast.



Photograph 12: Barn on the east side of Dunsmore Road historically associated with 2789 Dunsmore Road. It was built sometime after 1966, replacing an older barn that stood here. Currently this barn and the barn in Photograph 13 are located on a separated parcel than the house at 2789 Dunsmore Rd. Looking east.



Photograph 13: Barn on the east side of Dunsmore Road historically associated with 2789 Dunsmore Road. It was built in the mid-1960s. Currently this barn and the barn in Photograph 12 are located on a separated parcel than the house at 2789 Dunsmore Rd. Looking northeast.



Photograph 14: View looking west from 2684 Dunsmore Road to the Project. The solar array would be largely masked by the intervening vegetation.



Photograph 15: View looking west towards the Project from the barns shown in Photographs 12 and 13. The approximate location of the solar array is indicated by the red arrow. At center is another smaller solar array which is not highly visible.



Photograph 16: 2789 Dunsmore Road, listed in the State Register (#0613-22). VHB recommends that this property is no longer State Register eligible due to alterations and loss of integrity. Looking northwest.



Photograph 17: 2789 Dunsmore Road façade showing multiple alterations resulting in a loss of integrity, looking west.



Photograph 18: 2789 Dunsmore Road, looking southwest.



Photograph 19: Garage southwest of the house at 2789 Dunsmore Road, looking west. The approximate Project location is indicated by red arrow.



Photograph 20: Non-historic outbuilding south of the house at 2789 Dunsmore Road, looking southwest.



Photograph 21: 578 Perry Road, looking southeast.



Photograph 22: Barn associated with 578 Perry Road, looking south.