



United States
Department of
Agriculture

Forest
Service

Green Mountain & Finger Lakes
National Forests
Manchester Ranger District

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**Project Status Update and Invitation to Comment on Minor
Changes to the Proposed Action
Deerfield Wind Project Special Use Permit Application
Towns of Searsburg and Readsboro, Vermont**

Please Reply by October 19, 2007

As most of you are aware, Deerfield Wind LLC (the "Proponent") has applied to the Forest Service for a Special Use authorization in accordance with the provisions of 36 CFR § 251.54 to use public lands under the management of the Forest Service for construction and long-term operation of a wind energy facility. The Deerfield Wind Project (the "Project") would involve construction wind turbines on National Forest System (NFS) lands in the Manchester Ranger District of the Green Mountain National Forest (GMNF) in the towns of Searsburg and Readsboro, Vermont. The objective of this letter is to update you on the status of the project and provide notice of some minor changes to the original proposed action.

The project is moving through the National Environmental Policy Act (NEPA) process at this time. As previously noted, an Environmental Impact Statement (EIS) is being prepared to document the analysis and disclose environmental and social impacts. A Draft EIS (DEIS) is scheduled for release in January, 2008. A 45-day public comment period will be provided to take comments on the DEIS. Those comments will be considered and used to complete the analysis. A Final EIS (FEIS) and Record of Decision (ROD), that documents the decision of the Forest Service Responsible Official scheduled for release in mid-summer 2008. As Forest Supervisor of the Green Mountain and Finger Lakes National Forests, I will be making that decision.

As the NEPA process continues, the State section 248 process will also progress. A schedule will be finalized soon that will provide notice for the hearings process and any public site visits that will occur. In order for the project to move forward, the PSB must grant a Certificate of Public Good.

On January 8, 2007, Deerfield Wind LLC submitted their State of Vermont section 248 application to the Public Service Board (PSB). In their initial review of the application, the PSB determined that additional site specificity was needed before they could effectively hold hearings on the proposal. The Proponent provided that specificity to the PSB in their revised application filed on July 30, 2007. It is these changes that I wish to bring to your attention at this time. All changes are within the original scope of the proposal and simply add more specificity to the



proposed action. In order to help you understand the scope of the changes, I am enclosing the original Project Information document (attached) that fully explained the project and the proposed action. Please review this and compare it to the list of changes noted here:

1. The Project will consist of 17 wind turbines with a rotor size of 87 or 88 meters in diameter and a name plate power rating of 2.0 or 2.1 megawatts (MW). Seven of the turbines will be placed in the Eastern Project Area and ten turbines will be placed along the ridgeline in the Western Project Area. Several manufacturers have products in this size range. Suzlon Wind Energy Corporation and Gamesa Wind US are preferred vendors for this Project and each offers turbines in this size range. The total nameplate capacity of the Project would be 34 or 35.7 MW, depending upon which turbine type is ultimately selected.

Original Proposal: The original scoping letter for the Project proposed 20 to 30 wind turbines, each having an electrical rating between about 1.5 and 2.0 megawatts, which corresponds to a total project electrical capacity range of 30 to 45 megawatts, depending upon the final number of turbines. The placement of the turbines would be divided more or less equally between the east and west ridge.

Please note that the Forest Service has accepted notification from the Proponent on two previous occasions that the power rating on individual turbines could range from 1.5 to 3.0 MW. As noted above, they are rated at 2.0 to 2.1 MW.

2. A rotor size of 87 to 88 meters will yield a total turbine height from ground to the top of the blade tip at about 400 to 410 feet.

Original Proposal: Total height based on estimates for previous models was noted in the original scoping letter as between 340 and 370 feet.

3. The proposed substation location will be in the northwestern corner of the Western Project Area, adjacent to the existing 69 kilovolt transmission line that crosses the mountain at this location. The substation and electrical interconnection gear will occupy an area of approximately 29,000 square feet.

Original Proposal: As noted above, the substation location has been specifically identified in the revised section 248 application, whereas the original proposal left it “somewhere” in the northwest corner of the Western Project Area. Also, the alternative of interconnecting the new turbines to the existing Green Mountain Power substation on private land on the east side of Route 8 is no longer feasible due to capacity issues.

4. Access to the Western Site Area will now be from the north along a private road known as the Putnam Road, and will extend westerly onto Forest Service land, past the proposed new operations and maintenance building, and then westward toward the location proposed for the substation and the northern end of the Western Project Area.

Original Proposal: The original proposal simply stated that a new access road would be constructed off Route 8, across from the cemetery, that would lead up to the ridge on the Western site. This proposed access was looked at closely. A northern access along Puthnam Road became the environmentally preferred location because it would have much less impacts. Therefore, the southern route will be dropped from further consideration and the revised proposed action will reflect this change.

5. The storage and maintenance facility building, approximately 1,076 square feet in size, will be located along the northern access route between the substation and the entrance to Putnam road. A storage yard of about three acres will be maintained next to the building.

Original Proposal: The original proposed location for this facility (approximately 24 x 40 feet in size) was just off the western access road, near its entrance with Route 8 across from the cemetery. This southern access point to the western area is no longer being considered.

In order to be most useful to the analysis at this point, you may direct your comments to those changes that are being proposed to the original proposal. There is no need to re-submit comments or thoughts that you have already submitted during the scoping process held in July-August of 2005. Those people new to the process at this time may feel free to provide a broader range of comments.

Comments should be provided orally or in writing (phone, facsimile, mail, or email), and received (postmarked or facsimile imprinted) no later than the closing date of the comment period, October 19, 2007. Written comments are preferred. Please make your comments as specific as possible as they relate *to the changes to the proposed action*, and include your name, address, and, if possible, telephone number and email address. All comments should be sent to: Bob Bayer, Project Coordinator, USDA Forest Service, 2538 Depot Street, Manchester Center, VT 05255 (mail); (802) 362-1251 (facsimile). Comments submitted electronically via email should be sent to “comments-eastern-green-mt-finger-lakes-manchester@fs.fed.us” (no quotes). Comments may also be submitted by telephone to 802-362-2307 ext. 218 (voice mail is available) preferably during normal working hours of 8:00 to 4:30.

Comments received in response to this letter, including name and address of those who comment, will be considered part of the public record for this Project and will be available for public review¹. If you would like more information concerning the proposed action or this invitation for comments, please contact Bob Bayer, Project Coordinator, USDA Forest Service, 2538 Depot Street, Manchester Center, VT 05255 (mail), at (802) 362-1251 (facsimile); rbayer@fs.fed.us (email); or by telephone at 802-362-2307 ext. 218 (voice). If you decide to comment, you will automatically be added to our mailing list and receive the DEIS and other pertinent documents related to this Project analysis unless stated otherwise.

Thank you for your continued interest in the management of the Green Mountain National Forest.

¹ Comments received in response to this solicitation, including the names and addresses of those who comment, will be considered part of the public record and will be available for public inspection. Comments submitted anonymously will be accepted and considered. Additionally, pursuant to 7CFR1.27 (d), any person may request that a submission be withheld from the public record by showing how the Freedom of Information Act permits such confidentiality. Persons requesting such confidentiality should be aware that confidentiality is granted in only very limited circumstances. The Forest Service will inform the requester of its decision regarding a request for confidentiality. Where the request is denied, the submission will be returned, and the requester notified that the comments may be resubmitted with or without name and address.

Sincerely,

/s/ Steve Roy (for)

MEG MITCHELL
Forest Supervisor

Attachments

1. Project Information
2. Project Map

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PROJECT INFORMATION
DEERFIELD WIND PROJECT
[ORIGINAL DESCRIPTION FROM JULY 2005 LETTER]

Background

In March of 2004, Deerfield Wind LLC (the Proponent), a wholly owned subsidiary of enXco, Inc., submitted a Special Uses proposal for Forest Service review under 36 CRF 251 and Chapter 10 of the Forest Service Handbook (FSH) 2709.11. Accordingly, the proposal went through two levels of screening to determine whether or not the proposal could appropriately be presented to the Forest Service as a formal Special Uses application. In November of 2004, the Proponent was notified that the proposal satisfied the second and final screening criteria, and the GMNF accepted a formal special uses application for the proposal described below.

This wind energy facility proposal is unique in that it is an expansion of the existing Searsburg Wind Energy facility, which is separately owned and operated by Green Mountain Power Corporation. In 1997, the Searsburg facility was placed in service on 35 acres of private land that abuts the GMNF. It consists of eleven 0.55 megawatt (MW) (550 kilowatts) wind turbines, each just below 200 feet in height to the tip of the blade when in a vertical position. The turbines have a combined capacity of six megawatts. The proposal described below, using 20 to 30 new state-of-the-art turbines each capable of generating between 1.5 to 2.0 megawatts of electricity (or about 3 times as much energy as the smaller turbines), will be developed as a separate facility but relying in part, on the infrastructure of the existing site.

Purpose of Proposed Action

The purpose of the proposed action is to expand an existing 11-turbine private land based wind energy facility in Searsburg, Vermont onto NFS lands to provide between 30 and 45 megawatts of new wind energy and capacity that will supply additional renewable power to the Vermont and New England electric supply grid. The U.S. Forest Service, Green Mountain National Forest, has accepted an application for the use and occupancy of a specific parcel of NFS land in the Towns of Searsburg and Readsboro, Vermont for the proposal to develop a commercially viable wind energy facility (see attached map). The USFS is responding to this application, as required by the Code of Federal Regulations, 36 CFR 251.54(g)(2)(i), by fully analyzing the proposal under the National Environmental Policy Act (NEPA).

Need for Proposed Action

Regional forecasts indicate an increasing demand for renewable energy supplies due to legislation in several New England states establishing Renewable Portfolio Standards² (RPS) and

² Connecticut, Maine, Massachusetts, Rhode Island and Vermont have Renewable Portfolio Standards.

because of increased public demand. RPS requirements call for an increasing percentage of electric energy to be supplied from renewable sources in each year. Additionally, energy consumption forecasts continue to increase in Vermont and regionally. Uncertainty exists as to the continued availability beyond the next decade of approximately 60 percent of Vermont's peak electric power mix, including electric power supplied by Vermont Yankee Nuclear Power Plant and Hydro-Quebec.

Federal policy has recognized the need for new renewable energy resources. Important goals of the May, 2001 National Energy Policy are to increase domestic energy supplies, modernize and improve our nation's energy infrastructure, and improve the reliability of the delivery of energy from its sources to points of use. The use and occupancy of Federal lands is an important element in facilitating the exploration, development, and transmission of affordable and reliable energy to meet these goals. By Executive Order, "it is the policy of this Administration that executive departments and agencies shall take appropriate actions, to the extent consistent with applicable law, to expedite projects that will increase the production, transmission, or conservation of energy." The Forest Service is undertaking this review consistent with this policy.

Over the past decade, a major shift has occurred toward the use of natural gas to supply electric energy. Increased demand for natural gas and inability of the supply to keep pace has led to volatility in prices and supply concerns. Natural gas has become the marginal fuel for many hours in the northeast and therefore gas price volatility has led to volatile electricity prices. The Department of Energy has identified a need for additional sources of energy to offset New England's dependence on natural gas.

Emissions from fossil fueled electric generation sources contribute to acid rain that has been implicated in damage to forests and other vegetation as well as human health effects. Carbon dioxide from the combustion of fossil fuels has also raised concerns about greenhouse gas effects and the possible climate changes that could occur as a result.

The proposed action is needed to:

1. Supply Vermont's and the region's growing demand for reliable sources of clean, cost-effective, renewable energy.
2. Contribute to a secure, reliable supply of electric generating capacity to address the regional and local need.
3. Provide a source of clean, renewable electric power to offset natural gas generation, decrease electric price volatility and provide potential cost savings to consumers.

4. Provide a clean, renewable source of electric energy to reduce emissions from fossil fuel use, improve local and regional air quality and reduce associated negative environmental and human health effects.

Proposed Action

The major features of the proposed action are:

1. The Project would install 20 to 30 wind turbines, each having an electrical rating between about 1.5 and 2.0 megawatts, which corresponds to a total project electrical capacity range of 30 to 45 megawatts (if larger turbines are used, fewer of them will be necessary). The placement of the turbines would be divided more or less equally between the east and west ridge (see attached map). Each wind turbine is comprised of three components – the tower, the nacelle, and the rotor blades (see diagram). The turbines would use a tubular steel tower, which at its widest dimension will be approximately 15 feet in diameter. Tower heights would be up to approximately 230 feet. The tower is topped by a nacelle, which houses the main mechanical components of the turbine. The nacelle is approximately 9 feet high and 25 feet long, and connects with the rotor hub. The rotor consists of three fiberglass blades up to approximately 133 feet in length, resulting in a blade tip height³ in the range of 340 to 370 feet. The turbine structures would be anchored to a concrete foundation. An area of the concrete foundation approximately 18 feet by 18 feet would be left exposed. The wind turbines would be sited a minimum of about 2.5 rotor diameters apart. Aircraft safety lighting would be required and specified by the Federal Aviation Administration (FAA). Current draft guidelines undergoing review at the FAA specify the turbines at the end of a ridgeline strings and then those approximately one half mile apart within the string should be lit with one red flashing strobe light atop the nacelles. This could result in approximately 3 to 5 turbines being lit on each of the eastern and western turbine strings. It is anticipated that guidelines similar to this will soon be formally adopted by the FAA.
2. New service roads would be needed for construction and operation. A total of approximately 4 miles of all-weather roads would be constructed that would serve both the east and west sections of the Project. The roads would be graveled and hardened, and up to 35 feet wide for use during the construction period. Roads must be capable of handling the large tractor-trailer equipment and cranes used to deliver and erect the turbines. Roads would be reduced to about 16 feet wide over most of their length after construction is complete and would provide continuing access for maintenance. Roads on Forest Service lands would be constructed and maintained to applicable Forest Service standards.
3. Land clearing and harvesting of trees would be done for the turbine installation and for the road construction described above. It is estimated to impact about 80 acres. Land would be cleared and roads constructed to allow installation of the turbines and to provide continuing

³ Height above grade to the tip of the blade when in the highest vertical position.

access. The clearing would be done in linear strips to accommodate roads, with small areas approximately one acre in size cleared out along the ridge-top portions of the roadways around the base of each individual turbine. The existing GMP road at the eastern side of the Project would be extended in a southeasterly direction. A new access road would be constructed off Route 8 leading up to the ridge site of the western side of the Project.

4. The Project would connect to a new substation constructed on NFS lands in the northwest corner of the proposed western ridge development, adjacent to the existing 69-kilovolt transmission line corridor (see attached map). The new substation would be approximately one-half acre in size and would be enclosed in a chain link fence approximately 8 feet high for security and safety purposes. It will contain transformers, electrical switchgear, and other components that would be generally less than 25 feet in height. Lightning protection devices would extend as high as approximately 45 feet. The substation would be sited within the forest so as to minimize its visibility from off site locations. As an alternative, Deerfield Wind LLC is still exploring an option to interconnect the new turbines to the existing GMP substation on private land on the east side of Route 8.
5. A new overhead and underground electrical collector system totaling approximately 4 miles in length for the east and west ridges would be constructed. New electric collector cables would need to be constructed for the western section and the existing cable system for the eastern section of the Project would need to be extended. The collector cables would be underground beneath the access roads in the vicinity of the wind turbines and either underground or overhead along the remainder of the access roads. They are typically either buried 3-4 feet deep along service roads or placed overhead on 35 to 45 foot high poles.
6. A storage and maintenance facility building approximately 24 x 40 feet would be constructed. The building is anticipated to be metal frame construction and would need a well and waste disposal system. These facilities will be designed and constructed to applicable state and/or Forest Service standards. The specific location is presently proposed to be just off the western access road, near its entrance with Route 8 (see attached map). As an alternative, Deerfield Wind LLC is still exploring an option to place the storage building on private land adjacent to the site.
7. Work space and temporary lay down areas, where equipment parts can be placed, would be required for the construction of the Project. Turbine tower sections and other turbine parts require secure lay down areas in reasonable proximity to the construction sites. A workspace area approximately 200 feet in diameter around the base of each turbine would be cleared during construction. A smaller portion of this area around each turbine would be required for maintenance. Once construction and installation is completed, these lay down areas would be allowed to revegetate.

8. Deerfield Wind LLC's Special Use Authorization application requests authorization for a minimum of 30 years of Project operation. Operation and maintenance (O&M) of the Project would be in accordance with an O&M plan that would include the following components:
 - A centralized Site Control and Data Acquisition (SCADA) system would monitor the condition of the wind plant equipment, alert service technicians to any fault or alarm conditions, record and sort data, and allow remote control of the turbines.
 - Maintenance of the individual wind turbines, transmission facilities, and site improvements (roads, gates, fences, etc.) would generally be scheduled in two separate inspections at approximately six-month intervals and averaging 40 to 50 person hours per year for each turbine.
 - Controlled year-round access to the Project facilities would be maintained so operators can monitor the facilities and equipment and quickly respond to any unforeseen condition that might impact the safety of the operations staff or the public. Deerfield Wind LLC would ensure that the facility is operated according to the terms of the special use authorization in a manner that is both safe and consistent with the management objectives of the surrounding National Forest land. Deerfield Wind LLC anticipates implementing a public access control plan similar to the management plan in place for the existing Searsburg facility. Access roads would be gated and closed to the public.
9. The Project would be operated year-round over its useful efficient life as consistent with proper maintenance and refurbishment. At the end of its useful efficient life or the loss of permission from the Forest Service to maintain the facility, all facilities would be dismantled and removed and the site restored to pre-existing conditions as much as practicable. A Removal and Reclamation Plan would be prepared at the appropriate time.

Nature of the Decision to be Made

The main decision to be made based on the environmental analysis is to determine whether to allow use of NFS lands for the development and long-term operation of the wind energy facility as proposed, to allow the use under one of the alternatives to be developed for the analysis, or to select the "No Action" alternative. The No Action alternative for this analysis will be no authorization to use NFS lands for the wind energy facility.

The Forest Supervisor of the Green Mountain and Finger Lakes National Forests will be the Deciding Official for the Project.