

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**Petitions of BNE Energy Inc. for a  
Declaratory Ruling for the Location,  
Construction and Operation of 4.8 MW  
Wind Renewable Generating Projects on  
Flagg Hill Road in Colebrook,  
Connecticut (“Wind Colebrook South”)  
and Winsted-Norfolk Road in Colebrook,  
Connecticut (“Wind Colebrook North”)**

**Petition Nos. 983 and 984**

**March 15, 2011**

**PRE-FILED TESTIMONY OF WILSON H. FAUDE**

**Q1. Please state your name and address for the record.**

A1. My name is Wilson Faude, and I live at 42 Fulton Place, West Hartford, Connecticut.

**Q2. Please describe your educational background.**

A2. I am a 1969 graduate of Hobart College, where I received a B.A. in European History. After serving in the U.S. Army, I attended Trinity College, where I received an M.A. in American History in 1975.

**Q3. What is your employment history?**

A3. Beginning in March of 1963, during school breaks and summer vacations, I worked as the assistant to the director of the Mark Twain House in Hartford, Connecticut, and after I completed the majority of my course work at Trinity College, in the fall of 1971, I was hired by the Board of Trustees as the Mark Twain House’s first curator.

In 1975, I became involved with saving the 1796 Old State House in Hartford, which had been voted to be demolished in favor of a parking garage by the Hartford Chamber of Commerce with the concurrence of the Hartford Court of Common Council. In 1978, I left the Mark Twain House and became the executive director of the Old State House, where I helped to make

necessary improvements, leading to its reopening in 1979.

In 1981, I left the Old State House to become an associate to the vice-president for development at the University of Hartford. In 1985, I returned to the Old State House as its executive director, where I helped to author a new long-range plan and raise twelve million dollars to finance a significant restoration of the landmark. In December of 2001, I stepped down as the executive director and became the executive director emeritus.

Since 2001, I have acted as guest curator for the exhibition on Bushnell Park at the Wadsworth Atheneum in honor of the park's 150<sup>th</sup> anniversary and as archivist for the City Clerk of Hartford, where I have been involved in emptying and archiving the records of the clerk's five story vault. I currently serve as the archivist for the city of Hartford and as the project historian for the Hartford History Center of the Hartford Public Library.

I also have written ten books on Hartford and Connecticut history, and I have published several articles about historic preservation in a variety of newspapers and magazines

In addition to the work described above, I was appointed by Governor Ella T. Grasso in 1980 to be a member of the Connecticut Historical Commission. In 1983, I was reappointed as a member of the commission by Governor William A. O'Neill, and in 1984, Governor O'Neill appointed me chairman of the commission. I was subsequently reappointed as a member and as chairman by Governors Weicker and Rowland. In 1996, I resigned as chairman and member of the commission, having served the maximum number of terms allowable under state law.

**Q4. How did you become involved with these proceedings?**

A4. I was retained by Reid and Riege, P.C., on behalf of FairwindCT, Inc., to assess the plans submitted by BNE Energy Inc. ("BNE") regarding what impacts, if any, the proposed wind turbines would have on Rock Hall and other historical and cultural resources in the surrounding area.

**Q5. Have you had a chance to review BNE's plans for siting the wind turbines subject to these petitions and the proposed locations for those sites?**

A5. Yes, I have. I have reviewed the proposed site locations, as well as general information about the size of the wind turbines themselves, and I have visited the areas near the proposed sites.

**Q6. Do you have an opinion with respect to how the proposed wind turbines would impact Rock Hall and the other historical and cultural resources in the surrounding area?**

A6. Yes, I do.

**Q7. What is that opinion?**

A7. In my opinion, should BNE's wind turbines be sited at the proposed locations, they would greatly harm the historical and cultural resources of the surrounding area – including Rock Hall – both with respect to damage to the nature and character of the area and with respect to possible physical damage to the historical sites themselves. At a minimum, in order to ensure conservation of our historic resources, the burden should fall on BNE to prove that the proposed structures will not harm those resources, and in my opinion, BNE has to this point failed in that respect.

**Q8. In its petitions, BNE has included as Exhibit B letters from its consultant, Vanasse Hangen Brustlin ("VHB"), to the State Historic Preservation Office ("SHPO"). The letters apparently have been stamped "No Effect" by the SHPO. Do you know what that stamp means?**

A8. That stamp indicates that, according to the SHPO, the proposed project will not have any adverse effect on any historic or cultural resources recognized by the SHPO.

**Q9. How could the SHPO have concluded that the proposal would have no effect on surrounding historic or cultural resources?**

A9. Considering that Rock Hall was listed on the National Register of Historic Places as of the date of the letter, and considering that Rock Hall is located within the 1.5-mile distance referenced in the letter itself, the SHPO could only have made such a determination by mistake.

In fact, it is my understanding that the “no effect” determination is now under review by the SHPO because of its subsequent discovery of listed properties within the area of potential effect.

**Q10. What is the 1.5-mile distance you just referenced?**

A10. According to the footnote in the letter, that distance refers to the presumed area of potential effect used by Federal Communications Commission for visual effects resulting from the construction of new facilities of over 400 feet in height.

**Q11. Do you agree that this distance is a sound presumption with respect to potential effects?**

A11. I agree that for cell towers, this probably is an appropriate presumption. However, in light of the size and function of the wind turbines that BNE has proposed to site in this case, a 1.5-mile area of potential effect is likely too small of a distance when assessing viewshed impacts to historical and cultural sites.

**Q12. Regarding your opinion that the proposed wind turbines will have a negative impact on both Rock Hall and on other surrounding historic resources, what do you base that opinion on?**

A12. As I mentioned, I considered BNE’s proposed sites as set forth in the petitions, including maps prepared by BNE’s consultant. I considered these plans in light of the area’s existing historical and cultural resources, and I also visited the area twice to observe first hand how the proposed wind turbines would affect those resources.

I also considered the Congressional declaration of purpose associated with the National Historic Preservation Act of 1969, which explains some of the goals that the United States Congress set forth with respect to historic preservation.

**Q13. Can you briefly describe for the Council the purposes of the NHPA?**

A13. Yes, the Act itself states a variety of findings made by Congress in choosing to enact the NHPA. To briefly quote a few of those findings, Congress specifically saw fit to note that “the spirit and direction of the Nation are founded upon and reflected in its historic heritage,” that “[t]he historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people,” and that “[t]he preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic and energy benefits will be maintained and enriched for future generations of Americans.”

In order to help accomplish those goals, section 101 of the Act (16 U.S.C. § 470a(a)) authorizes the Secretary of the Interior to maintain the National Register of Historic Places, which by statute contains districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture.

**Q14. What kind of property typically is listed on the National Register of Historic Places?**

A14. As I just mentioned, the Act by its own terms describes the Register as a list containing objects significant in American history, architecture, archaeology, engineering, and culture. Importantly, defining what constitutes significance is largely a local matter.

The best formulation of this idea comes from William J. Murtagh, the first Keeper of the National Register of Historic Places. His charge was to lead the congressionally mandated change under the Act to expand and maintain the Register, and he was the person who greatly defined and gave shape to the congressional mandate. His philosophy of preservation was

reported by Carol Shull in an article for the National Trust for Historic Preservation on Murtagh.

The article states:

Under the National Historic Preservation Act, the National register was to be expanded to include properties of State and local significance. When a man from Oregon asked [Murtagh] how many of the 16 lighthouses on the coast of Oregon the State should nominate to the National register, Murtagh answered: "I'm not going to tell you. I don't live in Oregon. I don't see your lighthouses. How important are they to you as an Oregonian? If they're not that important, don't submit any of them. If only one of them is important, submit one. If you feel they're all important, submit all of them. How many do you think you need to keep Oregon's sense of locality, and place, and identity?"

The article goes on to describe a meeting in Washington, D.C., between Murtagh and William Pinney, then the Historic Preservation Officer for the state of Vermont. Pinney remarked to Murtagh that "Vermont was a small state with an aging population on fixed incomes. 'I want you to know,' Murtagh recalls Pinney saying, 'that what they see every day in their local villages is their national patrimony. That's all they're ever going to see.' Murtagh says, 'That was the best statement for the importance of local significance I've ever heard, and I still think that way.'"

These ideas – locality as decisionmaker and local village as national patrimony – represent what the Act really is about. In that sense, there is no "type" of property that typically is listed. Instead, the properties that the states and the local communities think are important are listed on the Register.

**Q15. Can you describe the process by which a property is listed on the National Register?**

A15. Nominations for listing on the Register undergo a long, thorough, and careful evaluation. The process begins with the State Historic Preservation Office (SHPO). From it one can obtain the necessary forms and the required research, information and documentation that must be a part of any nomination. Nominations can be sent to the SHPO by property owners,

historical societies, preservation organizations, governmental agencies and other individuals or groups.

The National Register of Historic Places has criteria for evaluating and considering all nominations to the register. These include:

- **Age and Integrity.** Is the property old enough to be considered historic (generally 50 years old at a minimum) and does it still look much the way it did in the past?
- **Significance.** Is the property associated with events, activities, or developments that were important in the past? With the lives of people who were important in the past? With significant architectural history, landscape history, or engineering achievements? Does it have the potential to yield information through archeological investigation about our past?

The registration form to nominate a property for listing on the Register is a detailed, multi-page document that requires information regarding the name and location of the property, its classification, ownership, function or use, and architectural classification. Following that is a “narrative description” which includes a brief summary paragraph followed by a detailed description of the property, exterior, interior, and outbuildings. This is followed by a summary paragraph on the significance of the property being nominated which is then followed by a “narrative statement of significance” and developmental history information. In addition, nominations have maps, floor plans, and photographs which further document and testify to the worthiness of a property being considered for nomination. The SHPO, upon receiving a nomination, informs the affected property owners and local governments and solicits public comment. If the owner (or the majority of owners for a historic district nomination) objects, the property cannot be listed but may be forwarded to the National Park Service for a Determination of Eligibility.

The proposed nominations are reviewed by the SHPO and the state’s National Register Review Board. The process can take several months; the minimum is at least 90 days. It is a very thorough and thoughtful process.

After the review by the SHPO and the state's National Register Review Board, the complete nomination, with certifying recommendations, is submitted by the state to the National Park Service in Washington, D.C., for final review. The National Park Service makes its listing decision within 45 days. If approved it is then placed on the National Register of Historic Places by the Keeper of the National Register of Historic Places.

**Q16. Did you identify any properties located near the proposed sites that are listed on the National Register?**

A16. Yes, I did.

In Litchfield County, there are over 140 properties and historic districts listed on the National Register of Historic Places, including 48 properties from the towns of Colebrook, Norfolk, Winchester and Winsted. I have provided a list of these 48 properties in Exhibit 1.

It may well be, however, that there are many more properties and historic districts that would be affected by BNE's proposed wind turbines. In all likelihood, Barkhamsted, Canaan, Goshen, Hartland, North Canaan and Torrington should also be placed under consideration for the visual and environmental affect the turbines would have.

It is also important to note that a historic district may be under a single name such as, for example, "The Colebrook Center Historic District." The Colebrook Center Historic District has 51 contributing buildings dating from the mid-1700s. Except for paved roads and automobiles, the center has remained unchanged for 200 years. The Colebrook Center Historic District is situated in a small valley surrounded by wooded hills, which hills will of course include the very spot of BNE's wind turbines.

**Q17. Your list contains a reference to Rock Hall. Did you look particularly at that property?**

A17. Yes, I did.



**Q18. Can you tell the Council a bit about what you found?**

A18. Rock Hall is a 10,000 square foot country manor house that was designed by Addison Mizner for Jerome Alexander, whose family had made its fortune in the Alexander Steamship Lines. The National Register of Historic Places nomination form provides additional detail about the property:

The “10,000 square-foot, H-plan house built in a free interpretation of the Tudor mode. . . . The main floor of the house is clad in random rubble rock, while the upper two floors are faced in stucco. A terra cotta tile roof tops the building. . . . The property has well-landscaped grounds, complete with tree-lined alleys, that are defined on the north and west sides by stone walls. Specimen trees dot the grounds, which slope gently to the south.” As the grounds were laid out in 1911-1912, many of the trees are over 100 years old and represent a mature landscape plan.

“Built in 1911-1912, Rock Hall epitomizes country house design in its era in Connecticut. The general character of the Country house had been well defined by this date. During the 1870s, Americans escaping the heat of the city began to expect something more substantial than the artificial life of great hotels and summer villas in the springs, shore and resort towns.”

On March 18, 2010, the Connecticut State Preservation Board voted unanimously to list Rock Hall of Colebrook, Connecticut, on the National Register of Historic Places. The nomination to the National Register of Historic Places was carefully researched and prepared. On May 25, 2010, the completed nomination was signed by the State Historic Preservation Officer and sent to Washington to the National Park Service for consideration. On August 25, 2010, David Bahlman, Deputy State Historic Preservation Officer of the Connecticut Commission on Culture & Tourism, wrote to Michael and Stella Somers, the owners of Rock Hall:

“It is with great pleasure to inform you that the Rock Hall located at 19 Rock Hall Road Colebrook, Connecticut was listed in the National Register of Historic Places by the National Park Service on June 22, 2010.”

**Q19. Can you identify any specific impacts that the proposed wind turbines likely will have on Rock Hall?**

A19. If the proposed wind turbines are indeed permitted and sited, the effects on Rock Hall and all of the surrounding acreage would be nearly catastrophic. Instead of the rural landscape or rolling ridges, one would have a “King Kong” presence always looming some 500 feet above. The football field-sized blades swirling, the audible hum buzzing in a mosquito-like drone, 24 hours a day, will distract, unnerve, and upset resources that our state has decided are worth preserving. And what will be the effect on the environment, the animals, and insects that call this home, along with the tourists and visitors that enjoy its amenities?

Some of these potential impacts can be better visualized when considering photographs of the site, included below.



**Rock Hall Road, looking south toward Rock Hall.**



**The sign for Rock Hall at 19 Rock Hall Road**



**The gates into Rock Hall**



**Rock Hall, Colebrook, Connecticut**











**The landscape around Rock Hall**





**Q20. You mentioned earlier that you visited the area surrounding the location of the proposed wind turbines. Can you describe for the Council what you found on your visits?**

A20. Yes, on March 8, 2011, I visited Colebrook because I wanted to observe exactly what the landscape looked like in close proximity to the proposed turbine sites and the acres that surround those sites.

I drove out Rt. 44 from Hartford and took Rt. 183 north to Colebrook and North Colebrook. I then backtracked and took Rt. 182A, and zigzagged around the landscape until I came back onto Rt. 44 at the junction of Rt. 182 and Loon Meadow Dr., just above the gas station. I then proceeded south to Rock Hall Road. At the corner of Rt. 44 and Rock Hall Road is the proposed site for the Wind Colebrook North's #1. I drove down Rock Hall Road to understand what effect such a wind system, some 500 feet in the air, would have there. I later proceeded south on Rt. 44 back to Winsted.

This is a rural landscape, relatively unchanged in over three hundred years. Its streams and rocks and trees and hills grow and rise and dip and rise again. The rivulets and brooks, with their gurgling sounds of water on rock, meander across the landscape, joining other brooks and streams. When I visited in March, the landscape was frozen but beginning to emerge. All too soon I knew it would become chartreuse as buds and plants emerged, followed by turtles resting on sunny branches and birds and other wildlife, young fawns and cubs.

There in these hills, there in this landscape, is the beautiful and all too rare powerful quiet, devoid of the intrusions and the mechanical whirls of civilization.

I took the following pictures over the course of my visit to Colebrook:



**The Colebrook Congregational Church**



**North Colebrook, Arah Phelps Inn, corner of Prock Hill Road and Rt. 183, which is listed on the National Register of Historic Places. Beyond is seen part of the Phelps Farms Historic District.**











**Standing on this bridge, I thought of William Wordsworth, in a time past, in London writing: “Dull would he be of soul who could pass by a sight so touching in its majesty.”**













**Back on Rt. 44, I came to Rock Hill Road, the proposed location for BNE's Wind Colebrook North Winsted-Norfolk Road (Rt. 44) and Rock Hall Road's Wind Turbine #1. Today it is a golf driving range.**





**I drove down Rock Hall Road to the lower part, where this stream is. I then turned around and took the picture looking back to the top of the hill where the driving range is today.**







The statements above are true and accurate to the best of my knowledge.

March 15, 2011  
Date

Wilson H. Faude  
Wilson H. Faude

## ATTACHMENTS

- Exhibit 1 List of historic properties on the National Register of Historic Places in Colebrook, Norfolk, Winchester and Winsted

# **EXHIBIT 1**

## **COLEBROOK**

Francis Benedict Jr. House

Colebrook Center Historic District

Colebrook Store

Phelps Farms Historic District

Arah Phelps Inn

Rock Hall

## **NORFOLK**

Bigelow House

Braman Camp

Carr House

Childs House Wing

Childs, Starling, Camp

Converse Camp

Farnum House

Gould House

Haddock House

Haystack Mountain Tower

Hillside

Holbrook Camp

Hubbell and Hegeman Garage

Knox Camp

Low House

Ludlow Cottage  
Mead Camp  
Mosley House-Farm  
Moss Hill  
Mulville House  
Noble House  
Norfolk Country Club House  
Norfolk Downs Shelter  
Norfolk Historic District  
Prentice House  
Rectory and Church of the Immaculate Conception  
Rockwell House  
Rubly Building  
Rubly Carriage house  
John Shepard House  
Sports building  
Stoeckel, Robbins House  
Tamarack Lodge Bungalow  
Tom Thumb House  
World War I Memorial  
**WINCHESTER**  
Gilbert Clock Factory  
Winchester Soldiers' Monument  
**WINSTED**  
Moses Camp House (Winslow House)

West End Commercial District

Winsted Green Historic District

Winsted Green National Register Historic District (Boundary Increase)

Winsted Hosiery Mill

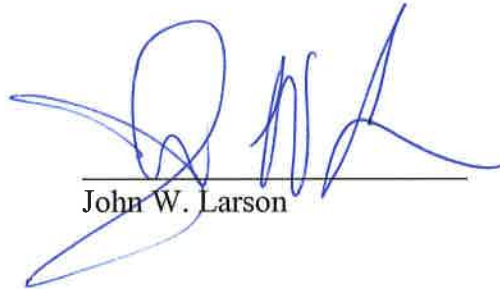
**CERTIFICATION**

I hereby certify that a copy of the foregoing document was delivered by first-class mail and e-mail to the following service list on the 15th day of March, 2011:

Carrie L. Larson  
Paul Corey  
Jeffery and Mary Stauffer  
Thomas D. McKeon  
David M. Cusick  
Richard T. Roznoy  
David R. Lawrence and Jeannie Lemelin  
Walter Zima and Brandy L. Grant  
Eva Villanova

and sent via e-mail only to:

John R. Morissette  
Christopher R. Bernard  
Joaquina Borges King



John W. Larson