



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
HISTORICAL PRESERVATION & HERITAGE COMMISSION

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19 December 2011

Captain J.P. Voboril, USN  
Commanding Officer  
Naval Station Newport  
690 Peary Street  
Newport, Rhode Island 02841-1522

Re: Proposed Wind Turbine Locations  
Comments for Environmental Assessment  
Naval Station Newport  
Newport, Middletown, and Portsmouth, Rhode Island

Dear Captain Voboril:

U.S. Naval Station Newport has conducted an Environmental Assessment of the impacts resulting from potential installation of up to 12 wind turbines ranging in height from 459 feet to as little as 211 feet to be located at one or more of 12 sites that were investigated. The Rhode Island Historical Preservation and Heritage Commission (RIHPHC) staff has reviewed reports for "Historical Resources Assessment for the Naval Station Newport Viewshed Study, Newport County, Rhode Island" prepared by Gray & Pape, Inc. for Tetra-Tech, Inc. The reports, which summarized viewshed analyses regarding sites proposed by the Navy for the location of wind turbines, have been well done and thorough.

In a letter to you dated 22 July 2011, the RIHPHC informed you that we had begun to share the revised photographic simulation information for this project with our peers whose properties are located in the area around the project. We also stated that following our receipt of comments from those groups, we would evaluate the project based on the Criteria of Adverse Effect as defined in Section 106 and issue our Section 106 determinations of effect for the project.

As you are aware, most of the groups that we contacted requested the opportunity to have representatives attend information sessions on the project that you had previously offered to conduct. We thank you for conducting these meetings on 28 October and 17 November 2011. We received responses from five of the eight groups to whom we sent information. The responses were generally in favor of a wind energy project, however, there were concerns expressed, mostly about the southernmost sites, including multiple single turbines versus one or more clusters, and the potentially out-of-scale relationship between the turbines and the built and natural environment of the area.

Based on the photographic simulations that have been provided by the Navy and in consideration of the comments that we have received from our peers, we have made a preliminary determination that the installation of wind turbines at the 12 locations under consideration will have a visual effect on the following properties:

- United States Naval War College, a National Register of Historic Places (NR) -listed and National Historic Landmark (NHL) district which includes Luce Hall, an NR-listed property: as illustrated by the photographic simulation from Battery Park (#11);
- Newport Historic District, an NR-listed and NHL district: as illustrated by photographic simulations from Battery Park (#11), Island Cemetery (#13, 13a), and Bowen's Wharf (#3);
- Bellevue Avenue National Historic Landmark District, an NR-listed and NHL district, and Ochre Point-Cliffs Historic District, an NR-listed district, both in Newport: as illustrated by photographic simulations from the Breakers (#10, 10a);
- Bellevue Avenue-Casino Historic District and the Newport Casino (and the Van Alen Casino Theatre and Newport Performing Arts Center) in Newport, an NR-listed and an NR-listed and NHL property, respectively: as illustrated by the photographic simulation from Bellevue Avenue at Casino Terrace (#5);
- Ocean Drive Historic District in Newport, an NR-listed and NHL district: as illustrated by a photographic simulation from Ida Lewis Yacht Club in Newport (#6);
- Fort Adams Historic District in Newport, an NR-listed and NHL district: as illustrated by photographic simulations from both outside and inside the Fort (#7, 8, 9);
- Windmill Hill Historic District and Jamestown Windmill in Jamestown, both of which are listed in the NR: as illustrated in two photographic simulations from the Windmill property (#25, 25a);
- Rose Island Lighthouse off the west coast of Newport, an NR-listed property: as illustrated by photographic simulations from Narragansett Bay (#12, 12a);
- Shoreby Hill Historic District in Jamestown, an NR-listed district: as illustrated by the photographic simulation from Jamestown Harbor (#26);
- Newport Naval Hospital Historic District in Newport, which is considered eligible for listing in the NR: as illustrated by photographic simulations from Cypress Street in Newport (#1, 2);
- Agricultural District at Green Lane and West Main Road in Middletown, which is considered potentially eligible for listing in the NR: as illustrated by photographic simulations from 1942 West Main Road, in Middletown (#20, 20a).

It is possible that there will also be visual effects on other historic properties within the above-listed districts.

The southernmost six proposed turbines (Katy Field, Bishop Rock, Prichard Field South, Prichard Field North, Navy Lodge, and Coddington Point), due in part to their proximity to the large number of National Register of Historic Places-listed and -eligible and National Historic Landmark-designated properties, have the greatest possibility of causing adverse visual effects to historic resources. If constructed, turbines at these locations would have adverse effects on views of the United States Naval War College NHL District, of Luce Hall, of the President's House (aka Quarters AA), of the

Point section of the Newport NHL District, and of Rose Island Lighthouse, and views within the Common Burying Ground and Island Cemetery, which is individually listed in the NR and within the bounds of the Newport NHL district, and from the Fort Adams Historic NHL District.

Additionally, the construction of the proposed turbine at Tank Farm 5 would have an adverse visual effect on the Agricultural District at Green Lane and West Main Road in Middletown, located just to the east of the turbine. Even at its FAA-maximum allowed height of 211 feet, the photographic simulations of the proposed turbine show a significant presence in this sparsely built agricultural district.

In order to reach our conclusion that the undertaking would result in adverse effects to historic properties, RIHPHC carefully considered the comments of the interested public, and we considered the visual qualities that are integral to the properties' historical significance and historical character. We concluded that simple visibility of a proposed wind turbine from a historic property would not, by itself, constitute an adverse effect. However, when the visual impact of one turbine or the cumulative effect of multiple turbines diminished the integrity of the historic property's setting, feeling, and association, we concluded that an adverse effect would result as described in the federal Procedures of the Advisory Council on Historic Preservation (36 CFR Part 800.5(a)). For example, the southernmost turbines significantly intrude on the historic waterfront character of the Point section of the Newport NHL District, and they seriously alter the visual setting of historic properties on Coasters Island, Rose Island, and Fort Adams. The visibility of any turbines would significantly intrude on the historic landscape character of the Common Burying Ground and Island Cemetery.

In addition to identifying visual impacts to specific historic properties, RIHPHC agrees with comments of the Preservation Society of Newport County that: "The viewshed of Newport and its Harbor, its component landscapes and structures represents a globally significant cultural resource. This year nearly ten million vehicles will have crossed the Bridge onto or off the island, and approximately 121,000 visitors arrived by cruise ship to tour Newport. We believe their view of historic Newport would have been adversely impacted if wind turbines were installed on the proposed sites 6-12 [Building 6CC aka Derecktor Shipyard, Building 1112 aka Coddington Point, Building 1285 aka Navy Lodge, Bishops Rock, Prichard Field – North, Prichard Field – South, and Katy Field, respectively]." Acceptance of adverse visual effects from Navy turbines not only would diminish the integrity of significant historic properties, but could also affect Newport's attractiveness as a destination for cultural tourism.

We understand that the Navy is in the process of gathering information for consolidation in an environmental assessment, after which it will review and evaluate the document in order to make a decision whether or not to construct wind turbines at these locations. At such time that the Navy decides to pursue and construct wind turbines, we will expect to review those plans under the regulations set forth in Section 106 of the National Historic Preservation Act.

Based on the information that has been provided by the Navy, we have made a preliminary determination that the project will not have a direct, physical impact to any above-ground historic property.

We have reviewed the draft of the Phase I archaeological investigation that was transmitted to our office; we assume that the final version will include information on who did the work, information on the project impacts, and additional historical and archaeological context for the areas investigated.

We concur that no additional archaeological survey is required at the following areas:

- Tank Farm 3
- Tank Farm 4 Turbine Site B
- NUWC
- Derecktor Shipyard
- Coddington Point
- Navy Lodge
- Bishops Rock
- Prichard Field North
- Prichard Field South
- Katy Field

At Tank Farm 5, a historical site, RI 2519, was discovered to the north of the proposed wind turbine. We concur that no further survey is need for this site at the present time. However, if the wind turbine location should shift to the north, additional survey would be needed to determine the spatial extent of RI 2519, and, depending on the results of that survey, a Phase II investigation might be necessary to determine if RI 2519 is eligible for listing on the National Register of Historic Places.

At Tank Farm 4 Turbine Site A, prehistoric artifacts were recovered from the plow zone. It is our opinion that this site, designated RI 2520, could potentially be eligible for listing on the National Register. A Phase II survey should be conducted to determine if this is the case.

These comments are provided in accordance with Section 106 of the National Historic Preservation Act. We look forward to working with the Navy and its team to complete this important project. If you have any questions, please contact Jeffrey Emidy, Project Review Coordinator, or Charlotte Taylor, Staff Archaeologist, of this office.

Very truly yours,



Edward F. Sanderson  
Executive Director  
State Historic Preservation Officer

cc: John Brown, NITHPO  
D.D. Dorocz, Environmental Department Head, Naval Station Newport  
Shannon Kam, Naval Station Newport  
Keith Stokes, Executive Director, RI Economic Development Corporation

To: Captain J.P. Voboril  
Re: Navy Wind Turbines

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cc, cont:

Dana Corson, Preservation Planner, Newport Historic District Commission, by email  
Trudy Coxe, Chief Executive Officer, Preservation Society of Newport County, by email  
Beth Cullen, President, The Point Association, by email  
Grover Fugate, Executive Director, RI Coastal Resources Management Council, by email  
John Grosvenor, Commissioner, RIHPHC, by email  
Eric Hertfelder, Executive Director, Fort Adams Trust, by email  
David McCurdy, Executive Director, Rose Island Foundation, by email  
Ronald Onorato, Commissioner, RIHPHC, by email  
Linnea Petersen, President, Jamestown Historical Society  
Pieter Roos, Executive Director, Newport Restoration Foundation, by email  
Mark Stenning, Chief Executive Officer, Int'l Tennis Hall of Fame & Museum, by email  
Valerie Talmage, Executive Director, Preserve Rhode Island, by email