



*Preserving America's Heritage*

November 7, 2012

Captain Doug Mikatarian, USN  
Commanding Officer  
Naval Station Newport  
690 Peary Street  
Newport, RI 02841-1522

***Ref: Proposed Wind Energy Project at Naval Station Newport  
Newport, Newport County, Rhode Island***

Dear Captain Mikatarian:

On July 13, 2012, the Advisory Council on Historic Preservation (ACHP) advised you of our decision to participate in the consultation for the above referenced project in accordance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800). The ACHP has been involved in consultation on a number of wind energy projects, and we look forward to bringing that perspective to the early stages of this important project and to assist in the Section 106 compliance process.

We understand that the Navy is proposing to install wind turbines at Naval Station Newport under the Department of Defense's (DoD's) Energy Conservation Investment Program (ECIP). Naval Station Newport's stated purpose, (from Navy's letter to RIHPHC dated February 10, 2011) is to "reduce our energy consumption." The ACHP acknowledges the imperative to seek renewable energy sources and we note that examples of modern wind energy installations are not yet plentiful. Offshore wind energy projects have included only the Cape Wind project, an offshore turbine field that received a Department of the Interior permit but is still under legal challenge; and DoD's Programmatic Agreement for the "Smart from the Start" Atlantic Wind Energy Initiative on the Outer Continental Shelf. Land-based wind energy projects have been located in western states, with the exception of the Atlantic Wind Power Facility project in North Carolina, an inland array of 150 turbines, which is under consultation.

This wind turbine project proposed for Naval Station Newport is unprecedented to our knowledge, in that these land-based turbines are proposed for coastal locations for which an Area of Potential Effect (APE) for visual effects would be extensive and populous. In view of the challenges of high-visibility turbines in this sensitive location, it is incumbent on the Navy to consider alternatives to land-based wind turbines that might achieve the goal of reducing energy consumption, such as energy conservation programs, facility improvements to achieve energy efficiency, and aggregating bargaining power with other users to achieve better energy rates. In evaluating such alternatives, a life-cycle cost analysis may reveal that the small scale of a wind

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004

Phone: 202-606-8503 • Fax: 202-606-8647 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)

turbine project here may not achieve the cost-effectiveness that accompanies larger-scale wind farms; which leads to a concern about the reasonably foreseeable need to expand the project in order to attain efficiencies of scale. The ACHP recommends that the Navy consider a broader approach to achieving energy conservation goals across multiple installations to achieve efficiencies of scale.

The proposed APE for the suggested turbine locations encompasses significant historic properties and therefore, the proposal for highly visible infrastructure presents substantial challenges. The definition of the APE may need to be expanded to encompass the broader setting of these multiple historic properties and districts. We also note that the Narragansett Tribe has been invited to comment on a government-to-government basis regarding whether the project may affect properties which may be of religious and cultural significance to them. In addition, photo-simulations of each potential location from key vantage points within the APE may not capture some of the key characteristics of wind turbines (such as persistence of the distant object in a moving field of vision, potential movement-related effects of the spinning turbine such as sunlight glints and shadow-flicker effects, and audible effects) on historic properties. Given these additional effects, the necessary analysis needed to evaluate the effects of these factors on historic properties may be costly and difficult to achieve without more specific information on siting and product selection. Such planning may best be achieved through a more intensive government-led planning process prior to award of a contract for design/construction.

It is important that Naval Station Newport clarify these issues more fully in future consultations on the project. Should you have any questions, please contact Louise D. Brodnitz, Program Analyst, at 202-606-8527 or via email at [lbrodnitz@achp.gov](mailto:lbrodnitz@achp.gov).

Sincerely,



Caroline D. Hall  
Assistant Director  
Federal Property Management Section  
Office of Federal Agency Programs