

APPENDIX J

**Finding of Adverse Effect for Historic Properties and
Draft Memorandum of Agreement**

Introduction

Attached to this appendix are the Bureau of Ocean Energy Management's (BOEM's) *Finding of Adverse Effect for the Revolution Wind Farm and Revolution Wind Export Cable Construction and Operations Plan* (Finding) and *Draft Memorandum of Agreement Among the Bureau of Ocean Energy Management, the State Historic Preservation Officers of Connecticut, Massachusetts, New York, and Rhode Island, and the Advisory Council on Historic Preservation Regarding the Revolution Wind Farm and Revolution Wind Export Cable Project* (MOA).

The Finding documents BOEM's determination of adverse effect on historic properties pursuant to this environmental impacts statement (EIS) analysis and to Sections 106 and 110 of the National Historic Preservation Act (NHPA), as guided by the Section 106 regulations in 36 Code of Federal Regulations 800. BOEM has found that the Revolution Wind Farm and Revolution Wind Export Cable Project (Project) would have an adverse effect on historic properties.

BOEM is completing the MOA in consultation with consulting parties under NHPA Section 106 and with opportunity for public review of draft iterations of the MOA as presented in this appendix of the Draft EIS and the Final EIS. This draft MOA includes stipulations, measures for resolving adverse effects, and treatment plans and other attachments. The MOA will be finalized through this consultation process and posted for public access after completion of the Final EIS and before a record of decision.

Mitigation measures for cultural resources are drafted in the MOA and its historic property treatment plans attached in this appendix. Under the MOA, adverse effects from the Project to National Register of Historic Places (NRHP)-eligible cultural resources, including national historic landmarks (NHLs) and traditional cultural places (TCPs), would be avoided, minimized, or mitigated in accordance with the NHPA Section 106 regulations (36 CFR 800) and in compliance with Section 110(f).

The MOA also has attached post-review discovery plans for onshore and offshore cultural resources, should previously undiscovered or unimpacted historic properties be identified and moderate to major negative effects cannot be avoided. The post-review discovery plans would be implemented to assess and resolve any negative effects to these cultural resources. NRHP-eligible cultural resources that are discovered post-review, if adversely affected, would be mitigated through the NHPA Section 106 process.

This page intentionally left blank.

**Finding of Adverse Effect for the Revolution Wind Farm and
Revolution Wind Export Cable Construction and Operations Plan**

Finding of Adverse Effect for the Revolution Wind Farm and Revolution Wind Export Cable Construction and Operations Plan

June 2023

CONFIDENTIAL

Contents

1	Introduction.....	1
1.1	Marine Cultural Resources.....	1
1.2	Terrestrial Cultural Resources.....	2
1.3	Above Ground Historic Properties.....	2
2	Project Overview.....	7
2.1	Background.....	7
2.2	Undertaking.....	8
2.3	Area of Potential Effects.....	12
2.3.1	Marine Area of Potential Effects.....	12
2.3.2	Terrestrial Area of Potential Effects.....	13
2.3.3	Visual Area of Potential Effects.....	14
3	Steps Taken to Identify Historic Properties.....	16
3.1	Technical Reports.....	16
3.1.1	Report Summary – Marine.....	16
3.1.2	Report Summary – Terrestrial.....	16
3.1.3	Report Summary – Visual.....	17
3.2	Consultation and Coordination with Consulting Parties and the Public.....	20
3.2.1	Early Coordination.....	20
3.2.2	National Environmental Policy Act Scoping and Public Hearings.....	20
3.2.3	Section 106 Consultation.....	20
4	Application of the Criteria of Adverse Effect.....	29
4.1	Adversely Affected Historic Properties.....	29
4.1.1	Assessment of Effects to Historic Properties in the Marine Area of Potential Effects.....	29
4.1.2	Assessment of Effects to Historic Properties in the Terrestrial Area of Potential Effects.....	34
4.1.3	Assessment of Effects to Historic Properties in the Visual Area of Potential Effects.....	35
5	Actions to Avoid, Minimize, or Mitigate Adverse Effects.....	59
5.1	Alternatives Considered.....	59
5.1.1	National Historic Landmarks.....	59
5.1.2	Action Alternatives that Would Minimize the Adverse Effect of the Project.....	61
5.2	Avoidance, Minimization, and Mitigation Measures.....	66
6	Literature Cited.....	68

List of Appendices

Appendix A	Area of Potential Effects Map Figures
Appendix B	Map Figures of Historic Properties in Relation to the Area of Potential Effects (detached)
Appendix C	Visual Simulations at the Pertinent Key Observation Points for Adversely Affected National Historic Landmarks

List of Figures

Figure 1. Block Island Southeast Lighthouse before it was offset from the bluff edge (Stupich 1988).....	43
Figure 2. Ocean Drive Historic District photographed from the sea (NRHP 1976).	50
Figure 3. Chateau-sur-mer in the Bellevue Avenue Historic District (Boucher 1969; NRHP 1972).	52
Figure 4. The Breakers in the Bellevue Avenue Historic District (NRHP 1971a).	54
Figure 5. Marble House in the Bellevue Avenue Historic District (NRHP 1971b).	55
Figure A-1. Revolution Wind construction and operations plan proposed offshore Project elements.	A-1
Figure A-2. Revolution Wind construction and operations plan proposed onshore Project elements.	A-2
Figure A-3. Visual area of potential effects and visual effects assessment geographic analysis area – onshore.	A-3
Figure A-4. Visual area of potential effects and visual effects assessment geographic analysis area – offshore.	A-4
Figure A-5. National historic landmarks in the visual area of potential effects – offshore.	A-5

List of Tables

Table 1. Historic Properties, Consisting of Ancient Submerged Landforms (Geomorphic Features), Adversely Affected by the Project.....	1
Table 2. Historic Properties, Consisting of Terrestrial Cultural Resources, Adversely Affected by the Project.....	2
Table 3. Above Ground Historic Properties Adversely Affected by the Project, in Order of Nearest Distance to Project WTGs.....	2
Table 4. Description of the Alternatives Reviewed in the Environmental Impact Statement.....	8
Table 5. Cultural Resources Investigations Performed by Revolution Wind in the Area of Potential Effects (Marine, Terrestrial, and Visual).....	18
Table 6. Parties Invited to Participate in 106 Consultation.....	21
Table 7. Consulting Parties Participating in 106 Consultation.....	25

List of Abbreviations

ACHP	Advisory Council on Historic Preservation
ADLS	aircraft detection lighting system
APE	area of potential effects
ASLF	ancient submerged landform
BOEM	Bureau of Ocean Energy Management
B.P.	before present
bsb	below seabed
ca.	circa
CATEX	Categorical Exclusion
CHRVEA	Cumulative Historic Resources Visual Effects Analysis
confidential	contains material that meets the criteria for confidentiality under Section 304 of the NHPA
CT	Connecticut
EA	Environmental Assessment
EIS	environmental impact statement
Finding	Finding of Effect
FONSI	Finding of No Significant Impact
GIS	geographic information system
HDD	horizontal directional drilling
HPTPs	historic property treatment plans
HRVEA	Historic Resources Visual Effects Analysis
IAC	inter-array cable
ICF	interconnection facility
MA	Massachusetts
MARA	Marine Archaeological Resources Assessment
MHC	Massachusetts Historical Commission
MOA	memorandum of agreement
MW	megawatt
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NOI	notice of intent
NPS	National Park Service
NMFS	National Marine Fisheries Service
NRHP	National Register of Historic Places
NY	New York
O&M	operations and maintenance
OCS	Outer Continental Shelf
OnSS	onshore substation
OSS	offshore substation

PA	programmatic agreement
PAL	Public Archaeology Laboratory, Inc.
PDE	project design envelope
PPAs	power purchase agreements
RI	Rhode Island
RIHPHC	Rhode Island Historical Preservation & Heritage Commission
RI/MA WEA	Rhode Island/Massachusetts Wind Energy Area
ROD	Record of Decision
RODA	Responsible Offshore Development Alliance
RWEC	Revolution Wind Export Cable
RWF	Revolution Wind Farm
SAP	Site Assessment Plan
SHPO	State Historic Preservation Officer
SWCA	SWCA Environmental Consultants
TARA	Terrestrial Archaeological Resources Assessment
TCP	Traditional Cultural Place
TNEC	The Narragansett Electric Company
Tribal Nation	Federally-recognized Indian Tribe
vhb	Vanasse Hangen Brustlin, Inc.
VIA	Visual Impact Assessment
WTG	wind turbine generator

1 Introduction

The Bureau of Ocean Energy Management (BOEM) is reviewing the construction and operations plan (COP) prepared by Vanasse Hangen Brustlin, Inc. (vhb) (2023) for the Revolution Wind Farm (RWF) and Revolution Wind Export Cable (RWEC) Project (the Project). The RWF is located in the Rhode Island-Massachusetts Wind Energy Area (RI/MA WEA), and the RWEC connects to Rhode Island (RI).

BOEM has made a Finding of Adverse Effect (Finding) for the Project pursuant to Section 106 of the National Historic Preservation Act (NHPA) (54 USC 306108), the implementing regulations for the Section 106 process (“Protection of Historic Properties” 36 CFR Part 800). BOEM has determined the Project would adversely affect National Historic Landmarks (NHLs) and, in compliance with Section 110(f) of the NHPA (54 USC 306107) BOEM, to the maximum extent possible, conducted early planning and actions as may be necessary to minimize harm to the NHLs. This Finding documents potential effects to historic properties in marine, terrestrial, and above ground historical contexts, including the NHLs. As defined in 36 CFR 800.16(l)(1), “Historic property means any prehistoric [or pre-contact] or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places [NRHP] maintained by the Secretary of the Interior.” The term historic property includes all NHLs as well as properties of traditional religious and cultural importance to Tribal Nations that are eligible for NRHP listing (36 CFR 800.16(l)(1)). Historic properties include “properties formally determined as such in accordance with regulations [in 36 CFR 63] of the Secretary of the Interior and all other properties that meet the National Register criteria” (36 CFR 800.16(l)(2)).

1.1 Marine Cultural Resources

In the COP, Revolution Wind, LLC (Revolution Wind) has identified 32 marine cultural resources in the Project’s area of potential effects (APE) that are of archaeological interest. Based on potential connections to significant historical events and on the important information these resources could provide, BOEM is treating these 32 resources as eligible for listing in the NRHP and, therefore, as historic properties. These marine cultural resources consist of 19 potential submerged archaeological marine resources, designated as shipwrecks/possible historic shipwrecks; although, they may also include other sunken crafts and structures. The 32 resources further consist of 13 geomorphic features, also referred to as ancient submerged landforms (ASLFs), that are of importance to Tribal Nations as well as being of potential archaeological significance. The COP indicates that all 19 shipwrecks/possible historic shipwrecks would be avoided with sufficient buffers by all proposed activities that are part of the Project and, as a result, there would be no effects to these potential historic properties (SEARCH, Inc. [SEARCH] 2023). Nine of the 13 ASLFs on the Outer Continental Shelf (OCS) and in RI state waters (Table 1) are not determined fully avoidable by physical disturbance from Project construction activities and, as a result, BOEM has determined these nine would be adversely affected.

Table 1. Historic Properties, Consisting of Ancient Submerged Landforms (Geomorphic Features), Adversely Affected by the Project

Geomorphic Feature ID	Location	Description
Target-21	RWEC (RI)	
Target-22	RWEC (RI)	

Geomorphic Feature ID	Location	Description
Target-23	RWEC (OCS)	[REDACTED]
Target-24	RWF (OCS)	[REDACTED]
Target-25	RWF (OCS)	[REDACTED]
Target-26	RWF (OCS)	[REDACTED]
Target-28	RWF (OCS)	[REDACTED]
Target-29	RWEC (RI)	[REDACTED]
Target-30	RWEC (RI)	[REDACTED]

Source: SEARCH (2023:Table 4-2). Mapped ASLF extents and locations (SEARCH 2023) contain material that meets the criteria for confidentiality under Section 304 of the NHPA and are not publicly distributed.

1.2 Terrestrial Cultural Resources

In the COP, Revolution Wind identified four archaeological sites not fully avoidable in the construction of onshore Project components. BOEM has determined that two of the archaeological sites (Table 2) are historic properties and would be adversely affected by onshore substation (OnSS) development.

Table 2. Historic Properties, Consisting of Terrestrial Cultural Resources, Adversely Affected by the Project

Terrestrial Cultural Resources	Portion of Project	Description
[REDACTED] #1	[REDACTED]	[REDACTED]/Archaeological
[REDACTED] #2	[REDACTED]	[REDACTED]/Archaeological

Source: Forrest and Waller (2023)

1.3 Above Ground Historic Properties

In the COP, the offshore Historic Resources Visual Effects Analysis (HRVEA) (EDR 2023; Revolution Wind 2022a) identified 451 above ground historic properties in the APE. The onshore HRVEA (EDR 2021a) identified 80 above ground historic properties and found two of these to be in the APE. Quonset Point Historic Naval Air station was addressed in both HRVEAs (EDR 2021a, 2023). The above ground historic properties range from individual structures to complex sites, historic districts, and Traditional Cultural Places (TCPs) that are within the viewshed of offshore and onshore Project facilities. BOEM has determined that offshore Project facilities would adversely affect 101 historic properties in RI and Massachusetts (MA) (Table 3) by introducing visual impacts from the Project wind turbine generators (WTGs) and offshore substations (OSSs).

Table 3. Above Ground Historic Properties Adversely Affected by the Project, in Order of Nearest Distance to Project WTGs

Survey ID	Visually Sensitive Resource	Municipality	County	State	Property Designation	Distance to nearest RWF WTG (miles)
TCP-3	[REDACTED] TCP	[REDACTED]	[REDACTED]	MA	NRHP-eligible (BOEM determined)	6*
300	Sakonnet Light Station	Little Compton	Newport	RI	NRHP-listed resource	12.7

Survey ID	Visually Sensitive Resource	Municipality	County	State	Property Designation	Distance to nearest RWF WTG (miles)
297	Warren Point Historic District	Little Compton	Newport	RI	NRHP-eligible resource (RIHPHC determined)	12.9
299	Abbott Phillips House	Little Compton	Newport	RI	RIHPHC historic resource	13
504	Flaghole	Chilmark	Dukes	MA	MHC historic inventory site	13.3
296	Stone House Inn	Little Compton	Newport	RI	NRHP-listed resource	13.4
503	Simon Mayhew House	Chilmark	Dukes	MA	MHC historic inventory site	13.5
496	71 Moshup Trail	Aquinnah	Dukes	MA	MHC historic inventory site	13.7
484	Vanderhoop, Edwin DeVries Homestead	Aquinnah	Dukes	MA	NRHP-listed resource	13.7
480	Gay Head - Aquinnah Shops Area	Aquinnah	Dukes	MA	MHC historic inventory site	13.7
474	Flanders, Ernest House, Shop, Barn	Aquinnah	Dukes	MA	MHC historic inventory site	13.8
495	3 Windy Hill Drive	Aquinnah	Dukes	MA	MHC historic inventory site	13.9
479	Gay Head Light	Aquinnah	Dukes	MA	NRHP-listed resource	13.9
485	Tom Cooper House	Aquinnah	Dukes	MA	MHC historic inventory site	14
497	Leonard Vanderhoop House	Aquinnah	Dukes	MA	MHC historic inventory site	14
490	Theodore Haskins House	Aquinnah	Dukes	MA	MHC historic inventory site	14.1
486	Gay Head - Aquinnah Coast Guard Station Barracks	Aquinnah	Dukes	MA	MHC historic inventory site	14.1
491	Gay Head - Aquinnah Town Center Historic District	Aquinnah	Dukes	MA	NRHP-listed resource	14.2
303	Gooseneck Causeway	Westport	Bristol	MA	MHC historic inventory site	14.8
304	Gooseberry Neck Observation Towers	Westport	Bristol	MA	MHC historic inventory site	14.8
540	Spring Street	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	14.9
590	Capt. Mark L. Potter House	New Shoreham	Washington	RI	RIHPHC historic resource	14.9
276	Tunipus Goosewing Farm	Little Compton	Newport	RI	NRHP-Eligible Resource (RIHPHC Determined)	15
543	WWII Lookout Tower – Spring Street	New Shoreham	Washington	RI	NRHP-Eligible Resource (RIHPHC Determined)	15.1
251	Westport Harbor	Westport	Bristol	MA	MHC historic inventory site	15.2
290	Bellevue Avenue Historic District NHL	Newport	Newport	RI	NHL	15.2
548	Block Island Southeast Lighthouse NHL	New Shoreham	Washington	RI	NHL	15.2
595	New Shoreham Historic District	New Shoreham	Washington	RI	Local Historic	15.3
536	Spring Cottage	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.3
531	Old Harbor Historic District	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC-determined)	15.3
538	Captain Welcome Dodge Sr.	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.3
541	Caleb W. Dodge Jr. House	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.3
535	Spring House Hotel	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.4

Survey ID	Visually Sensitive Resource	Municipality	County	State	Property Designation	Distance to nearest RWF WTG (miles)
545	Pilot Hill Road and Seaweed Lane	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.4
222	Ocean Drive Historic District NHL	Newport	Newport	RI	NHL	15.7
298	Marble House NHL	Newport	Newport	RI	NHL	15.7
597	Ochre Point – Cliffs Historic District	Newport	Newport	RI	NRHP-listed resource	15.8
546	WWII Lookout Tower at Sands Pond	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.8
552	Sea View Villa	Middletown	Newport	RI	RIHPHC historic resource	15.9
295	Rosecliff/Oelrichs (Hermann) House/ Mondroe (J. Edgar) House	Newport	Newport	RI	NRHP-listed resource	15.9
293	The Breakers NHL	Newport	Newport	RI	NHL	15.9
516	Corn Neck Road	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.9
302	Clam Shack Restaurant	Westport	Bristol	MA	MHC historic inventory site	15.9
301	Horseneck Point Lifesaving Station	Westport	Bristol	MA	MHC historic inventory site	15.9
553	Whetstone	Middletown	Newport	RI	RIHPHC historic resource	16
284	The Bluff/John Bancroft Estate	Middletown	Newport	RI	RIHPHC historic resource	16
288	Clambake Club of Newport	Middletown	Newport	RI	NRHP-listed resource	16
530	Old Town and Center Roads	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16
526	Beach Avenue	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.1
519	Mitchell Farm	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.1
523	Indian Head Neck Road	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.2
168	Westport Pt. Revolutionary War Properties	Westport	Bristol	MA	MHC historic inventory site	16.2
261	Indian Avenue Historic District	Middletown	Newport	RI	NRHP-listed resource	16.2
278	St. Georges School	Middletown	Newport	RI	NRHP-listed resource	16.3
528	Hygeia House	New Shoreham	Washington	RI	NRHP-listed resource	16.3
527	U.S. Weather Bureau Station	New Shoreham	Washington	RI	NRHP-listed resource	16.3
549	Miss Abby E. Vaill/1 of 2 Vaill cottages	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.4
550	Hon. Julius Deming Perkins / "Bayberry Lodge"	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.4
542	Lakeside Drive and Mitchell Lane	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.5
280	Land Trust Cottages	Middletown	Newport	RI	NRHP-eligible resource (RIHPHC determined)	16.6
482	Russell Hancock House	Chilmark	Dukes	MA	MHC historic inventory site	16.6
163	Westport Point Historic District (1 of 2)	Westport	Bristol	MA	NRHP-eligible resource (MHC determined)	16.7

Survey ID	Visually Sensitive Resource	Municipality	County	State	Property Designation	Distance to nearest RWF WTG (miles)
164	Westport Point Historic District (2 of 2)	Westport	Bristol	MA	NRHP-listed resource	16.7
551	Mohegan Cottage/Everett D. Barlow House	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.7
266	Paradise Rocks Historic District	Middletown	Newport	RI	RIHPHC historic resource	16.8
547	Lewis- Dickens Farm	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.8
525	Island Cemetery/Old Burial Ground	New Shoreham	Washington	RI	RI Historical Cemetery	16.8
279	Kay St.-Catherine St.-Old Beach Rd. Historic District/The Hill	Newport	Newport	RI	NRHP-listed resource	16.9
532	Beacon Hill Road	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.9
533	Nathan Mott Park	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.9
515	Block Island North Lighthouse	New Shoreham	Washington	RI	NRHP-listed resource	17.1
522	Champlin Farm	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	17.1
517	Hippocampus/Boy's Camp/ Beane Family	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	17.2
520	U.S. Lifesaving Station	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	17.4
518	U.S. Coast Guard Brick House	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	17.4
521	Peleg Champlin House	New Shoreham	Washington	RI	NRHP-listed resource	17.5
469	Hancock, Captain Samuel - Mitchell, Captain West House	Chilmark	Dukes	MA	NRHP-eligible resource (MHC determined)	17.6
508	Scrubby Neck Schoolhouse	West Tisbury	Dukes	MA	MHC historic inventory site	18
345	Point Judith Lighthouse	Narragansett	Washington	RI	NRHP-listed resource	18.2
245	Bailey Farm	Middletown	Newport	RI	NRHP-listed resource	18.3
226	Beavertail Light	Jamestown	Newport	RI	NRHP-listed resource	18.4
582	Horsehead/Marbella	Jamestown	Newport	RI	NRHP-listed resource	18.6
333	Ocean Road Historic District	Narragansett	Washington	RI	NRHP-listed resource	18.9
335	Dunmere	Narragansett	Washington	RI	NRHP-listed resource	19.2
86	Puncatest Neck Historic District	Tiverton	Newport	RI	RIHPHC historic resource	19.4
576	Fort Varnum/Camp Varnum	Narragansett	Washington	RI	NRHP-eligible resource (RIHPHC determined)	19.6
156	Salters Point	Dartmouth	Bristol	MA	MHC historic inventory site	19.7
578	Dunes Club	Narragansett	Washington	RI	NRHP-listed resource	19.8
329	Life Saving Station at Narragansett Pier	Narragansett	Washington	RI	NRHP-listed resource	19.8
330	The Towers Historic District	Narragansett	Washington	RI	NRHP-listed resource	19.8
591	Narragansett Pier MRA	Narragansett	Washington	RI	NRHP-listed resource	19.8
328	The Towers/Tower Entrance of Narragansett Casino	Narragansett	Washington	RI	NRHP-listed resource	19.9

Survey ID	Visually Sensitive Resource	Municipality	County	State	Property Designation	Distance to nearest RWF WTG (miles)
TCP-1	████████████████████	████████	██████	MA	NRHP-eligible resource (BOEM determined)	20
343	Brownings Beach Historic District	South Kingstown	Washington	RI	NRHP-listed resource	21.8
444	Tarpaulin Cove Light	Gosnold	Dukes	MA	NRHP-listed resource	22.1
391	Clark's Point Light	New Bedford	Bristol	MA	NRHP-listed resource	24.6
390	Fort Rodman Historic District	New Bedford	Bristol	MA	NRHP-eligible resource (MHC determined)	24.6
392	Fort Taber Historic District	New Bedford	Bristol	MA	NRHP-listed resource	24.6
386	Butler Flats Light Station	New Bedford	Bristol	MA	NRHP-listed resource	25.6
389	744 Sconticut Neck Road	Fairhaven	Bristol	MA	MHC historic inventory site	25.9
449	Nobska Point Lighthouse	Falmouth	Barnstable	MA	NRHP-listed resource	28

Source: EDR (2023:Attachment A)

Notes: MHC = Massachusetts Historical Commission, RIHCPC = Rhode Island Historical Preservation & Heritage Commission.

* This TCP extends for several miles offshore, including within 6 miles of the nearest potential Project WTG offshore ██████████
████████████████████

2 Project Overview

On March 13, 2020, BOEM received the initial COP to develop a wind energy project within BOEM Renewable Energy Lease Area OCS-A 0486 (Lease Area) from Revolution Wind. In the revised version of the COP (submitted in December 2021), Revolution Wind proposes the construction, operations, and eventual decommissioning of the Project, with up to 100 WTGs, up to two OSSs, inter-array cables (IACs) buried under the seafloor linking the individual WTGs to the OSS, one OSS-link cable under the seafloor linking the OSSs to each other, up to two offshore sub-seafloor export cables, a 3.1-acre landfall work area for the export cables to come ashore at Quonset Point, a buried onshore transmission cable system, up to one OnSS and adjacent interconnection facility (ICF) with a buried connection line, and an overhead connection from the ICF to The Narragansett Electric Company's (TNEC) existing Davisville Substation (and the electrical grid in RI) (Figures A-1 and A-2 in Appendix A [vhb 2023:Figures ES-1 and ES-2]). Revolution Wind is utilizing a project design envelope (PDE) in its COP, which represents a range of design parameters that could be used for the Project. In reviewing the PDE, BOEM is analyzing the maximum impacting scenario (or maximum-case scenario) that could occur from any combination of the Project parameters. BOEM's analysis and review of the PDE could result in the approval of a project that is constructed within that range or a subset of design parameters within the proposed range.

For the RWF, as proposed in Revolution Wind's COP, each of the up to 100 WTGs would have a nameplate capacity of 8 to 12 megawatts (MW)¹. The WTGs, OSSs, IACs, and OSS-link cable would be located in the Lease Area approximately 13 nautical miles (nm) (approximately 15 miles) east of Block Island, RI, and approximately 15 nm (approximately 17.25 miles) southeast of the coast of mainland RI. The RWEC would be buried in the seabed within federal OCS and RI state waters. The onshore transmission cabling, OnSS, ICF, and one grid connection would be located in Washington County, RI.

2.1 Background

The RWF is located within the RI/MA WEA where BOEM has conducted previous Section 106 reviews for issuance of the commercial lease and approval of site assessment activities. The Section 106 process was completed through a programmatic agreement (PA)² executed June 8, 2012 (BOEM 2012a), prepared concurrently with the BOEM's environmental assessment (EA) for commercial wind lease issuance and site assessment activities on the Atlantic OCS offshore RI and MA (BOEM 2012b, 2013). A commercial lease sale for the RI/MA was held in 2013 and Revolution Wind was the winner of Lease OCS-A 0486 (under its current number designation). Subsequent to award of the lease, Revolution Wind submitted a site assessment plan (SAP) describing the proposed construction and installation, operations and maintenance (O&M), and decommissioning of a stand-alone offshore meteorological data collection

¹ BOEM's EIS also analyzes an alternative that, if selected, would implement a higher nameplate capacity WTG (up to 14 MW assumed for the analysis) than what is in the COP project design envelope. This higher capacity WTG, however, must still fall within the physical design parameters of the PDE and thus within the maximum case design parameters used for evaluating impacts in the EIS and this Finding. It is important to note, however, that under this alternative less than 100 WTGs would be approved and installed, potentially reducing some of the impacts described in this Finding depending on which WTG positions were to be removed.

² *Programmatic Agreement among the U.S. Department of the Interior, Bureau of Ocean Energy Management; the State Historic Preservation Officers of Massachusetts and Rhode Island; the Mashpee Wampanoag Tribe; the Narragansett Indian Tribe; the Wampanoag Tribe of Gay Head (Aquinnah); and the Advisory Council on Historic Preservation Regarding the "Smart from the Start" Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities Offshore Massachusetts and Rhode Island*

system (Tetra Tech 2016), which BOEM reviewed and approved (BOEM 2017). Section 106 reviews for both the lease issuance and the approval of the SAP were conducted pursuant to the PA (BOEM 2012a). These reviews concluded with a BOEM determination of no historic properties affected for lease issuance, corresponding to the finding of no significant impact (FONSI), consequent to EA finalization on June 4, 2013. NEPA review of the SAP for categorical exclusion (CATEX) documented BOEM’s finding of no historic properties affected under Stipulation 1 of the PA, on September 21, 2016 (and for consequent SAP approval on October 12, 2017).

2.2 Undertaking

BOEM has determined that the construction, operation, maintenance, and eventual decommissioning of the Project is the undertaking subject to Section 106 and that the activities proposed in the COP have the potential to affect historic properties. Detailed information about the Project, including the COP and its appendices, can be found on BOEM’s website (see <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan-april-2021>). BOEM sent those appendices to the COP that identify cultural resources and assess historic properties to all consulting parties on February 28, 2022.. On August 1, 2022, and simultaneous to the March 2023 release of this Finding, BOEM sent revised versions of these appendices. These documents contain material that meets the criteria for confidentiality under Section 304 of the NHPA. The contents of the COP, as well as its public and confidential appendices on cultural resources, should be referred to by readers, where cited, and are not repeated in detail by the Finding.

BOEM has elected to use NEPA substitution for the Section 106 review pursuant to 36 CFR 800.8(c) (see also Advisory Council on Historic Preservation [ACHP} 2020; Council on Environmental Quality and ACHP 2013). BOEM’s Section 106 review for this undertaking includes the identification and evaluation of historic properties and the assessment of effects for all the action alternatives identified during the NEPA review, in the draft environmental impact statement (EIS) for the Project (BOEM 2022a). The EIS analyzes the impacts of the Project to the human environment and specifically to cultural resources, including historic properties. The final EIS and Section 106 review analyze a total of 17 alternatives (A through G and variants under four of these [C1–C2, D1–D3, E1–E2, and G1–G3]), as presented in Table 4. BOEM has identified a preferred alternative for the final EIS that would be a combination of the alternatives analyzed in the EIS; however, this alternative would result in no changes to BOEM’s finding adverse effect for the Project. BOEM’s final decision will be described in the record of decision (ROD).

Table 4. Description of the Alternatives Reviewed in the Environmental Impact Statement

Alternative	Description
A: No Action Alternative	Under the No Action Alternative, BOEM would not approve the COP. Project construction and installation, O&M, and decommissioning would not occur, and no additional permits or authorizations for the Project would be required. Any potential environmental and socioeconomic impacts, including benefits, associated with the Project as described under the Proposed Action or the Preferred Alternative, would not occur. However, all other past and ongoing impact-producing activities would continue... The current resource condition, trends, and impacts from ongoing

	<p>activities under the No Action Alternative serve as the baseline against which the direct and indirect impacts of all action alternatives are evaluated.</p> <p>Over the life of the Project, other reasonably foreseeable future impact-producing offshore wind and non-offshore wind activities would be implemented, which would cause changes to the affected environment even in the absence of the Proposed Action or the Preferred Alternative. The continuation of all other existing and reasonably foreseeable future activities described in Appendix E [of the EIS] without the Proposed Action serves as the baseline against which the cumulative impacts of all alternatives are evaluated.</p>
<p>B: Proposed Action Alternative (Proposed Action)</p>	<p>The construction and installation, O&M, and eventual decommissioning of a wind energy facility within the PDE and applicable mitigation measures, as described in the COP. The Proposed Action includes up to 100 WTGs ranging in nameplate capacity of 8 to 12 MW sufficient to fulfill at a minimum the existing power purchase agreements (PPAs, totaling 704 MW) and up to 880 MW, the maximum capacity identified in the PDE. The WTGs will be connected by a network of IACs; up to two OSSs³ connected by one OSS-link cable; up to two submarine export cables co-located within a single corridor; up to two underground transmission circuits located onshore; one onshore ICF; and one OnSS inclusive of up to two interconnection circuits connecting to the existing Davisville Substation in North Kingstown, RI. The Proposed Action includes the burial of offshore export cables below the seabed in both the OCS and RI state waters and a uniform east-west and north-south grid of 1 × 1-nm spacing between WTGs⁴.</p>
<p>C: Habitat Impact Minimization Alternative</p>	<p>The construction and installation, O&M, and eventual decommissioning of a wind energy facility within the PDE and applicable mitigation measures, as described in the COP. To reduce impacts to complex fisheries habitats most vulnerable to permanent and long-term impacts from the Proposed Action, however, certain WTG positions would be eliminated while maintaining a uniform east-west and north-south grid of 1 × 1-nm spacing between WTGs. The placement of WTGs would be supported by location-specific benthic and habitat characterizations conducted in close coordination with National Marine Fisheries Service (NMFS). Under this alternative, fewer WTG locations (and potentially fewer miles of IACs) than Alternative B would be approved by BOEM. Under this alternative, there are 5 “spare” WTGs:</p> <ul style="list-style-type: none"> • Alternative C1: This alternative allows for the fulfillment of the existing three PPAs, which total 704 MW, while omitting WTGs in locations to maintain a uniform east-west/north-south grid of 1 × 1-nm spacing between WTGs. Under this alternative, up to 35 WTGs and associated IACs would be removed from consideration, resulting in up to 65 WTGs and associated IACs being approved. • Alternative C2: This alternative allows for the fulfillment of the existing three PPAs, which total 704 MW, while omitting WTGs in locations to maintain a uniform east west and north-south grid of 1 × 1-nm spacing between WTGs. Under this alternative, up to 36 WTGs and associated IACs would be removed from consideration, resulting in up to 64 WTGs and associated IACs being approved. <p>Refer to EIS Appendix K for background information on the development of the Alternative C1 and C2 layouts.</p>

³ Each OSS has a maximum nominal capacity of 440 MW; two OSSs are required to achieve the PPA obligations of 704 MW.

⁴ In accordance with 30 CFR Part 585.634(C)(6), micro-siting of WTG foundations may occur within a 500-ft radius around each proposed WTG location. Micro-siting of WTGs will be performed on a case-by-case basis to avoid significant seabed hazards such as surface and subsurface boulders, as stated in the COP.

<p>D: No Surface Occupancy in One or More Outermost Portions of the Project Area Alternative</p>	<p>The construction and installation, O&M, and eventual decommissioning of a wind energy facility within the PDE and applicable mitigation measures, as described in the COP. However, to reduce conflicts with other competing space-use vessels, WTGs adjacent to or overlapping transit lanes proposed by stakeholders or the Buzzard’s Bay Traffic Separation Scheme Inbound Lane, would be eliminated while maintaining the uniform east-west and north-south 1 × 1–nm grid spacing between WTGs. Under this alternative, BOEM could select one, all, or a combination of the following three alternatives, while still allowing for the fulfillment of existing PPAs and up to the maximum capacity identified in the PDE (i.e., 880 MW). Under this alternative, fewer WTG locations (and potentially fewer miles of IACs) than Alternative B would be approved by BOEM. Under this alternative, there are up to 6 “spare” WTGs:</p> <ul style="list-style-type: none"> • Alternative D1: Removal of the southernmost row of WTGs that overlap the 4-nm east-west transit lane proposed by the Responsible Offshore Development Alliance (RODA), as well as portions of Cox Ledge. Under this alternative, up to 7 WTGs and associated IACs would be removed from consideration, resulting in up to 93 WTGs and associated IACs being approved. • Alternative D2: Removal of the eight easternmost WTGs that overlap the 4-nm north-south transit lane proposed by RODA. Under this alternative, up to 8 WTGs and associated IACs would be removed from consideration, resulting in up to 92 WTGs and associated IACs being approved. • Alternative D3: Removal of the northwest row of WTGs adjacent to the Inbound Buzzards Bay Traffic Lane. Under this alternative, up to 7 WTGs and associated IACs would be removed from consideration, resulting in up to 93 WTGs and associated IACs being approved. <p>The selection of all three alternatives (i.e., D1, D2, and D3) would eliminate up to 22 WTG locations and associated IACs, resulting in up to 78 WTGs and associated IACs being approved while maintaining the 1 × 1–nm grid spacing proposed in the COP and as described in Alternative B. Based on the design parameters outlined in the COP, allowing for the placement of 78 to 93 WTGs and two OSSs would still allow for the fulfillment of up to the maximum capacity identified in the PDE (e.g., 880 MW = 74 WTGs needed if 12 MW WTGs are used).</p>
<p>E: Reduction of Surface Occupancy to Reduce Impacts to Culturally-Significant Resources Alternative</p>	<p>The construction and installation, O&M, and eventual decommissioning of a wind energy facility within the PDE and applicable mitigation measures, as described in the COP. However, to reduce the visual impacts on culturally important resources on Martha’s Vineyard and in RI, some WTG positions would be eliminated while maintaining the uniform east-west and north-south 1 × 1–nm grid spacing between WTGs. Under this alternative, fewer WTG locations (and potentially fewer miles of IACs) than Alternative B would be approved by BOEM. Under this alternative, there are up to 5 “spare” WTGs:</p> <ul style="list-style-type: none"> • Alternative E1: Allows for the fulfillment of the existing three PPAs totaling 704 MW, while eliminating WTG locations to reduce visual impacts on these culturally-important resources. Under this alternative, up to 36 WTGs and associated IACs would be removed from consideration, resulting in up to 64 WTGs and associated IACs being approved. • Alternative E2: Allows for a power output delivery identified in the PDE of up to 880 MW while eliminating WTG locations to reduce visual impacts on these culturally-important resources. Under this alternative, up to 19 WTGs and associated IACs would be removed from consideration, resulting in up to 81 WTGs and associated IACs being approved. <p>Refer to EIS Appendix K for background information on the development of the Alternative E1 and E2 layouts.</p>

<p>F: Selection of a Higher Capacity Wind Turbine Generator</p>	<p>The construction and installation, O&M, and eventual decommissioning of a wind energy facility implementing a higher nameplate capacity WTG (up to 14 MW) than what is proposed in the COP. This higher capacity WTG must fall within the physical design parameters of the PDE and be commercially available to the Project proponent within the time frame for the construction and installation schedule proposed in the COP. The number of WTG locations under this alternative would be sufficient to fulfill the minimum existing PPAs (total of 704 MW and 56 WTGs, including up to five “spare” WTG locations). Using a higher capacity WTG would potentially reduce the number of foundations constructed to meet the purpose and need and thereby potentially reduce impacts to marine habitats and culturally significant resources and potentially reduce navigation risks.</p>
<p>G: Preferred Alternative</p>	<p>The construction and installation, O&M, and eventual decommissioning of a wind energy facility within the range of the design parameters outlined in the COP, subject to applicable mitigation measures. The Preferred Alternative is designed to reduce impacts to visual resources and benthic habitat and includes up to 79 possible positions for the installation of 65 WTGs with a nameplate capacity of 8-12 MW necessary to fulfill the existing PPAs (total of 704 MW) while maintaining the uniform east–west and north–south 1 × 1–nm grid spacing between WTGs. There are up to 14 “spare” WTG positions available for use if unforeseen siting conditions occur necessitating relocation of any of the 65 WTGs from the planned position(s). Two of the 65 WTGs have the flexibility to be located in 3 different spots within the 79 WTG possible positions. As a result, this alternative includes the analysis of three layouts for installation of the 65 WTGs. This flexibility in design could allow for further refinement for visual resources impact reduction on Martha’s Vineyard and Rhode Island, or for habitat impact reduction in the NMFS Priority 1 area.</p> <ul style="list-style-type: none"> • Alternative layout G1: Allows for the fulfillment of the existing three PPAs totaling 704 MW, while relocating 2 WTG locations from NMFS Priority 1 area to reduce fishery and essential fish habitat impacts. Under this alternative, 35 WTGs and associated IACs would be removed from consideration, resulting in 65 WTGs and associated IACs being installed in the positions identified in layout G1. • Alternative layout G2: Allows for the fulfillment of the existing three PPAs totaling 704 MW, while relocating 2 WTG locations to reduce visual impacts on the horizon from the Aquinnah Overlook, a culturally-important resource. Under this alternative, 35 WTGs and associated IACs would be removed from consideration, resulting in 65 WTGs and associated IACs being installed in the positions identified in layout G2. • Alternative layout G3: Allows for the fulfillment of the existing three PPAs totaling 704 MW, while relocating 2 WTG locations closest to the shore of Martha’s Vineyard to reduce visual impacts on culturally-important resources. Under this alternative, 35 WTGs and associated IACs would be removed from consideration, resulting in 65 WTGs and associated IACs being installed in the positions identified in layout G3. <p>All other components of Alternative G are the same as Alternative B and include: up to two offshore substations (OSSs) connected by an offshore substation-link cable; up to two submarine export cables co-located within a single corridor; up to two underground transmission circuits located onshore within a single corridor; and an onshore substation inclusive of up to two interconnection circuits within a single corridor connecting to the existing Davisville Substation in North Kingstown, Rhode Island.</p> <p>Refer to Appendix K for background information on the development of the Alternative G and Alternative G1, G2 and G3 layouts.</p>

Source: BOEM final EIS Table 2.1-1

2.3 Area of Potential Effects

The geographic analysis area, as described for potential impacts to cultural resources (marine, terrestrial, and above ground) in the EIS under NEPA is equivalent to the Project’s APE, as defined in the Section 106 regulations. In 36 CFR 800.16(d), the APE is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause alteration in the character or use of historic properties, if any such properties exist.” BOEM (2020) defines the Project APE as follows:

- the depth and breadth of the seafloor potentially affected by any bottom-disturbing activities, constituting the marine cultural resources portion of the APE;
- the depth and breadth of terrestrial areas potentially affected by any ground-disturbing activities, constituting the terrestrial cultural resources portion of the APE;
- the viewshed from which renewable energy structures, whether located offshore or onshore, would be visible, constituting the APE for visual impacts analysis; and
- any temporary or permanent construction or staging areas, both onshore and offshore.

This Finding assesses effects only to historic properties within the APE for the Project. These effects include reasonably foreseeable effects caused by the Project that could occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5(a)(1)).

2.3.1 Marine Area of Potential Effects

BOEM (2020) defines the APE for marine cultural resources (hereafter marine APE) as the depth and breadth of the seafloor potentially impacted by bottom-disturbing activities of the Project (Figure A-1 in Appendix A) (SEARCH 2023).

2.3.1.1 Revolution Wind Farm Maximum Work Area

The marine APE encompasses all offshore areas where seafloor-disturbing activities from WTG and OSS foundation construction IAC trenching and installation, boulder relocation, and vessel anchoring could occur. The RWF COP PDE proposes up to 100 WTGs and two OSSs within the extent of the APE. Each potential WTG and OSS foundation location includes up to approximately 3-acres of seafloor disturbance under the maximum-case scenario, for a combined total of approximately 734 acres of horizontal construction disturbance for up to 102 offshore Project foundations, reaching up to a maximum vertical extent of 164 feet below seabed (bsb) for monopile foundations (BOEM 2022a). Under the maximum-case scenario up to 164 miles of IAC and OSS-link cable would be installed, resulting in up to 2,619 acres of seafloor disturbance and reaching cable emplacement depths of up to 10 feet below seafloor (BOEM 2022a). The target IAC and OSS-link cable burial depth requirement for the Project is 4 to 6 feet bsb.

2.3.1.2 Revolution Wind Farm Export Cable Offshore Corridor

The RWEC would span approximately 42 miles through federal waters and RI state waters with landfall near Quonset Point, RI (BOEM 2022a). Combined, the two parallel cables’ length would be approximately 84 miles. The RWEC would span 19 miles of the OCS and 23 miles through RI state waters before reaching landfall (BOEM 2022a). The entire RWEC would be located within a 1,640-foot-wide Project easement (8,349 acres) with the maximum depth of RWEC burial impact extending 13 feet

(4 m) below the seafloor (BOEM 2022a). The target RWEC burial depth requirement for the Project is 4 to 6 feet bsb. The maximum-case scenario for horizontal seafloor disturbance of the RWEC would be 1,390 acres of the 8,349 acre-corridor (BOEM 2022a). At the landfall work area, the marine APE also includes workspaces where potential seafloor-disturbing activities associated with horizontal directional drilling (HDD), potentially involving use of an offshore cofferdam, and vessel anchoring could occur. Details of the onshore transition for the RWEC is described with the landfall envelope in Section 2.3.2.1.

2.3.1.3 Offshore Vessel Anchoring

Vessel anchoring for RWF and RWEC construction, operations, maintenance, and decommissioning would disturb up to 3,178 acres of seafloor under the maximum-case scenario (BOEM 2022a). Anchors for cable-laying vessels have a maximum penetration depth of 15 feet within the RWF and 18 feet for the RWEC (SEARCH 2023). Anchoring would be limited to the RWF maximum work area and the RWEC corridor (see Figure B-1).

2.3.2 Terrestrial Area of Potential Effects

BOEM (2020) defines the APE for terrestrial cultural resources (hereafter terrestrial APE) as the depth and breadth of terrestrial areas potentially impacted by any ground-disturbing activities of the Project. This includes the areas of the landfall envelope, onshore transmission cable easement, OnSS, and ICF depicted in Figure A-2.

2.3.2.1 Landfall Envelope

Revolution Wind is considering a range of siting options for the RWEC landfall, all of which are encompassed by a 20-acre landfall work area. Within this area, 3.1 acres would be sited, within which ground disturbance associated with the onshore transmission cable construction would occur. The deepest disturbances within the landfall work area would be associated with the HDD construction method for cable emplacement, which could entail the installation of temporary sheet pile anchor walls driven to a depth of approximately 20 feet. The HDD drill itself could reach a depth of up to 66 feet below the seafloor and between the onshore transition joint bays and the offshore exit pits. HDD sediment displacement would be largely confined to the two 3-foot-diameter bore holes.

2.3.2.2 Onshore Transmission Cabling

The width of potential ground disturbance for the onshore transmission cable is assumed to be at the extent of the Project easement, which is 25 feet wide centered along the cable route. The preferred onshore transmission cable route from the landfall location to the OnSS is an approximately 1-mile route that would predominantly follow along paved roads or previously disturbed areas such as parking lots. There are alternative onshore transmission cable routes under consideration within the onshore transmission cable PDE, as depicted on Figure A-2. The maximum-scenario for onshore cable disturbance is 16.7 acres. Although some of the alternative routes under consideration have segments that would be installed in undeveloped vegetated areas, these alternates would mostly be installed within paved roads and parking lots (as with the preferred onshore transmission cable route) and would be approximately the same length. Project-related ground disturbance could extend to a maximum depth of 13 feet below ground level anywhere within the width of this easement. Installation of the onshore transmission cable

would impact approximately 3.1 acres; therefore, only a portion of the 16.7-acre onshore transmission cable envelope would actually be impacted by installation of the onshore transmission cable.

2.3.2.3 Onshore Substation and Interconnection Facility

Construction of the OnSS and ICF would together require disturbance of approximately 11 acres within the terrestrial APE (BOEM 2022a). The maximum depth of disturbance within the OnSS and ICF work area limit is 60 feet below ground surface. The OnSS and ICF would have an underground cable connecting them, and the ICF would have an overhead cable connecting to the adjacent, existing TNEC Davisville substation.

2.3.3 Visual Area of Potential Effects

The APE for potential visual effects (hereafter visual APE) from the Project consists of onshore coastal areas of Connecticut (CT), New York (NY), RI, and MA. Maximum limits of theoretical visibility are represented by 1-mile, 3-mile, and 40-mile radii for each respective onshore or offshore Project component (WTG, OSS, OnSS, ICF, or O&M facility); however, these radii do not define the visual APE. Within these radii, the visual APE is defined only by those geographic areas with a potential visibility of Project components and, therefore, the visual APE excludes areas with obstructed views of Project components. Visibility and views of Project components were determined through a viewshed analysis (EDR 2021a, 2021b, 2021c, 2023). The viewshed analysis applied geographic information system (GIS) modeling to take into account the true visibility of the Project (e.g., visual barriers such as topography, vegetation, and intervening structures that obstruct the visibility of Project components).

Areas with potentially unobstructed views of offshore Project components comprise the APE for above ground historic properties (visual APE); see the shaded visual APE (Offshore Facility Viewshed) and visual APE (Onshore Facility Viewshed) areas in Figures A-3 and A-4. Figure A-4 also depicts reasonably foreseeable future project areas for consideration of cumulative effects within the visual APE.

2.3.3.1 Onshore Project Components

Onshore Project facilities with above ground components include the OnSS and ICF, and these components have a viewshed radius of 3 miles. Onshore Project components where redevelopment of existing facilities could occur (O&M facilities) have a viewshed radius of 1 mile around and include potential O&M facilities at the Port of Davisville at Quonset Point and Port Robinson. The 1-mile radius at the Port of Davisville at Quonset Point O&M facility is completely subsumed within the 3-mile radius around the ICF and OnSS (Figure A-3).

The horizontal extent of the OnSS and ICF, as described under the terrestrial APE at Section 2.3.2.3, would be within an 11-acre area of disturbance. The maximum height of OnSS and ICF equipment would be up to 45 feet above ground, with OnSS shielding masts extending further, up to 65 feet, and the ICF overhead transmission circuit structures reaching up to 80 feet above ground (BOEM 2022a). Facility lighting was considered in the analysis of visual effects.

2.3.3.2 Offshore Project Components

Offshore Project components (e.g., WTGs) have a viewshed radius of 40 miles around the edge of the Lease Area (Figure A-4). The Project ██████████ extends to above ground historic properties in the following cities and towns (EDR 2023):

- RI—Bristol, Charlestown, Cranston, East Greenwich, Exeter, Jamestown, Little Compton, Middletown, Narragansett, New Shoreham, Newport, North Kingstown, Portsmouth, South Kingstown, Tiverton, Warwick, and Westerly;
- MA—Acushnet, Aquinnah, Barnstable, Bourne, Chilmark, Dartmouth, Edgartown, Fairhaven, Fall River, Falmouth, Gosnold, Marion, Mattapoisett, Nantucket, New Bedford, Swansea, Tisbury, Wareham, West Tisbury, and Westport;
- NY—East Hampton and Southold; and
- CT—Groton.

Above ground historic property distribution in the visual APE is mapped on Figure A-4. APE delineation and historic property identification assessed the potential visibility of a WTG from the water level to the tip of an upright rotor blade at a height of 873 feet and further considered how distance and curvature of the Earth affect visibility as space between the viewing point and WTGs increases (EDR 2021c, 2023). Potential WTG and OSS locations and spacing in the Project Lease Area also informed analyses, including when combined with the cumulative development of other reasonably foreseeable offshore wind developments (EDR 2021b). The analysis further considered the nighttime lighting of offshore structures and construction lighting.

3 Steps Taken to Identify Historic Properties

3.1 Technical Reports

To support the identification of historic properties within the APE, Revolution Wind has provided survey reports detailing the results of multiple investigations within the APE (marine, terrestrial, and visual). Table 5 provides a summary of these efforts to identify historic properties and the key findings/recommendations of each investigation. BOEM has reviewed and accepted all reports summarized in Table 5. BOEM found that the preliminary APEs identified by Revolution Wind are appropriate for the magnitude, extent, location, and nature of the undertaking; that the reports collectively represent a good faith effort to identify historic properties within the APE; and that the reports are sufficient to apply the Criteria of Adverse Effect (see Section 4) and to continue consultations with consulting parties for taking into account and resolving adverse effects to historic properties.

3.1.1 Report Summary – Marine

The Marine Archaeological Resources Assessment (MARA) provides the results of the archaeological survey of the seafloor and seabed within the marine APE for historic properties, largely represented by ASLFs and shipwrecks/possible historic shipwrecks. ASLFs represent submerged [REDACTED] that were inundated by approximately 8,000 years before present (B.P.), with submersion taking several thousand years at the beginning of the Holocene epoch, following the last ice age. Shipwrecks and similar submerged craft or structures of the type found to date sank within the past 400 years, after European colonization of New England. Historic properties (shipwrecks/possible historic shipwrecks and ASLFs) located in the marine APE in the RWF Lease Area and the RWEC corridor are depicted in Appendix B (Figure B-1) (SEARCH 2023:Figure 4-1). Appendix B contains sensitive historic property location information that meets the criteria for confidentiality under Section 304 of the NHPA and, for this reason, is detached from the publicly available copies of the Finding.

3.1.2 Report Summary – Terrestrial

The Terrestrial Archaeological Resources Assessment (TARA) provides the results of land-surface and subsurface-onshore archaeological survey (Phase I archaeological survey) of the terrestrial APE. The RWEC would transition from sea to shore at Quonset Point in RI. Quonset Point is in an area [REDACTED] extending to the west and southwest of the terrestrial APE (Forrest and Waller 2023). However, construction, operations, decommissioning, and large-scale redevelopment of former military facilities at Quonset Point following World War II has substantially altered the terrestrial APE. Intact pockets of natural soils represent a small percentage of all surficial earth. The proposed OnSS site was used as a general dump site during naval operations (1940s through 1960s); several hundred tons of debris and soil were removed from this dump site during remediation activities in the late 1990s. The pockets of relatively intact natural soils within the terrestrial APE are located within [REDACTED] work area limits and along the southern margins of the landfall area (Forrest and Waller 2023).

The Public Archaeology Laboratory, Inc. (PAL) contacted the RIHPHC and the Narragansett Indian Tribe, Wampanoag Tribe of Gay Head (Aquinnah), Mashpee Wampanoag Tribe, Mashantucket (Western) Pequot Tribal Nation, and Mohegan Tribe of Indians of Connecticut Tribal Nations to consider and

address tribal concerns within its Phase I archaeological survey area. The archaeological survey [REDACTED] of the terrestrial APE identified four [REDACTED] archaeological resources (Forrest and Waller 2023). PAL did not conduct remote sensing (ground-penetrating radar, soil resistivity, magnetometry, or similar techniques). Dense surface vegetation made remote sensing impractical, and twentieth-century dumping, filling, and other ground disturbances and landscape modifications would have produced inconclusive results. The RIHPHC also has not favored remote sensing as a method sufficiently reliable for archaeological site identification in and of itself, preferring ground truthing instead to include the excavation of test pits or other excavation units.

3.1.3 Report Summary – Visual

The onshore and offshore Historic Resources Visual Effects Analyses (HRVEAs) and cumulative HRVEA (CHRVEA) identify the range of above ground historic properties identified in the visual APE for onshore and offshore project facilities, elements, or components (interchangeably). The CHRVEA builds from the results of the HRVEAs to assess where the effects of the Project may combine cumulatively with those of other reasonably foreseeable offshore wind projects (SWCA 2023).

For the onshore components' viewshed, the HRVEA identified a total of 80 above ground viewshed resources, within 3 miles of the proposed OnSS and ICF, that consist of 16 NRHP-listed properties, two properties that have been determined by the RIHPHC to be eligible for the NRHP, nine properties included in the RIHPHC inventory but without formal determinations of NRHP eligibility, and 53 RIHCC-identified Rhode Island Historical Cemeteries (EDR 2021a). Viewshed analyses determined that of these 80 viewshed resources, two are within the visual APE. These two resources are located within the viewshed of the OnSS and ICF. The viewshed analysis determined that neither are within the viewshed of any of the five potential O&M facility locations considered in the COP. At 1.1 miles away from the OnSS and ICF location is the NRHP-listed Wickford Historic District; at 0.25 mile away is the Quonset Point Naval Air Station, determined by the RIHCC to be NRHP eligible (EDR 2021a). The historic Quonset Point Naval Air Station is also addressed in the offshore HRVEA (EDR 2023).

In relation to the offshore Project components, the HRVEA identified a total of 451 above ground historic properties within the visual APE that consist of 98 NRHP-listed properties, 73 historic properties that have been determined eligible for the NRHP, 280 properties included in the RIHPHC, Massachusetts Historical Commission (MHC), or local historic inventories but without formal determinations of NRHP eligibility (EDR 2023). Those without formal determinations of NRHP eligibility are treated as historic properties in the HRVEA and in this Finding. Twelve of the NHRP-listed viewshed resources are also NHLs (EDR 2023). These are the Montauk Point Lighthouse, Block Island Southeast Lighthouse, Original U.S. Naval War College Historic District, Fort Adams Historic District, Battle of Rhode Island Historic District, Nantucket Historic District, New Bedford Historic District, Ocean Drive Historic District, Bellevue Avenue Historic District, The Breakers, Marble House, and William Watts Sherman House (Figure A-5). Three resources documented specifically due to their categorization as TCPs in MA, and where they may extend to the OCS, consist of the [REDACTED] TCP, the [REDACTED] TCP, and the [REDACTED] TCP. These TCPs are represented by broad, complex cultural landscapes and connected seascapes (EDR 2023). The [REDACTED] TCP is NRHP listed and the [REDACTED] TCP and the [REDACTED] TCP have previously been determined NRHP eligible by BOEM.

Table 5. Cultural Resources Investigations Performed by Revolution Wind in the Area of Potential Effects (Marine, Terrestrial, and Visual)

Portion of APE	Report	Description	Key Findings/Recommendations
Offshore	<i>Marine Archaeological Resources Assessment</i> (SEARCH 2023)	Assessment of marine archaeological resources through remote sensing technologies of the marine APE	This MARA identified 19 shipwrecks/possible historic shipwrecks and 13 geomorphic features (ASLFs) of archaeological interest. SEARCH concluded avoidance is possible for 20 of the shipwrecks/possible historic shipwrecks through a 164-foot (50-meter) buffer in radius around the extent of the identified resource. Revolution Wind has determined that it would be able to fully avoid four ASLFs (Revolution Wind 2023). Full avoidance was determined not feasible at the remaining nine ASLFs and further action was recommended as necessary.*
Onshore	<i>Terrestrial Archaeological Resources Assessment Revolution Wind Farm Project Onshore Facilities</i> (Forrest and Waller 2023)	Phase I archaeological survey for the onshore components to identify terrestrial archaeological sites	This TARA identified four [REDACTED] archaeological sites. Two of the sites, [REDACTED] #1 and [REDACTED] #2, were recommended eligible for the NRHP under Criteria A and D. Full avoidance of the two historic properties was determined not feasible and further action was recommended as necessary (Forrest and Waller 2023).*
Visual	<i>Visual Impact Assessment and Historic Resources Visual Effects Analysis Revolution Wind Onshore Facilities</i> (EDR 2021a)	Report analyzing the viewsheds surrounding the O&M, OnSS, and ICF facilities proposed for Quonset Business Park/Quonset Point	This HRVEA identified 80 above ground historic properties within 3 miles of the proposed OnSS and ICF. Viewshed analyses determined that a total of two above ground historic properties are located within the viewshed of the OnSS and ICF but are not within the viewshed of any of the five potential O&M facility locations. One of these historic properties, the Quonset Point Naval Air Station, is additionally reviewed in the offshore HRVEA (EDR 2023). No adverse effects were found to above ground historic properties from proposed onshore project components (EDR 2021a).

* Note: In confidential COP Appendix BB (EDR 2022b), Revolution Wind has proposed further measures to avoid, minimize, and mitigate adverse effects from the Project to historic properties. BOEM continues meeting with consulting parties to take into account the effects of the undertaking on historic properties and to reach resolution of adverse effects through preparation and implementation of a memorandum of agreement (MOA). BOEM has drafted avoidance, minimization, and mitigation measures for historic properties in both the MOA and the historic property treatment plans (HPTPs) attached to the MOA.

Portion of APE	Report	Description	Key Findings/Recommendations
Visual	<i>Historic Resources Visual Effects Analysis Revolution Wind Farm</i> (EDR 2023)	Report analyzing the viewsheds from the WTGs and OSS through GIS modeling to determine the area of Project visibility and define the APE for historic properties sensitive to visual effects	This HRVEA identified 451 above ground historic properties within the APE, including 12 NHLs and three TCPs. These historic properties were analyzed with respect to the potential for visual effects. They were assessed according to the visibility of the offshore Project WTGs and OSS and potential Project effect on the characteristics of historic properties that make them eligible for NRHP listing. A total of 101 above ground historic properties would be adversely affected by the Project under maximum potential visibility (EDR 2023). BOEM’s further analysis of these results in the CHRVEA finds that the combined visual effects of the Project with those of other reasonably foreseeable offshore wind projects would additionally result in cumulative adverse effects to these 101 historic properties (SWCA 2023). The 101 above ground historic properties that would be adversely affected include five NHLs and two TCPs. Full avoidance of visual effects to the 101 historic properties was determined not feasible and further action was recommended as necessary in the HRVEA and CHRVEA. See * note above.
	<i>Revolution Wind Project Updates to Historic Resources Visual Effects Analysis</i> (Revolution Wind 2022a)	Memorandum reviewing revisions in 2022 to the HRVEA, originally drafted in 2021	This memo summarizes responses to consulting party comments resulting in the refinement—in the HRVEA (EDR 2023)—of the precision of historic property boundaries, the refinement of the identification and evaluation of historic properties, and the refinement of the assessment of Project visual effects to historic properties in the APE in relation to offshore project facilities.
	<i>Revolution Wind Farm National Historic Landmarks</i> (EDR 2022a)	Supplemental documentation with added summaries of NHLs in the APE and visualizations of offshore Project facilities from NHLs	This supplemental documentation further summarizes the historic significance of the 12 NHLs identified in the APE in relation to their aspects of integrity that are connected to sea views. Additional photographs and visualizations (i.e. simulated Project WTGs) for each NHL are included. These visualizations include representations of the visibility of simulated WTGs on the sea and wire-frame visualizations that indicate where WTGs would be positioned behind obstructions, such as treescapes.
	<i>Overview of Revisions to S106 Technical Reports and Document</i> (Revolution Wind 2023)	Memorandum on revisions in 2023 to the TARA, MARA, HRVEA, and historic property treatment plans (HPTPs)	This memo summarizes responses to consulting party comments resulting in the refinement—in the HRVEA (EDR 2023)—of the precision of historic property boundaries, the refinement of the identification and evaluation of historic properties, and the refinement of the assessment of Project visual effects to historic properties in the APE in relation to offshore project facilities.

3.2 Consultation and Coordination with Consulting Parties and the Public

3.2.1 Early Coordination

Since 2009, BOEM has coordinated OCS renewable energy activities for the RI/MA and MA WEAs with its federal, state, local, and tribal government partners through its intergovernmental Renewable Energy Task Force. BOEM has met regularly with federally recognized Native American Tribal Nations (Tribal Nations) that could be affected by renewable energy activities in the area since 2011, specifically during planning for the issuance of offshore wind energy leases and review of site assessment activities proposed for those leases. BOEM also hosts public information meetings to update interested stakeholders on major renewable energy milestones. Information on BOEM's RI/MA and MA Renewable Energy Task Force meetings is available at <https://www.boem.gov/Massachusetts-Renewable-Energy-Task-Force-Meetings>, and information on BOEM's stakeholder engagement efforts is available at <https://www.boem.gov/renewable-energy/state-activities/public-information-meetings>.

3.2.2 National Environmental Policy Act Scoping and Public Hearings

On April 30, 2021, BOEM published the notice of intent (NOI) to prepare an EIS for the Revolution Wind COP and published a revised NOI on June 4, 2021 (BOEM 2021a; BOEM 2021b), extending the public scoping period to June 11, 2021. The purpose of the NOI was to announce BOEM's intent to prepare an EIS and to start the public scoping period for the NEPA effort wherein BOEM solicits public input on issues of concern and potential alternatives to be considered in the EIS. Through this notice, BOEM announced that it would use the NEPA substitution process for the Section 106 review for this undertaking, in accordance with Section 106 implementing regulations.

During the public scoping period, BOEM held three virtual scoping meetings for consulting parties and the public, which included specific opportunities for engaging on issues relative to Section 106 for the Project, on Thursday, May 13; Tuesday, May 18; and Thursday, May 20, 2021. Through the NEPA scoping process, BOEM received comments related to cultural, historic, archaeological, and tribal resources. BOEM's EIS scoping report includes these comments (BOEM 2022b).

BOEM published a notice of availability of the draft EIS for the COP on September 2, 2022. As part of this process, BOEM held a 45-day comment period and public meetings (through October 17, 2022), providing further opportunity for engagement on issues pertinent to Section 106 review. BOEM held public hearings on the draft EIS on September 29 and October 4–6 and 11, 2022.

3.2.3 Section 106 Consultation

BOEM sent Section 106 consultation invitations to 127 potential consulting parties pursuant to 36 CFR 800.3(f) of the Section 106 regulations, via mail and email between April 2 and 30, 2021. Additional consulting parties were invited throughout the consultation process, as they were identified. Throughout spring and early summer 2021, as third-party consultant to BOEM, SWCA Environmental Consultants (SWCA) followed up with parties to confirm preferred points of contact and interest in participating. Consequent to BOEM drafting the Finding, BOEM additionally invited entities who may own or

administer adversely affected historic properties and requested Revolution Wind post public notices (in newspapers and at libraries and post offices) notifying the public and interested parties qualified to consult under NHPA Section 106 (36 CFR 800.2). Where appropriate, public notices were posted in both English and Spanish. The organizations BOEM invited to consult beginning in April 2021 and contacted directly in February 2023 are listed in Table 6.

Table 6. Parties Invited to Participate in 106 Consultation

Participants in the Section 106 Process	Invited Consulting Parties
SHPOs and state agencies	Connecticut State Historic Preservation Office
	Connecticut Department of Economic and Community Development
	RIHPHC
	New York State Division for Historic Preservation
	MHC
	Massachusetts Board of Underwater Archaeological Resources
	Massachusetts Commissioner on Indian Affairs
	Rhode Island Department of Environmental Management
Federal agencies	National Park Service (NPS)
	National Oceanic and Atmospheric Administration – Habitat and Ecosystem Services Division
	U.S. Army Corps of Engineers, New England District
	U.S. Army Corps of Engineers, New York District
	Office of the Deputy Assistant Secretary of the Navy for Environment (DASN(E))
	Chief of Naval Operations, Installations Division
	Naval Facilities Engineering Systems Command Headquarters– Cultural Resources
	Naval History and Heritage Command – Underwater Archaeology Branch
	Bureau of Safety and Environmental Enforcement
	U.S. Department of Defense - Office of the Deputy Assistant Secretary of Defense (Environment), Environmental Compliance and Planning
	U.S. Department of Defense - Office of the Assistant Secretary of Defense for Sustainment
	ACHP
	U.S. Coast Guard -Sector SE New England
	U.S. Coast Guard - Marine Transportation Systems (CG-5PW)
	U.S. Coast Guard – First Coast Guard District

Participants in the Section 106 Process	Invited Consulting Parties
	U.S. Fish and Wildlife Service Environmental Protection Agency Federal Aviation Administration
Federally recognized Tribal Nations	Mashpee Wampanoag Tribe Shinnecock Indian Nation Mashantucket (Western) Pequot Tribal Nation Wampanoag Tribe of Gay Head (Aquinnah) Mohegan Tribe of Indians of Connecticut Narragansett Indian Tribe Delaware Tribe of Indians The Delaware Nation
Non-federally recognized Tribal Nations	Chappaquiddick Tribe of Wampanoag Nation The Golden Hill Paugussett Eastern Pequot Tribal Nation Schaghticoke Tribal Nation Unkechaug Nation
Local governments	Cape Cod Commission City of Newport County of Dukes (MA) Town of Charlestown Town of East Hampton Town of Middletown Town of Nantucket Nantucket Planning and Economic Development Commission Town of Narragansett Town of North Kingstown City of Cranston City of East Providence City of Fall River City of New Bedford City New Bedford Historical Commission City of Providence City of Rehoboth City of Taunton

Participants in the Section 106 Process	Invited Consulting Parties
	County of Barnstable (MA)
	County of Bristol (MA)
	County of Plymouth (MA)
	County of Suffolk (NY)
	Town of Acushnet
	Town of Aquinnah
	Town of Barnstable
	Town of Barrington
	Town of Berkley
	Town of Bourne
	Town of Bristol
	Town of Chilmark
	Town of Coventry
	Town of Dartmouth
	Town of Dighton
	Town of East Greenwich
	Town of Edgartown
	Town of Exeter
	Town of Fairhaven
	Town of Falmouth
	Town of Freetown
	Town of Gosnold
	Town of Griswold
	Town of Groton
	Town of Hopkinton
	Town of Jamestown
	Town of Johnston
	Town of Lakeville
	Town of Ledyard
	Town of Little Compton
	Town of Marion
	Town of Mashpee
	Town of Mattapoisett
	Town of Middleborough

Participants in the Section 106 Process	Invited Consulting Parties
	Town of Nantucket
	Town of New Shoreham
	Town of North Stonington
	Town of Oak Bluffs
	Town of Portsmouth
	Town of Richmond
	Town of Rochester
	Town of Sandwich
	Town of Scituate
	Town of Seekonk
	Town of Somerset
	Town of South Kingstown
	Town of South Kingstown Historic District Commission
	Town of Southold
	Town of Stonington
	Town of Swansea
	Town of Tisbury
	Town of Tiverton
	Town of Tiverton Historic Preservation Advisory Board
	Town of Voluntown
	Town of Wareham
	Town of Warren
	Town of Warwick
	Town of West Greenwich
	Town of West Tisbury
	Town of West Tisbury Historic District Commission
	Town of West Warwick
	Town of Westerly
	Town of Westport
	Town of Westport Historical Commission
Non-governmental organizations or groups	Alliance to Protect Nantucket Sound
	Balfour Beatty Communities
	Beavertail Lighthouse Museum Association
	Block Island Historical Society

Participants in the Section 106 Process	Invited Consulting Parties
	Bristol Historical and Preservation Society
	Butler Flats Lighthouse (Mass Light Ltd)
	Clambake Club of Newport
	Cuttyhunk Historical Society
	East Greenwich Historic Preservation Society
	Friends of Sakonnet Light
	Gay Head Lighthouse Advisory Committee
	Martha's Vineyard Commission
	Montauk Historical Society
	Newport Historical Society
	Newport Restoration Foundation
	Norman Bird Sanctuary
	Preservation Massachusetts
	Rhode Island Historical Society
	Salve Regina University
	Southeast Lighthouse Foundation
	The Preservation Society of Newport County
	Revolution Wind (lessee)

Entities that responded to BOEM’s invitation to consult or were subsequently made known to BOEM and added as consulting parties are listed in Table 7.

Table 7. Consulting Parties Participating in 106 Consultation

Participants in the Section 106 Process	Participating Consulting Parties
SHPOs and state agencies	Connecticut State Historic Preservation Office
	Connecticut Department of Economic and Community Development
	RIHPHC
	New York State Division for Historic Preservation
	MHC
	Rhode Island Department of Environmental Management
Federal agencies	NPS
	U.S. Army Corps of Engineers, New England District
	U.S. Army Corps of Engineers, New York District
	Office of the Deputy Assistant Secretary of the Navy for Environment (DASN(E))

Participants in the Section 106 Process	Participating Consulting Parties
	Chief of Naval Operations, Installations Division Naval Facilities Engineering Systems Command Headquarters– Cultural Resources Naval History and Heritage Command – Underwater Archaeology Branch U.S. Department of Defense - Office of the Deputy Assistant Secretary of Defense (Environment), Environmental Compliance and Planning U.S. Department of Defense - Office of the Assistant Secretary of Defense for Sustainment ACHP Bureau of Safety and Environmental Enforcement U.S. Coast Guard -Sector SE New England U.S. Coast Guard - Marine Transportation Systems (CG-5PW) Environmental Protection Agency Federal Aviation Administration
Federally recognized Tribal Nations	Mashpee Wampanoag Tribe Shinnecock Indian Nation Mashantucket (Western) Pequot Tribal Nation Wampanoag Tribe of Gay Head (Aquinnah) Mohegan Tribe of Indians of Connecticut Narragansett Indian Tribe Delaware Tribe of Indians The Delaware Nation
Non-federally recognized Tribal Nations	Chappaquiddick Tribe of Wampanoag Nation Unkechaug Nation
Local governments	City of Newport County of Dukes (MA) Town of Charlestown Town of East Hampton Town of Little Compton Town of Middletown Town of Nantucket Nantucket Planning and Economic Development Commission Town of Narragansett

Participants in the Section 106 Process	Participating Consulting Parties
	Town of North Kingstown
	Town of New Shoreham
Nongovernmental organizations or groups	Block Island Historical Society
	Clambake Club of Newport
	Friends of Sakonnet Light
	Gay Head Lighthouse Advisory Committee
	Newport Restoration Foundation
	Norman Bird Sanctuary
	The Preservation Society of Newport County
	Rhode Island Historical Society
	Salve Regina University
	Southeast Lighthouse Foundation
	Revolution Wind (lessee)

On January 15–17, July 21 and 27, and August 20, 2020; on March 12 and April 9 and August 2 and 13, 2021; February 3, May 2, June 1 and 2, 2022; and January 24 and February 3, 2023, BOEM met with federally recognized Tribal Nations to simultaneously discuss multiple BOEM actions, including BOEM’s action on Revolution Wind. Officials with the Mashpee Wampanoag Tribe, Mashantucket (Western) Pequot Tribal Nation, and Wampanoag Tribe of Gay Head (Aquinnah) have attended Project cooperating agency meetings to date. BOEM received comments from the Tribal Nations during June 2021 cooperating agency meetings in the scoping of Project alternatives and weighed these in the identification of alternatives to consider in detailed EIS analyses (BOEM 2022a). See EIS Appendix A at *Government-to-Government Consultation with Federally Recognized Indian Tribes* (BOEM 2022a). The Mohegan Tribe of Indians of Connecticut, the Mashantucket (Western) Pequot Tribal Nation, the Narragansett Indian Tribe, the Wampanoag Tribe of Gay Head (Aquinnah), the Mashpee Wampanoag Tribe, the Shinnecock Indian Nation, the Delaware Nation, and the Delaware Tribe of Indians participated in various meetings. BOEM continues to consult with these and other Tribal Nations on developments in offshore wind and the Project. BOEM is planning additional government-to-government consultations for the future.

In correspondence and subsequent consultation meetings, BOEM requested information from consulting parties on defining the APE and identifying historic properties potentially affected by the proposed undertaking. BOEM held an initial Section 106 virtual consultation meeting with consulting parties on December 17, 2021, reviewing the Project background; NEPA substitution in the Section 106 process, consultation schedule, and timing; and Section 110(f) consultation requirements and BOEM’s compliance with these requirements. On February 28, 2022, the historic properties assessment/analysis reports were distributed to consulting parties (MARA, TARA, HRVEAs, and CHRVEA). BOEM held a second Section 106 virtual consultation meeting with consulting parties on April 8, 2022, reviewing technical report information and the agency’s preliminary assessment of historic properties. BOEM provided a

revised MARA, offshore HRVEA, CHRVEA and accompanying documents (i.e., a memos on technical report revisions, documentation of response to comments on historic properties assessment and analysis reports, and an updated consultation schedule), and redistributed the previously provided TARA and the onshore HRVEA, on August 1, 2022, and simultaneous to the release of this revised Finding in March 2023. BOEM held the third Section 106 virtual consultation meeting with consulting parties September 27, 2022, reviewing the August 2022 changes to the historic properties assessment/analysis reports and the Finding and draft MOA. On December 5, 2022, BOEM held a consultation meeting with the Town of Aquinnah, focusing on mitigation proposals the Town provided for their historic properties. BOEM held a consultation meeting on NHLs with consulting parties associated with the NHL review on the Project on December 14, 2022, reviewing the 12 NHLs and the supplemental NHL documentation. Meeting summaries and access to recordings of the meetings were made available to consulting parties following each meeting.

In spring and fall 2022, consulting parties provided comments on the distributed historic properties assessment and analysis reports on the identification of historic properties and preliminary considerations of effect on these properties as presented in the MARA, TARA, HRVEAs, and CHRVEA. The fall comments in 2022 included further address of the Finding, draft MOA, and draft EIS. BOEM's responses to all comments were provided in response-to-comment document releases with, and are reflected in, the revised versions of the historic properties assessment/analysis reports, which were distributed to consulting parties in August 2022 and March 2023.

BOEM will continue meeting with consulting parties to take into account the effects of the undertaking on historic properties and to reach resolution of adverse effects through preparation and implementation of a MOA. A draft MOA was provided by BOEM to consulting parties with the release of this Finding. BOEM has scheduled a meeting with consulting parties on April 7, 2023, to further review the results of the Finding and consult upon resolution of adverse effects and refine the MOA. BOEM plans to hold other future consulting party meetings to finalize the MOA and complete the NHPA Section 106 process.

4 Application of the Criteria of Adverse Effect

The Criteria of Adverse Effect under Section 106 (36 CFR 800.5(a)(1)) states that an undertaking has an adverse effect on a historic property when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative. According to the regulations (36 CFR 800.5(a)(2)), adverse effects on historic properties include, but are not limited to:

- i. physical destruction of or damage to all or part of the property;
- ii. alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines;
- iii. removal of the property from its historic location;
- iv. change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- v. introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- vi. neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian Tribe [Tribal Nations] or Native Hawaiian organization; and
- vii. transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

4.1 Adversely Affected Historic Properties

4.1.1 Assessment of Effects to Historic Properties in the Marine Area of Potential Effects

As noted in the Introduction (Section 1) to this Finding, BOEM has determined that the undertaking would have an adverse effect on nine historic properties (NRHP-eligible marine cultural resources) within the marine APE (see Table 1). Each of these are ASLF features.

Archaeological surveys within the marine APE identified 32 historic properties within the RWF maximum work area (SEARCH 2023). Of these, 19 are shipwrecks/possible historic shipwrecks and 13 are geomorphic features (ASLFs) of archaeological interest. [REDACTED]

[REDACTED]

4.1.1.1 Shipwrecks and Possible Historic Shipwrecks

All 19 shipwrecks/possible historic shipwrecks would be avoided with sufficient buffers by all proposed Project activities that are part of the undertaking, and as a result, there would be no effects to these potential historic properties (SEARCH 2023). Revolution Wind has established a protective buffer extending 50 m (164 feet) from the maximum discernable extent of the shipwreck or unidentified sonar and/or magnetic anomalies delineated in the high-resolution remote sensing survey data sets and would avoid seafloor-disturbing activities within this buffer during construction, operations, and decommissioning activities (SEARCH 2023). BOEM has determined the protective buffer to be sufficient and would require its implementation as a condition of approval if the COP is approved. Because the Project would avoid adverse effects to these shipwrecks/possible historic shipwrecks, which would be eligible for the NRHP based upon their ability to contribute further important historic and archaeological research information under NRHP Criterion D and/or their role in important events in history under NRHP Criteria A, this Finding does not go into detail on their significance and integrity; for greater detail, see the MARA (SEARCH 2023).

4.1.1.2 Ancient Submerged Landforms

As part of the MARA, SEARCH conducted for the COP an inclusive search of pre-contact period archaeological sites (i.e., archaeological sites that were once part of the terrestrial landscape and have since been inundated by global sea level rise during the late Pleistocene and early Holocene) (see BOEM 2020). Revolution Wind followed BOEM (2020), *Guidelines for Providing Archaeological and Historic Property Information Pursuant to 30 CFR 585*, in identifying and delineating ASLFs and ASLF features with archaeological potential in the marine APE, as described in the MARA (SEARCH 2023). These features may derive their significance from reasons other than their archaeological potential, such as their potential contribution to a broader culturally significant landscape. The MARA applied high-resolution geophysical survey utilizing magnetometer/gradiometer and side-scan sonar, sub-bottom profiler, and seismic data sets to identify ASLF targets or features, then developed a geotechnical testing strategy for collection of vibracore samples to a maximum depth of 20 feet to further refine targets that could be an ancient submerged landscape (SEARCH 2023:Section 3.6).

The vibracore samples recovered were subjected to macrobotanical, pollen, faunal, and radiocarbon sample analyses to further support the identification of marine archaeological sites and to inform the broader paleolandscape reconstruction (SEARCH 2023). Please see the MARA for details on the methods and results of these investigations. Although 13 ASLFs and features were identified that exhibit high archaeological potential, no evidence of human occupation associated with the ASLFs or ASLF features was identified in core samples taken during the submerged cultural resources investigation (SEARCH 2023:Section 5).

The offshore RWF area was once exposed as dry land at the end of the last ice age. Glacial retreat exposed the area beginning approximately 24,000 years before present (B.P.), and it remained exposed until between 11,000 and 8,000 B.P. when sea levels rose to submerge the area (SEARCH 2023). ASLFs are the formerly terrestrial landscapes exposed between the time of glacial retreat and submersion by the sea. Features identified as discrete surviving remnants of these landscapes, albeit submerged, are persisting areas [REDACTED]

[REDACTED] ASLFs are a finite resource that [REDACTED]

[REDACTED] and serve as an archaeological and scientific source of information for understanding the past climatic regimes, landscapes, and resources present [REDACTED] during ancient times. [REDACTED] (Joy 2018; SEARCH 2023). Additionally, low-lying areas only require low-energy sea level rise to reach inundation. With the onset of rapid sea level rise however, these same low-lying environments could have been submerged deeply and quickly, leading to potentially deeply buried, intact former terrestrial soils with higher preservation potential than high-elevation areas (SEARCH 2023). As such, using seismic data sets, sub-bottom profiler data, and preliminary ground model and geologic interpretation SEARCH employed a paleoreconstruction model within the RWF and RWEC areas to identify the ASLFs with the highest potential for preservation. The MARA identified 13 total ASLF features (Target-21 through Target-33). Of these 13, eight are located within the RWEC corridors (Target-21, Target-22, and Target-29 through Target-33 within the RWEC in RI and Target-23 within RWEC on the OCS) and five are located within the RWF area (Target-24 through Target-28) (see Table 1). Horizontal and vertical extents of the 13 ASLFs are presented in Section 5 of the MARA, in detail. Of these 13 targets, the MARA states explicitly:

[REDACTED]

[REDACTED] The extent of the intact geomorphic features of archaeological interest within the APE is minimal due to the relatively shallow impacts of the cable installation process, wind turbine layout, post-glacial processes, and marine transgression. (SEARCH 2023:202).

The MARA concluded that nine of the 13 ASLFs (all except Target-27) could be impacted by proposed Project activities, with the recommendation for further consultation to evaluate these nine features. The MARA identified that the RWF and RWEC areas have been subject to heavy erosion and redistribution of sediments through glacial and marine processes, thereby diminishing the chance of identifying preserved, intact ASLFs except for the 13 identified here (SEARCH 2023:Section 6). The majority of the Project's seafloor disturbance—in areas where ASLFs occur—is limited to 3 to 4 m (10 to 13 feet) bsb. [REDACTED]

[REDACTED] (SEARCH 2023).

Although geomorphic features (the ASLFs) exhibit high archaeological potential; as the MARA notes, no evidence of human occupation associated with the ASLFs was identified in core samples taken during the submerged cultural resources investigation (SEARCH 2023).

The 13 identified ASLFs are NRHP eligible at minimum for their connection to broad events within [REDACTED] history under NRHP Criterion A and for their ability to contribute further information to the understanding of that history under NRHP Criterion D, pursuant to 36 CFR 800.16(l) (SWCA 2021a). All ASLF and ASLF features identified in the APE are categorized as sites [REDACTED] [REDACTED] in accordance with the NRHP evaluation criteria (see SWCA 2021a). The 13 ASLF and ASLF features are individually eligible under Criterion A for their associations [REDACTED] [REDACTED] [REDACTED] They are individually eligible under Criterion D for the potential to yield important cultural, historical, and scientific information [REDACTED] [REDACTED] prior to 8,000 B.P. Consistent with NRHP Bulletin 15, natural features or sites “unmarked by cultural materials” can be eligible under Criterion D where “the study of the feature, or its location, setting, etc... will yield important information about the event or period with which it is associated” under Criterion A, and “usually in the context of data gained from other sources” (NPS 1997:22).

The ASLF and ASLF features identified within the APE each retain integrity of location, setting, association, and feeling. [REDACTED]

[REDACTED] ASLFs occupy a unique location within a relict terrestrial landscape, and the information that their paleosols and positions on the landscape may provide is important in understanding the earliest history of the region (SWCA 2021a). All ASLF and ASLF features were identified in the APE through confirmation of evidence of relict terrestrial surfaces or sediments.

Integrity of setting is important to ASLFs and ASLF features. [REDACTED]

[REDACTED] The 13 ASLF features in the marine APE for the Project retain their integrity of setting.

Integrity of association is important for connection of ASLFs and ASLF features [REDACTED]

[REDACTED] (SWCA 2021a). The 13 ASLF features in the marine APE for the Project continue to convey these associations [REDACTED]

Integrity of feeling is key to the significance of these properties [REDACTED] Though now submerged, the ASLFs document the paleoclimate [REDACTED] through palynological, geochemical, and other analysis points of the prehistoric natural environment. These ASLFs and ASLF features provide well-preserved evidence of the landscape [REDACTED] (SWCA 2021a). [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] (SWCA 2021a). The 13 ASLF features in the marine APE for the Project retain their integrity of feeling. Under NRHP Criteria B and C, insufficient information is available to determine eligibility for the 13 ASLF in the marine APE for the Project.

ASLFs and ASLF features are preserved under limited conditions, making persisting sites rare examples of the property type. However, they retain [REDACTED]
[REDACTED] their historic character and significance (SWCA 2021a), in accordance with NRHP Bulletin 15 (NPS 1997). No cultural materials, patterns of design, or elements of workmanship have yet been identified at these ASLFs or ASLF features. The 13 ASLF features in the marine APE for the Project are not known to retain integrity of material, workmanship, and design.

BOEM has found that the Project would potentially result in adverse effects to nine of the 13 ASLFs within the RWF and RWEC areas; however, Revolution Wind would use micrositing of project cabling and WTGs to the extent able to avoid these adverse effects (e.g., by placing cabling in younger sediments [REDACTED]). In terms of the Criteria of Adverse Effect, where the ASLFs are not avoidable, the undertaking would result in the permanent, irreversible physical destruction at or damage to nine of the ASLF features (excluding ASLF Target-27). [REDACTED]
[REDACTED]

At Target-22, Target-23, Target-24, Target-26, Target-27, and Target-28, final design scenarios could result in full avoidance of physical Project disturbance (Revolution Wind 2022b). At Target-21, Target-29, and Target-30, adverse effects would be limited and minimized by micrositing (SEARCH 2023). Target-25 may not be avoidable by WTG placement under the maximum case scenario, however, it could be avoidable by alternatives where fewer than 100 WTGs would be constructed.

At Target-22, Target-23, and Target-24, complete avoidance is feasible for the RWEC, and Target 26 can be avoided vertically if cable burial depth of 4-6 ft is maintained across the feature, as Revolution Wind intends (Revolution Wind 2022b). At each of these four ASLFs, [REDACTED]
[REDACTED] the maximum-case scenario for the RWEC, so impacts would be limited and could be minimized by micrositing (SEARCH 23). At Target-27, project siting would avoid its known extent by excluding all physical Project disturbance from the ASLF feature boundary. At Target-28, WTG placement and workspaces could be microsited to avoid [REDACTED]
[REDACTED] the maximum-case scenario for the IAC (SEARCH 23).

At Target-21, Target-29, and Target-30 along the RWEC and at Target-25 along the IAC, [REDACTED]
[REDACTED] the maximum-case scenario for the RWEC. As a result, impacts would be limited and could be minimized by micrositing (SEARCH 2023).

Target-31 is located [REDACTED] where anchor penetration could impact the feature; therefore, Revolution Wind has committed to avoidance of Target-31 by establishing a no anchor zone to avoid impacts to this feature (Revolution Wind 2023). Target-32 and Target-33 [REDACTED]
[REDACTED] would be physically avoided by project impacts (Revolution Wind 2023). Although potential anchoring depths of up to 18 feet bsb also

increase the consideration of the horizontal extent of ASLFs on portions of the RWEC, where deeper anchor depths could occur, the potential for adverse effects to ASLFs are previously accounted for and would not increase given Revolution Wind’s commitment to exclusion of anchoring from these ASLF areas (Revolution Wind 2023).

4.1.2 Assessment of Effects to Historic Properties in the Terrestrial Area of Potential Effects

BOEM has determined that the undertaking would have an adverse effect on two historic properties (██████████ archaeological sites) within the terrestrial APE (see Table 2). Overall, the TARA identified four ██████████ archaeological resources. ██████████
██████████
██████████ (Forrest and Waller 2023). ██████████ #1 archaeological site and the ██████████
██████████ #2 archaeological site are eligible for NRHP listing under Criteria A and D and are archaeologically significant (see Table 2).

██████████ #1 . . . likely contains significant new information ██████████
██████████
██████████
██████████
██████████
██████████
██████████ #1 is eligible for listing in the National Register under Criteria A and D. (Forrest and Waller 2023:4-24)

██████████ #2 Site may contain significant new information on ██████████
██████████
██████████
██████████
██████████
██████████
██████████ #2 Site is eligible for listing in the National Register under Criteria A and D. (Forrest and Waller 2023:4-25)

Revolution Wind is committed to avoiding or minimizing impacts to these sites to the best extent feasible. However, ██████████ plans are unlikely to be able to fully avoid impacts to these two historic properties, and adverse effects would result. Therefore, BOEM will continue to consult with the Tribal Nations, Revolution Wind, other federal and state agencies, and consulting parties to develop and implement an archaeological mitigation/treatment plan to resolve adverse effects that Project construction would have on the ██████████ #1 and ██████████ #2 sites. These mitigation measures would be made a requirement of the MOA for the project. ██████████

[REDACTED]

[REDACTED]

[REDACTED]

4.1.3 Assessment of Effects to Historic Properties in the Visual Area of Potential Effects

BOEM has determined that the undertaking would have an adverse effect on 101 historic properties within the visual APE for offshore development (see Table 3). Of the 101 above ground historic sites and districts in the visual APE that could be susceptible to visual adverse impacts from the offshore components of the Project, 37 are listed on the NRHP (five of which are also NHLs). The remaining 64 are properties that have been determined to be eligible for the NRHP (a total of 33) or are included in the inventories of the RIHPHC, MHC, or local entities with final determinations of NRHP eligibility pending (a total of 31). The 101 adversely affected above ground historic properties are coastal properties with open ocean viewsheds toward the RWF. They include five NHLs in RI: Southeast Lighthouse on Block Island and Ocean Drive Historic District, Bellevue Avenue Historic District, The Breakers, and Marble House at Newport. They also include two TCPs in MA: [REDACTED]

[REDACTED]

Although the visual APE for onshore development also contains two historic properties in the viewshed of the OnSS and ICF, BOEM has determined that no adverse effects would result at these two historic properties. The historic Quonset Point Naval Air Station and Wickford Historic District are within the visual APE of the OnSS and ICF; however, these onshore Project facilities would be in scale and character with the current use of the Quonset Point Naval Air Station and would not introduce contrasting visual elements inconsistent with either that naval air station or with the existing setting of the Wickford Historic District (BOEM 2021a). Although the historic Quonset Point Naval Air Station is also in the range of potential physical effects due to the potential construction of the Project’s RWEC landfall and onshore cable siting on Quonset Point, BOEM has determined that physical Project disturbance would not diminish the integrity of the Quonset Point Naval Air Station and no adverse effects would result.

The HRVEA identified the 101 adversely affected historic properties from 451 above ground historic properties in the viewshed of offshore project components and therefore in the visual APE; 246 of these are in MA, 197 in RI, 6 in NY, and 2 in CT (EDR 2023:Table 3.1.1-1 and Attachment A). To determine visual APE intersections with these 451 historic properties, the HRVEA used the Spatial Join extension in the ESRI ArcGIS® software and refined historic property parcel boundaries to determine which historic properties, identified in files searches and previous historic properties surveys, overlaid with the modeled Project viewshed (EDR 2023; Revolution Wind 2022a). The results of this exercise were then manually reviewed to confirm the location of each resource in areas of potential visibility (EDR 2021). This process was then repeated to determine which resources had visibility of RWF aircraft warning lights and the OSS. Finally, redundant resource points were eliminated, along with contributing resources (e.g., those not individually recorded as historic properties) which were located within historic districts (EDR 2023).

In this Finding, consistent with the HRVEA, “historic districts within the [APE] were counted as a single property regardless of the number of contributing properties located within the [APE] in each district, as it was considered a conservative approach to address potential impacts to the entirety of the district rather than just select properties. Available documentation for NHL and NRHP-listed districts did not always

indicate the total number of contributing properties, or which properties are considered to be contributing to the significance of a given district” (EDR 2023:20). This means that effects to historic districts and the contributing properties within them were considered as a whole, inclusive of those portions of the district that may extend beyond the APE.

Potential impacts to above-ground historic properties within the [visual]APE which have individual designations apart from the historic districts in which they are located were evaluated on an individual basis. Potential impacts to historic districts within the [visual] APE were considered to the entirety of the district as one property, rather than to each of the contributing properties, as not all contributing properties within historic districts are located in the [visual]APE. This approach is considered to be conservative as far as addressing potential impacts to historic districts as a whole. (EDR 2023:19)

As the HRVEA notes, the primary “potential effect resulting from the introduction of WTGs into the visual setting for any historic or architecturally significant property is dependent on a number of factors, including distance, visual dominance, orientation of views, viewer context and activity, and the types and density of modern features in the existing view (such as buildings/residences, overhead electrical transmission lines, cellular towers, billboards, highways, and silos)” (EDR 2023:101).

Potential visual effects were assessed by considering a number of factors for each above-ground historic property, including:

- Maritime setting
- Contribution of views of the sea to the above-ground historic property’s significance
- The location and orientation of the above-ground historic property relative to the shoreline/sea

EDR reviewed the characteristics contributing to historic significance for each of the identified above-ground historic properties that have been determined as part of NRHP resource documentation, or state-level NRHP eligibility determinations (where such documentation was available) to determine whether or not the property had a significant maritime setting. . . . For the purposes of this analysis and assessment, views of marine waters are considered critical aspects of maritime settings. . . .

Significant views to the sea were assessed by desktop review of online mapping systems as well as field observation to determine whether the above-ground historic property has clear, unobstructed views of the sea and whether or not this view contributes to the historic significance of a given property. The distance and direction of view related to the intended historic purpose of above-ground historic properties with maritime setting was also given consideration in this assessment. . . .

Eight distinct and empirical points of measurement were also considered in the assessment of the Project’s potential visual effect on above-ground historic properties within the [visual]APE. These points of measurement were determined using the

viewshed analysis generated through ArcGIS as described [above], and are further defined in the [visual impact assessment] VIA (EDR [2021c]). They include the following:

- Distance from the nearest visible WTG
- Blade tip visibility
- WTG Aviation light visibility
- Mid-tower aviation light visibility
- Coast Guard light visibility
- Total acreage of above-ground historic property
- Total acreage of visibility within the above-ground historic property
- The portion of the above-ground historic property (percent of acreage) from which the Project would be potentially visible

. . . While all the resources within the [visual]APE have theoretical views of the wind WTGs, due to the effect of distance, intervening vegetation and buildings/structures, as well as the Earth's curvature on visibility, not all of the resources would have views of full WTGs (i.e., in which the entire WTG structure was visible). In order to provide the most conservative level of analysis of potential Project visibility, the number of WTGs for which WTG blade tips were visible was used in determining the number of WTGs visible from a given above-ground historic property.

Upon a manual review of the viewshed results, it was found that in some cases the amount of potential visibility which was found to intersect . . . above-ground historic property boundaries was relatively small, in some cases single "cells" or "pixels" and would not represent any noticeable amount of actual visibility. Single cells of visibility produced in the viewshed analysis represent 0.00222-acre, or approximately 96 square feet (8.9 sq. m) of space and may be considered erroneous or otherwise not representative of actual visibility. Therefore, although the viewshed analysis indicated that these small portions of the [APE] occur within the boundaries of an above-ground historic property, these above-ground historic properties with only one "cell" of visibility were not considered to have actual views of the Project.

In addition, [many] above-ground historic properties within the [visual]APE have large boundaries (i.e., over 10 acres), so that even a small percentage of the viewshed within such a property's acreage could be relatively large. For example, the Kay St.-Catherine St.-Old Beach Road Historic District (73000052) occupies 303 acres in the City of Newport. The viewshed analysis indicated that four percent of this property had potential views of the RWF. In this case, four percent of the property is approximately 13 acres, which is still a relatively large area of visibility.

Therefore, this quantitative assessment was intended to provide a baseline level of effects which was then supplemented with a qualitative assessment of the contribution of a property's maritime setting to its historic significance, the level of Project visibility, relationship of specific views towards the Project to the location, design, and historic use of an above-ground historic properties, and the overall sensitivity of each above-ground historic properties to visual effects. (EDR 2023:101–105)

Because relevant “maritime settings vary considerably among the different types of above-ground historic properties” in the visual APE, the HRVEA grouped the historic properties where Project effects would result by resource type and discussed them thematically (EDR 2023:101). The HRVEA found the identified historic properties to be broadly categorizable as follows:

- Native American Sites, Historic Districts, and TCPs;
- Historic Buildings and Structures;
- Lighthouses and Navigational Aids;
- Recreational Properties;
- Historic Cemeteries and Burial Grounds;
- Maritime Safety and Defense Facilities;
- Agricultural Properties;
- Estates/Estate Complexes; and
- Historic Battlefields.

Above ground historic properties within each of these categories tend to be eligible for NRHP listing because of their contributions to important events in history under Criterion A and/or their embodiment of a significant architectural or engineering design, style, or masterful work under Criterion C. TCPs may additionally be eligible under NRHP Criteria B and D for their connections to important people in the heritage of [REDACTED] and the important information they can provide regarding [REDACTED] history, respectively. Some of the historic properties also were found to meet several of the NRHP Criteria Considerations before being found eligible for NRHP listing under Criteria A, C, or D (EDR 2023). Additionally, NHLs identified under any category are recognized to "possess exceptional value as commemorating or illustrating the history of the United States" that requires “a higher standard of care when considering undertakings that may directly and adversely affect NHLs” (NPS 2021).

4.1.3.1 Native American Sites, Buildings, Districts, and Traditional Cultural Properties

Six Native American Sites, Buildings, Districts, and TCPs are identified in the visual APE by the HRVEA (Appendix B). These include three recorded as historic resources (non-TCPs) in RI: [REDACTED] [REDACTED] Three TCPs in MA and extending to the OCS were originally documented specifically due to their identification [REDACTED] as TCPs: [REDACTED] [REDACTED], all of which are represented by broad, complex cultural landscapes and connected seascapes (EDR 2023).

Of the six Native American historic properties in the visual APE, BOEM has determined that the Project would result in visual adverse effects to the [REDACTED] TCP and the [REDACTED] TCP due to the proximity of the RWF and due to the importance of the TCPs' views toward the water, where the visual character of the adjoining landscape and seascape contribute to TCP significance.

The common attributes of the TCP historic property type with respect to visual setting are described by EDR (2023:51–52) as follows:

[REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

4.1.3.2 Historic Buildings and Structures

There are 251 historic buildings and structures identified in the offshore visual APE (Appendix B). Historic properties of this type “consist mostly of vernacular residences or groupings of residences, with some limited variety of building types within the districts, in addition to historic markers and public parks” (EDR 2023:109). The variety of buildings and structures associated with this type extends to neighborhood commercial districts and buildings (including industrial sites) and includes supporting infrastructure, such as area bridges, that—in composite—made up these settlement areas and supported the livelihoods of the local residents. In other cases, the use of the historic residence has changed to commercial, municipal, institutional, educational, religious, transportation or to other non-residential repurposing (EDR 2023).

Of the 251 historic properties of this type in the visual APE, RI contains 87, MA 162, and CT two (EDR 2023). Of these historic buildings and structures, 48 in RI and MA possess important settings and critical views of the Project (see EDR 2023:Attachment A) and have been determined by BOEM to be subject to adverse effects from the offshore elements of the Project:

Aquinnah, MA

Vanderhoop, Edwin DeVries Homestead
Tom Cooper House
Theodore Haskins House
Gay Head – Aquinnah Town Center HD
3 Windy Hill Drive
71 Moshup Trail
Leonard Vanderhoop House
Gay Head-Aquinnah Coast Guard Station Barracks

Dartmouth, MA

Salters Point

Fairhaven, MA

744 Sconticut Neck Road

Chilmark, MA

Hancock, Capt. Samuel-Mitchell, Capt. West House
Russell Hancock House
Simon Mayhew House
Flaghole
Flanders, Ernest House, Shop and Barn

West Tisbury, MA

Scrubby Neck Schoolhouse

Westport, MA

Westport Point Historic Districts (1 of 2)
Westport Point Historic Districts (2 of 2)
Westport Harbor
Gooseneck Causeway

Little Compton, RI

Warren Point Historic District

City of Newport, RI

Kay St.-Catherine St.-Old Beach Rd. HD/The Hill

Middletown, RI

Indian Avenue Historic District
Paradise Rocks Historic District
St. Georges School
Land Trust Cottages
Sea View Villa
Whetstone

South Kingstown, RI

Brownings Beach Historic District

Tiverton, RI

Puncatest Neck Historic District

New Shoreham, RI

Spring Street
Corn Neck Road
Hippocampus/Boy's Camp/Beane Family
Mitchell Farm
Beach Avenue
Peleg Champlin House
Indian Head Neck Road
U.S. Weather Bureau Station
Old Town and Center Roads
Old Harbor Historic District
New Shoreham Historic District
Beacon Hill Road
Capt. Welcome Dodge Sr.
Caleb W. Dodge Jr. House
Lakeside Drive and Mitchell Lane
Pilot Hill Road and Seaweed Lane
Mohegan Cottage/Everett D. Barlow House
Capt. Mark L. Potter House

The HRVEA describes the common attributes of this historic property categorization with respect to the visual setting of the historic properties as follows:

These above-ground historic property types often are adjacent to and offer clear views of the ocean or are significant due to their development as residential communities. For many above-ground historic properties of this type, a relationship with the Atlantic Ocean is essential to their historic integrity. . . . Historic Buildings and Structures are important elements of cultural heritage within the [APE], within the majority of examples found

along or near the shoreline While no official documentation relative to the maritime significance of this specific above-ground historic property type is known, several common features are mentioned across the breadth of the individual nomination forms that may be considered as the common attributes with respect to their visual setting:

- Historic maritime (fishing and shipping) economy;
- Location along or near the water;
- Views and vistas of the Atlantic Ocean;
- Vernacular design and locally sourced materials;
- Landscape design derived from the natural environment; and
- Local historic associations. (EDR 2023:53)

Historic buildings and structures . . . occur throughout the study area and in a variety of local contexts. Location and orientation of such properties is critical to understanding the nature of any associated maritime settings. Many historic houses were oriented to local roadways, with the front and rear elevations parallel to the nearby road’s alignment. Local roadways along the region’s shorelines often parallel the water’s edge and historic homes frequently shift in orientation along such coastal roads. This variation in orientation may strongly influence the associated views of marine waters that may form important elements of a property’s historic setting. . . . Historic seaside villages, ports and other districts in the study area are commonly characterized by dense development and narrow roadways. The maritime setting for such districts is often obvious and may be expressed through the design and orientation of homes, commercial properties and other buildings, parks, docks, piers, and breakwaters. Depending on the specific characteristics of each district, open ocean views may or may not be available from the majority of historic buildings and other areas within a village. Further, marine viewsheds may encompass limited areas due to the complexity of the shoreline and presence of points, necks, or islands that screen views towards the open ocean. Where ocean versus bay views are available but are tangential to the dominant aspects of maritime viewsheds, changes to those distant ocean views may not diminish the integrity of a seaside village or other historic district. Where ocean views are a dominant aspect of the maritime setting, changes to such viewsheds may diminish the integrity of a historic district, even where views are limited to immediate shoreline sections. (EDR 2023:103–104)

4.1.3.3 Lighthouses and Navigational Aids

There are 20 lighthouses and navigational aids identified in the visual APE (Appendix B). This historic property type, lighthouses in particular, “may be broadly defined as water-related navigation aids to transportation and defense consisting of a light tower, featuring prominent views of the sea, and dominance of the surrounding landscape generally shared among all the individual properties” (EDR 2023:54).

Of the 20 historic properties of this type in the visual APE, MA contains 10, RI eight, and NY two (EDR 2023). Of these lighthouses and navigational aids, 10 in RI and MA possess important settings and critical views of the Project (see EDR 2023:Attachment A) and have been determined by BOEM to be subject to adverse effects from the offshore elements of the Project:

Aquinnah, MA

Gay Head Light

Falmouth, MA

Nobska Point Lighthouse

Gosnold, MA

Tarpaulin Cove Light

New Bedford, MA

Butler Flats Light Station

Clark's Point Light

Jamestown, RI

Beavertail Light

Little Compton, RI

Sakonnet Light Station

Narragansett, RI

Point Judith Lighthouse

New Shoreham, RI

Block Island North Lighthouse

Block Island Southeast Lighthouse NHL

The common attributes of this historic property type with respect to visual setting are described by EDR (2023:56) as follows:

- Direct physical location and/or historic functional relationship with the sea;
- Elevated and prominent views of the sea;
- Visual prominence of the surrounding landscape;
- Isolation or at least spatial dominance of the surrounding landscape; and
- Proximal relationship to shipping lanes.

Lighthouses and other historic navigation aids in the study area include properties that were intended to serve mariners plying large areas of open water and other properties that served specific navigation routes through the complex and treacherous waters of the region's bays. All of these properties have an obvious association with maritime settings, but the scale of those settings will vary due to the conformation of the local landscape and seas and the design and purpose of each navigation aid. (EDR 2023:102)

4.1.3.3.1 Block Island Southeast Lighthouse National Historic Landmark

Among the identified lighthouses and navigational aids, the Block Island Southeast Lighthouse (Figure 1) has been recognized for its importance to U.S. history as an NHL. The HRVEA describes the property as follows.



Figure 1. Block Island Southeast Lighthouse before it was offset from the bluff edge (Stupich 1988).

This property is located approximately 12 miles (19.3 km) south of the coast of mainland Rhode Island, on Mohegan Bluff, on the southeast shore of Block Island, approximately 14 miles (22.5 km) from the nearest [Project] WTG. . . . Built in 1874 and fully operational by 1875, [Southeast] Lighthouse consists of a five-story brick tower and a two-and-a-half-story, brick duplex keeper's residence. The duplex residence is connected to a one-and-a-half-story kitchen by a hyphen of the same height. It is a rare surviving example of a lighthouse built during a brief period of Victorian Gothic design influence at the U.S. Lighthouse Board and the sole surviving lighthouse of its high-style design. In 1993, the lighthouse structure and dwelling were moved approximately 250 feet (76.2 m) back from the edge of the bluffs to prevent the loss of the above-ground historic property to erosion. The light tower and dwelling were moved as a single mass, including the above-ground elements of the foundations, to retain the historic fabric. The new location preserves the historic relationship of the lighthouse with seacoast . . . Block Island Southeast Lighthouse was designated an NHL in 1995. (EDR 2023:55)

Block Island Southeast Lighthouse NHL is listed in the NRHP under Criterion A for its national importance in the history of maritime transportation, and under Criterion C for the national significance of its architecture and technology (SWCA 2021b). The maritime setting of the NHL is a key aspect of historic integrity cited in the NHL nomination. The HRVEA found Block Island Southeast Lighthouse NHL in particular to have high visual sensitivity within the visual APE, due to its historic location, setting, and feeling being primarily associated with clear views of the sea and for which public use enhances appreciation of the property's historic use and association with the sea (EDR 2023). Approximately 48% (6 acres) of this approximately 134-acre historic property are within the visual APE

and would have visibility of Project WTGs and OSS (EDR 2023:Attachement A). The visual simulations for this NHL are at KOP BI-04 (day and night) in Appendix C (see also EDR 2022a).

Prudent and feasible alternatives to avoid adverse effects from the Project on the Block Island Southeast Lighthouse NHL and other NHLs, and planning to the maximum extent possible necessary to minimize harm to NHLs, are presented in Section 5 of this Finding.

4.1.3.4 Historic Cemeteries and Burial Grounds

There are 36 historic cemeteries and burial grounds included in the visual APE (Appendix B), consisting of “cemeteries identified by federal, state, or local governmental agencies as having historic significance” (EDR 2023:56). Of the 36 historic properties of this type in the visual APE, RI contains 23 and MA 13 (EDR 2023). RI has specific mandates for documenting historic cemeteries.

Of these, one in RI possesses important settings and critical views of the Project (see EDR 2023:Attachment A) and has been determined by BOEM to be subject to adverse effects from the offshore elements of the Project: Island Cemetery/Old Burial Ground in New Shoreham on Block Island. The Island Cemetery/Old Burial Ground would be adversely affected by the Project because of the characteristically elevated ocean views that are maintained for this memorial resting place and the historically maritime populous that it serves. Otherwise, the secluded nature of properties of this type and their rare occurrence near the shoreline greatly limits visibility, and therefore effects, of the Project.

The common attributes of this historic property type with respect to visual setting are described as follows:

These above-ground historic properties may be municipally owned cemeteries on public land, small family plots on private land, or abandoned burial grounds. Historic cemeteries are lasting memorials to the past, provide a guide to the changing values and composition of communities in the course of their historic development. . . . Typically, cemeteries and burial grounds are not eligible for listing in the NRHP except when they satisfy NPS Criteria Consideration D: ‘d. A cemetery which derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events’. . . . [Attributes include:]

- Secluded or private setting;
- Designed landscape features;
- Graves of persons of local, state, or national significance; and
- Examples of funerary art and/or architecture (i.e., a mausoleum or above-ground crypt). (EDR 2023:56–57)

Where such burial grounds are located near the water they may be associated with ocean or other maritime viewsheds, however, ocean vistas are less likely to have been a significant consideration in the siting of such cemeteries than their larger, more formal counterparts in the region. Where cemeteries are located within districts or other historic settlements strongly associated with maritime settings, such burial grounds may be sited

to maintain a visual connection to the waters in order to maintain a sense of continuity linking the departed's final resting places with the environment in which they lived. . . . Maritime views from hillside cemeteries that were intentionally incorporated or framed by landscape designs may be more sensitive to discordant modern elements than those associated with less formal burial grounds that may not have been specifically located to provide ocean views. (EDR 2023:103)

4.1.3.5 Maritime Safety and Defense Facilities

There are 31 maritime safety and defense facilities included in the offshore visual APE (Appendix B), plus one within the onshore visual APE (EDR 2021a). This property type consists of “facilities erected by bureaus of the U.S. Department of Defense or their predecessors and share historic associations with coastal defense” (EDR 2023:57). Although, “These structures vary in their design and construction materials,” they “are unified by their historic functions of rescuing and protecting maritime transportation in the area, or for coastal defense” (EDR 2023:57).

Of the 31 historic properties of this type in the visual APE, RI contains 20, MA nine, and NY two (EDR 2023). Of these, 10 in RI and MA possess important settings and critical views of the Project (see EDR 2023:Attachment A) and have been determined by BOEM to be subject to adverse effects from the offshore elements of the Project:

New Bedford, MA

Fort Rodman Historic District
Fort Taber Historic District

Westport, MA

Horseneck Point Lifesaving Station
Gooseberry Neck Observation Towers

Narragansett, RI

Life Saving Station at Narragansett Pier
Fort Varnum/Camp Varnum

New Shoreham, RI

U.S. Coast Guard Brick House
U.S. Lifesaving Station
WWII Lookout Tower – Spring Street
WWII Lookout Tower at Sands Pond

The common attributes of this historic property type with respect to their visual setting are described in the HRVEA as follows:

The Maritime Safety and Defense Facilities within the [APE] have served to protect and act as rescue stations for the coastal waters of Rhode Island and Massachusetts. These above-ground historic properties were constructed as government buildings that needed open views and access to the ocean to fulfill their functional roles and are therefore located immediately adjacent to the coastline to facilitate direct interaction with the water. For all above-ground historic properties of this type, a physical relationship to the Atlantic Ocean is essential to historic integrity. . . . [Attributes include:]

- Construction commissioned by the federal government for use by a bureau of the Department of Defense;
- Built for interaction between the structure and ocean-going vessels;
- Location along or near the water;

- Clear views of the ocean, and/or direct access to the water; and
- Design includes living quarters and functional space. (EDR 2023:58)

Historic military and maritime safety properties along the shoreline will likely be associated with maritime settings. Aesthetic considerations in the siting of such facilities may or may not be expressed in the design of buildings, structures, and landscapes depending on the age and specific functions of the property. Proximity to navigation channels, defensibility, and the presence of existing shipbuilding or repair infrastructure in a broader maritime context may have been significant considerations in the siting of naval facilities. Such factors may not demonstrate a significant association with open ocean viewsheds. The study area includes several significant examples of World War II-era defense structures, including fire control or observation towers designed to monitor specific parts of the maritime environment. Early lifesaving stations were likewise intended to provide for observation of marine waters in the vicinity of known hazards or where storms posed specific risks to sea-going or coastal vessels. Lifesaving stations were also frequently located where rescue boats or other vessels might be safely launched under treacherous conditions. These locations may have included inlets, harbors or coves adjacent to open waters where rescue and recovery efforts would likely be made. (EDR 2023:103)

4.1.3.6 Agricultural Properties

There are 48 agricultural properties included in the visual APE (Appendix B). This property type consists of “historic farm buildings and landscapes which have retained a high degree of integrity and are generally no longer used for their original purpose” (EDR 2023:58).

Of the 48 historic properties of this type in the visual APE, MA contains 33 and RI 15 (EDR 2023). Of these agricultural properties, four in RI possess important settings and critical views of the Project (see EDR 2023:Attachment A) and have been determined by BOEM to be subject to adverse effects from the offshore elements of the Project:

Little Compton, RI

Tunipus Goosewing Farm

Middletown, RI

Bailey Farm

New Shoreham, RI

Champlin Farm

Lewis-Dickens Farm

Although, “Generally, these above-ground historic properties do not derive their significance in any direct way from the ocean or maritime activities” (EDR 2023:58), the HRVEA addresses the four cases where adverse effects would result based on the open or maritime island settings of these particular historic properties. The common attributes of this historic property type with respect to their visual setting are described in the HRVEA (EDR 2023:59) as follows:

- Farmhouses;
- Barns and associated ancillary buildings;

- Large, open fields;
- Fieldstone walls dividing property or grazing space; and
- Locally sourced building materials.

Historic agricultural properties, including farms, farmhouses, barns and related buildings and structures are relatively common in the study area. Many of these properties were built between 1700 and 1850, after which agricultural economies in New England and New York declined sharply. The historic settings for such properties typically include open, agrarian landscapes which once may have afforded open views of the seas when sited along the shoreline or at higher elevations within the coastal interior. Few of the once expansive agrarian landscapes associated with the historic use of the region’s farms survive. Some have been altered by later residential and commercial development and many have been transformed by reforestation. Despite these changes, historic agricultural properties remain an important part of the region’s heritage and tangible expression of several centuries of intensive farming that transformed the landscapes throughout southern New England and eastern Long Island. (EDR 2023:102)

4.1.3.7 Recreational Properties

There are 27 recreational properties included in the visual APE (Appendix B). This property type is “defined by the role these properties served in their original functions as places for the resort tourism economy of the late-nineteenth century to flourish” (EDR 2023:59).

Of the 27 historic properties of this type in the visual APE, RI contains 19, MA six, and NY two (EDR 2023). Of these recreational properties, 14 in RI and MA possess important settings and critical views of the Project (see EDR 2023:Attachment A) and have been determined by BOEM to be subject to adverse effects from the offshore elements of the Project:

<u>Aquinnah, MA</u> Gay Head - Aquinnah Shops Area	<u>Middletown, RI</u> Clambake Club of Newport
<u>Westport, MA</u> Clam Shack Restaurant	<u>New Shoreham, RI</u> Hygeia House Nathan Mott Park Spring House Hotel Spring Cottage Miss Abby E. Vaill/1 of 2 Vaill cottages Hon. Julius Deming Perkins/"Bayberry Lodge"
<u>Narragansett, RI</u> The Towers Historic District The Towers/Tower Entrance-Narragansett Casino Ocean Road Historic District Dunes Club Narragansett Pier MRA	

The common attributes of this historic property type with respect to their visual setting are described in the HRVEA as follows:

These above-ground historic properties feature beaches, casinos, restaurants, and other buildings and structures built to entertain seasonal vacationers. They are typically located

near the shoreline or immediately adjacent to the sea, and in some cases, are the beaches themselves. The enjoyment of, and interaction with, the sea are integral features of the significance of these above-ground historic properties. In many cases, the beachfront, shoreline, and adjacent ocean waters are prominent features of the historic setting due to their close association with historic recreational activities. . . . [Attributes include:]

- Functionality designed for human interaction;
- Location along or near the water;
- Views and vistas of the Atlantic Ocean;
- Landscaped lawns and gardens; and
- Ancillary buildings, such as garages, caretaker cottages, or sheds. (EDR 2023:59–60)

Seaside resorts, like many other shoreline recreational, commercial, and residential properties, were often sited to take advantage of aesthetically pleasing ocean or maritime views. Depending on location and the conformation of the local shoreline, such properties may be associated with specific bay or cove viewsheds that include limited areas of the open ocean waters. Recreational activities at resorts frequently included swimming and designated beaches where residents and visitors may have spent considerable time during the summer months. Where these features are still present and express a tangible association with the historic resort property, views from beaches may be as important as views from more formal elements of the designed landscape. Likewise, historic hotels and inns became more common elements of the region’s shoreline communities in the late 19th century. Such properties were often sited near harbors, ferry landings, rail stations, and public or private beaches and may be associated with similar historic maritime settings. Views to ocean waters or the more intimate bays and coves of the region may have been an integral part of the visitor’s motivation for staying in such establishments. Such considerations can be expressed through the inclusion of building and landscape features clearly intended to afford views of ocean. Older taverns and inns in the study area may be found along the working harbors and ports and were intended to serve the fishing, whaling, and related participants in maritime commerce. The design and location of these properties may not show the same influence of aesthetic considerations but will likely also retain a strong association with the waterfront and maritime environment. (EDER 2023:102)

4.1.3.8 Estates and Estate Complexes

There are 28 estates and estate complexes included in the visual APE (Appendix B). This property type “consists of high-style residences, or groupings of residences, typically designed by prominent architects of the nineteenth and early twentieth centuries” (EDR 2023:60).

Of the 28 historic properties of this type in the visual APE, RI contains 21 and MA seven (EDR 2023). Of these, 11 in RI possess important settings and critical views of the Project (see EDR 2023:Attachment A) and have been determined by BOEM to be subject to adverse effects from offshore Project elements:

Jamestown, RI

Horsehead/Marbella

Little Compton, RI

Stone House Inn

Abbott Phillips House

Middletown, RI

The Bluff/John Bancroft Estate

Narragansett, RI

Dunmere

City of Newport, RI

Ocean Drive Historic District NHL

Bellevue Avenue Historic District NHL

The Breakers NHL

Marble House NHL

Ochre Point – Cliffs Historic District

Rosecliff/Oelrichs (Hermann) House/Monroe (J.

Edgar) House

The common attributes of this historic property type with respect to their visual setting are described by the HRVEA as follows:

Estates and Estate Complexes within the [visual]APE transcend the traditional residential above-ground historic property type in their grandeur and scale. These above-ground historic property types often are set upon open tracts of naturalistic or stylized designed landscapes and are often accompanied by a variety of ancillary buildings. For many above-ground historic properties of this type, views of the Atlantic Ocean are essential to their historic integrity. . . . Estates and Estate Complexes are well-known as one of the symbols of cultural heritage in Rhode Island, and the City of Newport in particular. . . . [Attributes include:]

- Location along or near the water;
- Views and vistas of the Atlantic Ocean;
- Long driveways meant to offer views of the main house on approach;
- Landscaped lawns and gardens; and
- Ancillary buildings, such as garages, caretaker cottages, or sheds. (EDR 2023:61)

Estates built by or for wealthy families have been part of the region’s landscapes for centuries and many such properties are located along the shorelines. High style, architect-designed mansions and associated landscapes are characteristic of several areas within the study area and many such properties were sited to take advantage of ocean views. The importance of maritime settings to these properties may be apparent in the design of building features such as veranda, porches, and large windows facing the water or through landscape elements and overall designs that were intended to frame specific views towards the seas. As with many other above-ground historic property types, the conformation of local shorelines and the specific orientation of each property may be important in assessing the association with specific aspects or elements of each associated viewshed. (EDR 2023:102–103)

4.1.3.8.1 Ocean Drive Historic District National Historic Landmark

The Ocean Drive Historic District (Figure 2) is one of four identified estates and estate complexes recognized for its importance to U.S. history as an NHL. The HRVEA describes this NHL as follows.

The summer homes in the Ocean Drive Historic District feature great variety in style and opulence, ranging from Neoclassical-style mansions to early nineteenth-century farms. In contrast to the adjacent Bellevue Avenue Historic District, however, Ocean Drive (aka Ocean Avenue) is decidedly more bucolic and rural, with greater expanses between structures accentuated by natural and designed landscapes. The national significance of the Ocean Drive Historic District is derived from its architecture, which includes works from McKim, Mead and White, John Russell Pope, and landscape architecture by Frederick Law Olmstead [*sic*] . . . In 2012 an updated statement of significance was appended to the NHL nomination which elaborated and expanded upon the initial areas of Criterion C significance such as architecture and landscape design. The update also addressed additional Criterion A areas of significance such as planning, and engineering related to maritime views and design features purposefully built to interact with the shoreline and the ocean. The updated nomination materials also included a detailed account of the evolution of Ocean Drive as a “pleasure drive” to accompany the development of the inland areas as an upper-income resort suburb. (EDR 2023:145)

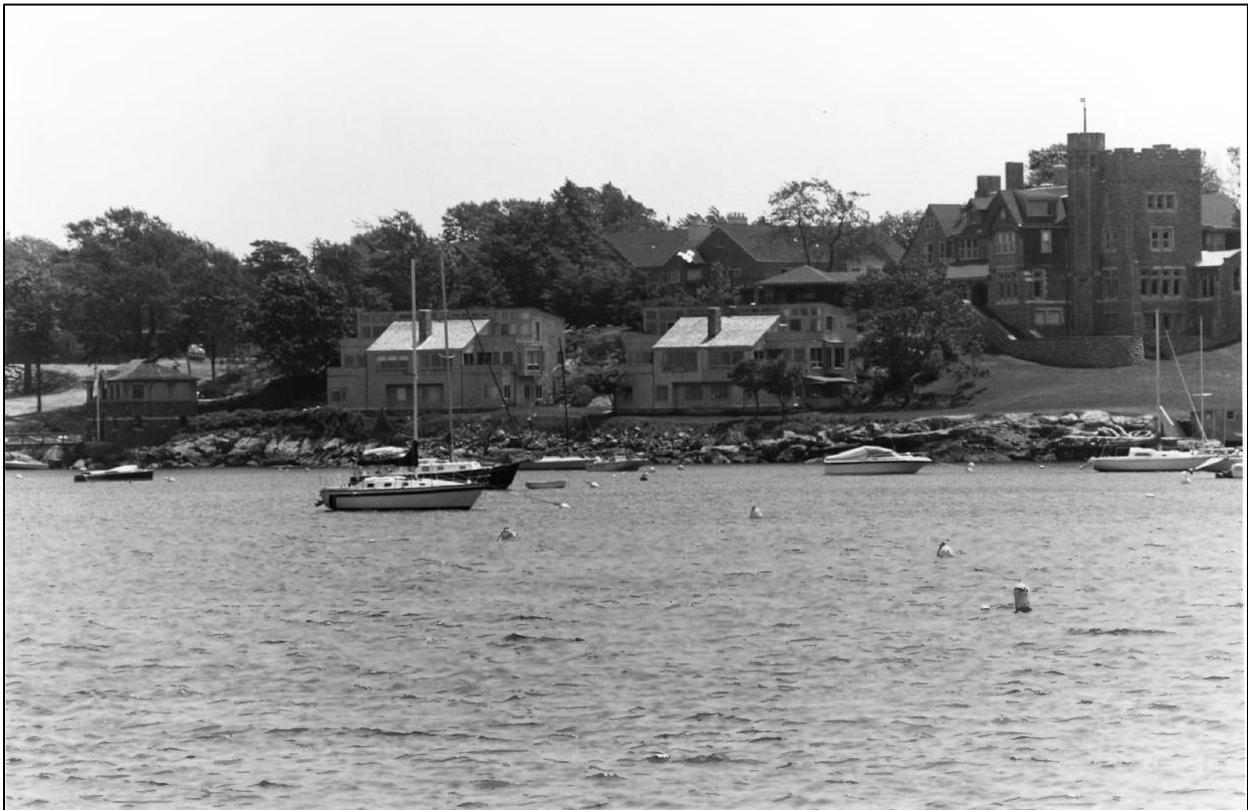


Figure 2. Ocean Drive Historic District photographed from the sea (NRHP 1976).

[Olmsted's] landscape architecture firm . . . was involved in at least two subdivisions and 15 private contract designs within the district. These designs include properties situated on dramatic overlooks, and along Ocean Drive. Clearly this roadway was specifically constructed to take advantage of ocean views. (EDR 2023:145)

The Ocean Drive Historic District NHL was made up of 45 contributing properties located in an over-1,500-acre district in a suburban/rural setting encompassing most of the peninsula southwest of the City of Newport (SWCA 2021b). The NRHP nomination finds the district eligible under Criteria A and C in the areas of architecture, landscape architecture, community planning, conservation, and environmental preservation (SWCA 2021b). The NHL program focuses on the district architecture and landscape, providing the following statement of national significance, "This large historic district . . . has a rugged, informal character, as compared with the formal aspect of the Bellevue Historic District. It includes early farms and elaborate summer homes, as well as landscapes designed by Olmsted's firm to accord with the natural contours of rocky cliffs, green hills and pastures. The area was favored by 19th-century industrial magnates and the social elite" (NPS 2012). The Ocean Drive Historic District NHL and its contributing buildings tend to retain integrity of location, design, materials, workmanship, association, feeling, and setting (SWCA 2021b). An estimated 15% (261 acres) of this approximately 1,756-acre historic property are within the visual APE and would have visibility of Project WTGs and OSS (EDR 2023:Attachement A). The visual simulations from Newport Cliff Walk at KOP AI-03 in Appendix C represents the key views from the shorelines and NHLs at Newport, RI. See EDR (2022a) for supplemental visualizations that are specific to the Ocean Drive Historic District NHL.

Prudent and feasible alternatives to avoid adverse effects from the Project on this and other NHLs, and planning to the maximum extent possible necessary to minimize harm to NHLs, are presented in Section 5 of this Finding.

4.1.3.8.2 Bellevue Avenue Historic District National Historic Landmark

The Bellevue Avenue Historic District (Figure 3) is one of four of the identified estates and estate complexes recognized for its importance to U.S. history as an NHL. The HRVEA describes this historic property as follows.



Figure 3. Chateau-sur-mer in the Bellevue Avenue Historic District (Boucher 1969; NRHP 1972).

Newport is one of the most spectacular assemblages of American architecture from its beginning to our own time. There are structures in this district that could never be built again in such close proximity, nor possessing such variety, nor by a group of such distinguished architectural firms. This district begins with several commercial blocks including the Casino, continues with the Gothic Revival villas, and includes the "Stick Style" and Shingle Style and culminates in the great 19th century summer palaces of Bellevue Avenue and Ochre Point. The list of architects embraces almost every major designer of that time and what emerges at Newport is also a study of the development of the taste and skill of men like Richard Upjohn, Richard Morris Hunt and McKim, Mead and White over their professional careers.

The Bellevue Avenue Historic District National Historic Landmark is approximately two miles long and consists of 87 contributing properties . . . occupying several blocks along Bellevue Avenue, from Memorial Boulevard in the north, to Block Island Sound in the south, in the City of Newport. Spring Street and Cogshell Avenue form the western boundary of the district, while Narragansett Bay forms the eastern boundary. From north to south, this district features two miles of commercial blocks and villas, notably ending in the south with the grand and palatial nineteenth-century estates of wealthy summer residents. (EDR 2023:A-25)

The district possesses many distinctive examples of high-style architecture. While the significance statement in the NRHP-nomination of the district does not explicitly reference the ocean, the views of the ocean were essential to the planning and construction of the contributing buildings (SWCA 2021b). The district contains contributing buildings that are also individually recognized as NHLs, specifically The Breakers NHL and Marble House NHL. The NRHP nomination finds the district significant in the areas of architecture, landscape architecture, and commerce (SWCA 2021b). The significance focuses on aspects of the district that make it NRHP-eligible under Criterion C, for the embodiment of distinctive characteristics of a type, period, or method of construction, that represent the work of a master, and possess high artistic values. Significance in the area of commerce further provides for the NRHP-eligibility of the district under Criterion A for its relation to important events in the historic development of Newport (SWCA 2021b). The NHL program more fully focuses on the district architecture, providing the following statement of national significance, “An assemblage of American architecture distinguished by the variety of styles and famous architectural firms represented, the district includes Gothic Revival villas, Stick- and Shingle-style buildings, and great summer palaces of the late 19th century” (NPS 2015a). The Bellevue Avenue Historic District NHL and its contributing buildings tend to retain integrity of location, design, materials, workmanship, association, feeling, and setting (SWCA 2021b). About 13% (over 70 acres) of this approximately 600-acre historic property are within the visual APE and would have visibility of Project WTGs and OSS (EDR 2023:Attachment A). The visual simulations from Newport Cliff Walk at KOP AI-03 in Appendix C best represent the views from the NHLs on Newport shores. See EDR (2022a) for more visualizations that are specific to the Bellevue Avenue Historic District NHL.

4.1.3.8.3 The Breakers National Historic Landmark

The Breakers (Figure 4) is an estate/estate complex recognized for its importance to U.S. history as an NHL and located in the Bellevue Avenue Historic District NHL. The HRVEA describes this NHL:

The Breakers . . . is located on at Ochre Point Avenue in Newport, Rhode Island, approximately 16 miles (25.7 km) from the nearest [Project] WTG. . . . The estate was designed by Richard Morris Hunt and built between 1893 and 1895 for Cornelius Vanderbilt II. It emulates a sixteenth-century, northern Italian palazzo. Elaborate façade work and imposing mass are featured in the architecture and speak to the substantial power and wealth of the original residents. The estate is significant for its historic associations with America’s first architect trained at the Ecole Des Beaux-Arts, Richard Morris Hunt, and for being the largest and perhaps most famous Newport estate built by wealthy patrons at the turn of the twentieth century. . . . The Breakers was individually listed in the NRHP in 1971. . . . and designated an NHL in 1994. (EDR 2023:61)



Figure 4. The Breakers in the Bellevue Avenue Historic District (NRHP 1971a).

The NRHP nomination finds The Breakers significant in the areas of architecture, social history, and transportation (SWCA 2021b). The significance focuses on aspects of the historic property that make it NRHP-eligible under Criterion C, for the embodiment of distinctive characteristics of a type, period, or method of construction, that represent the work of a master, and possess high artistic values. Significance in the area of social history and transportation further provides for the NRHP-eligibility of the historic property under Criterion A for its relation to important events associated with high society in the historic development of Newport and the social position and wealth of the Vanderbilts arriving from the railroad industry. The NHL nomination further indicates eligibility of The Breakers under NRHP Criterion B for significant association with Cornelius Vanderbilt II and Richard Morris Hunt (SWCA 2021b). The NHL program focuses on architecture, providing the following statement of national significance, “The Breakers is the architectural and social archetype of the Gilded Age, a period when members of the Vanderbilt family were the merchant princes of American life through their prominence in the world of finance, as patrons of the arts, and as vanguards of international society. In 1895, the year of its completion, The Breakers was the largest, most opulent house in a summer resort considered the social capital of America. It was built for Cornelius Vanderbilt II (1843-1899), a key figure in American railroads, philanthropy, and fashionable society, and designed by Richard Morris Hunt (1827-1895), one of the founding fathers of architecture in America” (NPS 2006). The Breakers NHL retains integrity of location, design, materials, workmanship, association, feeling, and setting (SWCA 2021b). About 29% (5 acres) of this approximately 16-acre historic property are within the visual APE and would have visibility of Project WTGs and OSS (EDR 2023:Attachement A). The visual simulations from Newport Cliff Walk at KOP AI-03 in Appendix C best represent the views from the NHLs on Newport shores. See EDR (2022a) for more visualizations that are specific to The Breakers NHL.

4.1.3.8.4 Marble House National Historic Landmark

Marble House (Figure 5) is an estate/estate complex recognized for its importance to U.S. history as an NHL and is also located in the Bellevue Avenue Historic District NHL. Marble House is described as follows.



Figure 5. Marble House in the Bellevue Avenue Historic District (NRHP 1971b).

Marble House (71000025) is a three-story Neoclassical mansion located on Bellevue Avenue in Newport. It was commissioned by William Vanderbilt, designed by famed architect Richard Morris Hunt and constructed 1892. Built with an imposing architectural scale and clad in Tuckahoe white marble, it is one of the stateliest mansions contributing to the NHL-listed Bellevue Avenue Historic District. The property was individually listed on the NRHP before the district was nominated. (SWCA 2021b:30)

The NRHP nomination finds the Marble House significant in the areas of architecture and social history (SWCA 2021b). The significance focuses on aspects of the historic property that make it NRHP-eligible under Criterion C, for the embodiment of distinctive characteristics of a type, period, or method of construction, that represent the work of a master, and possess high artistic values. Significance in the area of social history further provides for the NRHP-eligibility of the historic property under Criterion A for its relation to important events in the historic development of Newport. The NHL nomination additionally finds Marble House eligible under NRHP Criterion B for its significant associations with Alva Belmont and William K. Vanderbilt (SWCA 2021b). The NHL program focuses on architecture, providing the following statement of national significance, “Inspired by the Petit Trianon (1760-1764) a garden retreat on the grounds of Versailles, the house’s French inspired interiors were designed by Jules Allard and

Sons, of Paris. A virtual showcase of various French styles and built with seemingly endless financial resources, the house was unparalleled in design and opulence in its day. The economic influence of the Vanderbilts and their financial and cultural power in America were expressed in the family houses and their patronage of American architecture. As one of the earliest of the Beaux Arts houses to appear in America, it would influence the design of architecture thereafter. Today, Marble House is a testament to the architectural genius of Richard Morris Hunt and the spirit of America's 'Gilded Age.'" (NPS 2015b). The Marble House NHL retains integrity of location, design, materials, workmanship, association, feeling, and setting (SWCA 2021b). About 5% (one-third acre) of this approximately 6-acre historic property are within the visual APE and would have visibility of Project WTGs and OSS (EDR 2023:Attachement A). The visual simulations from Newport Cliff Walk at KOP AI-03 in Appendix C best represent the views from the NHLs on Newport shores. See EDR (2022a) for more visualizations that are specific to the Marble House NHL.

4.1.3.9 Historic Battlefields

There are four historic battlefields included in the visual APE, which "consist of typically large landscapes across which the events of historic military actions took place" and, within these, "any number of more focused and specific points of significance may exist, while the collective significance of the events of the battle is broader" (EDR 2023:61).

Of the four historic properties of this type in the visual APE, MA contains three and RI one (EDR 2023). Of these, one historic battlefield in MA, the Westport Point Revolutionary War Properties, would be subject to adverse effects from the Project.

The common attributes of this historic property type with respect to their visual setting are described by the HRVEA as follows:

These types of above-ground historic properties are typically spread out over large areas, sometimes encompassing entire town centers or portions of townships. They may include landscapes, buildings, or water features which were integral to the outcome of the struggles which took place in their midst. In some cases, these features have been significantly altered from the time of the battles. . . .

[R]egarding the visual setting of battlefields with regard to their significance, as in most cases the significance of an historic battlefield lay in their historic context and the physical struggles that took place on them. However, there are some characteristics which may be generally common to Historic Battlefields:

- Natural features which influenced military operations;
- Military engineering works (trenches, forts);
- Sites of engagement; and
- Corridors of movement. (EDR 2023:62)

Properties of this type are mostly inland and will only have visibility in isolated areas within their boundaries, or in the small areas where their boundaries touch the shoreline.

The potential effects of the Project are further mitigated because the significance and setting of these properties are characterized by terrestrial conflict, and not from pristine views of the seascape or relationship to the ocean. (EDR 2023:115)

4.1.3.10 Summary of the Assessment of Adverse Effects and Cumulative Effects to Historic Properties in the Visual Area of Potential Effects

The 101 adversely affected historic properties within the visual APE for onshore and offshore development retain their maritime setting, and that maritime setting contributes to the property's NRHP eligibility and continues to offer significant seaward views. These seaward views support the integrity of the maritime setting and include vantage points with the potential for an open view from each property toward RWF WTGs (EDR 2021b, 2023). For historic properties where BOEM has determined the Project would cause adverse effects, BOEM then assessed whether those effects would be additive to the potential adverse effects of other reasonably foreseeable actions at the 101 historic properties, thereby resulting in cumulative effects (see SWCA 2023).

BOEM reviewed the HRVEA's list of historic properties assessed as likely to be adversely affected by the Project and all information and comments provided by consulting parties in correspondence and at meetings to date to inform determinations of adverse effects including visual and cumulative effects.

BOEM (2022a) has determined that options to reduce the number of RWF WTGs under any action alternative for the Project (see Table 1) would effectively minimize visual effects because there would be fewer WTGs constructed and visible from the affected historic properties (see also Section 5). However, none of the alternatives would completely avoid visual adverse effects for the 101 above ground historic properties.

The cumulative effects analysis quantified the total number of WTGs from all planned future developments theoretically visible (daytime or nighttime) within the APE (EDR 2021b). This analysis projected that the development of additional wind farms in the RI/MA WEA would result in the construction of nearly 1,000 WTGs (EDR 2021b, 2023; SWCA 2023). The project would contribute proportionally from nearly 10% to nearly 90% of the cumulative adverse effect, owing to the location and intensity of the foreseeable build-out attributed to other offshore wind energy development activities. This is based on full buildout of the Project (up to 100 WTGs and two offshore substations [OSS]) and all other reasonably foreseeable offshore wind projects currently planned in the APE (modeled at 955 WTGs and three OSSs [EDR 2021b]). The proportion of visible WTG elements added by the project ranges from 9.6 percent at ██████████ TCP, where all modeled WTGs and OSS would potentially be visible, to 87.2 percent at the historic U.S. Weather Bureau Station at Block Island, where the Project WTGs would potentially be visible in greater numbers than the combination of all other future wind farms planned in adjacent OCS lease areas (41 Project WTGs would potentially be visible there versus six WTGs from other planned projects) (SWCA 2023). Intensity of visual impacts from WTG and OSS development would reduce with distance from historic properties and lighting and design actions that would be taken by Revolution Wind to minimize impacts; however, cumulative effects would not be fully eliminated at the 101 adversely affected historic properties.

BOEM has found that the Project would have adverse visual effects on the 101 historic properties listed in Table 3. Per the Criteria of Adverse Effect, the undertaking would introduce visual Project elements that

diminish the integrity of these historic properties' significant historic features. BOEM did, however, determine that due to the distance and open viewshed, the integrity of the properties would not be so diminished as to disqualify any of them from NRHP eligibility.

Although the HRVEA identified 350 other above ground historic properties on mainland RI and MA within the visual APE of offshore Project components, BOEM has determined that either no effects or no adverse effects would result at these historic properties, based on the justifications provided in the HRVEA (see EDR 2023:Attachment A). While their size and siting may afford many of these historic properties some view toward the Lease Area, for some these views will not be critical to their integrity and for others existing buildings, vegetation, and elements of the built environment result in limited, screened views. Existing buildings and infrastructure are also often accompanied by preexisting nighttime lighting that would reduce the visibility of farther off Project lighting. Visibility would be further minimized based on distance between onshore historic properties and offshore Project components. With increasing distances between historic properties and the RWF, atmospheric, environmental, and other obscuring factors, such as fog, haze, sea spray, wave height, and normal viewer acuity, serve to further minimize the visual intrusion posed by offshore WTGs. The ability of these 350 historic properties to convey the significance of their architectural and social history would be unaltered by the Project.

BOEM reviewed the assessment in the HRVEAs and CHRVEA and has determined that the Project would result in no adverse effects to any above ground historic properties identified in the visual APE beyond the 101 historic properties identified as adversely affected in Table 3.

5 Actions to Avoid, Minimize, or Mitigate Adverse Effects

As a requirement of COP approval, BOEM would stipulate the avoidance of historic properties identified in the APE and not currently found to be subject to adverse effects from the Project. This includes considering all prudent and feasible alternatives to avoid adverse effects on the NHLs, as discussed below.

For unavoidable adverse effects to historic properties, additional minimization and mitigation measures would be developed in consultation with the appropriate parties. This includes, to the maximum extent possible, taking such planning and actions as may be necessary to minimize harm to any NHL that may be directly and adversely affected by an undertaking.

Avoidance, minimization, and mitigation measures would be implemented through execution of an MOA by BOEM and the required signatories to resolve adverse effects under Section 106. Simultaneous to the release of this Finding, BOEM is releasing its *Draft Memorandum of Agreement Among the Bureau of Ocean Energy Management, the State Historic Preservation Officers of Connecticut, Massachusetts, New York, and Rhode Island, and the Advisory Council on Historic Preservation Regarding the Revolution Wind Farm and Revolution Wind Export Cable Project* for consulting party review. The MOA would be finalized and its requirements set by BOEM under NHPA Section 106 as a condition of BOEM's signing the ROD, completing the NEPA review. Avoidance, minimization, and mitigation measures for historic properties are drafted in both the MOA and the HPTPs attached to the MOA. Under the MOA, adverse effects from the Project to historic properties, including NHLs, would be avoided, minimized, or mitigated in accordance with the NHPA Section 106 regulations (36 CFR 800) and in compliance with Section 110(f). The MOA also includes post-review discovery plans for onshore and offshore cultural resources, should previously undiscovered or unimpacted historic properties be identified. The post-review discovery plans would be implemented to assess and resolve any inadvertent adverse effects to these historic properties. Any historic properties that are discovered post-review, if adversely affected, would be resolved through the Section 106 consultation process detailed in these post-review discovery plans and the MOA.

5.1 Alternatives Considered

BOEM used the NEPA review process to consider a range of feasible alternatives to the maximum-case scenario of the Project's Proposed Action. That maximum-scenario would result in construction, operation, maintenance, and conceptual decommissioning of up to 100 WTGs and two OSS at the RWF. Alternatives considered would reduce the number of proposed WTGs. Analyses have found that reductions in WTG numbers will help minimize the adverse effects on above ground historic properties in the visual APE and ASFLs in the marine APE. However, no alternative meeting the purpose and need of Project development in the Lease Area would fully avoid adverse effects to historic properties, including from visual impacts to NHLs.

5.1.1 National Historic Landmarks

As the NPS (2021) conveys, "Section 110(f) of the NHPA requires that Federal agencies exercise a higher standard of care when considering undertakings that may directly and adversely affect NHLs. The law

requires that agencies, ‘to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark.’ In those cases when an agency’s undertaking directly and adversely affects an NHL... the agency should consider all prudent and feasible alternatives to avoid an adverse effect on the NHL.” The implementing regulations for Section 106 of the NHPA at 36 CFR 800.10 provide special requirements for protecting NHLs and complying with the NHPA Section 110(f).

In considering the other factors suggested by NPS, BOEM recognizes there is generally substantial and highly supportive public interest in using the OCS to develop clean energy sources. For instance, Executive Order 14008 in 2021 declared it the policy of the United “to organize and deploy the full capacity of its agencies to combat the climate crisis to implement a Government-wide approach that reduces climate pollution in every sector of the economy... and spurs well-paying union jobs and economic growth, especially through innovation, commercialization, and deployment of clean energy technologies and infrastructure.” This undertaking contributes to these goals.

BOEM has planned and is taking action to avoid adverse effects on NHLs in accordance with NHPA 110(f) and pursuant to The Secretary of the Interior’s Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the National Historic Preservation Act (NPS 2021). Under all Project alternatives (BOEM 2021c), BOEM would avoid adverse effects to seven of the 12 NHLs in the visual APE: the Montauk Point Lighthouse, Original U.S. Naval War College Historic District, Fort Adams Historic District, Battle of Rhode Island Historic District, Nantucket Historic District, New Bedford Historic District, and William Watts Sherman House. This avoidance of adverse effects would be accomplished by taking advantage of existing obscuration, consisting of intervening factors such as curvature of the Earth, and atmospheric and environmental factors like fog, haze, sea spray, and intervening buildings, vegetation, and topography, which are enhanced with increasing distances between WTGs and historic properties. In addition, BOEM reviewed other NHLs in the vicinity, including the steamship *Sabino* in CT and the Newport Historic District in RI and determined these to not be in the APE. The *Sabino* only travels within 35 miles of the Project on tours and the Newport Historic District NHL, once distinguished from other adjoining historic district boundaries in the City of Newport, was found to be across Newport Neck from the Project without open ocean views of the RWF (EDR 2023; Revolution Wind 2022a).

BOEM has determined that five NHLs in RI would be adversely affected by the Project: Southeast Lighthouse on Block Island and Ocean Drive Historic District, Bellevue Avenue Historic District, The Breakers, and Marble House at Newport. BOEM has notified the NPS (as delegate of the Secretary of the Interior) and the ACHP of this determination with distribution of this Finding. The ACPH and NPS have been active consulting parties on the Project since BOEM invited them to consult at the initiation of the NHPA Section 106 process on the Project on April 6 and April 29, 2021, respectively. BOEM is fulfilling its responsibilities to give a higher level of consideration to minimizing harm to NHLs, as required by NHPA Section 110(f), through implementation of the special requirements outlined at 36 CFR 800.10 (BOEM 2021a).

Given the location of the lease and number of WTGs proposed, constraints on the necessary generation capacity for the project to be feasible, and the distance of the Lease Area to the shorelines of Block Island and Newport (see Figure A-5), BOEM determined that all feasible alternatives, including all feasible WTG layouts, would result in adverse visual effects on these five NHLs. Because of all these factors, the

only alternative that BOEM was able to identify that avoids any Project effects on these NHLs was the no-action alternative. In the EIS, BOEM (2022a) has identified alternatives that reduce the number of WTGs by from the maximum-case scenario of the Proposed Action. While the differences between alternatives may be variable, alternatives for reduction in WTG numbers would all reduce visual effects on the NHLs and other adversely affected historic properties due to the fact that fewer WTGs would be constructed and therefore visible from above ground historic properties. Additionally, fewer WTGs could lessen the potential for physical disturbance of ASLFs on the seafloor, such as through providing greater flexibility for avoidance by cables and seafloor work areas.

When prudent and feasible alternatives “appear to require undue cost or to compromise the undertaking’s goals and objectives, the agency must balance those goals and objectives with the intent of section 110(f)” (NPS 2021). In this balancing, the NPS suggests that agencies should consider “(1) the magnitude of the undertaking’s harm to the historical, archaeological and cultural qualities of the NHL; (2) the public interest in the NHL and in the undertaking as proposed, and (3) the effect a mitigation action would have on meeting the goals and objectives of the undertaking” (NPS 2021). For the Project, the magnitude of the visual effects on the five NHLs is minimized by the distance between proposed offshore WTGs and the onshore NHLs and other factors (such as obscuring factors) limiting views between Project WTGs and the five NHLs. Moreover, while the undertaking would affect the historic setting of the NHLs, it would not affect other character-defining features or aspects of the NHL’s historic integrity. The five NHLs, should the undertaking proceed, would still illustrate their regional and national significance, and continue to exemplify their national importance.

Through consultation, BOEM would refine minimization measures to the maximum extent feasible and further develop mitigation measures of adverse effects that remain at the five NHLs after the application of minimization efforts. BOEM would identify and finalize mitigation measures specific to each NHL with the consulting parties through development of the MOA. Mitigation measures for adverse effects to NHLs must be reasonable in cost and not be determined using inflexible criteria, as described by the NPS (2021). Mitigation of adverse effects to the five NHLs would meet the following requirements:

- reflect the heightened, national importance of the property and be appropriate in magnitude, extent, nature, and location of the adverse effect;
- focus on replacing lost historic resource values with outcomes that are in the public interest, such as through development of products that convey the important history of the property;
- comply with The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (NPS 2017).

5.1.2 Action Alternatives that Would Minimize the Adverse Effect of the Project

The Proposed Action (Alternative B) would construct, operate, maintain, and perceivably decommission up to 100 WTGs of 8 to 12 MW each and up to two OSS; whereas, Alternative C (Habitat Alternative) would include 64–65 WTGs, Alternative D (Transit Alternative) would include 78–93 WTGs, Alternative E (Viewshed Alternative) would include 64–81 WTGs, and Alternative G (Preferred Alternative) would include 65 WTGs. Alternative F (Higher Capacity Turbine Alternative) would combine with action alternatives C or E1 to use 14 MW WTGs within the PDE of the 12 MW WTGs and thereby use fewer

WTGs, reducing overall numbers to as few as 56 WTGs (see Table 4). BOEM has identified a preferred alternative for the final EIS that would be a combination of the alternatives analyzed in the EIS; however, it would result in no changes to BOEM's finding of adverse effect for the Project. BOEM's final decision will be described in the record of decision (ROD).

5.1.2.1 Minimization of Visual Adverse Effect

Reduction in WTG numbers was analyzed in the EIS to have the following opportunities to reduce visual impacts to above ground historic properties, which would additionally minimize harm to NHLs.

Compared to the maximum-case scenario under the Proposed Action, Alternatives C through F could decrease impacts to historic properties from visibility of offshore wind structures and from the construction and installation lighting on these structures because the number of constructed WTGs and their viewshed would be reduced in the following manners (see BOEM 2022a:Table 3.10-7).

WTG structure and lighting visibility would be reduced from up to 100 WTGs under the Proposed Action to:

- 64 or 65 WTGs (up to 35% to 36% less, respectively) under Alternative C.
- 78 to 93 WTGs (up to 7% to 22% less) under Alternative D. These visual impacts under Alternative D would remain greater than those of Alternative C. Alternative D3 would specifically remove the closest seven WTG locations to Block Island and have an increased advantage for reducing visual impacts on above ground historic properties on the shores of that island over other action alternatives, except Alternative E2, which would remove even more WTGs on the Block Island side of the RWF.
- 64 to 81 WTGs (up to 36% to 19% less) under Alternative E. The Alternative E1 configuration, in particular, would reduce the proximity of WTGs to Martha's Vineyard and toward mainland RI. Alternative E2 would remove the closest WTGs to Martha's Vineyard and be most advantageous for reducing WTG proximity to Block Island; however, it would not be as effective overall as Alternative E1 for reducing WTG proximity to onshore areas. Although the distance of WTGs from Martha's Vineyard would increase under Alternative E specifically compared to other alternatives, the total number of WTG impacts would remain greater than those of Alternative C and would reach the potential lower WTG numbers and impacts of Alternative D. Alternative E is primarily focused on setbacks of WTGs from Martha's Vineyard and would effectively increase distances of Project WTGs to historic properties there, especially under Alternative E1. This especially includes increased setbacks from historic properties [REDACTED] inclusive of the Edwin DeVries Vanderhoop Homestead, Gay Head Light, and Gay Head - Aquinnah Shops. Alternative E also further increases setbacks from Newport and Block Island, including the Breakers, Marble House, and the Ocean Drive Historic District, Bellevue Avenue Historic District, and Southeast Lighthouse NHLs. The Alternative E setbacks for RWF WTGs would increase the distances to historic properties at Aquinnah by between approximately 0.25 and 1 mile, at Newport and mainland RI by approximately 4 miles, and at Block Island variably beginning at less than 1 mile and extending to over 4 miles. Therefore, Alternative E would be more effective in reducing visual impacts from the nearest potential WTGs to historic properties at Martha's Vineyard, MA, and along RI shores compared to other action alternatives but would not eliminate visual impacts to all historic properties and would not result in fewer visible WTGs and offshore RWF lighting sources than Alternatives C or F.

- as few as 56 WTGs (up to 44% less than the maximum of 100 WTG under the Proposed Action) under Alternative F when combined with any of the action alternatives (C1, C2, or E1) intended to allow for the fulfillment of the existing three PPAs' generation requirement of at least 704 MW. These WTG impacts under Alternative F could potentially be reduced from those of the other action alternatives, where WTG numbers are comparatively less.
- 65 WTGs (35% to 17% less than under the Proposed Action [Alternative B], Alternative D, and Alternative E2). Alternative G could decrease impacts to viewshed resources when compared to the Proposed Action, Alternative D, and Alternative E2 because the number of constructed WTGs and their viewshed would be reduced by 35% for Alternative G as compared to the maximum-case scenario under the Proposed Action and by at least 17% for the minimum case for these alternatives. The 35% reduction under Alternative G is comparable to the amount of reduction as would occur under Alternative C and Alternative E1, based on their WTG numbers; however, WTGs under Alternative G would be differently configured than under other alternatives. Finally, Alternative F would have 13% fewer WTGs than Alternative G, and the potential for an equivalent proportion of reduced visual impact on viewshed resources. However, WTG setback distances changes cannot be quantified until the additional WTGs to be removed are identified under Alternative F.

WTG configurations for Alternative G, BOEM's Preferred Action, would effectively reduce the proximity of WTGs to NHLs at Block Island and Newport, RI. With the combination of reduced WTG numbers and farther setbacks from shorelands, Alternative G would be equally or more effective in reducing visual impacts from the nearest potential WTGs to viewshed resources at Martha's Vineyard, on Block Island, and along Rhode Island shores, as at Newport, compared to other action alternatives, except potentially Alternative E1 and Alternative F. Similar to Alternative E1, Alternative G is generally more effective at increasing setbacks from NHLs at Newport and Block Island than other alternatives, even though Alternative G would not eliminate visual impacts to all viewshed resources and would not result in fewer visible WTGs and offshore RWF lighting sources than Alternative C, E1, or F.

In relation to the five adversely affected NHLs, at Block Island and Newport, Rhode Island, Alternative G would reduce the field of view in which WTGs would be seen in a line across the horizon. Under Alternative G, Southeast Lighthouse NHL would have comparatively the narrowest visible extent of WTGs across the horizon, within a 24 to 26 degree field of view, as compared to a 29 degree field of view of WTGs under Alternative E, a 33 to 38 degree field of view of WTGs under Alternative D, and the broadest 38 degree field of view for the project under Alternative C and under the Proposed Action (EDR 2023). NHLs in the Newport area would have proportionately the fewest WTGs (a maximum of 65) in combination with a narrowed field of view (37 to 41 degrees) for WTGs visible across the horizon; although, the reduction is not as much as for the field of view from Block Island (EDR 2023). Only Alternative D2 would have a narrower line of turbines visible from those NHLs at Newport, within a 35 to 37 degree field of view (EDR 2023); however, Alternative D would have a cluster of up to 92 WTGs on the horizon, proportionately 42% more than Alternative G.

Compared to the Proposed Action, Alternative G setbacks for RWF WTGs would increase the distances to viewshed resources at Aquinnah by a minimum of approximately 1.25 miles and at Newport and mainland Rhode Island by 1.15 mile and up to 3.5 miles, dependent on the WTG configuration used. In relation to Block Island, Alternative G would reduce the number of closest WTGs and remove the line of

WTGs visible on the horizon from Block Island, thereby removing the massing of RWF WTGs southeast and northeast of Block Island in comparison to the Proposed Action. Compared to Alternative C, Alternative G would continue to have WTGs in approximately the same proximity to Martha's Vineyard, although Alternative G would have fewer WTGs than Alternative C. Alternative G would have approximately the same changes as Alternative C in relation to Block Island, Newport, and mainland Rhode Island (in comparison to the Proposed Action). Alternative G, in comparison to Alternative D, would have increased setbacks from Martha's Vineyard, Newport, and mainland Rhode Island. However, in comparison to Alternative D3, Alternative G would have approximately the same increased setback distances from Block Island, albeit with a different WTG configuration under Alternative G and Alternative D3. Alternative E1 would begin placing WTGs farther from Martha's Vineyard and from Newport than Alternative G, with Alternative G WTG placement beginning approximately 2 miles nearer from Martha's Vineyard and approximately 1.15 to 3.5 miles from Newport than the nearest Alternative E1 WTG. Alternative G would not reduce WTG proximity to Block Island as much as Alternative E2 WTG (where WTGs would begin at the same distance as Alternative G, but then begin receding more greatly to the northwest, to distances of 1.15 to approximately 5.5 miles farther away). The distances by which Alternative F would increase WTG setbacks from shore in relation to the other action alternatives cannot be quantified until the additional WTGs to be removed are identified. As described, those action alternatives with the fewest WTGs and the greatest distances of setback would have the least degree of potential visual impacts on viewshed resources. Although the level of impact would be reduced, the layout modification and construction activities proposed under Alternatives C through F would still include the same historic properties adversely affected under the Proposed Action and the same potential for impacts to these historic properties. Portions of all RWF WTGs would potentially be visible from nearly all the 101 historic properties adversely affected under the action alternatives. All action alternatives, regardless of planned WTG numbers, would have the WTG visibility reduced somewhat due to intervening land areas and with setback distance from the coastline. As described, those action alternatives with the fewest WTGs and the greatest distances of setback would have the least degree of potential visual adverse effects on historic properties. Under Alternatives C through F, the construction and installation of offshore Project components with lighting would have adverse effects to historic properties, similar to those of the Proposed Action. O&M and decommissioning of offshore Project components with lighting would have effects to historic properties under Alternatives C through F, similar to those of the Proposed Action. Visual effects from offshore Project components' lighting would be removed upon completion of decommissioning.

To the potential 955 WTGs modeled in a maximum-case scenario for other future offshore wind activities (EDR 2021b), Alternatives C through F would add visual effects from offshore WTG structure visibility and lighting, including from navigational and aviation hazard lighting systems. The same 101 historic properties would continue to be adversely affected by offshore structure lighting visibility in the visual APE under Alternatives C through F as under the Proposed Action. The cumulative visual effects of offshore structures and lighting on historic properties in the visual APE associated with Alternatives C through F when combined with past, present, and reasonably foreseeable activities would be long term and adverse, until decommissioning of the Project. However, for Alternatives E1 and G in particular, the visual proximity for effects from offshore Project elements would specifically have increased setbacks from historic properties at Martha's Vineyard, MA, and the nearest shores of RI (including NHLs at Newport and Block Island).

5.1.2.2 Minimization of Physical Effects to ASLF from Seafloor Disturbance

Alternatives C through F would involve the same types or numbers of submerged historic properties on the seafloor at the RWF and RWEC offshore development areas as under the Proposed Action. However, these alternatives could decrease the risk of disturbance and impacts to historic properties because the number of constructed WTGs could be reduced and associated cable trenching could also decrease, resulting in greater Project flexibility for avoiding these historic properties. Therefore, RWEC and RWF WTG and IAC construction, operation, maintenance, decommissioning, and associated vessel anchoring would result in less seafloor disturbance than is anticipated for the Proposed Action (see BOEM 2022a:Table 3.10-7).

Potential construction disturbance for WTG and OSS locations is expected to reduce from the maximum scenario of 734.4 acres of Alternative B to 475.2-482.4 acres under Alternative C, 576-684 acres under Alternative D, 475.2-597.6 acres under Alternative D, 482.4 acres under Alternative G, and as little as 417.6 acres under Alternative F (BOEM 2022a:Table E4-1). The IAC length and acreage of disturbance between WTG would reduce comparatively. Potential anchorage disturbance is expected to reduce from the 3,178 acres of Alternative B to 2,062-2,093 acres under Alternative C, 2,496-2,961 acres under Alternative D, 2,062 or 2,589 acres under Alternative D, and as little as 1,814 acres under Alternative F (BOEM 2022a:Table E4-1).

Compared to the Proposed Action, Alternative C would place WTG locations farther from seven of the 29 historic properties in the marine APE, specifically 2.8 to 3.0 miles farther from ASLF Target-28 and Target-27, respectively, and 0.25 mile to 2.5 miles farther from shipwrecks/possible historic shipwreck Target-02, Target-08, Target-17, Target-18, and Target-19, in order of increasing distance. Distances to other submerged historic properties in the marine APE would not change under Alternative C.

Alternative D would decrease the risk of disturbance and impacts at one potential shipwreck (Target 04) because the nearest WTG would be sited approximately 3.5 miles more distant from that shipwreck. Impacts would remain the same as the Proposed Action, however, if Alternative D retains WTG proximity to that shipwreck. As a result, Alternative D would not have the potential to reduce potential for adverse effects at submerged historic properties as much as Alternative C. Alternative D would also maintain similar configurations to the Proposed Action at the other 28 ASLFs and shipwrecks/possible historic shipwrecks in the marine APE.

Compared to the Proposed Action, the 64 WTG configuration of Alternative E1 would place WTG locations farther from seven of the 32 ASLFs and shipwrecks/possible historic shipwrecks in the marine APE. These seven consist of two ASLFs (Target-24 and Target-26), three known shipwrecks (Target-01, Target-06, and Target-09), and two possible historic shipwrecks (Target-07 and Target-16). Compared to the Proposed Action, the 81 WTG configuration of Alternative E2 would place WTG locations farther from one ASLF (Target-24) and one possible historic shipwreck (Target-09). Either configuration of Alternative E would have more potential for adverse effects at submerged historic properties than Alternative C but less potential for adverse effects than either Alternative D or the Proposed Action. Although of closer proximity to some submerged cultural properties than these other alternatives, Alternative E would increase the distance of Project WTGs to a range of other submerged historic properties than either Alternative C or Alternative D. Nevertheless, Alternative E would result in similar

effects to the Proposed Action at the 22 to 27 historic properties in the marine APE where its configurations do not provide farther avoidance distances.

Seafloor disturbance associated with Alternative F, which combines alternative WTG reduction options, would result in less seafloor disturbance than is anticipated for the Proposed Action or, potentially, the other action alternatives.

Alternative G would place the WTGs and their connecting IAC farther from two ASLFs and three to eight shipwreck sites than the Proposed Action by placing WTGs 1.9 to 3.7 miles farther away. However, the shift in WTG locations would result in a shift of IAC cabling, which would potentially increase impacts to one possible historic shipwreck (Target 10) and one ASLF (Target 28) by moving or increasing IAC cabling within these two targets (three IAC cables in parallel under Alternative G instead of one under the Proposed Action). Alternative G would also move IAC cabling 0.28 mile closer to an ASLF (Target 25).

Alternatives C through F would use the same RWEC as that of the Proposed Action. These alternatives would result in irreversible adverse effects to historic properties where seafloor disturbance would not be avoidable during construction of the RWEC.

Due to the similarity in Project activities and locations, the impacts of seafloor disturbance on identified ASLFs and shipwrecks/possible historic shipwrecks from Project operations, maintenance, and decommissioning activities associated with Alternatives C through F would be similar to the Proposed Action. Seafloor disturbance, including shipwrecks and ASLF, would be negligible (not adverse) during operations and maintenance, because these activities would be restricted to areas that have been surveyed and found to contain no marine cultural resources or that have previously experienced disturbance during construction. Decommissioning activities would be expected to take place in previously disturbed areas and therefore not adverse to historic properties. Overall, the reduced scale of Alternatives C through F would result in fewer potential effects from seafloor disturbance activities than the Proposed Action.

5.2 Avoidance, Minimization, and Mitigation Measures

The Section 106 process requires BOEM to seek ways to avoid, minimize, or mitigate the adverse effects of the Project that would result from the undertaking. BOEM is approaching this process sequentially, beginning with avoidance. Avoidance of adverse effects is preferred and prioritized. BOEM would then implement minimization to reduce the adverse effect to the extent able. All adverse effects remaining after avoidance and minimization measures would be mitigated. Mitigation measures for historic properties, including NHLs, would be stipulated in the MOA and detailed in the HPTPs attached to the MOA. This includes consideration of monitoring and of emergency situations, such as storms affecting or damaging wind facilities in proximity to ASLFs. These same measures, committed to by Revolution Wind in the MOA and identified in COP Appendix BB – Cultural Resources Avoidance, Minimization, and Mitigation Measures (EDR 2022d), would also be incorporated by BOEM into COP approval.

BOEM remains in consultation with all consulting parties under Section 106 of the NHPA, including Tribal Nations [REDACTED]

[REDACTED] State Historic Preservation Offices/Division for Historic Preservation; ACHP; NPS; and other cooperating federal agencies, local governments, historical interest groups, and involved property owners.

BOEM will continue to consult with these parties on this Finding and the resolution of all adverse effects. Consistent with the provisions for NEPA substitution, pursuant to 36 CFR 800.8(c)(4)(i)(A), BOEM will codify the resolution of adverse effects through the MOA for the Project.

6 Literature Cited

- Advisory Council on Historic Preservation (ACHP). 2020. *Timing and Communication: Section 106 and Environmental Impact Statement*. Available at: https://www.achp.gov/sites/default/files/2021-03/NEPA_Section106_121120_0.pdf. Accessed November 17, 2021.
- Boucher, Jack E. 1969. View from the West - Chateau-sur-Mer, Bellevue Avenue, Newport, Newport County, RI. Historic American Building Survey Photograph. Available from the Library of Congress online at <https://www.loc.gov/pictures/item/ri0341.photos.144766p/>. Accessed July 31, 2022.
- Bureau of Ocean Energy Management (BOEM). 2012a. *Programmatic Agreement concerning the “Smart from the Start” Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island*. Available at: https://www.boem.gov/sites/default/files/renewable-energy-program/State-Activities/HP/MA-RI-PA_Executed.pdf. Accessed June 11, 2022.
- . 2012b. *Commercial Wind Lease Issuance and Site Assessment Activities on the Atlantic Outer Continental Shelf Offshore Rhode Island and Massachusetts: Environmental Assessment*. OCS EIS/EA BOEM 2012-087. Available at: https://www.boem.gov/sites/default/files/uploadedFiles/BOEM/Renewable_Energy_Program/State_Activities/BOEM_RI_MA_EA_2012-070_719.pdf. Accessed June 11, 2022.
- . 2013. *Commercial Wind Lease Issuance and Site Assessment Activities on the Atlantic Outer Continental Shelf Offshore Rhode Island and Massachusetts: Revised Environmental Assessment*. OCS EIS/EA BOEM 2013-1131. Available at: https://www.boem.gov/sites/default/files/uploadedFiles/BOEM/Renewable_Energy_Program/State_Activities/BOEM%20RI_MA_Revised%20EA_22May2013.pdf. Accessed June 11, 2022.
- . 2017. *SAP Approval for Lease OCS-A 0486*. Available at: https://www.boem.gov/sites/default/files/renewable-energy-program/State-Activities/RI/SIGNED_BOEM-to-DWW_SAP-Approval-for-OCS-A-0486_101217-%281%29.pdf. Accessed June 11, 2022.
- . 2020. *Guidelines for Providing Archaeological and Historic Property Information Pursuant to 30 CFR Part 585*. Available at: <https://www.boem.gov/sites/default/files/documents/about-boem/Archaeology%20and%20Historic%20Property%20Guidelines.pdf>. Accessed October 1, 2021.
- . 2021a. Notice of Intent to Prepare an Environmental Impact Statement for Revolution Wind LLC’s Proposed Wind Energy Facility Offshore Rhode Island. April 30. *Federal Register* 86(82):22972–22975. Accessed June 1, 2021.
- . 2021b. Notice of Intent to Prepare an Environmental Impact Statement for Revolution Wind LLC’s Proposed Wind Energy Facility Offshore Rhode Island; Reopening of Comment Period and Corrections. June 4. *Federal Register* 86(106):30068–30069. Accessed June 1, 2021.
- . 2021c. *Guidelines for Lighting and Marking of Structures Supporting Renewable Energy Development*. Available at: www.boem.gov/sites/default/files/documents/renewable-energy/2021-Lighting-and-Marking-Guidelines.pdf. Accessed June 23, 2021.
- . 2022a. *Revolution Wind Farm and Revolution Wind Export Cable Project Draft Environmental Impact Statement*. Washington, D.C.: U.S. Department of the Interior, Bureau of Ocean Energy Management.

- . 2022b. *Scoping Summary Report for the Revolution Wind Farm Environmental Impact Statement*. Pending. Washington, D.C.: U.S. Department of the Interior, Bureau of Ocean Energy Management.
- Council on Environmental Quality and Advisory Council on Historic Preservation. 2013. *NEPA and NHPA: A Handbook for Integrating NEPA and Section 106*. Available at: https://www.achp.gov/sites/default/files/2017-02/NEPA_NHPA_Section_106_Handbook_Mar2013_0.pdf. Accessed June 11, 2022.
- Environmental Design and Research, Landscape Architecture, Engineering and Environmental Services, D.P.C. (EDR). 2021a. *Visual Impact Assessment and Historic Resources Visual Effects Analysis Revolution Wind Onshore Facilities*. Appendix U1 in *Construction and Operations Plan Revolution Wind Farm*. Syracuse, New York: EDR.
- . 2021b. *Revolution Wind Farm Potential Adverse Effect Above-Ground Historic Resource Supplemental Visibility Analysis*. Memorandum to Bureau of Ocean Energy Management. December 20.
- . 2021c. *Visual Impact Assessment Revolution Wind Farm*. Appendix U3 in *Construction and Operations Plan Revolution Wind Farm*. Syracuse, New York: EDR.
- . 2022a. *Revolution Wind Farm National Historic Landmarks*. Syracuse, New York: EDR.
- . 2022b. *Cultural Resources Avoidance, Minimization, and Mitigation Measures*. Appendix BB in *Construction and Operations Plan Revolution Wind Farm*. Syracuse, New York: EDR.———. 2023. *Historic Resources Visual Effects Analysis Revolution Wind Farm*. Appendix U2 in *Construction and Operations Plan Revolution Wind Farm*. Syracuse, New York: EDR.
- . 2023. REV_Layout Alternatives AE NHL Visibility Analysis_03272023 (Excel spreadsheet). Syracuse, New York: EDR.
- Forrest, D., and J.N. Waller, Jr. 2023. *Terrestrial Archaeological Resources Assessment Revolution Wind Farm Project Onshore Facilities*. Appendix N in *Construction and Operations Plan Revolution Wind Farm*. Pawtucket, Rhode Island: The Public Archaeology Laboratory.
- Joy, Shawn. 2018. *The Trouble with the Curve: Reevaluating the Gulf of Mexico Sea-level Curve*. Unpublished master's thesis, Florida State University, Tallahassee.
- National Park Service (NPS). 1997. *How to Apply the National Register Criteria for Evaluation*. Rev. ed. National Register Bulletin 15. Available at: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf. Accessed August 13, 2021.
- . 2012. Ocean Drive Historic District. Available from The Wayback Machine at <https://web.archive.org/web/20121007141528/http://tps.cr.nps.gov/nhl/detail.cfm?ResourceId=1593&ResourceType=District>. Accessed October 11, 2021.
- . 2015a. Bellevue Avenue Historic District. Available from The Wayback Machine at <https://web.archive.org/web/20150622114630/http://tps.cr.nps.gov/nhl/detail.cfm?ResourceId=1192&ResourceType=District>. Accessed October 10, 2021.
- . 2015b. Marble House. Available from The Wayback Machine at <https://web.archive.org/web/20150510214046/http://tps.cr.nps.gov/nhl/detail.cfm?ResourceId=1143737094&ResourceType=Building>. Accessed October 11, 2021.
- . 2021. Section 110 of the National Historic Preservation Act. Available at: <https://www.nps.gov/fpi/Section110.html>. Accessed April 29, 2021.

- National Register of Historic Places (NRHP). 1971a. The Breakers. Photograph from The Preservation Society of Newport County. Available from the NPS online at <https://npgallery.nps.gov/NRHP/GetAsset/1bdeded6-9f0a-480c-930b-8ed667b8a055/>. Accessed July 31, 2022.
- . 1971b. Marble House. Photograph from The Preservation Society of Newport County. Available from the NPS online at <https://npgallery.nps.gov/NRHP/GetAsset/1da28a96-be14-4bb7-9284-5394d2b1c95f/>. Accessed July 31, 2022.
- . 1972. Chateau-sur-mer. Bellevue Avenue Historic District Photograph [Boucher 1969]. Available from the NPS online at <https://npgallery.nps.gov/NRHP/GetAsset/faae327d-6b76-480d-93fe-5667b9430885/>. Accessed July 31, 2022.
- . 1976. Ocean Drive Historic District. Photograph. Available from the NPS online at <https://npgallery.nps.gov/NRHP/GetAsset/90a530ff-be99-4ff3-829c-3a58f04062c3/>. Accessed July 31, 2022.
- Revolution Wind, LLC. 2022a. *Revolution Wind Project Updated Historic Resources Visual Effects Analysis (HRVEA)*. Memorandum from Revolution Wind, LLC to BOEM, July 29.
- . 2022b. Re: Revolution Wind – BOEM’s Section 106 Finding of Effects and Draft Memorandum of Agreement. Letter to BOEM, October 31.
- . 2023. Overview of Revisions to S106 Technical Reports and Documents. Memo to BOEM, March 8.
- SEARCH, Inc. (SEARCH). 2023. *Marine Archaeological Resources Assessment Revolution Wind Farm Project*. Confidential Appendix M in *Construction and Operations Plan Revolution Wind Farm*. Pensacola, Florida: SEARCH, Inc.
- Stupich, Martin. 1988. General view of building front looking west from area near abandoned fog signal building. - Block Island Southeast Light, Spring Street & Mohegan Trail at Mohegan Bluffs, New Shoreham, Washington County, RI. Historic American Engineering Record Photograph. Available from the Library of Congress online at <https://www.loc.gov/pictures/item/ri0392.photos.146649p/>. Accessed July 31, 2022.
- SWCA Environmental Consultants (SWCA). 2021a. *Ancient Submerged Landforms Evaluation Summary for the South Fork Wind Farm and South Fork Export Cable Project*. SWCA Project No. 049564.03. Amherst, Massachusetts.
- . 2021b. *Historic Resources Visual Effects Assessment Summary in Rhode Island for the South Fork Wind Farm and South Fork Export Cable Project*. SWCA Project No. 049564.03. Amherst, Massachusetts.
- . 2023. *Cumulative Historic Resources Visual Effects Analysis – Revolution Wind Farm and Revolution Wind Export Cable Project*. SWCA Cultural Resources Report No. 22-60. Amherst, Massachusetts.
- Tetra Tech. 2016. *Site Assessment Plan: Deepwater Wind North Lease OCS-A 0486*. Available at: https://www.boem.gov/sites/default/files/renewable-energy-program/State-Activities/RI/2016-11-16_Deepwater_North-Lease-SAP_Final_Clean-%281%29.pdf. Accessed June 11, 2022.
- vhb. 2023. *Construction and Operations Plan Revolution Wind Farm*. March 2023. Submitted to Bureau of Ocean Energy Management. Available at: <https://www.boem.gov/Revolution-Wind>.

APPENDIX A

Area of Potential Effects Map Figures

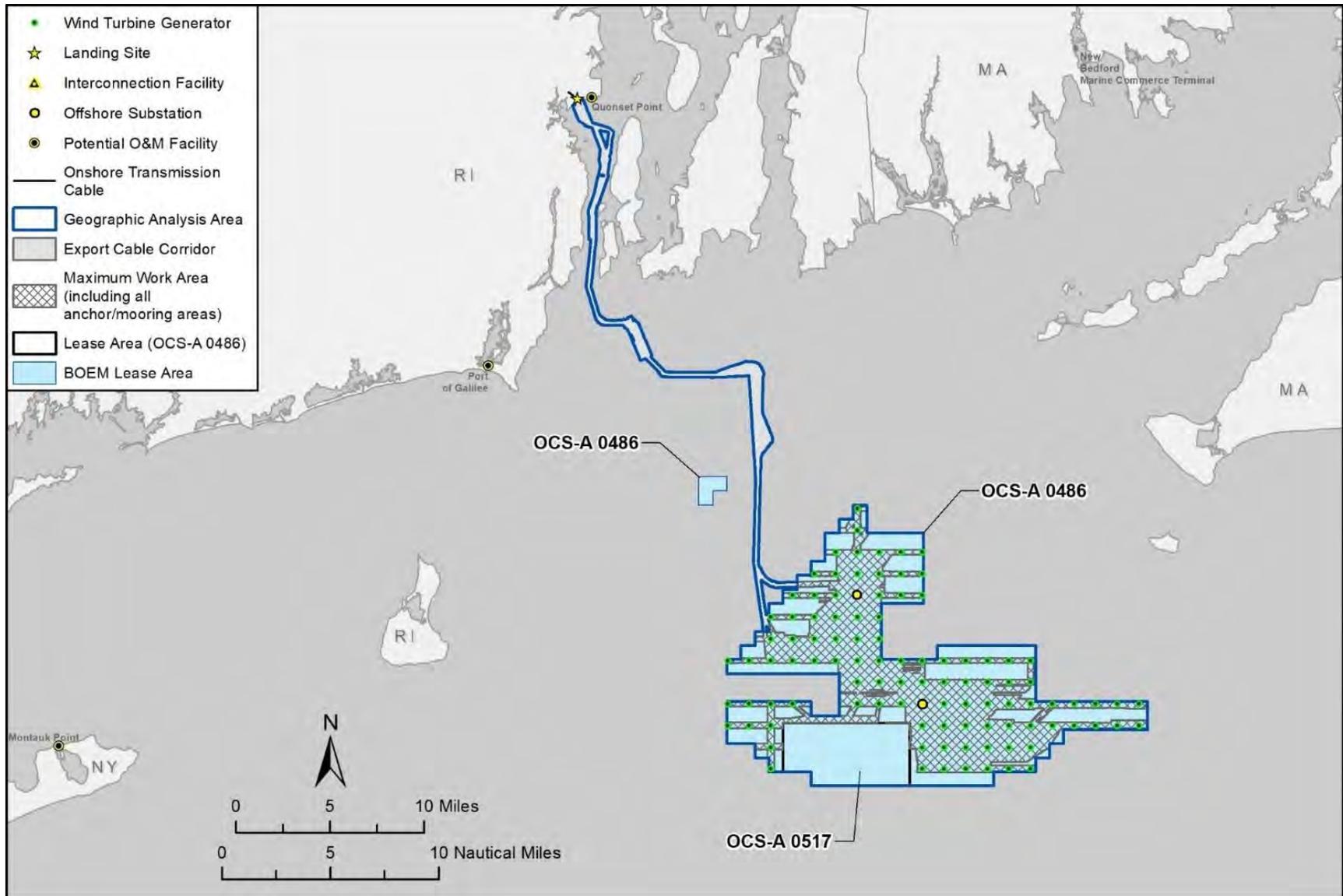


Figure A-1. Revolution Wind construction and operations plan proposed offshore Project elements.

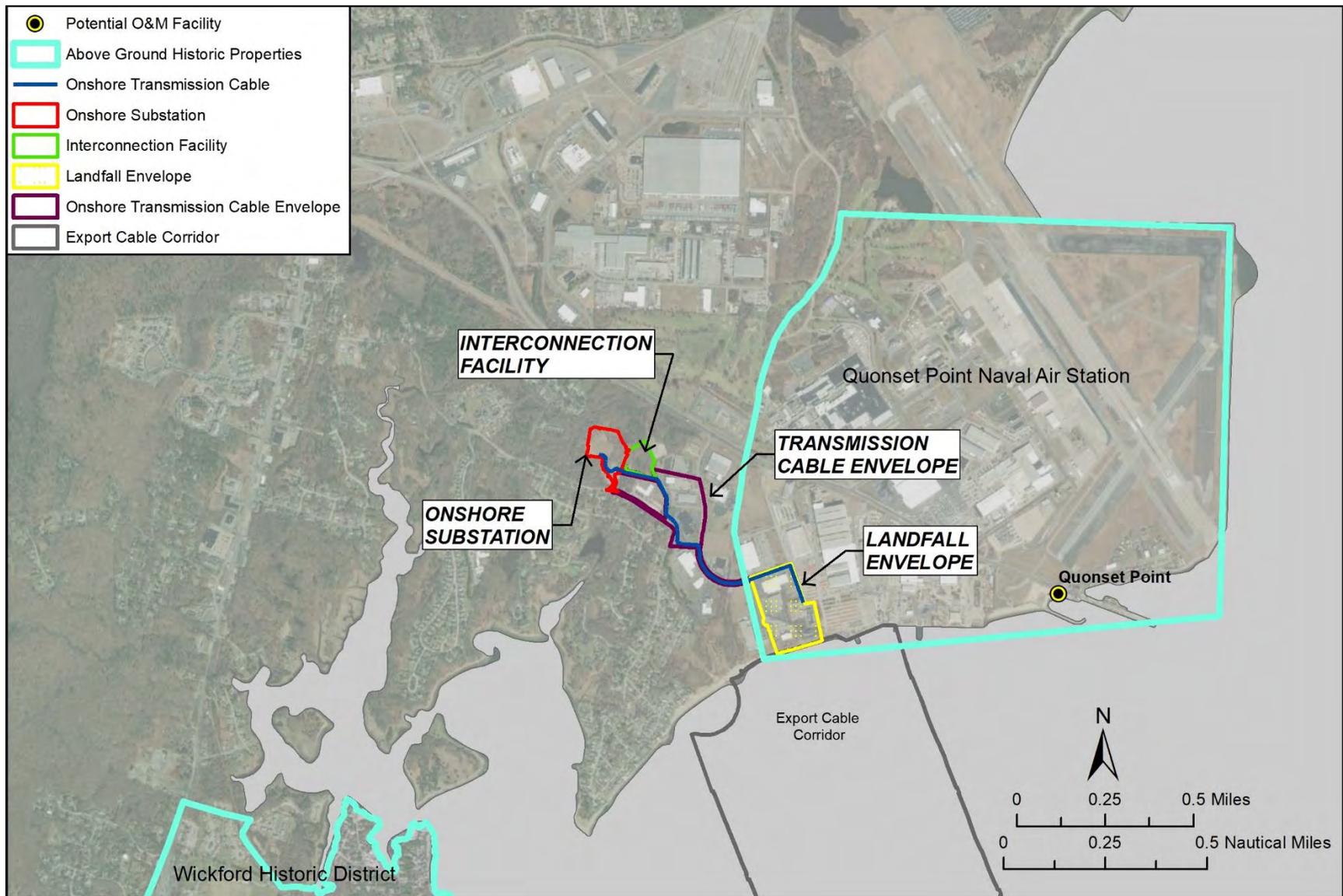


Figure A-2. Revolution Wind construction and operations plan proposed onshore Project elements.

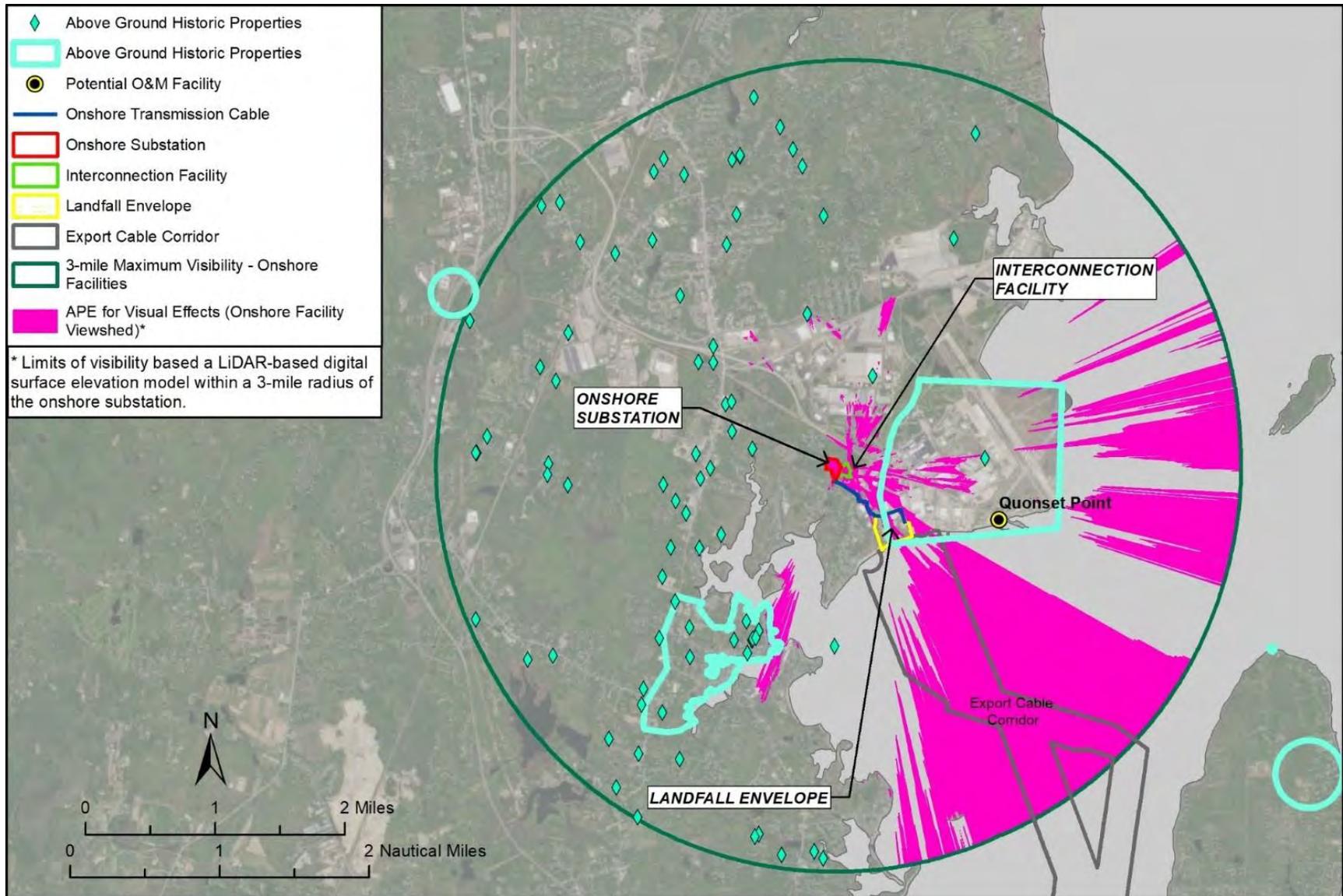


Figure A-3. Visual area of potential effects and visual effects assessment geographic analysis area – onshore.



Figure A-4. Visual area of potential effects and visual effects assessment geographic analysis area – offshore.

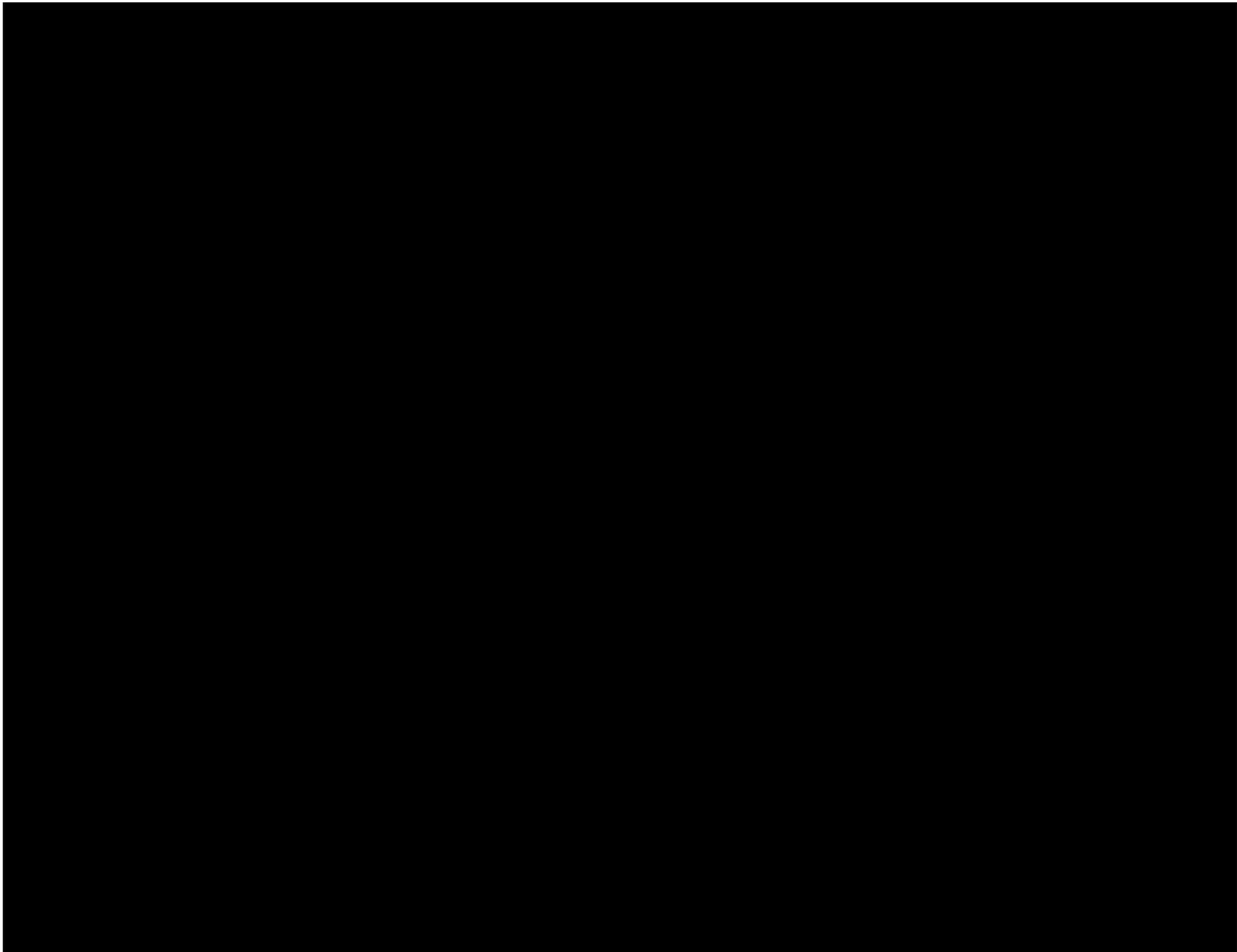
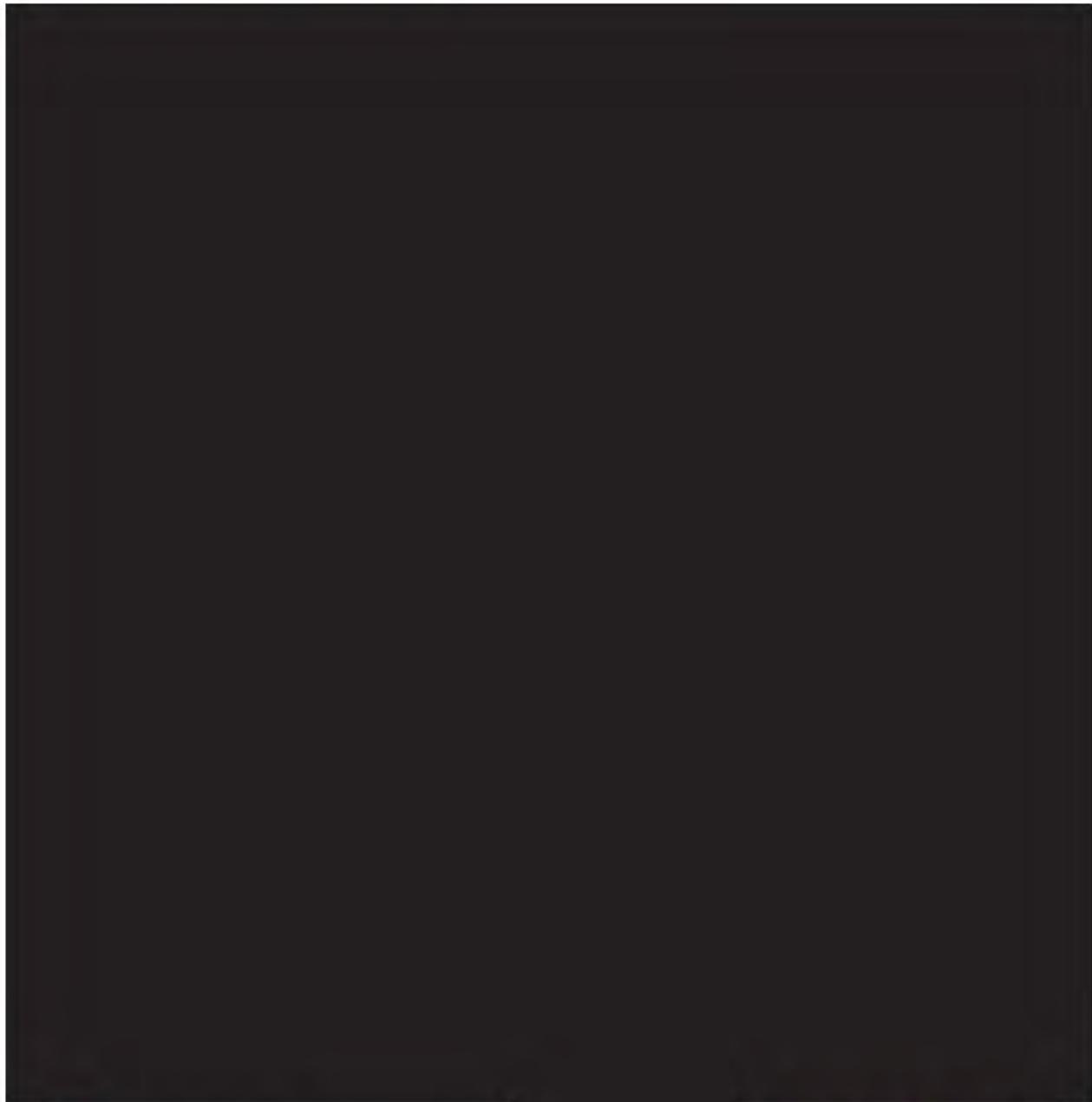


Figure A-5. National historic landmarks in the visual area of potential effects – offshore.

APPENDIX B

Map Figures of Historic Properties in Relation to the Area of Potential Effects

(detached – contains material that meets the criteria for confidentiality under Section 304 of the NHPA)



	Lease Area OCS-A 0486
	RWF APE
	RWEC-OCS APE
	RWEC-RI State Waters APE
	Avoidance Buffer, 50 m
	Geomorphic Feature of Archaeological Interest Area
	State/Federal Boundary

Service Layer Credits: National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.

Revolution Wind
AVOIDANCE TARGETS
RWF and RWEC

Reference system: NAD83 (2011)
Projection: UTM Zone 19N

Date: 4/28/2023
Created by: S. NELSON
Checked by: B. BLEICHNER
Approved by: B. BLEICHNER

Revolution Wind | Powered by Ørsted & Eversource

MARA Figure 4-1. Potential Submerged Cultural Resources in RWF and RWEC.
(SEARCH 2023:111) [Focusing on potential shipwrecks; see next page for all ASLF]



	Lease Area OCS-A 0486
	Revolution Wind Farm Indicative Export Cable Routing
	RWF APE
	RWEC-OCS APE
	RWEC-RI State Waters APE
	Indicative Interarray Cable Routing
	OSS Location
	WTG Location
	Micro-siting Buffer
	Geomorphic Feature of Archaeological Interest Area
	State/Federal Boundary

Service Layer Credits: National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.

Revolution Wind Geomorphic Feature of Archaeological Interest Area

Reference system: NAD83 (2011)
Projection: UTM Zone 19N

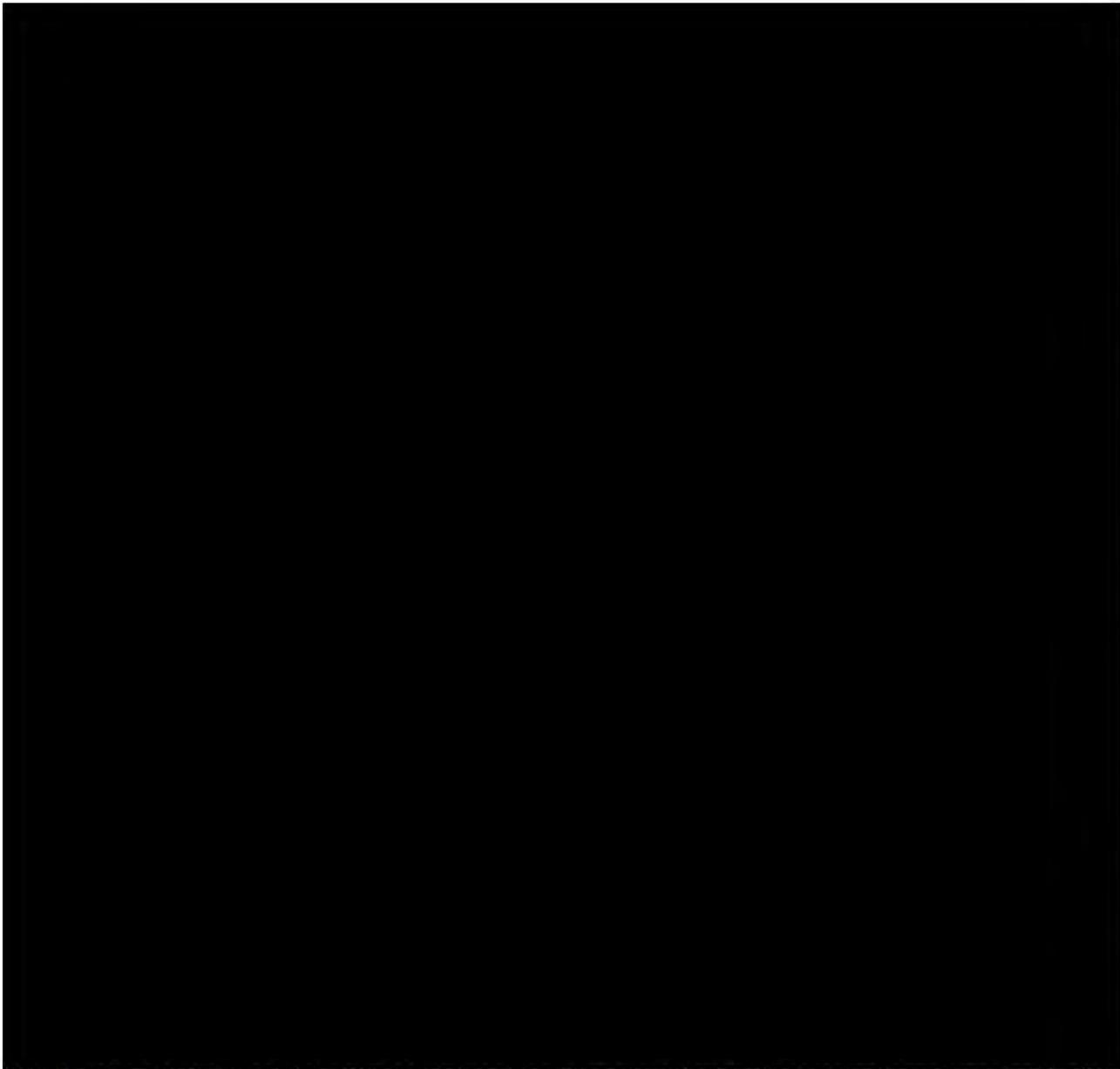
0 4 8 Kilometers
0 2.5 5 Miles

Date: 2/23/2023

Created by: S. NELSON
Checked by: B. BLEICHNER
Approved by: B. BLEICHNER

Revolution Wind Powered by Ørsted & Eversource

MARA Figure 6-1. Geomorphic Features of Archaeological Interest Areas. (SEARCH 2023:203)



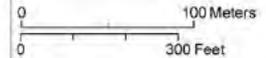
Revolution Wind
Figure 4-17
Identified Archaeological Resources

Legend

-  Identified Archaeological Resource
-  QDC and TNEC Parcels

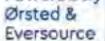
Service Layer Credits: Source: Historical Topographic Map Collection courtesy of the U.S. Geological Survey
Esri

Reference system: NAD83 (2011)
Projection: UTM Zone 18N

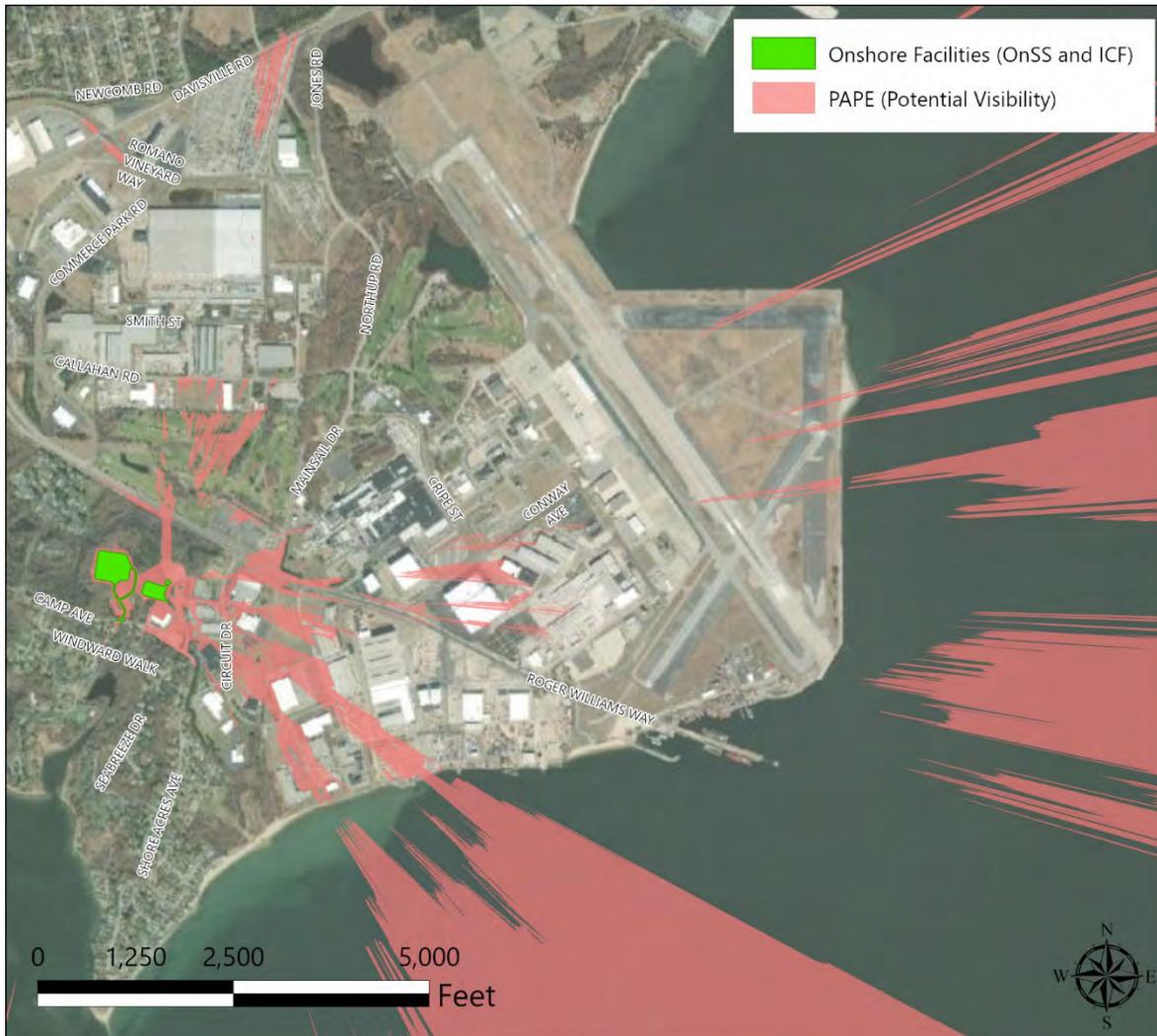


Date: 8/12/2021
Created by: PAL

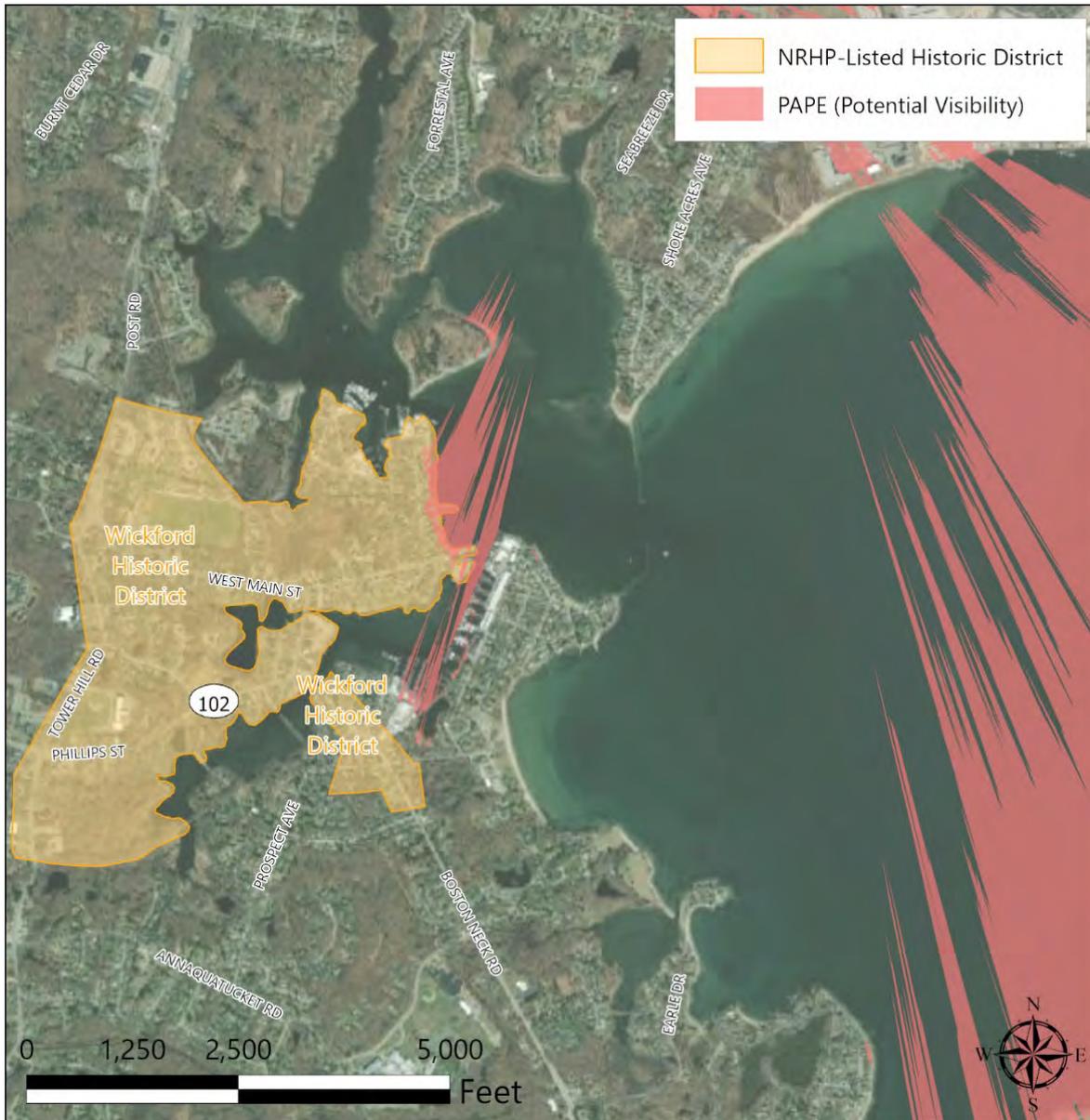
**Revolution
Wind**

Powered by

Ørsted &
Eversource

TARA Figure 4-17: Revolution Wind Onshore Facilities identified archaeological resources on the Wickford, RI USGS topographic quadrangle. (Forrest and Waller 2023:4-18)



Onshore HRVEA Figure 2.2-2. Detail of Potential Project Visibility at the Quonset Point Naval Air Station (EDR 2021a:23)



Onshore HRVEA Figure 2.2-3 - Detail of Potential OnSS and ICF Visibility Within the Wickford Historic District (EDR 2021a:24)

\\10138 Revolution Wind\IA\HRVEA\Graphical\Figures\HRVEA\010138_HRVEA_Figures_3_1-1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

Outer Continental Shelf
(OCS-A0486)

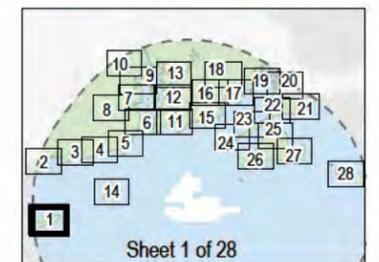
HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property
 - National Historic Landmark
 - NRHP-Listed Property
 - NRHP-Eligible Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect

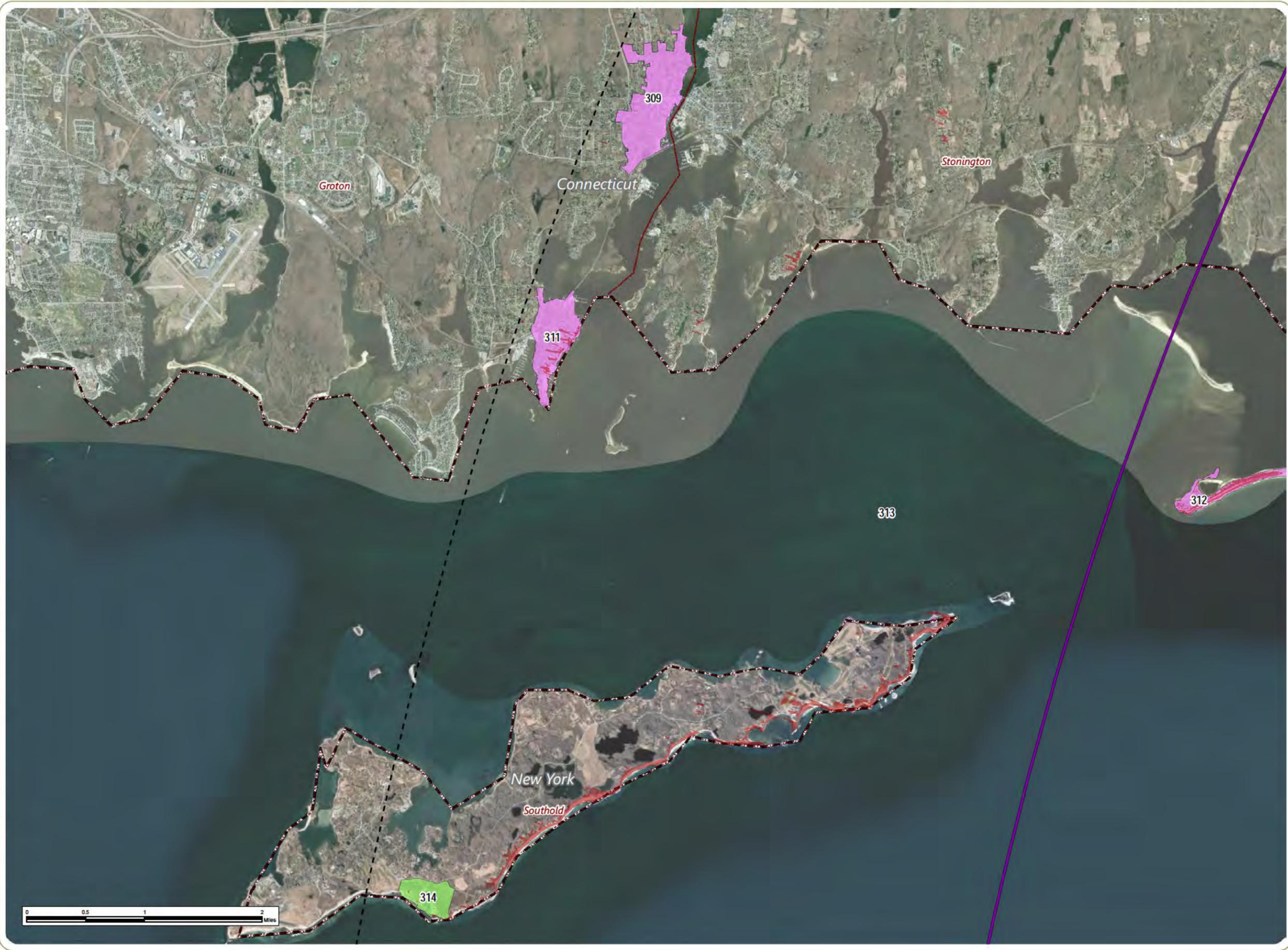


Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



www.edrdpc.com

J:\0138 Revolution Wind\1\HRVEA\Graphics\Figures\HRVEA\MXD\10138_HRVEA_Figures_3_1-1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

Outer Continental Shelf
(OCS-A0486)

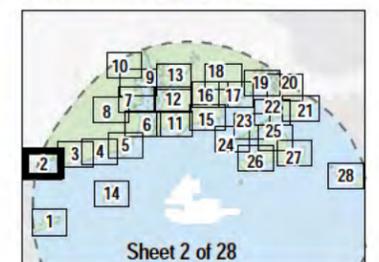
HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property
 - NRHP-Listed Property
 - NRHP-Eligible Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect

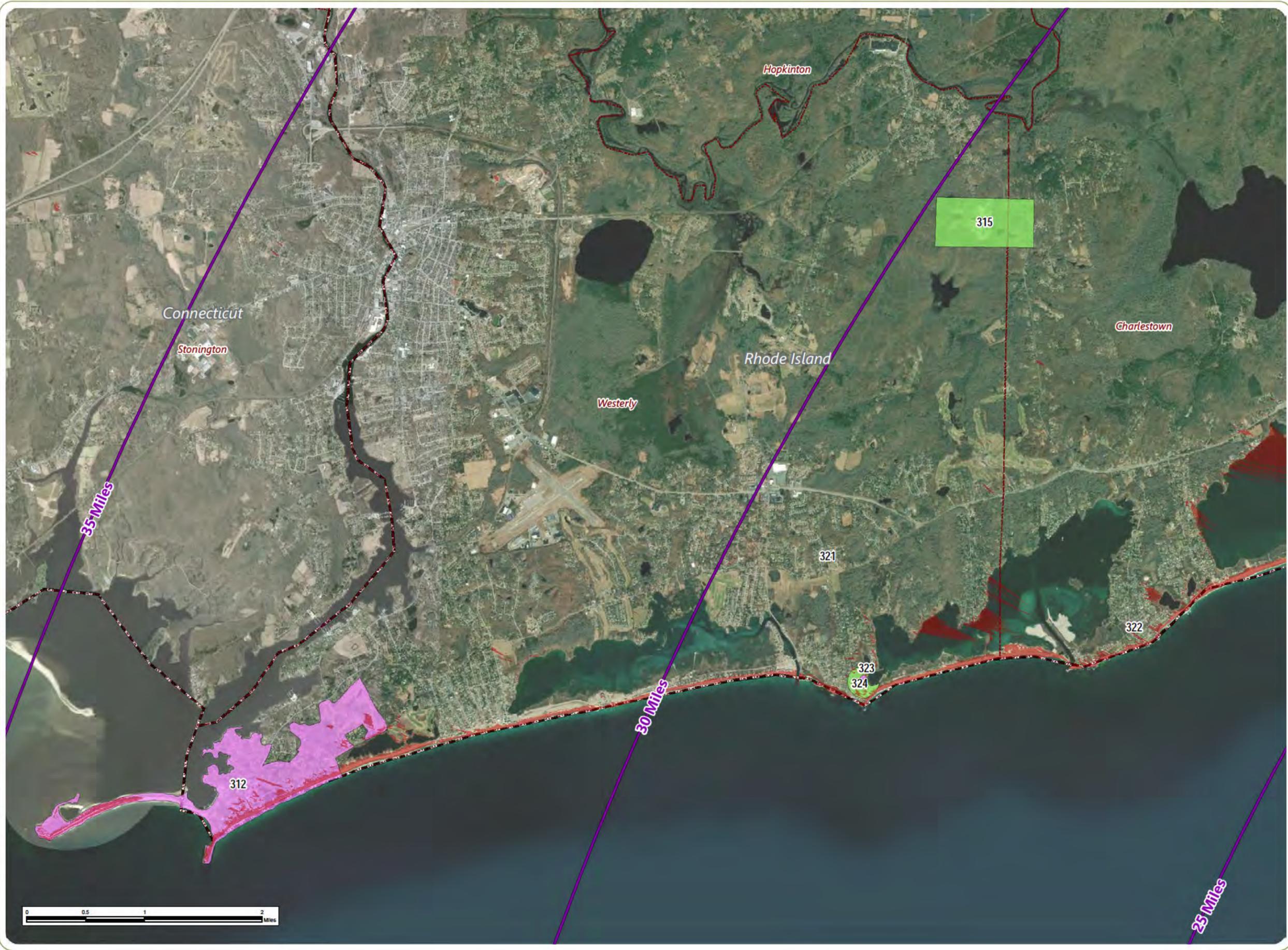


Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



www.edrdpc.com

J:\18138 Revolution Wind\18138 HRVEA\Graphics\Figures\HRVEA\Map01010138_HRVEA_Figures_3.1-1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

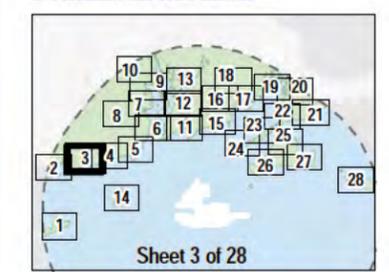
HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- - - Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
- NRHP-Listed Property
- NRHP-Eligible Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

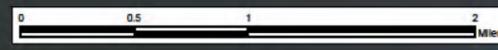
Label Key for Historic Properties

No Adverse Effect

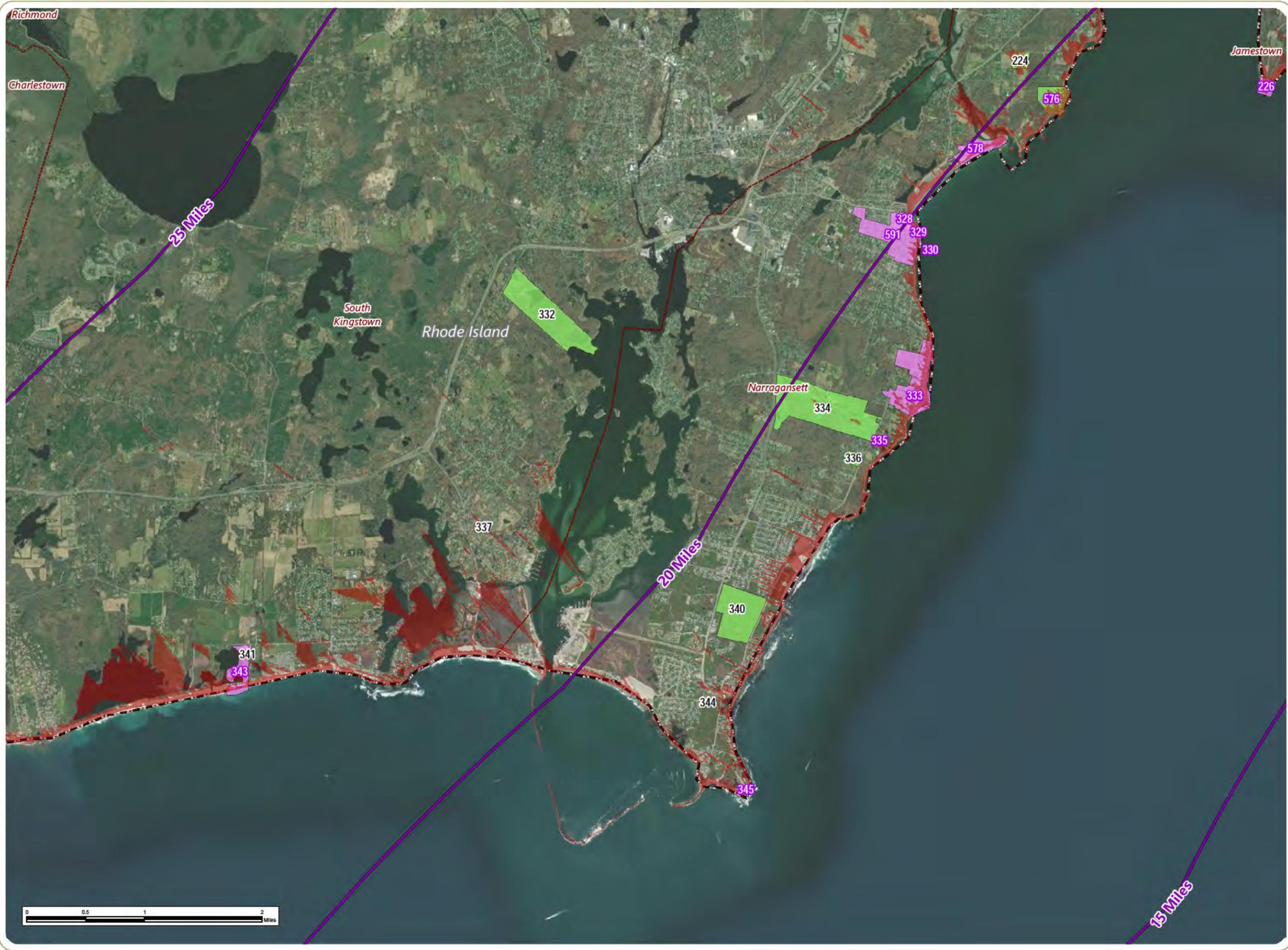
Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



www.edrdpc.com



Revolution Wind Farm

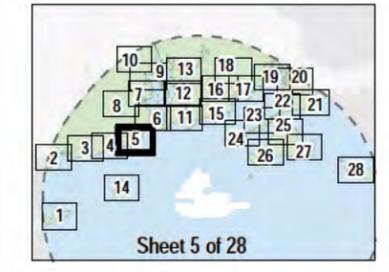
Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
- NRHP-Listed Property
- NRHP-Eligible Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

- No Adverse Effect
- Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

J:\0138 Revolution Wind\VA\HRVEA\Graphics\Figures\HRVEA\MXD\10138_HRVEA_Figures_3.1-1_Above-Ground Historic Properties_PAPE.mxd

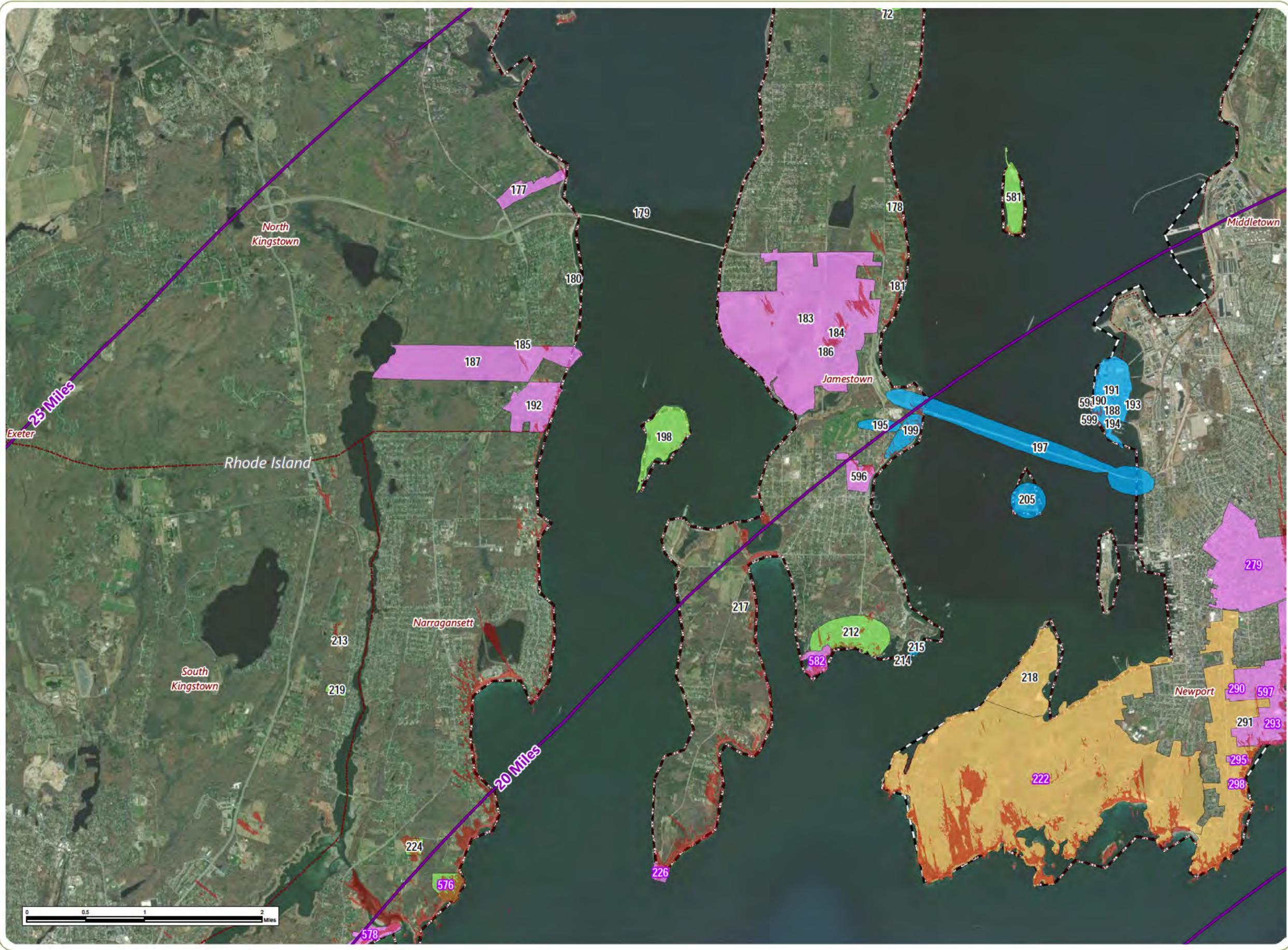


www.edrdpc.com

Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

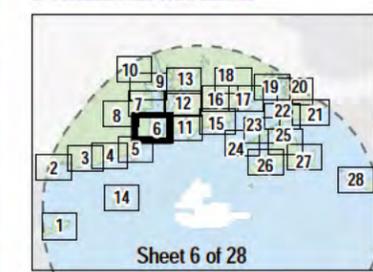


- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
- National Historic Landmark
- NRHP-Listed Property
- NRHP-Eligible Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

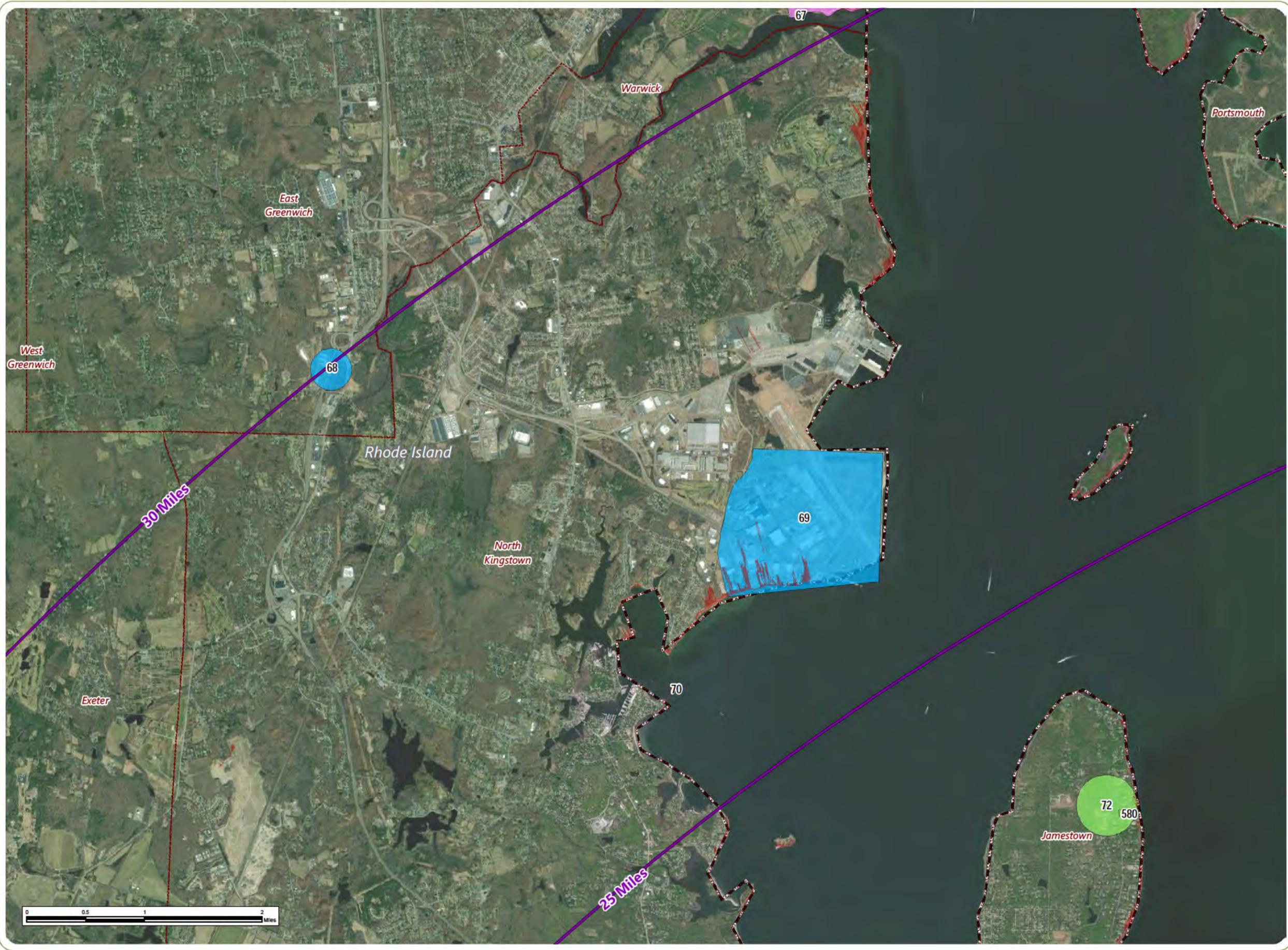
Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

www.edrdpc.com

J:\01308 Revolution Wind\VA\HRVEA\Graphics\Figures\HRVEA\0101308_HRVEA_Figures_3.1-1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

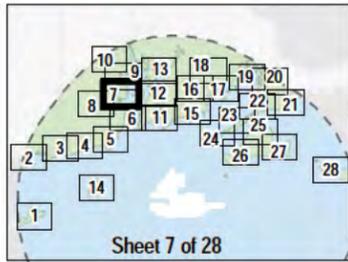
Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
- NRHP-Listed Property
- NRHP-Eligible Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

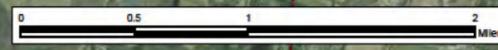
Label Key for Historic Properties

- No Adverse Effect
- Potential Adverse Effect



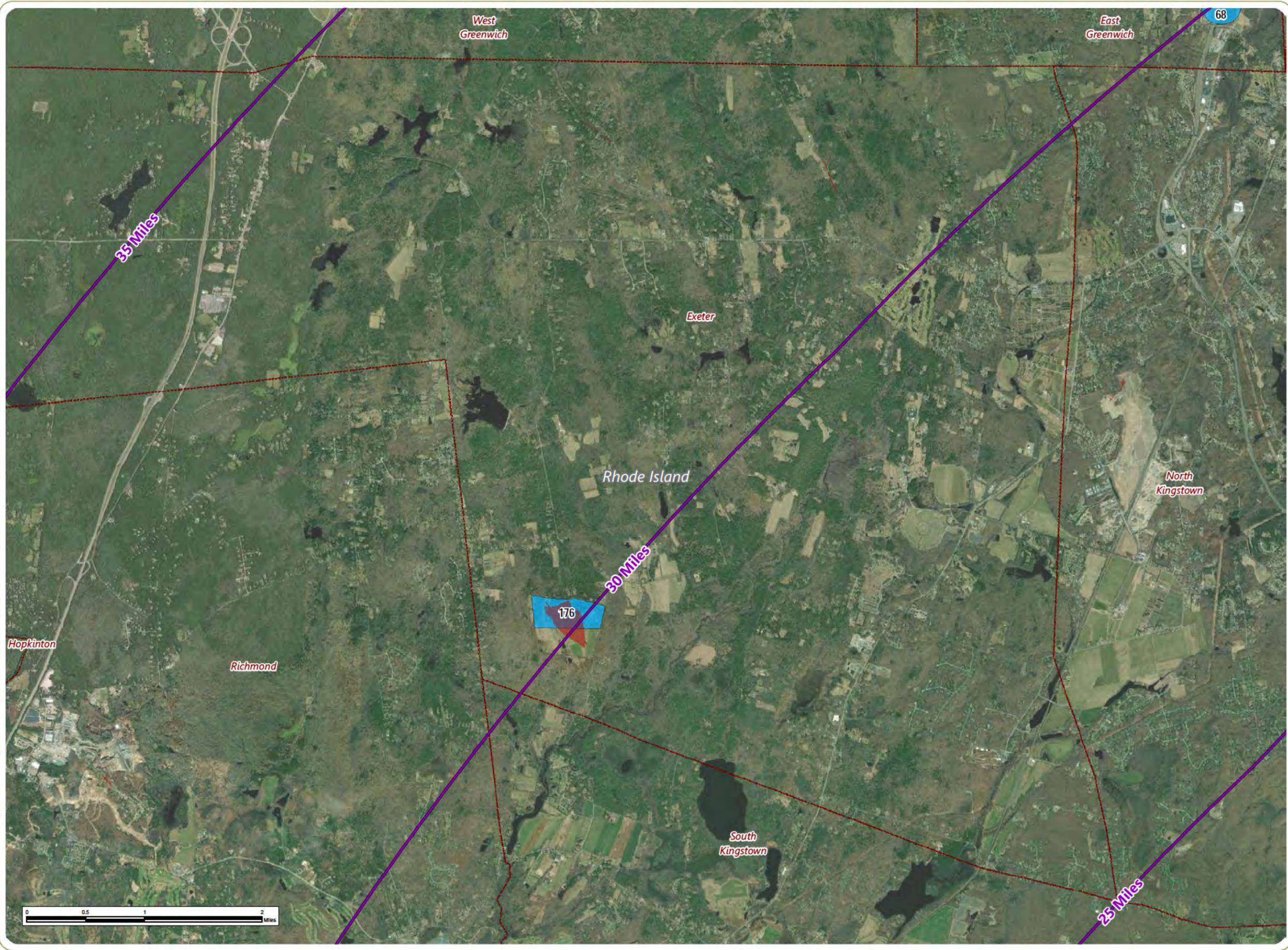
Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

J:\10138 Revolution Wind V\HRVEA\Graphics\Figures\HRVEA\Map010138_HRVEA_Figures_3.1-1_Above-Ground Historic Properties_PAPE.mxd



www.edrdpc.com

J:\19138 Revolution Wind V\HRVEA\Graphics\Figures\HRVEA\Figures_3_1_1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

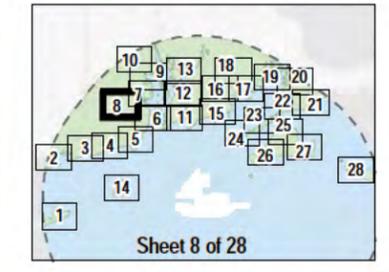
Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

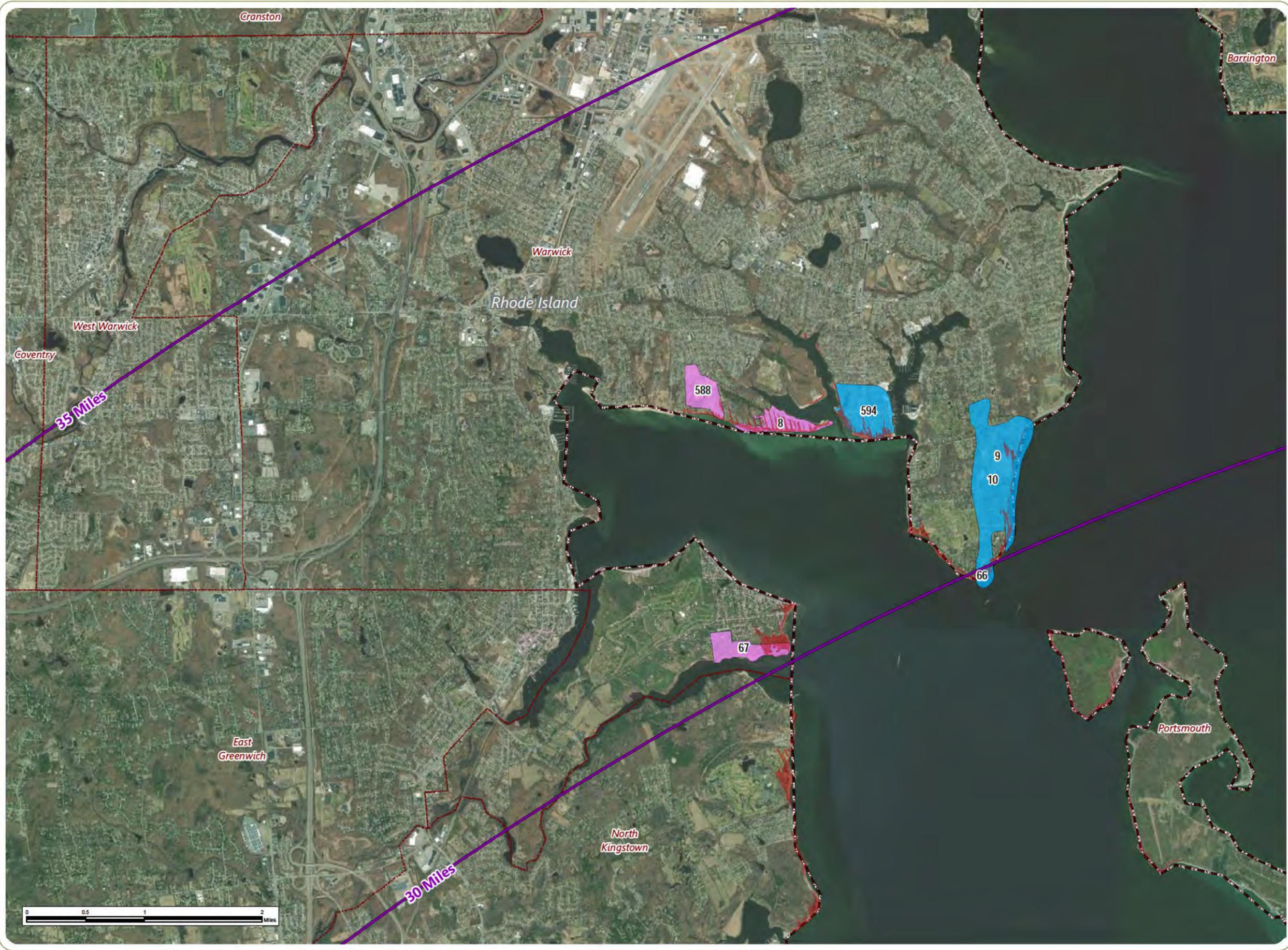
- No Adverse Effect
- Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

www.edrdpc.com

J:\10138 Revolution Wind\10138_HRVEA\Graphics\HRVEA\MapX10138_HRVEA_Figures\3.1-1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

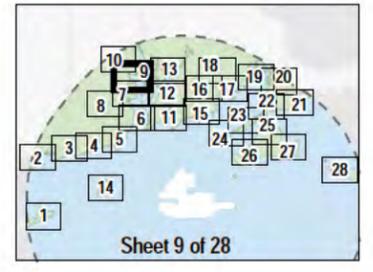
Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property
- NRHP-Listed Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

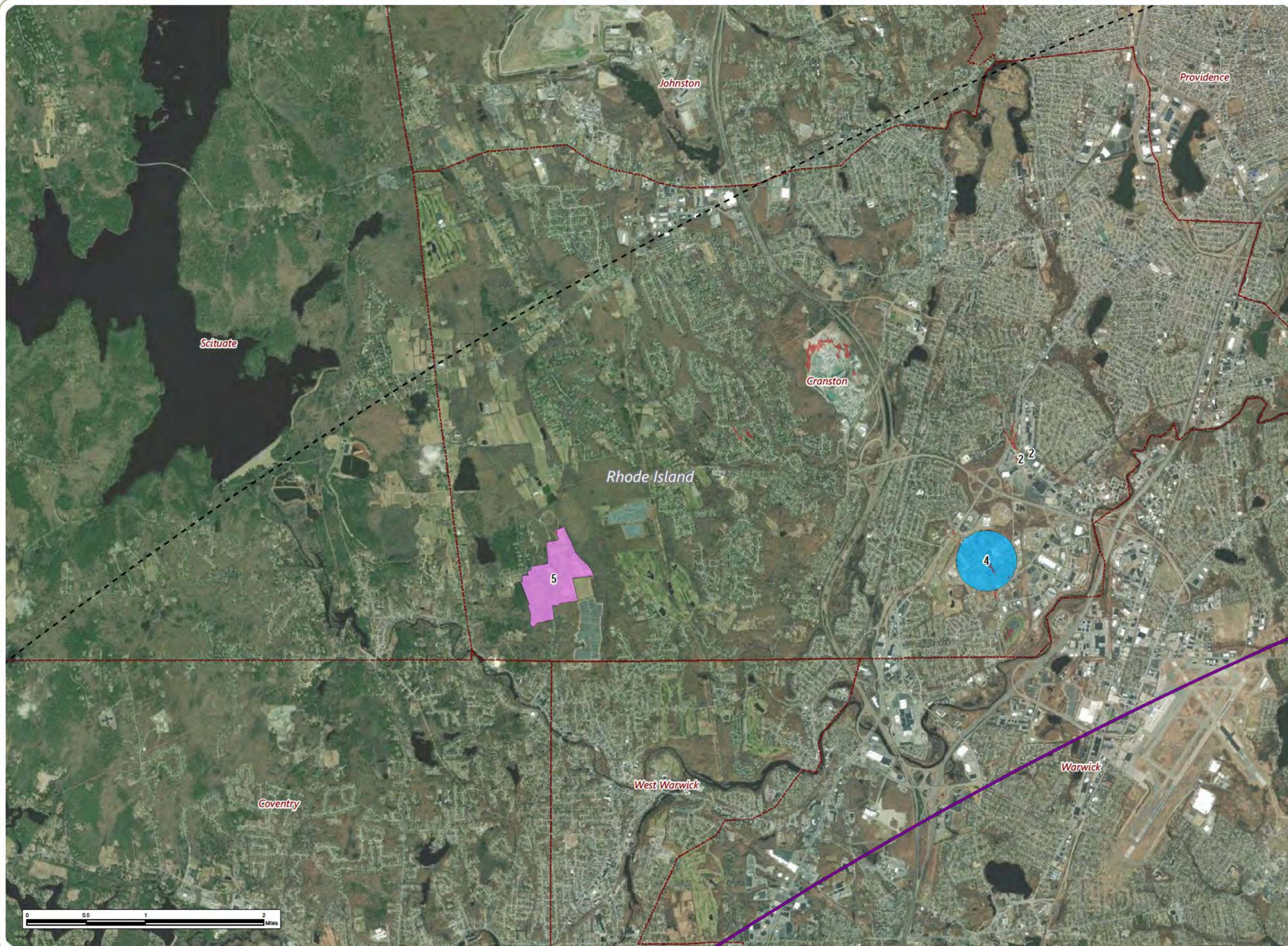
- No Adverse Effect
- Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

www.edrdpc.com

J:\10138 Revolution West\VA\HRVEA\Graphics\Figures\HRVEA\MXD\10138_HRVEA_Figures_3_1-1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

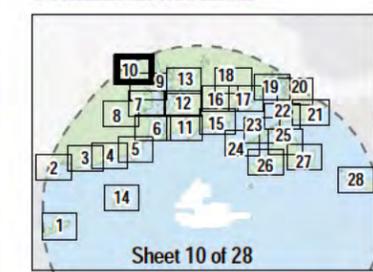
HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
- NRHP-Listed Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

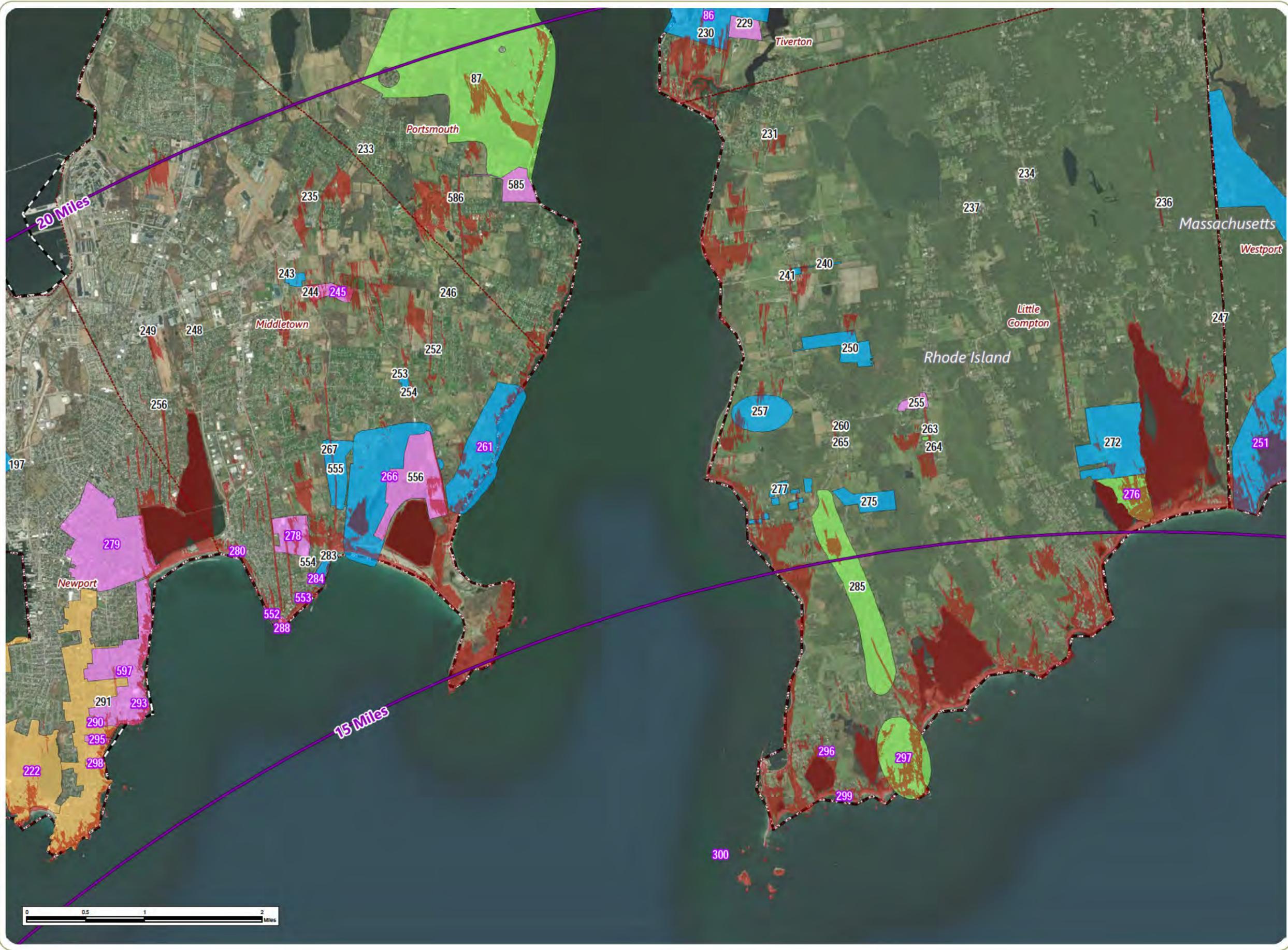
Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

www.edrpc.com

J:\10138 Revolution Wind\10138 HRVEA\Graphics\Figures\HRVEA\Figures_3_1_1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

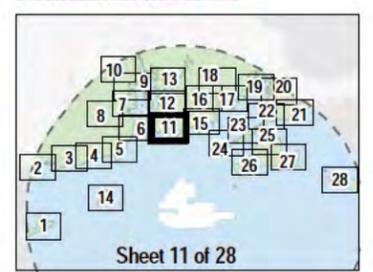
HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
 - National Historic Landmark
 - NRHP-Listed Property
 - NRHP-Eligible Property
 - Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

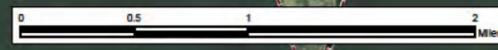
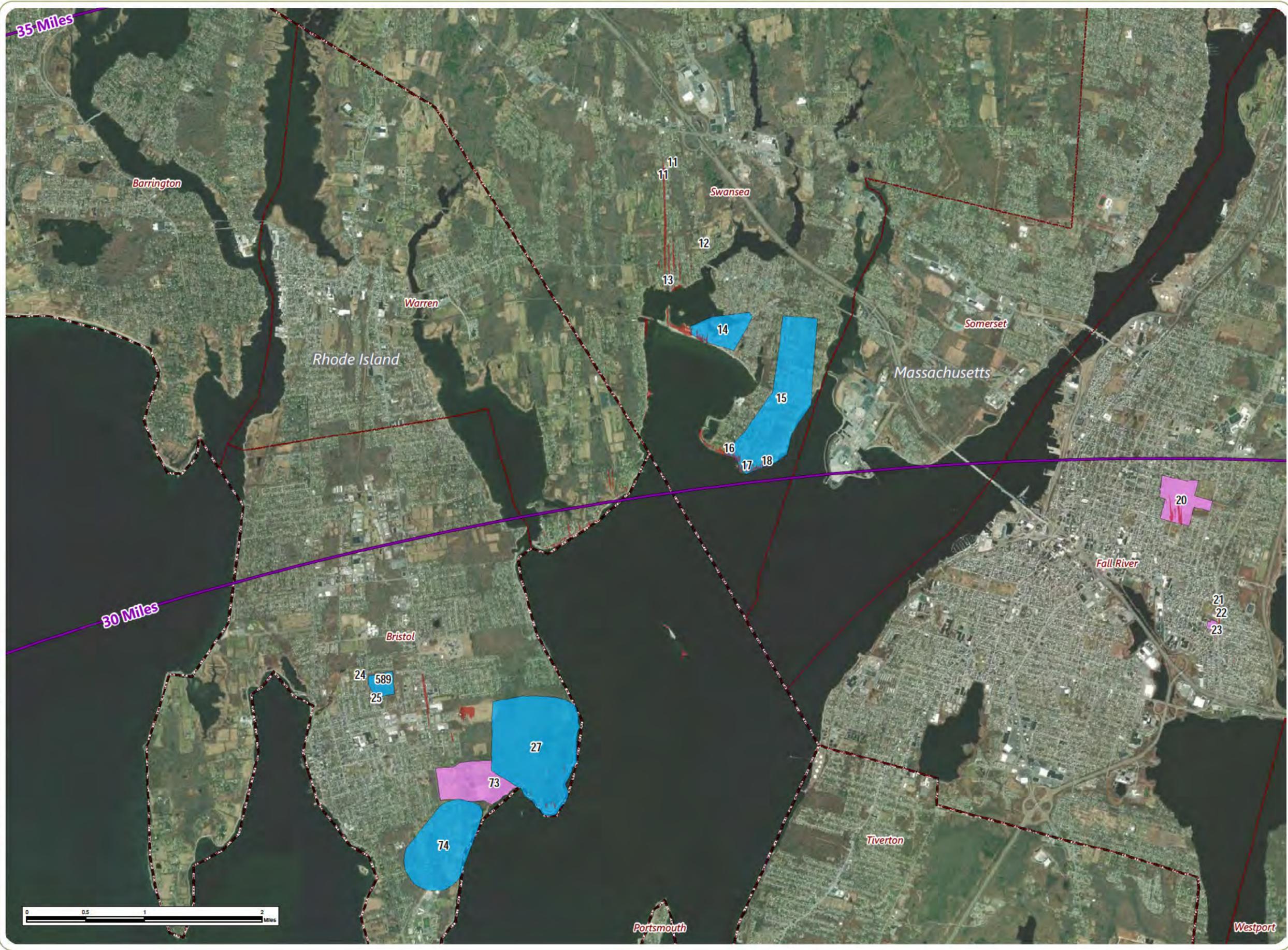
Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

www.edrdpc.com

J:\0138 Revolution Wind\1\HRVEA\Graphics\Figures\HRVEA\0138_HRVEA_Figures_3.1-1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

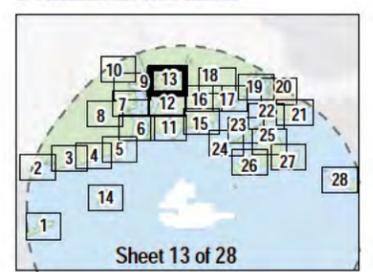
HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
- NRHP-Listed Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect



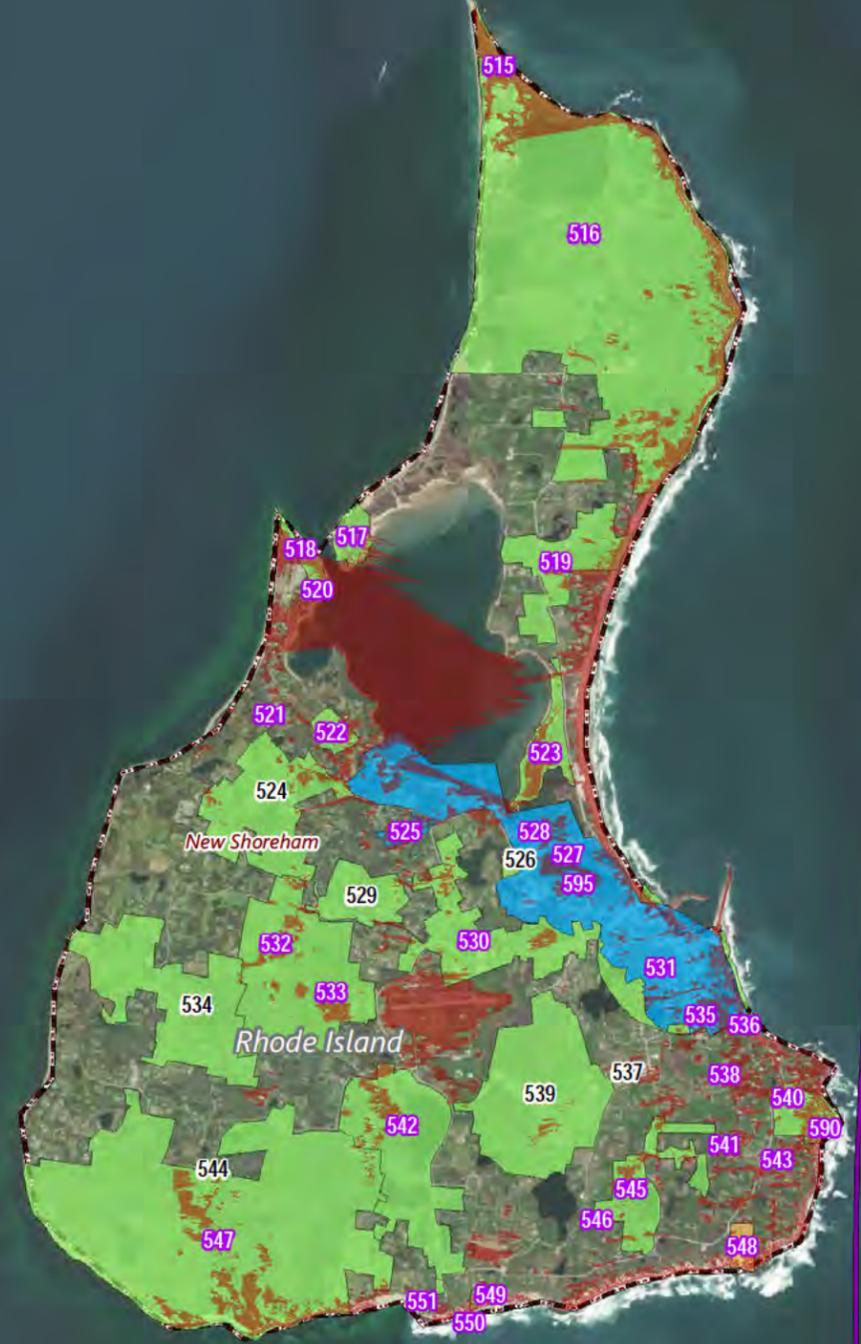
Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

www.edrpc.com

Revolution Wind Farm

Outer Continental Shelf
(OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

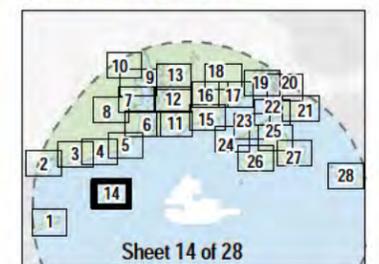


- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
 - National Historic Landmark
 - NRHP-Listed Property
 - NRHP-Eligible Property
 - Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



20 Miles

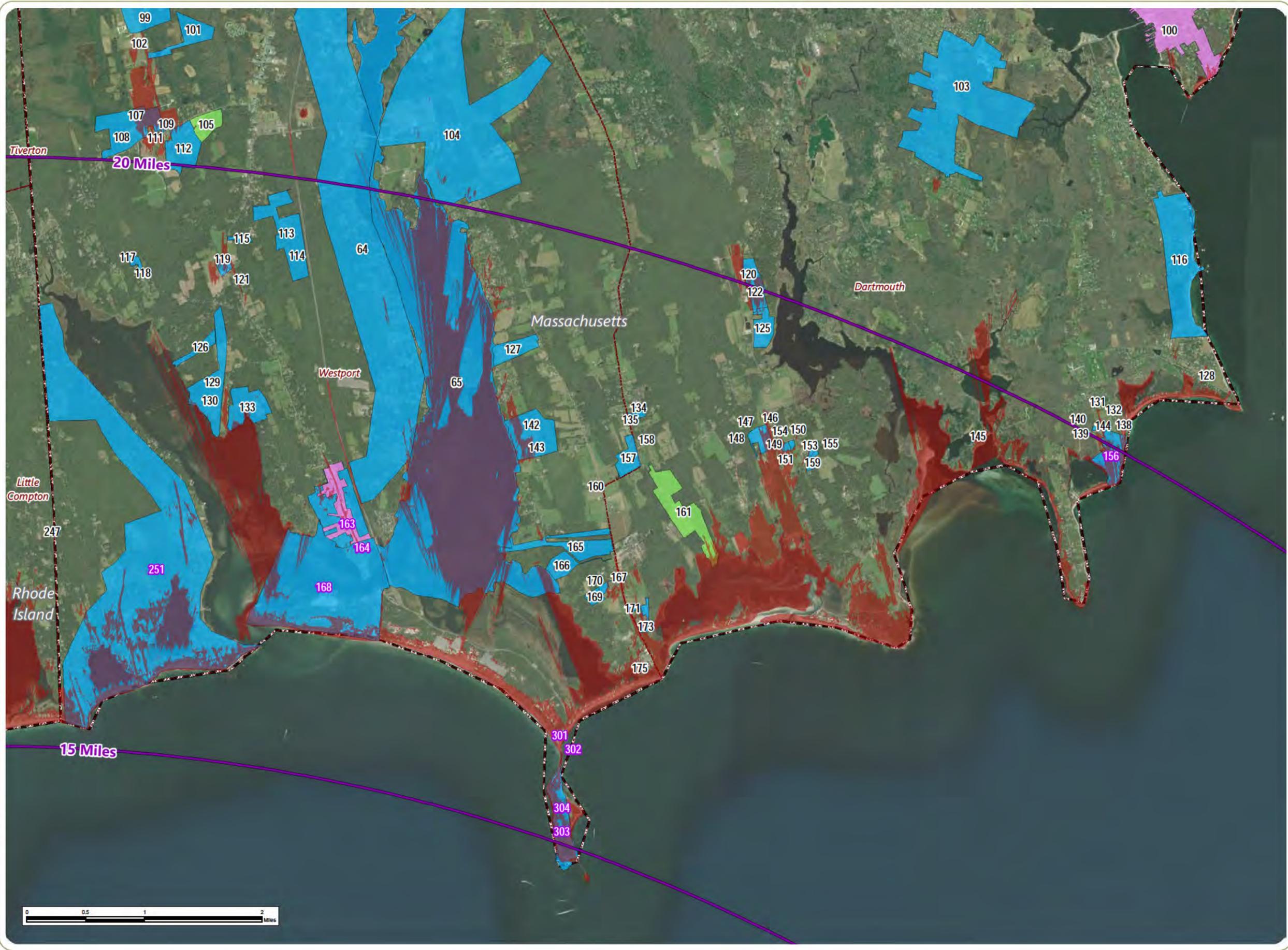
15 Miles

www.edrdpc.com

Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

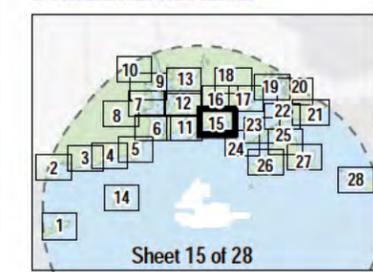


- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
- NRHP-Listed Property
- NRHP-Eligible Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

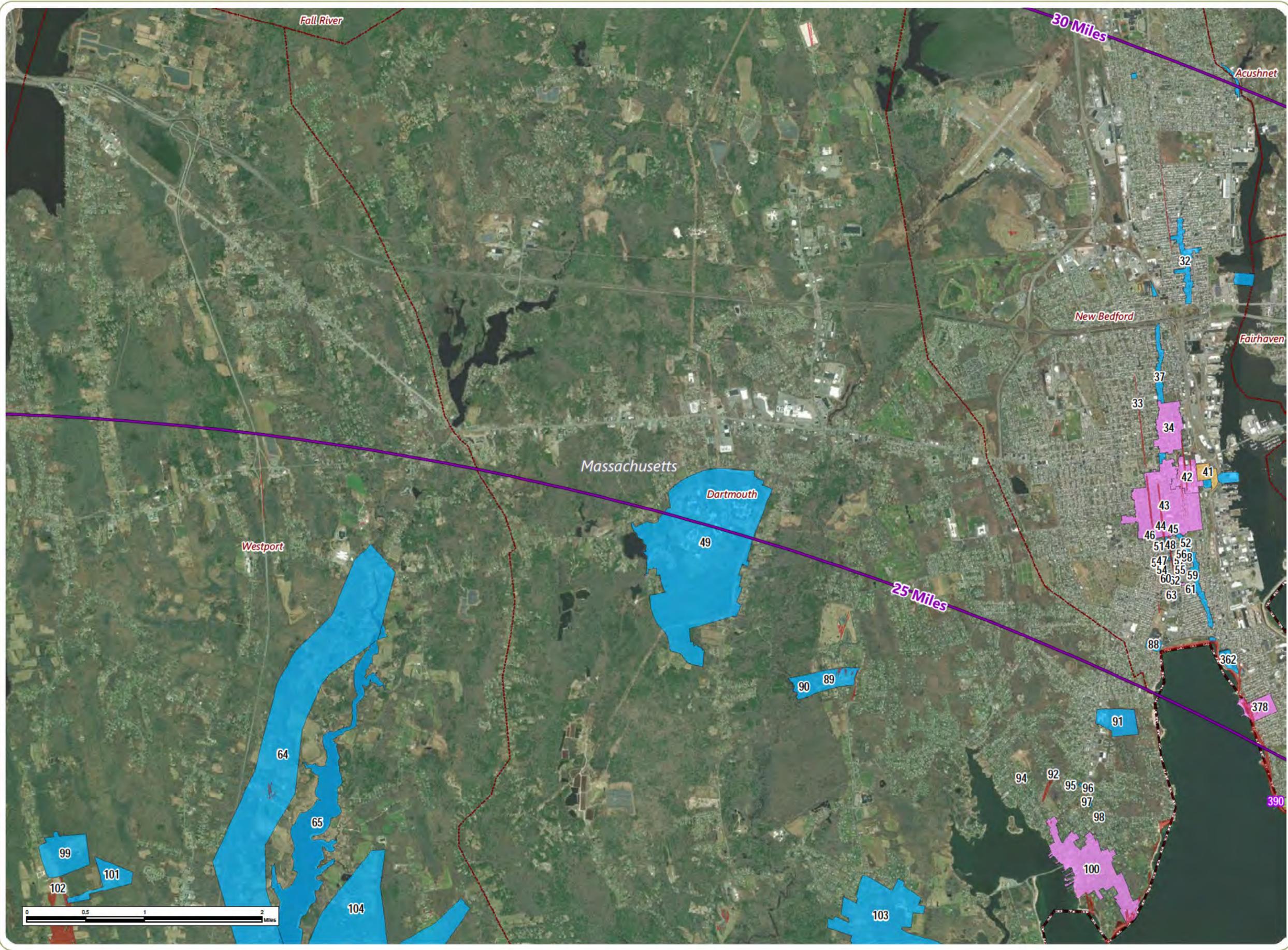
Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

www.edrdpc.com

J:\0138 Revolution Wind\VA\HRVEA\Graphics\Figures\HRVEA\MXD\150138_HRVEA_Figures_3_1-1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

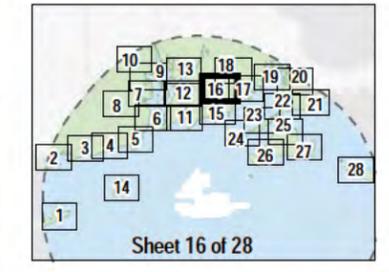
Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
- National Historic Landmark
- NRHP-Listed Property
- NRHP-Eligible Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

- No Adverse Effect
- Potential Adverse Effect

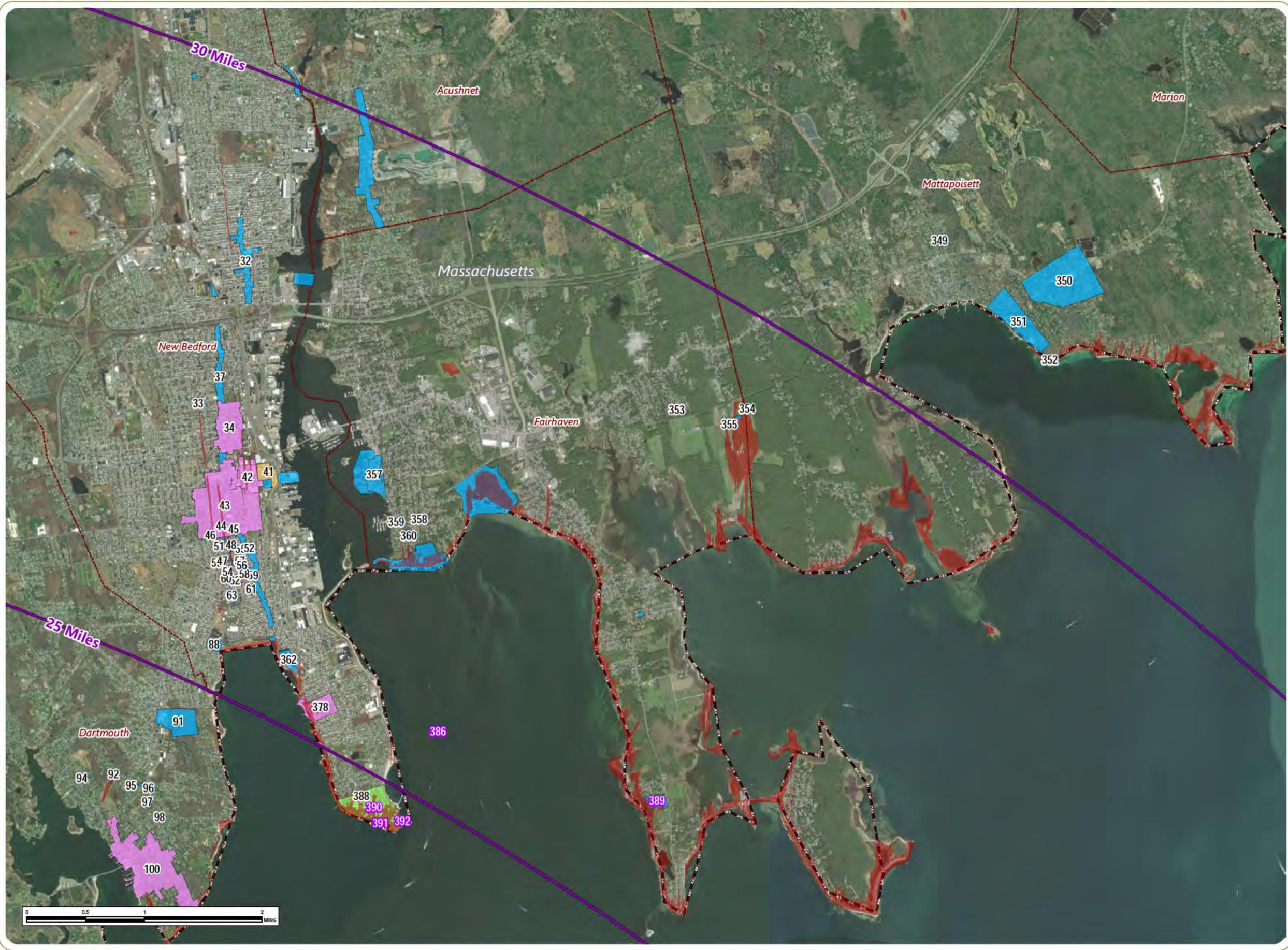


Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

www.edrdpc.com

J:\10138 Revolution Wind V\A\HRVEA\Graphics\Figures\HRVEA\MXD\10138_HRVEA_Figures_3.1-1_Above-Ground Historic Properties_PAPE.mxd

J:\19138 Revolution Wind\19138 HRVEA\Graphics\Figures\HRVEA\Map010138_HRVEA_Figures_3_1-1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

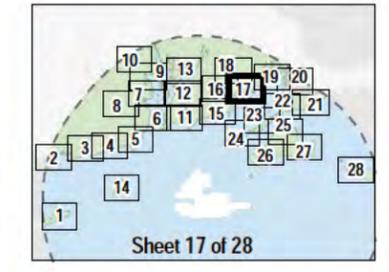
Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property**
 - National Historic Landmark
 - NRHP-Listed Property
 - NRHP-Eligible Property
 - Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

- No Adverse Effect
- Potential Adverse Effect**



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

N
W E
S

www.edrdpc.com

J:\10138 Revolution Wind\10138_HRVEA\Figures\HRVEA\Figures_3_1_1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

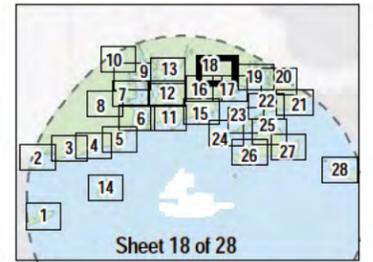
Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

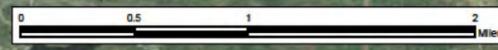
- ▭ Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- ▭ Above-Ground Historic Property
- ▭ Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

- No Adverse Effect
- Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



www.edrdpc.com

J:\19138 Revolution Wind\19138 HRVEA\Graphics\Figures\HRVEA\Map019138_HRVEA_Figures_3.1-1_Above-Ground Historic Properties_PAPE.mxd



Revolution Wind Farm

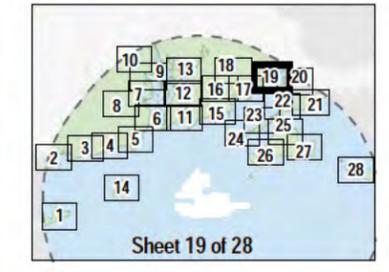
Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

- ▬ Preliminary Area of Potential Effects (PAPE)
- 40-Mile Visual Study Area
- Above-Ground Historic Property
- NRHP-Listed Property
- Other Potential Historic Property
- Municipal Boundary
- State Boundary
- Turbine Distance Intervals

Label Key for Historic Properties

- No Adverse Effect
- Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

www.edrpc.com

Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

-  Preliminary Area of Potential Effects (PAPE)
-  40-Mile Visual Study Area
- Above-Ground Historic Property**
 -  NRHP-Listed Property
 -  Other Potential Historic Property
 -  Traditional Cultural Property (TCP)
-  Municipal Boundary
-  State Boundary
-  Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

-  Preliminary Area of Potential Effects (PAPE)
-  40-Mile Visual Study Area
-  Above-Ground Historic Property
-  Other Potential Historic Property
-  Traditional Cultural Property (TCP)
-  Municipal Boundary
-  State Boundary
-  Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



www.edrdpc.com

Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

-  Preliminary Area of Potential Effects (PAPE)
-  40-Mile Visual Study Area
- Above-Ground Historic Property**
-  NRHP-Listed Property
-  Other Potential Historic Property
-  Traditional Cultural Property (TCP)
-  Municipal Boundary
-  State Boundary
-  Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

-  Preliminary Area of Potential Effects (PAPE)
-  40-Mile Visual Study Area
- Above-Ground Historic Property**
-  NRHP-Listed Property
-  Other Potential Historic Property
-  Traditional Cultural Property (TCP)
-  Municipal Boundary
-  State Boundary
-  Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



www.edrdpc.com

Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

-  Preliminary Area of Potential Effects (PAPE)
-  40-Mile Visual Study Area
- Above-Ground Historic Property**
-  NRHP-Eligible Property
-  Other Potential Historic Property
-  Traditional Cultural Property (TCP)
-  Municipal Boundary
-  State Boundary
-  Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

-  Preliminary Area of Potential Effects (PAPE)
-  40-Mile Visual Study Area
- Above-Ground Historic Property**
 -  NRHP-Listed Property
 -  Other Potential Historic Property
 -  Traditional Cultural Property (TCP)
-  Municipal Boundary
-  State Boundary
-  Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



www.edrdpc.com

Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

-  Preliminary Area of Potential Effects (PAPE)
-  40-Mile Visual Study Area
- Above-Ground Historic Property**
 -  NRHP-Listed Property
 -  NRHP-Eligible Property
 -  Other Potential Historic Property
-  Traditional Cultural Property (TCP)
-  Municipal Boundary
-  State Boundary
-  Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



www.edrdpc.com

Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

-  Preliminary Area of Potential Effects (PAPE)
-  40-Mile Visual Study Area
- Above-Ground Historic Property**
 -  NRHP-Listed Property
 -  Other Potential Historic Property
 -  Traditional Cultural Property (TCP)
-  Municipal Boundary
-  State Boundary
-  Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect



Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



Revolution Wind Farm

Outer Continental Shelf (OCS-A0486)

HRVEA (EDR 2023)
Figure 3.1-1: Above-Ground Historic Properties Within the Preliminary Area of Potential Effects

-  Preliminary Area of Potential Effects (PAPE)
-  40-Mile Visual Study Area
- Above-Ground Historic Property**
 -  National Historic Landmark
 -  Other Potential Historic Property
 -  Traditional Cultural Property (TCP)
-  Municipal Boundary
-  State Boundary
-  Turbine Distance Intervals

Label Key for Historic Properties

No Adverse Effect

Potential Adverse Effect

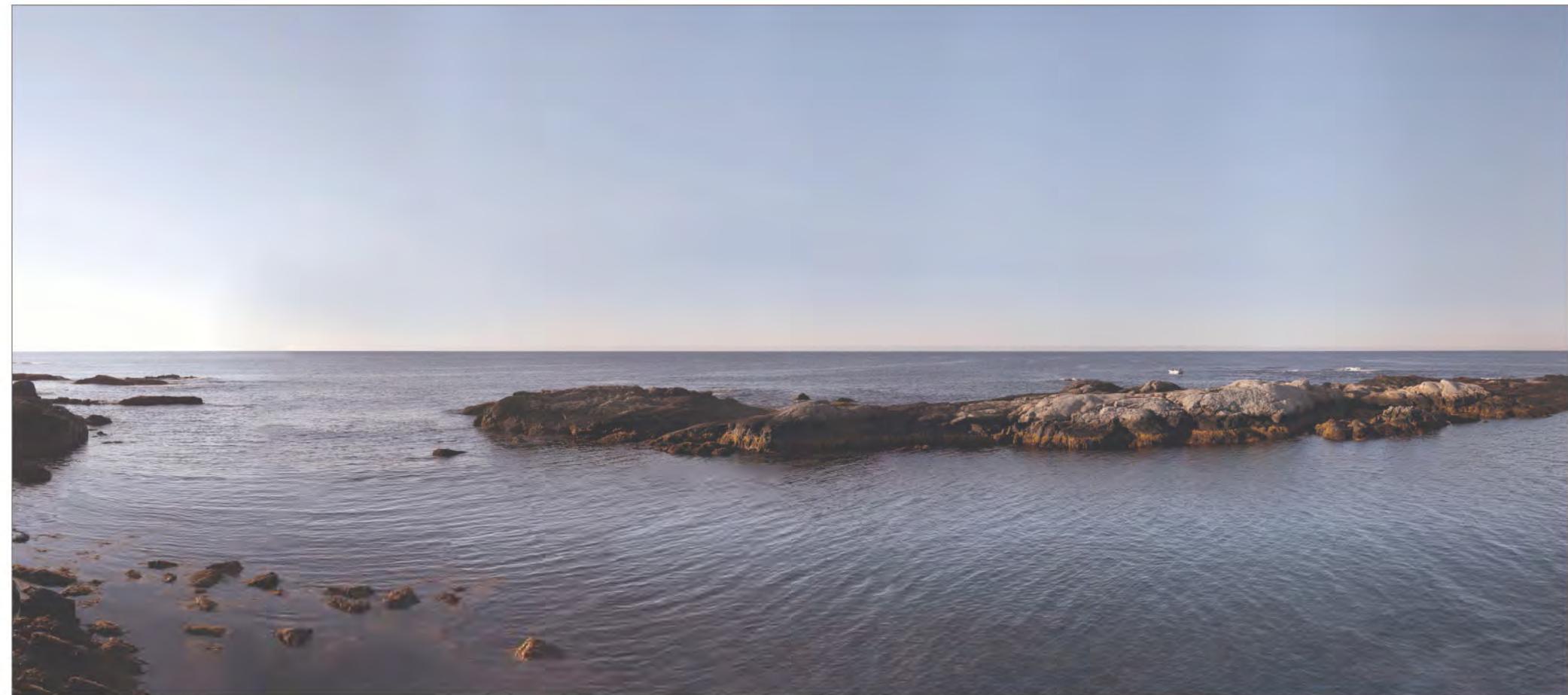
Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on July 28, 2022. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



www.edrdpc.com

APPENDIX C

Visual Simulations at the Pertinent Key Observation Points for Adversely Affected National Historic Landmarks



Revolution Wind

Powered by Ørsted & Eversource

A103: Newport Cliff Walk, Newport, Rhode Island

Visual Simulation: 2023 Project Construction (South Fork Wind and Vineyard Wind North)

Environmental Data
 Date Taken: 12/20/17
 Time: 7:00 AM
 Temperature: 59°F
 Humidity: 95%
 Visibility: >10 miles
 Wind Direction: Onshore
 Wind Speed: 8 mph
 Conditions Observed: Fair

Key Observation Point Information
 County: Newport
 Town: Newport
 State: Rhode Island
 Location: Aqueduct Island
 Latitude, Longitude: 41.45119° N, 71.31517° W
 Direction of View: Onshore (South-Southwest (155.7°))
 Field of View: 124° x 30°

Visual Resources
 Local or State Significance: Maritime Recreation Area, Onshore Recreation
 User Group: Local Resident, Tourist/Vacationers
 Aesthetic Resource: Newport Ocean Drive State Scenic Area, CliffWalk National Recreation Trail, Newport National Historic Landmark

Notes:

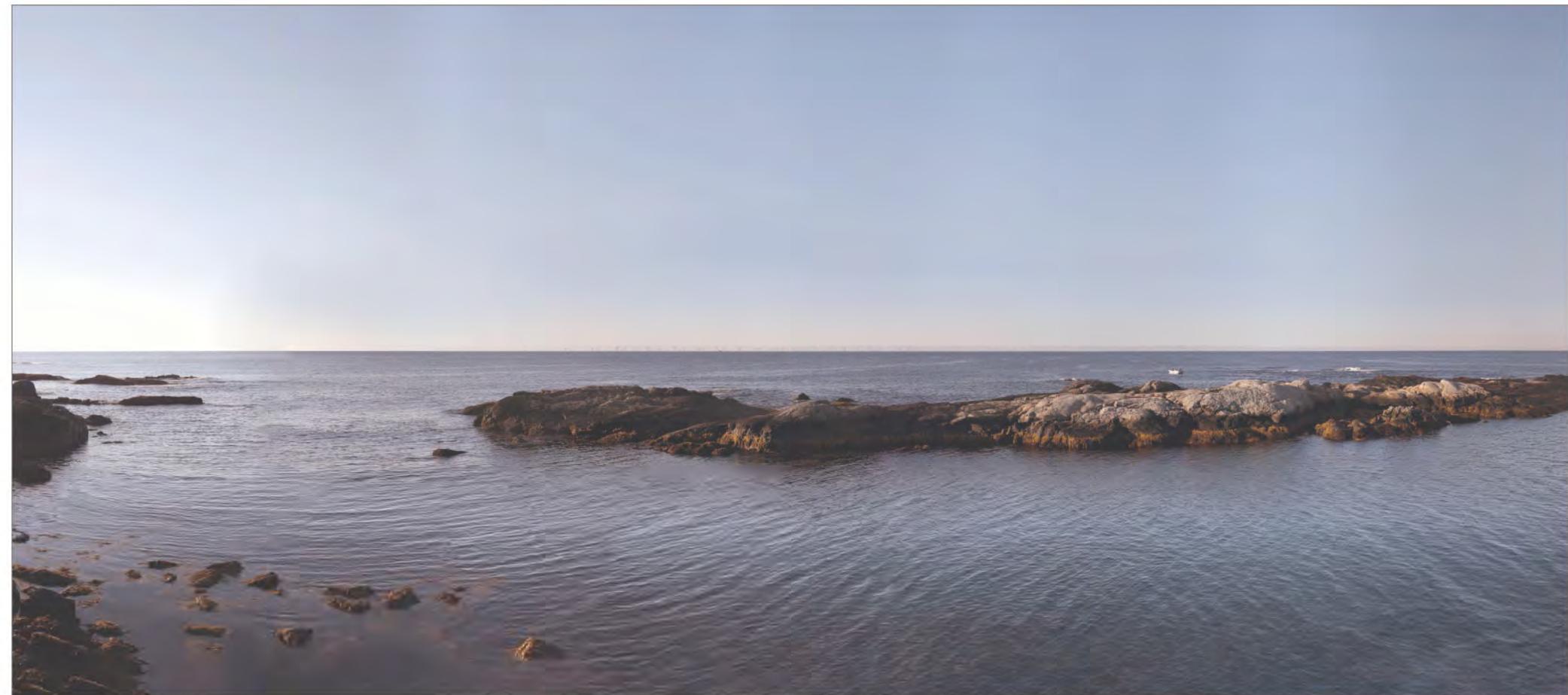
1. Photo-realistic imagery is available to a height corresponding to the level of the 10 tallest towers in the turbine project program.
2. The primary color of the sky and the background color were color-matched to the color of the sky and background from the photo-realistic imagery. The color of the sky and background were color-matched to the color of the sky and background from the photo-realistic imagery.
3. Other features include but are not limited to: buildings, roads, bridges, and other infrastructure.
4. Other features include but are not limited to: buildings, roads, bridges, and other infrastructure.
5. Other features include but are not limited to: buildings, roads, bridges, and other infrastructure.
6. Other features include but are not limited to: buildings, roads, bridges, and other infrastructure.
7. Other features include but are not limited to: buildings, roads, bridges, and other infrastructure.

Reasonably Foreseeable Projects Represented in Visual Simulation

Project	Year of Completion	WFO Model	Allowable WFOs (20% of WFOs)	WFOs in WFOs	WFOs in WFOs	WFOs in WFOs	WFOs in WFOs
South Fork Wind Farm	2023	12 MW	12	12	12	12	12
Vineyard North Farm	2023	12 MW	3	3	3	3	3



Revolution Wind is a registered trademark of Ørsted and Eversource. All other trademarks are the property of their respective owners.



Revolution Wind

Powered by Ørsted & Eversource

A103: Newport Cliff Walk, Newport, Rhode Island

Visual Simulation: 2023 Project Construction with Revolution Construction added (Revolution Wind, South Fork Wind, and Vineyard Wind North)

Environmental Data
 Date Taken: 12/20/17
 Time: 7:00 AM
 Temperature: 59°F
 Humidity: 95%
 Visibility: ~10 miles
 Wind Direction: Onshore
 Wind Speed: 8 mph
 Conditions Observed: Fair

Camera Information
 Camera: Canon EOS 5D Mark IV
 Resolution: 20.1 Megapixels
 Lens Focal Length: 50 mm
 Camera Height: 22.8 feet AGL

Key Observation Point Information
 County: Newport
 Town: Newport
 State: Rhode Island
 Location: Aqueduct Island
 Latitude, Longitude: 41.45119° N, 71.31517° W
 Direction of View (Degrees): South-Southwest (155.7°)
 Field of View: 124° x 38°

Visual Resources
 Land Usage: State Park Zone, Military Reservation Area, Open Area, Residential
 User Group: Local Resident, Tourist/Visitor/Commuter
 Activity: Recreation: Newport Ocean Drive, State Park Area, CBTVish National Recreation Trail, Newport National Historic Landmark

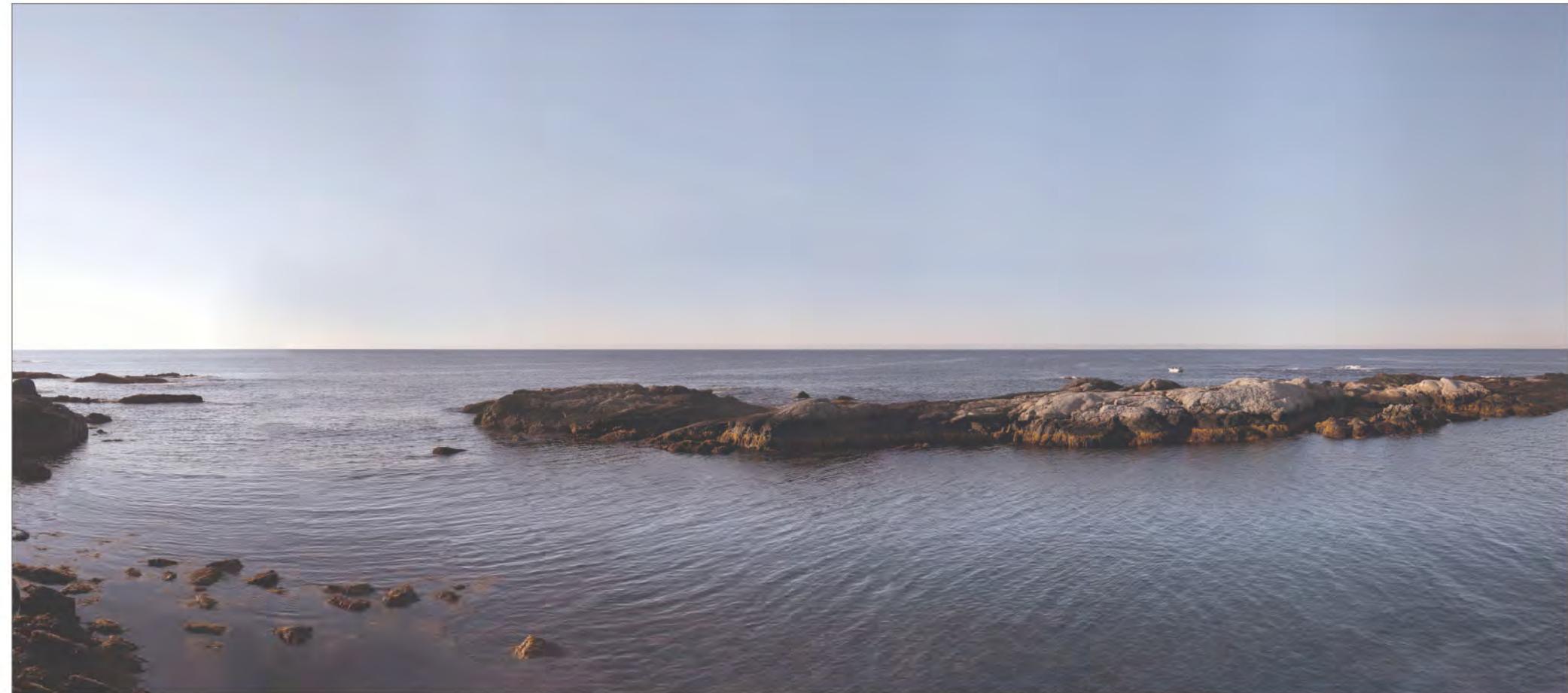
Reasonably Foreseeable Projects Represented in Visual Simulation

Project	Year of Construction	WFO Block	Power Production (MW)	Light Hours per Year	Observed Hours per Year by WFO	Observed Hours per Year by WFO with WFO
South Fork Wind Farm	2023	12 MW	12	12	245	253
Vineyard Wind North	2023	10 MW	7	39	36	36
Revolution Wind	2023	12 MW	102	102	63	103



Revolution Wind is visible to 20.7° N height. Height of observation point is 22.8 feet AGL. Height of observation point is 22.8 feet AGL. Height of observation point is 22.8 feet AGL.

Notes:
 1. Revolution Wind is visible to 20.7° N height. Height of observation point is 22.8 feet AGL. Height of observation point is 22.8 feet AGL.
 2. The project area of WFO is not shown here. The visualization is based on the data provided for the WFO. Other high, unobscured features along the coastline are not shown for the reasons of brevity, clarity, and legibility.
 3. Other features such as buildings and terrain are based on publicly available data. Projects for which the data is not available, WFO does not include them in this visualization. All project areas are shown in a color-coded manner to distinguish them from other features.
 4. Light pollution is not shown in this visualization. Light pollution is not shown in this visualization.
 5. The map WFO is overlaid with the Revolution Wind Farm area. WFO is not shown in this visualization. WFO is overlaid with the Revolution Wind Farm area. WFO is not shown in this visualization.
 6. The map WFO is overlaid with the Revolution Wind Farm area. WFO is not shown in this visualization. WFO is overlaid with the Revolution Wind Farm area. WFO is not shown in this visualization.
 7. The map WFO is overlaid with the Revolution Wind Farm area. WFO is not shown in this visualization. WFO is overlaid with the Revolution Wind Farm area. WFO is not shown in this visualization.



Revolution Wind

Powered by
Ørsted &
Eversource

A103: Newport Cliff Walk, Newport, Rhode Island

Visual Simulation: Full Lease Build-out Excluding Revolution Wind

Environmental Data
Date Taken: 12/20/17
Time: 7:00 AM
Temperature: 52°F
Humidity: 95%
Visibility: 15.0 miles
Wind Direction: 045°
Wind Speed: 8 mph
Conditions Observed: Fair

Camera Information
Camera: Canon EOS 5D Mark IV
Resolution: 20.1 Megapixels
Lens Focal Length: 50 mm
Camera Height: 22.8 feet AGL

Notes:

- 1. Revolution Wind® is within 200' of height. Responsibility for use of view is 10 seconds with 3.0 minute prep period.
- 2. The project color of WFS is 0.0. It is assumed that there is no color change in the water surrounding the WFS. Water height, underwater structure height, topography, and bottom are not included in the model. All modeling is based on aerial imagery, bathymetry, and topography.
- 3. Different turbine models and dimensions are based on various publicly available data. Project turbine models used are color-coded. WFS view and/or other models are not included in the model. The model is a simulation and does not represent actual conditions.
- 4. Lighter colored turbines represent turbines that are currently in operation. Darker colored turbines represent turbines that are planned for construction.
- 5. The model WFS is overlaid with the Bathymetry and Depth Data from the NOAA NED dataset. The model is a simulation and does not represent actual conditions.
- 6. The model WFS is overlaid with the Bathymetry and Depth Data from the NOAA NED dataset. The model is a simulation and does not represent actual conditions.
- 7. The model WFS is overlaid with the Bathymetry and Depth Data from the NOAA NED dataset. The model is a simulation and does not represent actual conditions.

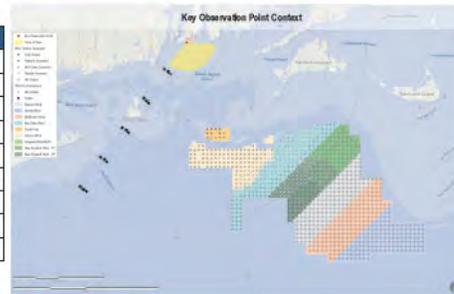
Key Observation Point Information

County: Newport
Town: Newport
State: Rhode Island
Location: Aqueduct Island
Latitude: Longitude: 41.45119° N, 71.31537° W
Direction of View: General: South-Southwest (155.7°)
Field of View: 124° x 38°

Visual Resources
Land Usage: Scenic Zone, Maritime Recreation Area, Shoreline Recreation
User Group: Local Resident, Tourist/Visitor
Activity: Recreation: Newport Ocean Drive State Spine Area, CliffWalk National Recreation Trail, Newport National Historic Landmark

Reasonably Foreseeable Projects Represented in Visual Simulation

Project	Year of Construction	WFS Model	Power Output (MW)	Height (ft)	Capacity (MW)	Distance from WFS (mi)	Distance from WFS (mi)
South Fork Wind Farm	2013	12 MW	12	15	245	20.1	
WFS - North 10	2013	10 MW	10	10	100	10.1	
New England Wind Farm 1	2014	10 MW	10	41	403	40.1	
New England Wind Farm 2	2014	10 MW	10	75	403	30.1	
Center Wind	2014	10 MW	102	103	203	40.1	
Magalloway Wind	2015	12 MW	0	140	100	10.1	
Liberty Wind	2015-2019	12 MW	0	108	100	10.1	
Greene Wind	2015-2019	12 MW	0	107	100	10.1	
Big Blue Wind	2015-2019	12 MW	108	108	17.1	40.1	



1. Revolution Wind® is within 200' of height. Responsibility for use of view is 10 seconds with 3.0 minute prep period.



Revolution Wind

Powered by
Ørsted &
Eversource

A103: Newport Cliff Walk, Newport, Rhode Island

Visual Simulation: Revolution Wind Without Other Foreseeable Future Changes

Environmental Data
Date Taken: 12/20/17
Time: 7:00 AM
Temperature: 59°F
Humidity: 95%
Visibility: >10 miles
Wind Direction: Onshore
Wind Speed: 8 mph
Conditions Observed: Fair

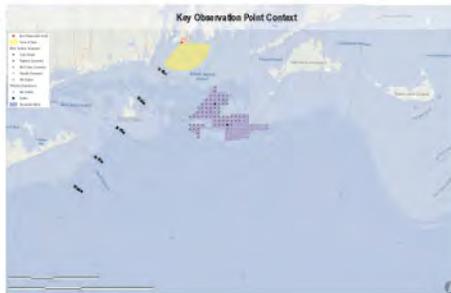
Camera Information
Camera: Canon EOS 5D Mark IV
Resolution: 20.1 Megapixels
Lens Focal Length: 50 mm
Camera Height: 22.8 feet AGL
Notes:

Key Observation Point Information
County: Newport
Town: Newport
State: Rhode Island
Location: Aqueduct Island
Latitude, Longitude: 41.45119° N, 71.31537° W
Direction of View (Degrees): South-Southwest (155.7°)
Field of View: 124° x 30°

Visual Resources
Land Usage: Scenic Buffer Zone, Maritime Forestation Area, Open Area, Residential
User Group: Local Resident, Tourist/Visitor/Commuter
Aesthetic Resource: Newport Ocean Drive State Scenic Area, CliffWalk National Recreation Trail, Newport National Historic Landmark

Reasonably Foreseeable Projects Represented in Visual Simulation

Project	Year of Completion	WFO Model	Power Production (MW)	Light Hours per Year	Observed Hours with WFO in View	Observed Hours with WFO in View
Revolution Wind	2023	12 MW	102	102	102	102



Revolution Wind is visible to the left of the image. The image is a simulation and does not represent actual conditions. The image is for informational purposes only.



Revolution Wind

Powered by Ørsted & Eversource

BI04: Southeast Lighthouse, New Shoreham, Rhode Island
Existing Conditions

Environmental Data
 Date Taken: 9/16/2017
 Time: 12:20 PM
 Temperature: 62°F
 Humidity: 67%
 Visibility: >10 miles
 Wind Direction: Northwest
 Wind Speed: 8 mph
 Conditions Observed: Clear

Camera Information
 Camera: Canon IXC 50 Mark IV
 Resolution: 20.4 Megapixels
 Lens Focal Length: 50 mm
 Camera Height: 10.1 feet AGL

Key Observation Point Information
 County: Washington
 Town: New Shoreham
 State: Rhode Island
 Location: Block Island
 Latitude, Longitude: 41.5529° N, 71.5588° W
 Direction of View (Degrees): East (90°)
 Field of View: 124° x 30°

Visual Resources
 Land Usage: Riparian Zone, Maritime Recreation Area, Coastal BLM
 State Design: Local Historical, Traditional/Scenic
 Aesthetic Resource: Southeast Light National Historic Landmark, Maritime BLM
 Scenic Area

Notes:

- Photomontage shown in north to 20° x 30° x 124° height. Responses to be sent to the 10' x 10' x 124° height. Responses to be sent to the 10' x 10' x 124° height.
- The primary purpose of this report is to provide a visual assessment of the proposed project. It is not intended to provide a detailed engineering or architectural review. The project is subject to the review and approval of the appropriate regulatory agencies. The project is subject to the review and approval of the appropriate regulatory agencies. The project is subject to the review and approval of the appropriate regulatory agencies.
- Other factors that may affect the visual quality of the project include the following: the project's location, the project's design, the project's construction, and the project's operation. The project's location, the project's design, the project's construction, and the project's operation may affect the visual quality of the project.
- Other factors that may affect the visual quality of the project include the following: the project's location, the project's design, the project's construction, and the project's operation. The project's location, the project's design, the project's construction, and the project's operation may affect the visual quality of the project.
- Other factors that may affect the visual quality of the project include the following: the project's location, the project's design, the project's construction, and the project's operation. The project's location, the project's design, the project's construction, and the project's operation may affect the visual quality of the project.



Photomontage shown in north to 20° x 30° x 124° height. Responses to be sent to the 10' x 10' x 124° height. Responses to be sent to the 10' x 10' x 124° height.



Revolution Wind

Powered by Ørsted & Eversource

BI04: Southeast Lighthouse, New Shoreham, Rhode Island

Visual Simulation: 2023 Project Construction (South Fork Wind and Vineyard Wind North)

Environmental Data
 Date Taken: 9/16/2023
 Time: 12:20 PM
 Temperature: 62°F
 Humidity: 65%
 Visibility: 10 miles
 Wind Direction: Westward
 Wind Speed: 8 mph
 Conditions Observed: Clear

Camera Information
 Camera: Canon EOS 5D Mark IV
 Resolution: 20.1 Megapixels
 Lens Focal Length: 50 mm
 Camera Height: 10.1 feet AGL

Notes:

- Resolution (height) is within 20' ± height. Height should be used for line of sight calculations for project purposes.
- The project name of WTS is used for the simulation. The name is not necessarily the name of the site. The name is used for the simulation. The name is not necessarily the name of the site. The name is used for the simulation.
- Other locations listed and dimensions are based on aerial photography and satellite data. They are not necessarily the same as the actual dimensions. They are not necessarily the same as the actual dimensions.
- Lighting characteristics are based on aerial photography and satellite data. They are not necessarily the same as the actual characteristics. They are not necessarily the same as the actual characteristics.
- The height of WTS is based on the elevation of the terrain. The height of WTS is based on the elevation of the terrain. The height of WTS is based on the elevation of the terrain.
- WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.
- WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

Key Observation Point Information
 County: Washington
 Town: New Shoreham
 State: Rhode Island
 Location: Block Island
 Latitude: Longitude: 41.5528° N, 71.5588° W
 Direction of View: General: East (80.8°)
 Field of View: 124° x 38°

Visual Resources
 Land Usage: Riparian Zone, Maritime Recreation Area, Coastal BLM
 State Design: Local Roadway, Travel/Throughway
 Aerial Use: Resource: Southeast Light National Historic Landmark, Maritime BLM
 Scenic Area

Reasonably Foreseeable Projects Represented in Visual Simulation

Project	Year of Construction	WTS Model	Power Output (MW)	WTS Height (ft)	WTS Diameter (ft)	WTS Spacing (ft)	WTS Orientation	WTS Color	WTS Shape
South Fork Wind Farm	2023	12 MW	11	11	113	243			
Vineyard Wind North	2023	12 MW	11	11	113	243			



Resolution (height) is within 20' ± height. Height should be used for line of sight calculations for project purposes.

Other locations listed and dimensions are based on aerial photography and satellite data. They are not necessarily the same as the actual dimensions. They are not necessarily the same as the actual dimensions.

The height of WTS is based on the elevation of the terrain. The height of WTS is based on the elevation of the terrain. The height of WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.

WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain. WTS is based on the elevation of the terrain.



Revolution Wind

Powered by Ørsted & Eversource

BI04: Southeast Lighthouse, New Shoreham, Rhode Island
 Visual Simulation: Full Lease Build-out Including Revolution Wind

Environmental Data
 Date Taken: 9/16/2017
 Time: 12:20 PM
 Temperature: 62°F
 Humidity: 65%
 Visibility: >10 miles
 Wind Direction: Northwest
 Wind Speed: 8 mph
 Conditions Observed: Clear

Key Observation Point Information
 County: Washington
 Town: New Shoreham
 State: Rhode Island
 Location: Block Island
 Latitude, Longitude: 41.15289° N, 71.55585° W
 Direction of View: General: East (80.8°)
 Field of View: 124° x 38°

Camera Information
 Camera: Canon IXC 50 Mark IV
 Resolution: 20.4 Megapixels
 Lens Focal Length: 30 mm
 Camera Height: 101.1 feet AGL
 Note:
 - Resolution 100% is width by 2/3 height. Resolution at base of lens is 100% width by 2/3 height proper perspective.
 - The primary color of WFO is red. All information from scene is color-coded by color of the WFO. Values are high, mid-range, and low-range. Resolution and distance are color-coded by color of the WFO. Values are high, mid-range, and low-range.
 - Other locations visible and distances are based on satellite imagery and are not to scale. Points to mark Block Island are also visible. WFO view is to the southeast. Other WFO locations are visible in the background.
 - WFO locations are color-coded by color of the WFO. Values are high, mid-range, and low-range.
 - The WFO is color-coded by color of the WFO. Values are high, mid-range, and low-range.
 - WFO is color-coded by color of the WFO. Values are high, mid-range, and low-range.
 - WFO is color-coded by color of the WFO. Values are high, mid-range, and low-range.

Reasonably Foreseeable Projects Represented in Visual Simulation

Project	Year of Completion	WFO Model	Power Output (MW)	WFO Color	WFO Height (ft)	WFO Spacing (ft)	Distance from WFO to WFO (ft)	Distance from WFO to WFO (ft)	Distance from WFO to WFO (ft)
South Fork Wind Farm	2013	12 MW	13	13	13	13	13	13	243
Wachusett Wind Farm	2013	12 MW	13	13	13	13	13	13	327
Revolution Wind	2013	12 MW	13	13	13	13	13	13	372
New England Wind Farm 1	2014	12 MW	13	13	13	13	13	13	369
New England Wind Farm 2	2014	12 MW	13	13	13	13	13	13	543
Littleton Wind	2015	12 MW	13	13	13	13	13	13	383
Mulholland Wind	2014	12 MW	13	13	13	13	13	13	146
Liberty Wind	2015-2016	12 MW	13	13	13	13	13	13	141
Enclave Wind	2015-2016	12 MW	13	13	13	13	13	13	338
Big Sea Wind	2015-2016	12 MW	13	13	13	13	13	13	323



Resolution 100% is width by 2/3 height. Resolution at base of lens is 100% width by 2/3 height proper perspective.
 The primary color of WFO is red. All information from scene is color-coded by color of the WFO. Values are high, mid-range, and low-range.
 Other locations visible and distances are based on satellite imagery and are not to scale. Points to mark Block Island are also visible. WFO view is to the southeast. Other WFO locations are visible in the background.
 WFO locations are color-coded by color of the WFO. Values are high, mid-range, and low-range.
 The WFO is color-coded by color of the WFO. Values are high, mid-range, and low-range.
 WFO is color-coded by color of the WFO. Values are high, mid-range, and low-range.



Revolution Wind

Powered by Ørsted & Eversource

BI04: Southeast Lighthouse, New Shoreham, Rhode Island

Visual Simulation: Revolution Wind Without Other Foreseeable Future Changes

Environmental Data
 Date Taken: 9/16/2017
 Time: 12:20 PM
 Temperature: 62°F
 Humidity: 65%
 Visibility: >10 miles
 Wind Direction: Westward
 Wind Speed: 8 mph
 Conditions Observed: Clear

Camera Information
 Camera: Canon IXC 50 Mark IV
 Resolution: 20.4 Megapixels
 Lens Focal Length: 50 mm
 Camera Height: 10.1 feet AGL

Notes:

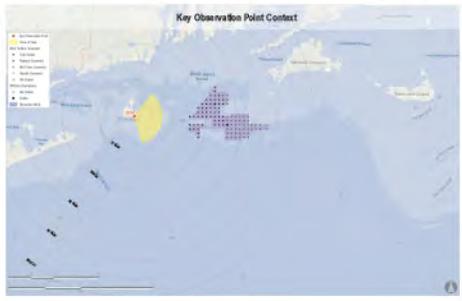
- Photomontage located in width by 20.7 x height by 10.1 feet. Resolution is based on a 10 x 10 inch print size. 300 dpi resolution print size.
- The primary color of the sky and the background color were color-matched to the color of the sky and background in the photo. Other colors were color-matched to the color of the sky and background in the photo.
- Other features in the photo and the background were color-matched to the color of the sky and background in the photo.
- Lighting characteristics were color-matched to the color of the sky and background in the photo.
- The wind turbines were color-matched to the color of the sky and background in the photo.
- The wind turbines were color-matched to the color of the sky and background in the photo.
- The wind turbines were color-matched to the color of the sky and background in the photo.
- The wind turbines were color-matched to the color of the sky and background in the photo.

Key Observation Point Information
 County: Washington
 Town: New Shoreham
 State: Rhode Island
 Location: Block Island
 Latitude: Longitude: 41.5528° N, 71.5588° W
 Direction of View: General: East (80.8°)
 Field of View: 124° x 38°

Visual Resources
 Land Usage: Recreation Zone, Maritime Recreation Area, Coastal BLM
 State Design: Local Roadway, Travel/Throughway
 Aesthetic Resource: Southeast Light National Historic Landmark, Maritime BLM
 Scenic Area

Reasonably Foreseeable Projects Represented in Visual Simulation

Project	Year of Completion	WFO Model	Power Output of WFO Model (MW)	Wind Turbine Count	Distance from WFO Model to Key Observation Point (mi)	Distance from WFO Model to Key Observation Point (mi)
Revolution Wind	2023	12 MW	102	102	62	372



Revolution Wind is a 20.7 x 10.1 foot print. Resolution is based on a 10 x 10 inch print size. 300 dpi resolution print size.

Environmental Data
 Date Taken: 6/10/2017
 Temperature: 67°F
 Humidity: 52%
 Wind Dir: 150 m/s
 Wind Direction: North-Northwest
 Wind Speed: 4 mph
 Conditions Observed: Fair

Key Observation Point Information
 County: Washington
 Town: New Shoreham
 State: Rhode Island
 Location: Block Island
 Latitude, Longitude: 41.15281° N, 71.55187° W
 Direction of View: North (N00°)
 Field of View: 12° x 15°

Camera Information
 Camera: Canon EOS 5D Mark IV
 Resolution: 20.4 Megapixels
 Lens: Focal Length: 50 mm
 Camera Height: 161.1 feet AGL

Natural Resources
 Landscape Sensitivity Zone: Mableton Fenwick Area, Coastal Dike
 State Design: Local Flood Zone, Transitional Shores
 Aesthetic Resource: Southwest Light National Historic Landmark, Mableton Fenwick
 Scenic Area

Notes:

- Photometric tower is within 20' of height. Image should be used for less than 10 minutes after 3:00 PM on project property.
- The primary purpose of this report is to provide a visual representation of the site conditions for the Block Island, Rhode Island, and the surrounding area. The information provided is for informational purposes only and should not be used for any other purpose.
- Other locations include and do not include any other locations. Please refer to the Block Island map for other locations. The information provided is for informational purposes only and should not be used for any other purpose.
- Lighting photometric tower height is based on topographic data. Light tower height is not intended to be used for any other purpose.
- The tower height is based on the Block Island map. The tower height is not intended to be used for any other purpose.
- The information provided is for informational purposes only and should not be used for any other purpose.
- Photometric tower height is based on topographic data. Light tower height is not intended to be used for any other purpose.

Photometric tower is within 20' of height. Image should be used for less than 10 minutes after 3:00 PM on project property.

BI04 Night: Southeast Lighthouse, New Shoreham, Rhode Island
Existing Conditions

Photometric tower is within 20' of height. Image should be used for less than 10 minutes after 3:00 PM on project property.



Environmental Data
 Date Taken: 10/20/2017
 Temperature: 61°F
 Humidity: 85%
 Visibility: >10 miles
 Wind Direction: North-Northwest
 Wind Speed: 1 mph
 Conditions Observed: Fair

Camera Information
 Camera: Canon IIG 50 Mark IV
 Resolution: 20.1 Megapixels
 Lens Focal Length: 50 mm
 Camera Height: 10.1 feet AGL

Notes:
 • Resolution 100% is width by 20.1 x height. Images should be saved at least 10 inches wide to maintain proper proportions.
 • The primary camera of this report is at the location shown. Other cameras may be available for this location. Please contact the project manager for more information.
 • Other cameras located near the location may be used to provide additional views of the site. Please contact the project manager for more information.
 • All images are provided as-is and do not represent a warranty of any kind. The project manager is not responsible for any damage or loss of data resulting from the use of these images.
 • The images are provided as-is and do not represent a warranty of any kind. The project manager is not responsible for any damage or loss of data resulting from the use of these images.
 • All images are provided as-is and do not represent a warranty of any kind. The project manager is not responsible for any damage or loss of data resulting from the use of these images.

Key Observation Point Information
 County: Washington
 Town: New Shoreham
 State: Rhode Island
 Location: Block Island
 Latitude: Longitude 41.15289° N, 71.55585° W
 Direction of View: General: East (90.0°)
 Field of View: 124° x 38°

Visual Resources
 Land Usage: 95% Rural Zone, 5% Agricultural, 5% Forest, 5% Water
 View Obstruction: Local Road, Trees, Fences
 Access: Road
 Source: Aerial

Reasonably Foreseeable Projects Represented in Visual Simulation

Project	Year of Construction	WFO Model	Number of WFOs in the Field	WFOs in the Field	Observed from this View	Observed from this View
South Fork Wind Farm	2023	12 WFO	10	10	10	20
Vineyard Wind Farm	2023	12 WFO	2	2	2	2
Revolution Wind	2023	12 WFO	10	10	10	20



BI04 Night: Southeast Lighthouse, New Shoreham, Rhode Island

Visual Simulation: 2023 Project Construction with Revolution Construction added (Revolution Wind, South Fork Wind, and Vineyard Wind North)

Resolution 100% is width by 20.1 x height. Images should be saved at least 10 inches wide to maintain proper proportions.

Memorandum of Agreement

**DRAFT MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND FARM AND REVOLUTION WIND EXPORT
CABLE PROJECT**

WHEREAS, the Bureau of Ocean Energy Management (BOEM) plans to authorize construction and operation of the Revolution Wind Farm and Revolution Wind Export Cable Project (Project) pursuant to Section 8(p)(1)(C) of the Outer Continental Shelf (OCS) Lands Act (43 U.S.C. 1337(p)(1)(C)), as amended by the Energy Policy Act of 2005 (Public Law No. 109-58) and in accordance with Renewable Energy Regulations at 30 Code of Federal Regulations (CFR) Part 585; and

WHEREAS, BOEM determined that the Project constitutes an undertaking subject to Section 106 of the National Historic Preservation Act (NHPA), as amended (54 USC 306108), and its implementing regulations (36 CFR 800); and

WHEREAS, BOEM plans to approve with conditions the Construction and Operations Plan (COP) submitted by Revolution Wind, LLC (Revolution Wind); and

WHEREAS, BOEM determined the construction, operation, maintenance, and eventual decommissioning of the Project, designed for up to 100 offshore Wind Turbine Generators (WTGs), up to two offshore substations, up to two export cables collocated in one easement connecting from the OCS to landfall on Rhode Island shores, one onshore transmission cable connecting from landfall to one onshore substations and adjacent interconnection facility (ICF) with a buried connection line, and an overhead connection from the ICF to the existing TNEC Davisville Substation have the potential to adversely affect historic properties as defined under 36 CFR 800.16(l); and

WHEREAS, BOEM is preparing an Environmental Impact Statement (EIS) for the Project pursuant to the National Environmental Policy Act (42 USC 4321 et seq.) (NEPA) and elected to use the NEPA substitution process with its Section 106 consultation pursuant to 36 CFR 800.8(c); and

WHEREAS, BOEM notified in advance the State Historic Preservation Officers (SHPOs) of Connecticut, Massachusetts, New York, and Rhode Island and the Advisory Council on Historic Preservation (ACHP) on April 6, 2021 of their decision to use NEPA substitution and followed the standards for developing environmental documents to comply with the Section 106 consultation for this Project pursuant to 36 CFR 800.8(c), and posted this decision in the Federal Register with BOEM's Notice of Intent to prepare an EIS for the Project on April 30, 2021; and

WHEREAS, BOEM notified and invited the Secretary of the Interior (SOI), as represented by the National Park Service (NPS), to consult regarding this Project pursuant to the Section 106 regulations, including consideration of the potential effects to National Historic Landmarks (NHLs) as required under NHPA Section 110(f) (54 USC 306107) and 36 CFR 800.10, the NPS accepted BOEM's invitation to consult, and BOEM invited the NPS to sign this MOA as a concurring party; and

WHEREAS, in accordance with 36 CFR 800.3, BOEM invited Connecticut SHPO, Massachusetts SHPO, Rhode Island SHPO, and New York SHPO to consult on the Project on April 2, 2021, and Connecticut SHPO formally accepted on April 30, 2021, and Massachusetts SHPO, Rhode Island SHPO, and New York SHPO accepted through participation in consultation following that date; and

WHEREAS, the Project is within a commercial lease area that was subject to previous NHPA Section 106 review by BOEM regarding the issuance of the commercial lease and approval of site

assessment activities. Both Section 106 reviews for the lease issuance and the approval of the site assessment plan were conducted pursuant to the PA and concluded with No Historic Properties Affected for lease issuance on June 4, 2013, and site assessment approval on October 12, 2017 consistent with the Programmatic Agreement (PA) regarding the review of OCS renewable energy activities offshore Massachusetts and Rhode Island (*Programmatic Agreement Among The U.S. Department of the Interior, Bureau of Ocean Energy Management; the State Historic Preservation Officers of Massachusetts and Rhode Island; The Mashpee Wampanoag Tribe; the Narragansett Indian Tribe; the Wampanoag Tribe of Gay Head (Aquinnah); and the Advisory Council on Historic Preservation; Regarding the "Smart from the Start" Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island*) (Attachment 1).

WHEREAS, consistent with 36 CFR 800.16(d) and BOEM's *Guidelines for Providing Archaeological and Historic Property Information Pursuant to 30 CFR Part 585* (May 27, 2020), BOEM defined the area of potential effects (APE) for the undertaking as the depth and breadth of the seabed potentially impacted by any bottom-disturbing activities, constituting the marine archaeological resources portion of the APE (marine APE); the depth and breadth of terrestrial areas potentially impacted by any ground disturbing activities, constituting the terrestrial archaeological resources portion of the APE (terrestrial APE); the viewshed from which offshore or onshore renewable energy structures would be visible, constituting the viewshed portion of the APE (visual APE); and any temporary or permanent construction or staging areas that may fall into any of the aforementioned offshore or onshore portions of the APE where direct, indirect, or cumulative effects could occur (see Attachment 2 APE Maps); and

WHEREAS, BOEM identified 451 aboveground historic properties in the offshore Project components' portion of the visual APE and two historic properties in the onshore Project components' portion of the visual APE; nineteen submerged historic properties and thirteen ancient submerged landforms and features (ASLFs) in the marine APE; and two historic properties in the terrestrial APE; and

WHEREAS, BOEM identified twelve NHLs within the visual APE for onshore and offshore development sand, BOEM's planning and action will avoid adverse effects on seven of the twelve NHLs in the visual APE (Montauk Point Lighthouse, Original U.S. Naval War College Historic District, Fort Adams Historic District, Battle of Rhode Island Historic District, Nantucket Historic District, New Bedford Historic District, and William Watts Sherman House); for other NHLs BOEM, to the maximum extent possible, BOEM has undertaken such planning and action as may be necessary to minimize harm from adverse effects on the other five of the twelve identified NHLs in the APE (Block Island Southeast Lighthouse, Bellevue Avenue Historic District, The Breakers, Marble House, and Ocean Drive Historic District) pursuant to 36 CFR 800.10 and NHPA Section 110(f), including the planning and action implemented for NHLs by this MOA; and

WHEREAS, within the range of Project alternatives analyzed in the EIS (EIS Chapter 2, Table 2.1-1), BOEM determined that 101 aboveground historic properties would be subject to visual adverse effects from WTGs (see Attachment 3), no submerged historic properties related to shipwrecks or sunken crafts will be adversely affected by physical disturbance from export cable construction within the avoidance buffers of these resources, nine ASLFs may be potentially adversely affected by physical disturbance in the lease area and from export cable construction, and two historic properties in the terrestrial APE would be adversely affected with implementation of the undertaking; and

WHEREAS, BOEM determined that the implementation of project design and avoidance measures identified in this MOA will avoid adverse effects to 350 aboveground historic properties in the offshore visual APE (including seven NHLs), and to 19 submerged shipwrecks or sunken crafts and to four ASLFs in the marine APE; and

WHEREAS, BOEM determined all of the ASLFs identified in the marine APE are eligible for the National Register of Historic Places (NRHP) under Criteria A and D; and

WHEREAS, under each of the Project alternatives analyzed in the EIS, BOEM determined the Project would visually adversely affect the 101 aboveground historic properties in Massachusetts and Rhode Island, including five NHLs in Rhode Island, and that the visual adverse effect would be cumulative with the potential adverse effects from other reasonably foreseeable offshore wind energy projects; and

WHEREAS, BOEM has identified historic sunken military craft (i.e., USS S-51) in the marine APE that are subject to the Sunken Military Craft Act (Public Law 108–375 Title XIV), administered by the Department of the Navy for the protection of these craft and associated remains, BOEM has invited the Department of the Navy to consult on this undertaking and they accepted the invitation, and BOEM and the Department of the Navy will continue to coordinate consultation on the Sunken Military Craft Act through this Section 106 review to ensure compliance with that act; and

WHEREAS, the Connecticut SHPO, Massachusetts SHPO, New York SHPO, and Rhode Island SHPO concurred with BOEM’s finding of adverse effect on [insert dates of SHPO’s concurrence for the Massachusetts SHPO, Rhode Island SHPO, Connecticut SHPO, and New York SHPO (August 19, 2022)]; and

WHEREAS, throughout this document the term ‘Tribal Nation’ has the same meaning as a federally recognized ‘Indian Tribe,’ as defined at 36 CFR 800.16(m); and

WHEREAS, BOEM invited the following federally recognized Tribal Nations (Tribal Nations) to consult on this Project: Mashpee Wampanoag Tribe, Shinnecock Indian Nation, Mashantucket (Western) Pequot Tribal Nation, Wampanoag Tribe of Gay Head (Aquinnah), Mohegan Tribe of Indians of Connecticut, Narragansett Indian Tribe, Delaware Tribe of Indians, The Delaware Nation; and

WHEREAS, the Mashpee Wampanoag Tribe, Shinnecock Indian Nation, Mashantucket (Western) Pequot Tribal Nation, Wampanoag Tribe of Gay Head (Aquinnah), Narragansett Indian Tribe, Delaware Tribe of Indians, The Delaware Nation accepted BOEM’s invitation to consult and BOEM invited these Tribal Nations to sign this MOA as concurring parties; and

WHEREAS, in accordance with 36 CFR 800.3, BOEM invited other federal agencies, state and local governments, and additional consulting parties with a demonstrated interest in the undertaking to participate in this consultation, the list of those accepting participation and declining to participate by either written response or no response to direct invitations are listed in Attachment 4; and

WHEREAS, BOEM has consulted with Revolution Wind in its capacity as applicant seeking federal approval of the COP, and, because Revolution Wind has responsibilities under the MOA, BOEM has invited the applicant to be an invited signatory to this MOA; and

WHEREAS, in accordance with 36 CFR 800.6(a)(1), BOEM has notified the ACHP of its adverse effect determination with specified documentation, including adverse effects to the NHLs pursuant to 36 CFR 800.10(b), and ACHP is consulting on the resolution of adverse effects to the historic properties pursuant to 36 CFR 800.6(a)(1)(iii) and 36 CFR 800.10(b); and

WHEREAS, pursuant to Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act, Department of the Army permits will be required from the United States Army Corps of Engineers (USACE) for this Project and BOEM invited USACE to consult; and

WHEREAS, the USACE designated BOEM as the Lead Federal Agency pursuant to 36 CFR 800.2(a)(2) to act on its behalf for purposes of compliance with Section 106 for this Project (in a letter dated July 27, 2022), BOEM invited the USACE to sign this MOA as a concurring party, and the USACE accepted the invitation to sign this MOA as a concurring party;

WHEREAS, BOEM has consulted with the signatories, invited signatories, and consulting parties participating in the development of this MOA regarding the delineation of the APEs, the identification and evaluation of historic properties, the assessment of potential effects to the historic properties, and on measures to avoid, minimize, and mitigate adverse effects to historic properties; and

WHEREAS, pursuant to 36 CFR 800.6, BOEM invited Revolution Wind to sign as an invited signatory and the consulting parties as listed in Attachment 4 to sign as concurring parties; however, the refusal of any consulting party to sign this MOA or otherwise concur does not invalidate or affect the effective date of this MOA, and consulting parties who choose not to sign this MOA will continue to receive information if requested and have an opportunity to participate in consultation as specified in this MOA; and

WHEREAS, the signatories agree, consistent with 36 CFR 800.6(b)(2), that adverse effects will be resolved in the manner set forth in this MOA; and

WHEREAS, BOEM requires all on-site actions prescribed for the mitigation at terrestrial archaeological sites and ASLFs to be concluded prior to Project construction or other ground or seafloor disturbing activities proceeding at those sites, not precluding Project construction or ground construction from proceeding off these sites, and not requiring that all mitigation be completed prior to the Project proceeding; and

WHEREAS, BOEM conducted five consulting party meetings, on December 21, 2021, April 8, 2022, September 27, 2022, April 7, 2023, and June 7, 2023; and

WHEREAS, BOEM sought and considered the views of the public regarding Section 106 for this Project through the NEPA process by holding virtual public scoping meetings when initiating the NEPA and NHPA Section 106 review on May 13, 18, and 20, 2021 and in-person and virtual public hearings related to the Draft EIS on September 29 and October 4–6 and 11, 2022; and

WHEREAS, BOEM made the first, redacted Draft MOA available to the public for review and comment from September 2, 2022 to October 17, 2022, and made an updated version of the redacted Draft MOA available to the public using BOEM's Project website, and BOEM did receive comments from the public; and

NOW, THEREFORE, BOEM, the Connecticut SHPO, Massachusetts SHPO, New York SHPO, and Rhode Island SHPO, and the ACHP agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

BOEM, with the assistance of Revolution Wind, shall ensure that the following measures are carried out as conditions of its approval of the undertaking:

I. MEASURES TO AVOID ADVERSE EFFECTS TO IDENTIFIED HISTORIC PROPERTIES

A. Marine APE

1. BOEM will include the following avoidance measures for adverse effects within the marine APE as conditions of approval of the Revolution Wind COP:
 - i. Revolution Wind will avoid the 19 known shipwreck or sunken craft sites and potentially significant debris fields previously identified during marine archaeological surveys (Target-01 to Target-11 and Target-13 to Target-20) by a distance of no less than 164 feet (50 meters) from the known extent of the resource for placement of Project structures and when conducting seafloor-disturbing activities.
 - ii. Revolution Wind will avoid ASLFs previously identified during marine archaeological resource assessments for the Project and incorporated avoidance buffering into the mapped ASLF feature boundary. This avoidance will protect ASLFs from the known extent of the resource for placement of Project structures and when conducting seafloor-disturbing activities. Target-27 and Target-31 to Target-33 (four ASLFs) are avoidable and adverse effects to other ASLFs could be avoidable through micro-siting or through design options dependent on WTG placement and Project alternative selection. Where the nine other ASLFs cannot be avoided, the mitigation measures at Section III.A will be applied.

B. Visual APE

1. To maintain avoidance of adverse effects on historic properties in the visual APE where BOEM determined no adverse effects or where no effects would occur, BOEM will require Revolution Wind to ensure Project structures are within the BOEM-approved Project design envelope (PDE), sizes, scale, locations, lighting prescription, and distances that BOEM used to inform the definition of APE for the Project and for determining effects in the Finding of Effect (see the Project COP).
2. This measure (i.e., Stipulation I.B.1) will avoid adverse effects on seven of the twelve NHLs in the visual APE (Montauk Point Lighthouse, Original U.S. Naval War College Historic District, Fort Adams Historic District, Battle of Rhode Island Historic District, Nantucket Historic District, New Bedford Historic District, and William Watts Sherman House), through the Project distance and lack of visibility resulting from BOEM conditions of approval for the COP and PDE specifications for sizes, scale, locations, lighting prescription for the Project.

II. MEASURES TO MINIMIZE ADVERSE EFFECTS TO IDENTIFIED HISTORIC PROPERTIES

A. Marine APE

1. Should full avoidance not be feasible for nine known ASLFs (Targets 21 through 26 and Targets 28 through 30), Revolution Wind in consultation with BOEM will minimize the extent of project disturbance introduced on these sites. Disturbed portions of ASLFs will be addressed under mitigation measures at MOA Stipulations III. Actions during minimization and mitigation at ASLFs would necessarily require consultation with Tribal Nations.

B. Terrestrial APE

1. Although the [REDACTED] #1 and [REDACTED] #2 sites were determined by BOEM to not be avoidable by project disturbance, Revolution Wind will minimize the extent of Project disturbance within these site areas by protecting portions of the site where disturbance can be avoided from Project impacts during construction, operations, maintenance, decommissioning and environmental restoration activities or mitigate those site portions prior to such activities. Protection measures may include fencing the resources or similar means to separate projects activities from the undisturbed site portions. Mitigation is described under Stipulation III, below.

C. Visual APE

1. BOEM has undertaken planning and actions to minimize visual adverse effects to historic properties, including minimizing harm to the five adversely affected NHLs (Block Island Southeast Lighthouse, Bellevue Avenue Historic District, The Breakers, Marble House, and Ocean Drive Historic District). The minimization measures below will minimize visual adverse effects to all adversely affected aboveground historic properties in the visual APE and will minimize the undertaking's cumulative visual adverse effects, that would add to the potential visual adverse effects of other reasonably foreseeable offshore wind energy developments. BOEM will include these minimization measures for adverse effects within the visual APE as conditions of approval of the Revolution Wind COP:
 - i. Revolution Wind will use uniform WTG design, speed, height, and rotor diameter to reduce visual contrast and decrease visual clutter.
 - ii. Revolution Wind will use uniform spacing of 1 nautical mile (1.15 mile) to decrease visual clutter, aligning WTGs to allow for safe transit corridors.
 - iii. The option to reduce the number of constructed WTGs from a maximum proposed number of 100.
 - iv. Revolution Wind will apply a paint color to the WTGs no lighter than RAL 9010 pure white and no darker than RAL 7035 light gray to help reduce potential visibility of the turbines against the horizon during daylight hours.
 - v. Revolution Wind will implement an aircraft detection lighting system (ADLS) to automatically activate lights when aircraft approach. The WTGs and OSS would be lit and marked in accordance with FAA and USCG lighting standards and consistent with BOEM's *Guidelines for Lighting and Marking of Structures Supporting Renewable Energy Development* (April 28, 2021) to reduce light intrusion.

III. MEASURES TO MITIGATE ADVERSE EFFECTS TO IDENTIFIED HISTORIC PROPERTIES

A. Marine APE

1. Revolution Wind cannot avoid nine ASLFs (Targets 21 through 26 and Targets 28 through 30). To resolve the adverse effects to the nine ASLFs, BOEM will include the following as conditions of approval of the Revolution Wind COP and require fulfillment of any on-site preconstruction work at these nine ASLFs for the following mitigation measures prior to construction at these ASLFs. Mitigation measures under Stipulation III.A must be completed within four years of MOA execution, unless a different timeline is agreed upon by the

consulting Tribal Nations and SHPO within whose state the mitigation is being performed, accepted by BOEM. Revolution Wind will fund mitigation measures as described in Attachment 5 (Mitigation Funding Amounts Proposed by Signatories and Consulting Parties) and Attachment 6 (Historic Property Treatment Plan [HPTP] for the Revolution Wind Farm Ancient Submerged Landform Feature, Outer Continental Shelf, Federal and Rhode Island Waters of Rhode Island Sound):

- i. Preconstruction Geoarchaeology. Revolution Wind will fulfill the following commitments: collaborative review of existing geophysical and geotechnical data with Tribal Nations; selection of coring locations in consultation with Tribal Nations; collection of two to three vibracores within each affected ASLF with a sampling focus on areas that will be disturbed by Project construction activities; written verification to BOEM that the samples collected are sufficient for the planned analyses and consistent with the agreed scope of work; for appropriate samples, collaborative laboratory analyses at a laboratory located in Rhode Island or Massachusetts; screening of recovered sediments for debitage or micro-debitage associated with indigenous land uses; third-party laboratory analyses, that may include but is not limited to a suite of micro- and macro-faunal analyses, micro- and macro-botanical analyses, radiocarbon dating of organic subsamples, and chemical analyses for potential indirect evidence of indigenous occupations, based on the recovered cores and materials; temporary curation of archival core sections; draft reports for review by consulting Tribal Nations and, in state waters, Tribal Nations and RHIHPC); final reporting; and public or professional presentations summarizing the results of the investigations, developed with the consent of the consulting Tribal Nations.
 - a. The Preconstruction Geoarchaeology effort will be conducted in accordance with BOEM's Guidelines for Providing Archaeological and Historic Property Information Pursuant to 30 CFR Part 585. The qualified professional archaeologists leading the research will meet the SOI's professional qualification standards for archeology (62 FR 33708) and BOEM's standards for Qualified Marine Archaeologists.
 - b. Revolution Wind will submit the Draft Tribal Audience Report, Draft Technical Report, Final Tribal Audience Report, Final Technical Report, and Draft Public or Professional Presentations to the consulting Tribal Nations and, in state waters, Tribal Nations and RHIHPC for review. Revolution Wind will provide draft descriptions and documentation of the GIS to the consulting Tribal Nations and, in state waters, Tribal Nations and RHIHPC for review and will provide a description of the draft Story Maps to the interested consulting Tribal Nations following the initial working sessions.
- ii. Open-Source GIS and Story Maps. Revolution Wind will fulfill the following commitments: consultation with the Tribal Nations to determine the appropriate open-source GIS platform; review of candidate datasets and attributes for inclusion in the GIS; data integration; development of custom reports or queries to assist in future research or tribal maintenance of the GIS; work Sessions with Tribal Nations to develop Story Map content; training session with Tribal Nations to review GIS functionality; review of Draft Story Maps with Tribal Nations; delivery of GIS to Tribal Nations; and delivery of Final Story Maps.
 - a. The GIS developed under this measure will be free to use and free to modify by the Tribal Nations. To the extent feasible, all data will be provided in formats

that allow for interoperability with other GIS platforms that the Tribal Nations may use. All datasets incorporated in the GIS will comply with Federal Geographic Data Committee data and metadata standards.

- b. Revolution Wind will submit the Description of the GIS with appropriate schema, data organization, and custom reports/queries, Draft Story Map descriptions with details on content, formatting, and intended audiences, and Final Technical Description of the GIS with schema, data organization, and custom reports/queries to the consulting Tribal Nations and, in state waters, Tribal Nations and RHIHPC for review.

B. Terrestrial APE

1. Revolution Wind cannot avoid [REDACTED] #1 and [REDACTED] #2 sites by project disturbances. To resolve the adverse effects to the two archaeological sites, BOEM will include the following as conditions of approval of the Revolution Wind COP and require fulfillment of the following as mitigation measures prior to construction. BOEM requires all on-site actions prescribed for the mitigation at archaeological sites (terrestrial and marine) to be concluded prior to Project construction or other ground or seafloor disturbing activities proceed at those sites, not precluding Project construction or ground construction from proceeding off these sites, and not requiring that all mitigation be completed prior to the Project proceeding. Mitigation measures under Stipulation III.B must be completed within four years of MOA execution, unless a different timeline is agreed upon by the consulting Tribal Nations and SHPO within whose state the mitigation is being performed, accepted by BOEM. Revolution Wind will fund mitigation measures as described in Attachment 5 (Mitigation Funding Amounts Proposed by Signatories and Consulting Parties) and Attachment 7 (HPTP for the Revolution Wind Farm, the [REDACTED] #1 and #2 Sites, Town of North Kingstown, Washington County, Rhode Island):
 - i. Data Recovery Investigations, Temporary Avoidance Measures, and Ongoing Protection Measures. Revolution Wind will fulfill the following commitments: Submission of the application for Phase III investigations to the Rhode Island SHPO for permit approval prior to execution of the Phase III Data Recovery Program (Attachment 7). Temporary avoidance measures will be implemented prior to construction and will include temporary placement of construction barrier fencing (e.g., snow fencing) to protect the non-impact areas of the two archaeological sites which have been committed to protection and avoidance. Cultural monitoring will occur during construction, as provided for by Revolution Wind, and will include maintaining fencing and monitoring of all ground disturbing work (Attachment 7) within and adjacent to the archaeological sites impact areas. Following Phase III investigations, the preparation of a Historic Property Archaeological Protection Plan will be developed by Revolution Wind to carry over protection measures throughout ongoing Operations and Maintenance for the Project.
 - a. Revolution Wind will develop the project consistent with the Rhode Island Historical Preservation & Heritage Commission's (RIHPC) Standards for Archaeological Survey (the *Standards*) and RIHPC's Performance Standards and Guidelines for Archaeology in Rhode Island (the *Guidelines*).
 - b. Revolution Wind will submit the Draft Phase III Archaeological Data Recovery Report, Final Phase III Archaeological Data Recovery Report; Draft Archaeological Construction Monitoring Report draft and final; [REDACTED] #1 and #2 Site Form Updates; and Historic Property Archaeological

Protection Plan draft and final to the consulting Tribal Nations and RHHPC for review. The reports will be prepared in accordance with the *Standards*.

C. Visual APE

1. BOEM will ensure the following mitigation measures to resolve the adverse effects to historic properties and to minimize harm to NHLs are required as conditions of approval of the Revolution Wind COP and are implemented by Revolution Wind, unless otherwise specified. Those forms of mitigation BOEM has determined effective for treating NHLs are also determined effective in treating other visually impacted historic properties. To mitigate visual and cumulative visual adverse effects to NHLs, TCPs, and other historic properties, BOEM will ensure the implementation of the mitigation measures described in this MOA and the HPTPs attached to this MOA. Where the integrity of historic properties would be diminished by the visual adverse effects and cumulative visual adverse effects of the project, the proposed mitigation measures serve to support other means of conveying the significance of the historic property and to minimize the harm to NHLs, including documentation, interpretation, and dissemination of information and property preservation planning and activities (including repair and stabilization). See Attachment 5 for proposed budgets for each mitigation effort, reflecting good faith estimates, based on the experience of qualified consultants with similar activities and comparable historic properties. Tasks associated with the mitigation of visual adverse effects can occur during and/or after Project construction. Mitigation measures under III.C must be completed within five years of MOA execution, unless a different timeline is agreed upon by the SHPO within whose state the mitigation is being performed, accepted by BOEM. Tasks may be completed simultaneously, as applicable. Revolution Wind will fund mitigation measures in accordance with Attachment 5 and pursuant to the following measures under III.C.
2. Traditional Cultural Properties (TCPs).
 - i. ██████████ Traditional Cultural Property. BOEM will include the following as described in Attachment 8 (Historic Properties Treatment Plan for the Revolution Wind Farm: the ██████████ Traditional Cultural Property ██████████ Massachusetts & Atlantic Outer Continental Shelf) as conditions of approval of the Revolution Wind COP. Revolution Wind will fund and commence the following prior to initiation of construction of any offshore project elements on the OCS included as part of this undertaking.
 - a. GIS Database of Contributing Resources to the TCP
 - 1) Revolution Wind will fund the development of a GIS database incorporating the results of on-going documentation of the TCP and will include information on existing conditions at each contributing resource and/or significant element of the TCP district as described in Attachment 8.
 - 2) Revolution Wind will have the documentation developed by professionals meeting the qualifications specified in the SOI's Professional Qualifications Standards (36 CFR Part 61). The GIS will be developed by professionals with demonstrated experience in the creation and organization of spatial databases of cultural resources and the relevant and specific attributes necessary for recordation and management. The GIS development will be overseen by a qualified Geographic Information Systems Professional

- 3) Revolution Wind will submit the Request for Proposal (RFP), proposals by qualified consultants in response to the RFP, preliminary draft of the exhibit, and final exhibit to the consulting Tribal Nations and MHC for review.

b. Development of Interpretative Materials

- 1) Revolution Wind will fund the development of GIS story maps or comparable presentations that could include relevant archival data, oral histories, news stories, video footage, and public domain datasets [REDACTED] [REDACTED] [REDACTED] as described in Attachment 8.
- 2) Revolution Wind will have the documentation developed by a qualified Geographic Information Systems Professional
- 3) Revolution Wind will submit a RFP, proposals by qualified consultants in response to the RFP, draft deliverables, and final deliverables to the consulting Tribal Nations and MHC for review.

c. Climate Adaptation Planning Study

- 1) Revolution Wind will fund the development of a Climate Adaptation Plan that is focused on the specific resources and characteristics of the [REDACTED] [REDACTED] and needs of the associated traditional community as described in Attachment 8.
- 2) Revolution Wind will have the documentation developed by qualified professionals with Global Association of Risk Professionals' Sustainability and Climate Risk certification and/or demonstrated experience in the preparation of climate change risk assessments for municipal, state, or federal governments.
- 3) Revolution Wind will submit the RFP, proposals by qualified consultants in response to the RFP, draft plan, and final plan to the consulting Tribal Nations and MHC for review.

- ii. [REDACTED] Traditional Cultural Property. BOEM will include the following as described in Attachments 9 and 10 [REDACTED] Traditional Cultural Property [REDACTED] Massachusetts & Atlantic Outer Continental Shelf for federal Tribal Nations and non-federal Tribes) as conditions of approval of the Revolution Wind COP. Revolution Wind will fund and commence the following prior to initiation of construction of any offshore project elements on the OCS included as part of this undertaking.

a. Support for [REDACTED]

- 1) Revolution Wind will support the identification of appropriate printed and/or digital media for interpretative exhibits; archival research on the history, development, and historical/cultural significance of [REDACTED] design and production of draft and final interpretive materials; and consultation, meetings, and discussions including the [REDACTED] [REDACTED] on these matters.

- 2) Revolution Wind will submit the RFP, consultant bids in response to the RFP, draft deliverables, and final deliverables to the consulting Tribal Nations and MHC for review.
- b. Scholarships and Training for [REDACTED] Resource Stewardship
- 1) Revolution Wind will fund scholarships and fees for professional training or certification programs in the fields of Astronomy, Archaeology or Anthropology, Marine Sciences, Aquaculture, Marine Fisheries, Marine Construction, Native American Studies, Ethnohistory, History, Biology, and related fields as described in Attachments 9 and 10.
 - 2) Revolution Wind will have the documentation prepared by professionals with demonstrated experience in education and training program management and fiscal reporting.
 - 3) Revolution Wind will submit the RFP, consultant bids in response to the RFP, executed contracts between the implementing party and selected consultants, draft Scholarship Program Proposal, and final Scholarship Program Proposal to the consulting Tribal Nations and MHC for review.
- c. Coastal Resilience and Habitat Restoration
- 1) Revolution Wind will provide funding for planning and implementation of targeted efforts to mitigate future losses of character defining features and contributing resources for the TCP, support economically sustainable [REDACTED] practices, and documentation and/or recover of threatened elements of cultural sites associated with the TCP as described in Attachments 9 and 10.
 - 2) Revolution Wind will have the documentation prepared by professionals with demonstrated experience in archaeology, habitat restoration, coastal resilience planning program management and fiscal reporting, as appropriate to the specific funded activities. All archaeological surveys or other subsurface terrestrial investigations on any land owned or controlled by the Commonwealth of Massachusetts, its agencies or political subdivisions or on any historical or archeological landmarks or on any lands restricted by Massachusetts General Law (MGL) c. 184, § 31 will be conducted in accordance with MHC regulations (950 CMR 70).
 - 3) Revolution Wind will submit the RFP, consultant bids in response to the RFP, draft deliverables, and final deliverables to the consulting Tribal Nations and MHC for review.
- d. Archaeological and Cultural Sites Data Compilation
- 1) Revolution Wind will fund updated inventories of archaeological and cultural resource data pertaining to the TCP and the preparation of updated historic contexts for the interpretation of such resources as described in Attachments 9 and 10.
 - 2) Revolution Wind will have the updated inventory prepared by professionals meeting the SOI's professional qualification standards in archeology and/or

history (36 CFR 60) and in direct consultation with each participating Tribal Nation.

- 3) Revolution Wind will submit the RFP, consultant bids in response to the RFP, draft and final historic context(s) and MHC inventory forms; and open-source GIS database to the consulting Tribal Nations and MHC for review.

e. Maritime Cultural Landscapes & Interconnected Contexts

- 1) Revolution Wind will fund a publicly-available and inclusive synthesis of information and knowledge about the maritime cultural landscapes along the shores, coastal islands, and waters of southern New England and Long Island as described in Attachments 9 and 10.
- 2) Revolution Wind will have the documentation prepared by professionals meeting the SOI's professional qualification standards in cultural anthropology, archeology, and/or history (36 CFR 60) and in direct consultation with each of the consulting Tribal Nation's Tribal Historic Preservation Office or other designated tribal representative.
- 3) Revolution Wind will submit the RFP, consultant bids in response to the RFP, draft and final reports, and open-source GIS database to the consulting Tribal Nations and MHC for review.

3. Rhode Island National Historic Landmarks and Historic Property Documentation Mitigation Measures.

- i. BOEM will include the following as described in Attachment 11 (Historic Property Treatment Plan for the Revolution Wind Farm: Documentation of Twenty-Six Historic Properties in Rhode Island) as conditions of approval of the Revolution Wind COP.
 - a. The HPTP at Attachment 11 provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions in the resolution of adverse effects from the Revolution Wind Project for the following NHLs and historic properties in addition to any mitigation fund actions that could further be applied to mitigating adverse effects for some or all these NHLs and historic properties under III.C.6:
 - 1) Abbott Phillips House, Little Compton
 - 2) Warren Point Historic District, Little Compton
 - 3) Tunipus Goosewing Farm, Little Compton
 - 4) Fort Varnum/Camp Varnum, Narragansett
 - 5) Narragansett Pier MRA, Narragansett
 - 6) Life Saving Station at Narragansett Pier, Narragansett
 - 7) The Towers Historic District, Narragansett
 - 8) The Towers/Tower Entrance of Narragansett Casino, Narragansett
 - 9) Dunmere, Narragansett
 - 10) Ocean Road Historic District, Narragansett
 - 11) Champlain Farm Historic District, New Shoreham
 - 12) Mitchell Farm Historic District, New Shoreham
 - 13) Beacon Hill Historic District, New Shoreham
 - 14) Lewis-Dickens Farm Historic District, New Shoreham
 - 15) Lakeside Drive and Mitchell Lane Historic District, New Shoreham

- 16) Indian Head Neck Road Historic District, New Shoreham
 - 17) Beach Avenue Historic District, New Shoreham
 - 18) Old Town and Center Roads Historic District, New Shoreham
 - 19) Corn Neck Road Historic District, New Shoreham
 - 20) Pilot Hill Road and Seaweed Lane Historic District, New Shoreham
 - 21) New Shoreham Historic District, New Shoreham
 - 22) Ochre Point-Cliffs Historic District, Newport
 - 23) Ocean Drive Historic District NHL, Newport
 - 24) Bellevue Avenue Historic District NHL, Newport
 - 25) Brownings Beach Historic District, South Kingstown
 - 26) Puncatest Neck Historic District, Tiverton
- b. National Historic Landmark and National Register of Historic Places nomination updates for historic districts in Newport
- 1) Update the existing nomination information for the Bellevue Avenue Historic District, Newport.
 - 2) Update the existing nomination information for the Ocean Drive Historic District, Newport.
 - 3) Update the existing nomination information for the Ochre Point-Cliffs Historic District, Newport.
- c. Complete New National Register of Historic Places Nomination Documentation
- 1) In Little Compton at the following historic properties: Abbott Phillips House, Warren Point Historic District, Tunipus Goosewing Farm.
 - 2) In New Shoreham at the following historic properties: West Side Road South, West Side Road North, Beacon Hill, African American Settlement, Lewis-Dickens Farm, Lakeside Drive and Mitchell Lane, Indian Head Neck Road, Beach Avenue, Old Town and Center Roads, Corn Neck Road, Pilot Hill Road and Seaweed Land, and New Shoreham Historic District.
- d. New and updated historic property surveys
- 1) Update the previous *Historic and Architectural Resources of Narragansett, Rhode Island*.
 - 2) Complete intensive-level surveys of the Matunuck and Green Hill neighborhoods in South Kingstown.
- e. Preparation of the National Historic Landmark and Historic Property Documentation
- 1) For the nomination form and survey documentation, Revolution Wind will review any previous nomination forms for a historic property or NHL; research other available historic sources and documentation; conduct field and condition assessments and NRHP-eligibility analysis; provide annotated photographs; draft the nomination forms; submit draft documents for review and comment to the RI SHPO, the participating municipal government, historical commission or organization, and, if requested, to the owners of the

historic property or properties; and develop final nomination documents to be provided to RI SHPO, the participating municipal government, historical commission or organization, and, if requested, to the owners of the historic property or properties. Final updates and new NHL and NRHP documents will be submitted by Revolution Wind to RI SHPO and other participating parties for their files and use. Revolution Wind is not responsible for submitting documents for historic property or NHL nominations or updates to RIHPHC's State Review Board or the NPS.

- 2) Revolution Wind will have the documentation prepared by professionals meeting the SOI's professional qualification standards in archeology and/or history (36 CFR 60) and in consultation with RI SHPO. Documentation will comply with the applicable standards of the SOI's *Guidance on the Identification of Historic Properties* (36 CFR 800.4); NPS's *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*; NPS's *National Register Bulletin 16a: How to Complete the National Register Registration Form*; and RIHPHC *Standards and Guidelines*.
 - 3) Revolution Wind will submit a RFP, proposals by qualified consultants in response to the RFP, draft updated historic property inventory if required, final updated historic property inventory if required, draft report to the RI SHPO and participating (if any) municipal government and historical commission or organization for review.
4. Town of Middletown historic property mitigation.
- i. BOEM will apply the following mitigation measures described in Attachment 12 (Historic Properties Treatment Plan for the Revolution Wind Farm: Nine Historic Properties, Town of Middletown, Newport County, Rhode Island) as conditions of approval of the Revolution Wind COP. The nine historic properties include the Bailey Farm, Clambake Club of Newport, Paradise Rocks Historic District, Sea View Villa, St. Georges School, Indian Avenue Historic District, Whetstone, Land Trust Cottages, and the Bluff/John Bancroft Estate. To resolve adverse effects, Revolution Wind will fund and implement the following mitigation measures.
 - a. Support on-going maintenance and aesthetic improvements to the Third Beach Road and Hanging Rocks Road through stone wall preservation and observation trails within the Paradise Rocks Historic District.
 - 1) Revolution Wind will provide funding for the proposed stone wall preservation and for preparing interpretive information to provide the Town, its community, and SHPO with improved experience of local history and historical sites.
 - 2) This will include Revolution Wind reviewing current Town of Middletown Charter and Code of Ordinances; reviewing existing planning documents, guidance, and regulations; existing photographs and documents of present conditions of stone walls; developing draft and final plan (including drawings, if necessary), to be distributed to the RI SHPO, the Town of Middleton, Norman Bird Sanctuary and other property owners for review and comment; and soliciting public engagement to discuss preservation priorities;

- 3) Develop draft and final reports on these actions to be distributed to RI SHPO, the Town of Middleton, Norman Bird Sanctuary and other property owners.
 - 4) Revolution Wind will develop the project consistent with Town of Middletown Charter and Code of Ordinances and the SOI's Standards for the Treatment of Historic Properties (36 CFR 68).
 - 5) Revolution Wind will submit a RFP, proposals by qualified consultants in response to the RFP, draft updated historic property inventory if required, final updated historic property inventory if required, draft report to the RI SHPO, the Town of Middleton, Norman Bird Sanctuary, and other property owners.
- b. Update the previous *Historic and Architectural Resources of Middletown, Rhode Island: A Preliminary Report*.
- 1) Revolution Wind will provide funding to update this report to provide the Town, its community, and SHPO with additional information on local history.
 - 2) Revolution Wind will review the existing Historic and Architectural Resources of Middletown, Rhode Island: A Preliminary Report and existing historic property documentation available at local repositories and the RIHPHC files; develop a methodology for completion of the survey to be distributed to RI SHPO, Rhode Island Historical Society, Town of Middletown, Norman Bird Sanctuary, Clambake Club of Newport, and any other participating property owners for review and comment; complete the survey per the RI SHPO-approved methodology; develop draft and final survey reports to be distributed to RI SHPO, Rhode Island Historical Society, Town of Middletown, Norman Bird Sanctuary, Clambake Club of Newport, and any other participating property owners for review and comment; and address any comments received for distribution with the final document(s) to these participating parties.
 - 3) Revolution Wind will develop the project consistent with SHPO *Standards and Guidelines* and SOI reporting standards in the SOI's Guidance on the Identification of Historic Properties (36 CFR 800.4); and the SOI Professional Qualifications Standards (36 CFR Part 61), as applicable.
 - 4) Revolution Wind will submit a RFP, proposals by qualified consultants in response to the RFP, draft updated historic property inventory if required, final updated historic property inventory if required, draft report to the RI SHPO, Rhode Island Historical Society, Town of Middletown, Norman Bird Sanctuary, and Clambake Club of Newport for review.
5. Town of Aquinnah historic property mitigation.
- i. BOEM will include the following as described in Attachment 13 (Historic Properties Treatment Plan for the Revolution Wind Farm, Nine Historic Properties, Town of Aquinnah, Dukes County, Massachusetts) as conditions of approval of the Revolution Wind COP. These nine properties consist of 71 Moshup Trail, Leonard Vanderhoop House, Edwin DeVries Vanderhoop Homestead, Tom Cooper House, Theodore Haskins House, 3 Windy Hill Drive, Gay Head – Aquinnah Town Center Historic District, Gay Head – Aquinnah Shops, Gay Head – Aquinnah Coast Guard Station Barracks. To

resolve adverse effects, Revolution Wind will fund and implement the following mitigation measures.

- a. Funding for Weatherization Improvements to the Edwin D. Vanderhoop Homestead, which houses the Aquinnah Cultural Center.
 - 1) Revolution Wind will fund energy efficiency improvements to the Edwin D. Vanderhoop Homestead to help to increase the energy efficiency and to help ensure the long-term preservation of this historic property as described in Attachment 13. Mitigation funds are being sought by the Town of Aquinnah for historically appropriate weatherization of this building to preserve and protect each element of this irreplaceable local venue and its contents.
 - 2) Revolution Wind will develop the project consistent with the Town of Aquinnah Building Code, as applicable; the Town of Aquinnah Energy and Climate Committee guidance, as applicable; the SOI's Standards for Rehabilitation (36 CFR 67.7); and National Park Service's Improving Energy Efficiency in Historic Buildings Preservation Brief 3.
 - 3) Revolution Wind will submit a RFP, proposals by qualified consultants in response to the RFP, preliminary draft plans and specifications, final plans and specifications, and as-built documentation including photographs to the MHC, Dukes County, Town of Aquinnah, and Wampanoag Tribe of Gay Head (Aquinnah) for review.
- b. Complete Identified Needs from the Americans with Disabilities Act (ADA) Compliance Plan.
 - 1) Revolution Wind will fund and complete the next phase of work identified in the proposed ADA Compliance Plan for the Aquinnah Circle and the Gay Head – Aquinnah Shops Area to ensure all visitors are able to access and enjoy the Gay Head – Aquinnah Shops as described in Attachment 13. To improve and expand access, Revolution Wind will fund the construction. The intent is to support establishment of fully ADA Compliant access to the Cliffs, shops, and Overlook Park, including replacement of the existing stairs, ramp access and appropriate pathways to and from other parts of the Circle.
 - 2) Revolution Wind will develop the project consistent with Town of Aquinnah, MA Building Code, as applicable; Martha's Vineyard regulations; Commission's planning guidance, as applicable; ADA; the Massachusetts Office on Disability Guidelines as applicable; and the SOI's Standards and Guidelines for Rehabilitation (36 CFR 68).
 - 3) Revolution Wind will submit photographs and documentation of existing conditions, a RFP, proposals by qualified consultants in response to the RFP, preliminary draft of the construction plans including schedule, cost, and specifications, and final construction plan to the MHC, Dukes County, Town of Aquinnah, and Wampanoag Tribe of Gay Head (Aquinnah) for review.
- ii. Town of Aquinnah, Dukes County, Massachusetts: *The Gay Head Lighthouse*. BOEM will include the following as described in Attachment 14 (Historic Properties Treatment Plan for the Revolution Wind Farm: The Gay Head Lighthouse, Town of Aquinnah, Dukes County, Massachusetts) as conditions of approval of the Revolution Wind COP.

Revolution Wind will fund and commence the following based on funds from and the consultation described under Section III.C.3.

a. Historic Rehabilitation of the Gay Head Lighthouse

- 1) Revolution Wind will contribute funds (see Attachment 5) and provide contracting support to the Town of Aquinnah for the next phase of rehabilitation at the Gay Head Lighthouse to ensure the long-term preservation of the lighthouse by completing physical repairs and/or rehabilitation of the historic building materials as described in Attachment 14, consulting with the Gay Head Light Advisory Committee throughout the process. This repair and/or restoration will prioritize restoration of the curtain wall pursuant to the ICC Commonwealth Corporation Report of December 2021 Inspection Gay Head Lighthouse Aquinnah, MA dated April 13, 2022.
- 2) Revolution Wind will develop the project consistent with the Town of Aquinnah, MA Building Code; Martha's Vineyard Commission planning guidance, as applicable; Preservation Restriction (MGL Chapter 184, Section 31-33); United States Coast Guard Aid to Navigation (ATON) Access Easement (U. S. Department of Homeland Security and U. S. Coast Guard, 2005); Preservation Brief 17: Architectural Character – Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving their Character; Preservation Brief 47: Maintaining the Exterior of Small and Medium Size Historic Buildings; National Register Bulletin 34: Guidelines for Evaluating and Documenting Historic Aids to Navigation; Historic Lighthouse Preservation Handbook; IALA-AISM Lighthouse Conservation Manual; Preservation Restriction (RIGL Title 42, Section 42-45-9); the SOI's Standards for Treatment of Historic Properties (36 CFR 68); the SOI Professional Qualifications Standards (36 CFR Part 61), as applicable; the SOI's Standards for Treatment of Historic Properties (36 CFR 68); and the SOI's Professional Qualifications Standards (36 CFR Part 61), as applicable. The Gay Head Lighthouse Advisory Committee will be given the opportunity to review the demonstrated experience and qualifications of all bidders in regard to their work on similar lighthouse restoration projects.
- 3) At such time as the Town of Aquinnah notifies Revolution Wind that sufficient funds are available for the defined scope of repair and/or restoration, Revolution Wind will submit proposed scopes of work including draft text, project plans, and design specifications; photographic and written documentation of existing conditions (prior to repair or restoration work); draft specifications and construction drawings; final Specifications and construction drawings; progress reports; and a Summary Report of the work completed to the MHC, Dukes County, and Town of Aquinnah, Gay Head Lighthouse Advisory Committee, and Wampanoag Tribe of Gay Head (Aquinnah) for review.

6. Mitigation Fund

- i. Fund Establishment. BOEM will require Revolution Wind to establish and contribute funds to a mitigation fund to resolve visual adverse effects to the historic properties, above-ground NHLs and historic properties in Rhode Island and Massachusetts, listed below (in no specific order).

- 1) Block Island Southeast Lighthouse NHL
- 2) Bellevue Avenue Historic District NHL
- 3) The Breakers NHL
- 4) Marble House NHL
- 5) Ocean Drive Historic District NHL
- 6) Ochre Point - Cliffs Historic District
- 7) Kay St.-Catherine St.-Old Beach Rd. Historic District / The Hill
- 8) Horsehead/Marbella
- 9) Brownings Beach Historic District
- 10) Puncatest Neck Historic District
- 11) Island Cemetery/Old Burial Ground
- 12) New Shoreham Historic District
- 13) Old Harbor Historic District
- 14) Captain Mark L. Potter House
- 15) Spring Cottage
- 16) Spring House Hotel
- 17) Spring Street Historic District
- 18) WWII Lookout Tower – Spring Street
- 19) Caleb W. Dodge Jr. House
- 20) Captain Noah Dodge
- 21) Captain Welcome Dodge Sr.
- 22) Pilot Hill Road and Seaweed Lane
- 23) WWII Lookout Tower at Sands Pond
- 24) Mohegan Cottage
- 25) Lewis-Dickens Farm
- 26) Miss Abby E. Vaill/1 of 2 Vaill cottages
- 27) Hon. Julius Deming Perkins/"Bayberry Lodge"
- 28) West Side and Grace Cove Roads
- 29) Peleg Champlin House
- 30) Lakeside Drive and Mitchell Lane
- 31) African American Settlement
- 32) Nathan Mott Park
- 33) Champlin Farm
- 34) Old Town and Center Roads
- 35) Beacon Hill
- 36) Beach Avenue
- 37) Indian Head Neck Road
- 38) Corn Neck Road
- 39) Hippocampus/Boy's camp/Beane Family
- 40) Mitchell Farm
- 41) U.S. Coast Guard Brick House
- 42) US Lifesaving Station
- 43) US Weather Bureau Station
- 44) Hygeia House
- 45) Sakonnet Light Station
- 46) Block Island North Lighthouse
- 47) Point Judith Lighthouse
- 48) Beavertail Light
- 49) Tarpaulin Cove Light Clark's Point Light
- 50) Butler Flats Light Station
- 51) Nobska Point Lighthouse

- 52) Captain Samuel Hancock – Captain Mitchell West House
- 53) Russell Hancock House
- 54) Ernest Flanders House, Shop, Barn
- 55) Simon Mayhew House
- 56) Flaghole
- 57) Salters Point
- 58) 744 Sconticut Neck Road
- 59) Scrubby Neck Schoolhouse
- 60) Gooseberry Neck Observation Towers
- 61) Gooseneck Causeway
- 62) Westport Harbor
- 63) Horseneck Point Lifesaving Station
- 64) Clam Shack Restaurant
- 65) Westport Point Historic District
- 66) Westport Point Revolutionary War Properties
- 67) Westport Point Historic District

- ii. Fund Establishment. BOEM will require the Revolution Wind to establish a mitigation fund to resolve visual adverse effects to historic properties from the Project, including five NHLs. Attachment 5 provides a basis for the total funding amounts, based on input of qualified consultants with experience fulfilling activities similar to those that can be funded through the mitigation fund and for historic properties comparable to those adversely effected by the Project.
- iii. Fund Amount and Application to Mitigation of Adverse Effects. In order to mitigate the Project's adverse visual impacts to historic properties, Revolution Wind must provide the total amount of \$3,873,000 of funding in support of historic preservation and public interpretive and commemorative activities; see Attachment 5. The measures listed in Attachment 5 were proposed or based on proposals by consulting parties and included in draft documents BOEM circulated to consulting parties and included in Appendix J to the Project EIS. BOEM continues to believe that these measures are appropriate to fully address the nature, scope, size, and magnitude of adverse effects including cumulative effects caused by the Project, NRHP-qualifying characteristics of each historic property that would be affected, and the heightened significance and concerns of the NHLs. In the specific context of this undertaking, including the numerous privately owned properties involved, the signatories agree that it is appropriate to provide flexibility to implement these or other specific activities for preservation, interpretation, and commemoration to mitigate adverse effects to historic properties, and the signatories agree that the level of funding identified in Attachment 5 is appropriate.
- iv. Depositing the Fund and the Allocation of Funds through Grants. Within 120 days of Revolution Wind of receiving a no objection to the complete Facility Design Report/Fabrication and Installation Report, Revolution Wind must pay half the total funding amount, \$1,936,500, to an escrow account. Within 1 year of the first payment, Revolution will place another \$1,936,500 into that escrow account. Those payments will be deposited into a fund to be drawn from by a third-party administrator for the purpose of providing grants until the fund balance is expended. Revolution Wind's deposit of such funds into this mitigation fund will satisfy Revolution Wind's obligations as it relates to mitigation for adverse visual impacts to the historic properties listed in Stipulation III.C.1, unless additional consultation is required in the event of unallocated funds, as described below. These grants are to support mitigation activities for the

preservation, interpretation, or commemoration of historic sites, buildings, or events. Grants will be awarded for the long-term protection, preservation, and commemoration of adversely affected historical properties in the following order of preference. Grants must first be awarded to the historic properties listed in Stipulation III.C.3.i. If after 3 years from the date the administrator begins accepting grant applications there are funds still unapplied, then grants should be awarded for alternative mitigation options for adversely affected historic property identified in Attachment 5.

- v. Unallocated Funds. If after five years from the date the administrator begins accepting applications any funds are unallocated, then BOEM will consult with the consulting parties on appropriate use of the remaining funds to resolve adverse effects. The signatories agree that the existence of unapplied funds does not constitute a breach of this agreement.
- vi. Fund Administrator Selection. BOEM and Revolution Wind will identify, within 1 year of execution of this MOA, an appropriate non-profit or governmental historic preservation organization, such as [TBD] or another similarly situated entity, to administer the fund and the funded activities, to ensure the effectiveness of these activities as mitigation for the undertaking's adverse effect to the historic properties. BOEM and Revolution Wind will consult on the selection of this fund administrator with the consulting parties and the administrator must be acceptable to BOEM. BOEM will invite the selected third-party administrator to sign the MOA as an invited signatory, and the addition of this invited signatory will not require an amendment to this MOA unless changes are proposed to this mitigation fund at Stipulation III.C.6. The same consultation process would be followed in the case of replacement of a fund administrator, if needed.
- vii. Fund Administration and Monitoring. BOEM will consult with the third-party administrator and the SHPO in the respective state where funding would be applied, prior to allowing the third-party administrator to issue any grants. The third-party administrator's fees and administrative costs will be paid from the fund and must not exceed 6 percent of the fund amount. BOEM with the assistance of the third-party administrator must ensure, through the annual reporting process (see Stipulation XI), that all granted funds are used exclusively for the purposes described in Stipulation III.C.6 for direct costs of preservation, interpretation, or commemoration of the historic properties adversely affected by the Project. The mitigation fund administrator must prohibit the use of grant funds for indirect costs, such as accountant fees, employee salary or benefits, or legal fees.
- viii. Mitigation Fund Operating Procedures and Reporting. BOEM will consult with the third-party administrator to develop operating procedures for the mitigation fund, and BOEM will review and approve the final operating procedures. BOEM will ensure that the third-party administrator has procedures under which it will provide a copy of all grants made and an annual report on expenditure of funds and activities to BOEM, SHPO, and Revolution Wind. Revolution Wind will summarize the third-party administrator's annual report to describe funded mitigation activities, progress, completion, and outcomes in the annual report per Stipulation XI, with sufficient detail for BOEM to ensure that the mitigation is being implemented according to this section (III.C.6).
- ix. Grant-supported Mitigation Standards. BOEM will ensure that the operating procedures include the following, where applicable.

- a. In such cases where Historic Architectural Building Survey (HABS) documentation and HABS-like documentation mitigation would be implemented, the grantee shall first consult with the historic property owner to identify photographic documentation specifications.
- b. Where Historic Structure Report mitigation is included within a grant, the documentation shall be prepared in accordance with the *Historic Structure Reports and Preservation Plans: A Preparation Guide – Second Edition*, as may be amended, and the project team must include an individual meeting the SOI's professional qualifications standards for historic architecture.
- c. Where funding for visitor experience, public access, climate resiliency, or comparable actions would be granted, all projects must meet the SOI's standards for the Treatment of Historic Properties and these projects should not constitute adverse effects themselves on the historic properties.
- d. Consistent with NHPA Section 110(f) and as described in EIS Appendix J, the Finding of Effect, BOEM has undertaken planning and actions as may be necessary to minimize harm to NHLs. The mitigation funding for NHLs under this MOA does not replace any other planning and actions BOEM has taken to comply with that statutory requirement.

IV. PROJECT MODIFICATIONS

- A. If Revolution Wind proposes any modifications to the Project that expands the Project beyond the Project Design Envelope included in the COP and/or occurs outside the defined APEs or the proposed modifications change BOEM's final Section 106 determinations and findings for this Project, Revolution Wind shall notify and provide BOEM with information concerning the proposed modifications. BOEM will determine if these modifications require alteration of the conclusions reached in the Finding of Effect and, thus, will require additional consultation with the signatories, invited signatories and consulting parties. If BOEM determines additional consultation is required, Revolution Wind will provide the signatories, invited signatories, and consulting parties with the information concerning the proposed changes, and they will have 30 calendar days from receipt of this information to comment on the proposed changes. BOEM shall take into account any comments from signatories, invited signatories, and consulting parties prior to agreeing to any proposed changes. Using the procedure below, BOEM will, as necessary, consult with the signatories, invited signatories, and consulting parties to identify and evaluate historic properties in any newly affected areas, assess the effects of the modification, and resolve any adverse effects.
 1. If the Project is modified and BOEM identifies no additional historic properties or determines that no historic properties are adversely affected due to the modification, BOEM, with the assistance of Revolution Wind, will notify and consult with the signatories, invited signatories, and consulting parties following the consultation process set forth in this Stipulation IV.A.1.
 - i. Revolution Wind will notify all the signatories, invited signatories, and consulting parties about this proposed change and BOEM's determination by providing a written summary of the project modification including any maps, a summary of any additional surveys and/or research conducted to identify historic properties and assess effects, and copies of the surveys.

- ii. BOEM and Revolution Wind will allow the signatories, invited signatories, and consulting parties 30 calendar days to review and comment on the proposed change, BOEM's determination, and the documents.
 - iii. After the 30-calendar review period has concluded and no comments require additional consultation, Revolution Wind will notify the signatories and consulting parties that BOEM has approved the project modification and, if they received any comments, provide a summary of the comments and BOEM's responses.
 - iv. BOEM, with the assistance of Revolution Wind, will conduct any consultation meetings if requested by the signatories or consulting parties.
 - v. This MOA will not need to be amended if no additional historic properties are identified and/or adversely affected.
2. If BOEM determines new adverse effects to historic properties will occur due to a Project modification, BOEM with the assistance of Revolution Wind will notify and consult with the signatories, invited signatories, and consulting parties regarding BOEM's finding and the proposed measures to resolve the adverse effect(s) including the development of a new treatment plan(s) following the consultation process set forth in this Stipulation IV.A. 2.
- i. Revolution Wind will notify all signatories, invited signatories, and consulting parties about this proposed modification, BOEM's determination, and the proposed resolution measures for the adverse effect(s).
 - ii. The signatories, invited signatories, and consulting parties will have 30 calendar days to review and comment on the adverse effect finding and the proposed resolution of adverse effect(s), including a draft treatment plan(s).
 - iii. BOEM, with the assistance of Revolution Wind, will conduct additional consultation meetings, if necessary, during consultation on the adverse effect finding and during drafting and finalization of the treatment plan(s).
 - iv. BOEM, with the assistance of Revolution Wind, will respond to the comments and make necessary edits to the documents.
 - v. Revolution Wind will send the revised draft final documents to the other signatories, invited signatories, and consulting parties for review and comment during a 30-calendar day review and comment period. With this same submittal of draft final documents, Revolution Wind will provide a summary of all the comments received on the documents and BOEM's responses.
 - vi. BOEM, with the assistance of Revolution Wind, will respond to the comments on the draft final documents and make necessary edits to the documents.
 - vii. Revolution Wind will notify all the signatories, invited signatories, and consulting parties that BOEM has approved the project modification and will provide the final document(s) including the final treatment plan(s) and a summary of comments and BOEM's responses to comments, if they receive any on the draft final documents, after BOEM has received concurrence from the appropriate SHPO(s) on the finding of new adverse effect(s), BOEM has accepted the final treatment plan(s), and BOEM has approved the Project modification.

- viii. The MOA will not need to be amended under Section XIII, after the treatment plan(s) is accepted by BOEM, for the treatment plan to become part of the MOA requirements.
- 3. If any of the signatories, invited signatories, or consulting parties object to determinations, findings, or resolutions made pursuant to these measures (Stipulation IV.A.1 and 2), BOEM will resolve any such objections pursuant to the dispute resolution process set forth in Stipulation XI.

V. REVIEW PROCESS FOR DOCUMENTS PRODUCED UNDER MOA STIPULATIONS

- A. The following process will be used for any document, report, or plan produced in accordance with Stipulations I through IV of this MOA:

- 1. Draft Document

- i. Revolution Wind shall provide the document to BOEM for technical review and approval
 - a. BOEM has 15 calendar days to complete its technical review.
 - b. If BOEM does not provide approval, it shall submit its comments back to Revolution Wind, who will have 15 calendar days to address the comments.
- ii. BOEM, with the assistance of Revolution Wind, shall provide the draft document to consulting parties, except the ACHP, for review and comment.
 - a. Consulting parties shall have 30 calendar days to review and comment.
 - b. BOEM, with the assistance of Revolution Wind, shall coordinate a meeting with consulting parties to facilitate comments on the document if requested by a consulting party.
 - c. BOEM shall consolidate comments received and provide them to Revolution Wind within 15 calendar days of receiving comments from consulting parties.

- 2. Draft Final Document

- i. Revolution Wind shall provide BOEM with the draft final document and response to consulting party comments for technical review and approval
 - a. BOEM has 15 calendar days to complete its technical review.
 - b. If BOEM does not provide approval, it shall submit its comments back to Revolution Wind, who will have 15 calendar days to address the comments.
- ii. BOEM, with the assistance of Revolution Wind, shall provide the draft final document and response to previous comments to consulting parties, except the ACHP, for review and comment
 - a. Consulting parties have 30 calendar days to review and comment.
 - b. BOEM, with the assistance of Revolution Wind, shall coordinate a meeting with consulting parties to facilitate comments on the document if requested by a consulting party.

- c. BOEM shall consolidate comments received and provide them to Revolution Wind within 15 calendar days of receiving comments from consulting parties.

3. Final Document

- i. Revolution Wind shall provide BOEM with the final document and response to consulting party comments for approval.
 - a. BOEM has 15 calendar days to complete its technical review.
 - b. If BOEM does not provide approval, it shall submit its comments back to Revolution Wind, who will have 15 calendar days to address the comments.
 - c. BOEM, with the assistance of Revolution Wind, shall provide the final document and responses to previous comments to consulting parties, except the ACHP, within 30 calendar days of approving the final document.

VI. SUBMISSION OF DOCUMENTS

A. Connecticut and New York, SHPOs, ACHP, NPS, Tribal Nations, and Consulting Parties.

- 1. All submittals to the Rhode Island, New York, and Connecticut SHPOs, ACHP, NPS, Tribal Nations, and consulting parties will be submitted electronically unless a specific request is made for the submittal be provided in paper format.
- 2. Rhode Island and Massachusetts SHPOs:
 - i. All submittals to the Massachusetts SHPO, if required for any HPTP, will be in paper format and delivered by U.S. Mail, delivery service, or by hand.
 - ii. Plans and specifications submitted to the Massachusetts SHPO, if required for any HPTP, must measure no larger than 11- x 17-inch paper format (unless another format is agreed to in consultation); therefore, all documents produced that will be submitted to Massachusetts SHPO under this MOA, must meet this format.

VII. CURATION

A. Collections from federal lands or the OCS:

- 1. Any archaeological materials removed from federal lands or the OCS as a result of the actions required by this MOA shall be curated in accordance with 36 CFR 79, "Curation of Federally Owned and Administered Archaeological Collections," ACHP's "Recommended Approach for Consultation on Recovery of Significant Information from Archaeological Sites" published in the Federal Register (64 Fed. Reg. 27085-27087 (May 18, 1999)), or other provisions agreed to by the consulting parties and following applicable State guidelines. No excavation should be initiated before acceptance and approval of a curation plan, which will be included by Revolution Wind in the application for Phase III investigations to the RI SHPO for permit approval for Phase III Data Recovery Program specified in Section B.1.i.

B. Collections from state, local government, and private lands:

- 1. Archaeological materials from state or local government lands in the APE and the records and documentation associated with these materials shall be curated within the state of their origin at a repository preferred by the SHPO, or an approved and certified repository, in accordance with the standards and guidelines required by the state. Lands as described here

may include the seafloor in state waters. The terrestrial APE for the Project, where archaeological materials could originate, is located only within Rhode Island. No excavation should be initiated before acceptance and approval of a curation plan.

2. Collections from private lands that would remain private property: In cases where archaeological survey and testing are conducted on private land, any recovered collections remain the property of the land owner. In such instances, BOEM and Revolution Wind, in coordination with the SHPO, and affected Tribal Nation(s), will encourage land owners to donate the collection(s) to an appropriate public or Tribal entity. To the extent a private landowner requests that the materials be removed from the site, Revolution Wind will seek to have the materials donated to the repository identified under Stipulation VII.B.1 through a written donation agreement developed in consultation with the consulting parties. BOEM, assisted by Revolution Wind, will seek to have all materials from each state curated together in the same curation facility within the state of origin. In cases where the property owner wishes to transfer ownership of the collection(s) to a public or Tribal entity, BOEM and Revolution Wind will ensure that recovered artifacts and related documentation are curated in a suitable repository as agreed to by BOEM, SHPO, and affected Tribal Nation(s), and following applicable State guidelines. To the extent feasible, the materials and records resulting from the actions required by this MOA for private lands, shall be curated in accordance with 36 CFR 79. No excavation should be initiated before acceptance and approval of a curation plan.

VIII. PROFESSIONAL QUALIFICATIONS

- A. SOI's Standards for Archaeology and Historic Preservation. Revolution Wind will ensure that all work carried out pursuant to this MOA will meet the SOI's Standards for Archaeology and Historic Preservation, 48 FR 44716 (September 29, 1983), taking into account the suggested approaches to new construction in the SOI's Standards for Rehabilitation.
- B. SOI Professional Qualifications Standards. Revolution Wind will ensure that all work carried out pursuant to this MOA is performed by or under the direction supervision of historic preservation professionals who meet the SOI's Professional Qualifications Standards (48 FR 44738-44739). A "qualified professional" is a person who meets the relevant standards outlined in such SOI Standards. BOEM, or its designee, will ensure that consultants retained for services pursuant to the MOA meet these standards.
- C. Investigations of ASLFs. Revolution Wind will ensure that the additional investigations of ASLFs will be conducted, and reports and other materials produced by one or more qualified marine archaeologists and geological specialists who meet the SOI's Professional Qualifications Standards and has experience both in conducting High Resolution Geophysical (HRG) surveys and processing and interpreting the resulting data for archaeological potential, as well as collecting, subsampling, and analyzing cores.
- D. Tribal Consultation Experience. Revolution Wind will ensure that all work carried out pursuant to this MOA that requires consultation with Tribal Nations is performed by professionals who have demonstrated professional experience consulting with federally recognized Tribal Nations.
- E. BOEM Acknowledgement of the Special Expertise of Tribal Nations. BOEM recognizes that all tribal participants and knowledge need not conform to the SOI's standards, acknowledging that Tribal Nations possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to Tribal Nations, pursuant to 36 CFR 800.4(c)(1).

IX. DURATION

- A. This MOA will expire at (1) the decommissioning of the Project in the lease area, as defined in Revolution Wind's lease with BOEM (Lease Number OCS-A 0486) or (2) 25-years from the date of COP approval, whichever occurs first. Prior to such time, BOEM may consult with the other signatories and invited signatories to reconsider the terms of the MOA and amend it in accordance with Amendment Stipulation (Stipulation XII).

X. POST-REVIEW DISCOVERIES AND EMERGENCY SITUATIONS

- A. Implementation of Post-Review Discovery Plans. If properties are discovered that may be historically significant or unanticipated effects on historic properties found, BOEM shall implement the post-review discovery plans found in Attachment 15 (Revolution Wind Export Cable Onshore Substation and Interconnection Facility, North Kingstown, Rhode Island: Procedures Guiding the Discovery of Unanticipated Cultural Resources and Human Remains) and Attachment 16 (Unanticipated Discoveries Plan for Submerged Archaeological Sites, Historic Properties, and Cultural Resources Including Human Remains: Revolution Wind Farm for Lease Area OCS A-0486 Construction and Operations Plan).
 1. The signatories acknowledge and agree that it is possible that additional historic properties may be discovered during implementation of the Project, despite the completion of a good faith effort to identify historic properties throughout the APEs.
- B. All Post-Review Discoveries. In the event of a post-review discovery of a property or unanticipated effects to a historic property prior to or during construction, operation, maintenance, or decommissioning of the Project, Revolution Wind will implement the following actions which are consistent with the post-review discovery plan:
 1. Immediately halt all ground- or seafloor-disturbing activities within the area of discovery while taking into account whether stabilization and further protections are warranted to keep the discovered resource from further degradation and impact;
 2. Notify BOEM in writing via report within 72 hours of the discovery, including any recommendations on need and urgency of stabilization and additional protections for the discovered resource;
 3. Keep the location of the discovery confidential and take no action that may adversely affect the discovered property until BOEM or its designee has made an evaluation and instructs Revolution Wind on how to proceed; and
 4. Conduct any additional investigations as directed by BOEM or its designee to determine if the resource is eligible for listing in the NRHP (30 CFR 585.802(b)). BOEM will direct Revolution Wind to complete additional investigations, as BOEM deems appropriate, if:
 - i. the site has been impacted by Revolution Wind Project activities; or
 - ii. impacts to the site from Revolution Wind Project activities cannot be avoided.
 5. If investigations indicate that the resource is eligible for the NRHP, BOEM, with the assistance of Revolution Wind, will work with the other relevant signatories, invited signatories, and consulting parties to this MOA who have a demonstrated interest in the affected historic property and on the further avoidance, minimization or mitigation of adverse effects.

6. If there is any evidence that the discovery is from an indigenous society or appears to be a preserved burial site, Revolution Wind will contact the Tribal Nations (Mashpee Wampanoag Tribe, Shinnecock Indian Nation, Mashantucket (Western) Pequot Tribal Nation, Wampanoag Tribe of Gay Head [Aquinnah], Mohegan Tribe of Indians of Connecticut, Narragansett Indian Tribe, Delaware Tribe of Indians, The Delaware Nation) as identified in the notification lists included in the post-review discovery plans within 72 hours of the discovery with details of what is known about the discovery, and consult with the Tribal Nations pursuant to the post review discovery plan.
 7. If BOEM incurs costs in addressing the discovery, under Section 110(g) of the NHPA, BOEM may charge Revolution Wind reasonable costs for carrying out historic preservation responsibilities, pursuant to its delegated authority under the OCS Lands Act (30 CFR 585.802 (c-d)).
- C. Emergency Situations. In the event of an emergency or disaster that is declared by the President or the Governor of Rhode Island or Massachusetts, which represents an imminent threat to public health or safety, or creates a hazardous condition, BOEM shall immediately notify the Tribal Nations, SHPOs, and the ACHP of the condition which has initiated the situation and the measures taken to respond to the emergency or hazardous condition. Should the Tribal Nations, SHPOs, or the ACHP desire to provide technical assistance to BOEM, they shall submit comments within seven calendar days from notification, if the nature of the emergency or hazardous condition allows for such coordination.

XI. MONITORING AND REPORTING

- A. At the beginning of each calendar year by January 31, following the execution of this MOA until it expires or is terminated, Revolution Wind will prepare and, following BOEM's review and agreement to share this summary report, provide all signatories, invited signatories, and consulting parties to this MOA a summary report detailing work undertaken pursuant to the MOA. Such report shall include:
 1. a description of how the stipulations relating to avoidance, minimization, and mitigation measures (Stipulations I, II, and III) were implemented;
 2. any scheduling changes proposed; any problems encountered; and
 3. any disputes and objections received in BOEM's efforts to carry out the terms of this MOA.
- B. Revolution Wind can satisfy its reporting requirement under this stipulation by providing the relevant portions of the annual compliance certification required under 30 CFR 285.633.
- C. BOEM with the assistance of Revolution Wind will hold annual meetings with the required signatories and invited signatories, to review work undertaken pursuant to the MOA for the first five calendar years of MOA implementation.

XII. DISPUTE RESOLUTION

- A. Should any signatory, invited signatory, or consulting party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, they must notify BOEM in writing of their objection. BOEM shall consult with such party to resolve the objection. If BOEM determines that such objection cannot be resolved, BOEM will:

1. Forward all documentation relevant to the dispute, including the BOEM's proposed resolution, to the ACHP. The ACHP shall provide BOEM with its advice on the resolution of the objection within 30 calendar days of receiving adequate documentation. Prior to reaching a final decision on the dispute, BOEM shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories, invited signatories, and/or consulting parties, and provide them with a copy of this written response. BOEM will make a final decision and proceed accordingly.
 2. If the ACHP does not provide its advice regarding the dispute within the 30 calendar-day time period, BOEM may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, BOEM shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories, invited signatories, or consulting parties to the MOA, and provide them and the ACHP with a copy of such written response.
- B. BOEM's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.
- C. At any time during the implementation of the measures stipulated in this MOA, should a member of the public object in writing to the signatories regarding the manner in which the measures stipulated in this MOA are being implemented, that signatory will notify BOEM. BOEM shall review the objection and may notify the other signatories as appropriate and respond to the objector.

XIII. AMENDMENTS

- A. This MOA may be amended when such an amendment is agreed to in writing by all signatories and invited signatories. The amendment will be effective on the date a copy signed by all of the signatories and invited signatories is filed with the ACHP.
- B. Revisions to any attachment may be proposed by any signatory or invited signatory by submitting a draft of the proposed revisions to all signatories and invited signatories with a notification to the consulting parties. The signatories and invited signatories will consult for no more than 30 calendar days (or another time period agreed upon by all signatories and invited signatories) to consider the proposed revisions to the attachment. If the signatories and invited signatories unanimously agree to revise the attachment, Revolution Wind BOEM will provide a copy of the revised attachment to the other signatories, invited signatories, and consulting parties. Revisions to any attachment to this MOA will not require an amendment to the MOA.

XIV. TERMINATION

- A. If any signatory or invited signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories, invited signatories, and consulting parties to attempt to develop an amendment per Stipulation XII. If within 30 calendar days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory or invited signatory may terminate the MOA upon written notification to the other signatories.
- B. Once the MOA is terminated, and prior to work continuing on the undertaking, BOEM must either (a) execute an MOA pursuant to 36 CFR 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR 800.7. BOEM shall notify the signatories and invited signatories as to the course of action it will pursue.

XV. COORDINATION WITH OTHER FEDERAL AGENCIES

- A. In the event that another federal agency not initially a party to or subject to this MOA receives an application for funding/license/permit for the undertaking as described in this MOA, that agency may fulfill its Section 106 responsibilities by stating in writing it concurs with the terms of this MOA and notifying the signatories and invited signatories that it intends to do so. Such federal agency may become a signatory, invited signatory, or a concurring party (collectively referred to as signing party) to the MOA as a means of complying with its responsibilities under Section 106 and based on its level of involvement in the undertaking. To become a signing party to the MOA, the agency official must provide written notice to the signatories and invited signatories that the agency agrees to the terms of the MOA, specifying the extent of the agency's intent to participate in the MOA. The participation of the agency is subject to approval by the signatories and invited signatories who must respond to the written notice within 30 calendar days, or the approval will be considered implicit. Any necessary amendments to the MOA as a result will be considered in accordance with the Amendment Stipulation (Stipulation XII).
- B. Should the signatories and invited signatories approve the federal agency's request to be a signing party to this MOA, an amendment under Stipulation XII will not be necessary if the federal agency's participation does not change the undertaking in a manner that would require any modifications to the stipulations set forth in this MOA. BOEM will document these conditions and involvement of the federal agency in a written notification to the signatories, invited signatories, and consulting parties, and include a copy of the federal agency's executed signature page, which will codify the addition of the federal agency as a signing party in lieu of an amendment.

XVI. ANTI-DEFICIENCY ACT

- A. Pursuant to 31 USC 1341(a)(1), nothing in this MOA will be construed as binding the United States to expend in any one fiscal year any sum in excess of appropriations made by Congress for this purpose, or to involve the United States in any contract or obligation for the further expenditure of money in excess of such appropriations.
- B. Execution of this MOA by BOEM, the Connecticut, Massachusetts, New York, and Rhode Island SHPOs, and the ACHP, and implementation of its terms evidence that BOEM has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

[SIGNATURES COMMENCE ON FOLLOWING PAGE]

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Signatory:

Bureau of Ocean Energy Management (BOEM)

Elizabeth Klein
Director
Bureau of Ocean Energy Management

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Signatory:

Connecticut State Historic Preservation Officer (SHPO)

Catherine Labadia
Deputy State Historic Preservation Officer
Connecticut State Historic Preservation Office

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Signatory:

Rhode Island State Historic Preservation Officer (SHPO)

Jeffrey Emidy
Executive Director and State Historic Preservation Officer
Rhode Island Historical Preservation & Heritage Commission

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Signatory:

New York State Historic Preservation Officer (SHPO)

Roger Daniel Mackay
Deputy Commissioner New York State Division for Historic Preservation

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Signatory:

Massachusetts State Historic Preservation Officer (SHPO)

Brona Simon
State Historic Preservation Officer
Massachusetts Historical Commission

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Signatory:

Advisory Council on Historic Preservation (ACHP)

Reid J. Nelson
Executive Director
Advisory Council on Historic Preservation

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Invited Signatory:

Revolution Wind, LLC

Kellen Ingalls
Authorized Person
Revolution Wind, LLC

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Concurring Party:

Mashpee Wampanoag Tribe

[Name]

[Title]

Mashpee Wampanoag Tribe

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Concurring Party:

Shinnecock Indian Nation

[Name]

[Title]

Shinnecock Indian Nation

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Concurring Party:

Mashantucket (Western) Pequot Tribal Nation

[Name]

[Title]

Mashantucket (Western) Pequot Tribal Nation

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Concurring Party:

Wampanoag Tribe of Gay Head (Aquinnah)

[Name]

[Title]

Wampanoag Tribe of Gay Head (Aquinnah)

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Concurring Party:

Mohegan Tribe of Indians of Connecticut

[Name]
[Title]
Mohegan Tribe of Indians of Connecticut

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Concurring Party:

Narragansett Indian Tribe

[Name]

[Title]

Narragansett Indian Tribe

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Concurring Party:

The Delaware Tribe of Indians

[Name]

[Title]

The Delaware Tribe of Indians

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Concurring Party:

The Delaware Nation

_____ Date: _____
[Name]
[Title]
The Delaware Nation

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

Concurring Party:

Organization

Name
Title
Organization

Date: _____

DRAFT

**MEMORANDUM OF AGREEMENT
AMONG THE BUREAU OF OCEAN ENERGY MANAGEMENT,
THE STATE HISTORIC PRESERVATION OFFICERS OF CONNECTICUT,
MASSACHUSETTS, NEW YORK, AND RHODE ISLAND,
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING THE REVOLUTION WIND OFFSHORE WIND FARM PROJECT**

LIST OF ATTACHMENTS TO THE MOA

ATTACHMENT 1 – PROGRAMMATIC AGREEMENT

ATTACHMENT 2 – APE MAPS

ATTACHMENT 3 – ABOVE GROUND HISTORIC PROPERTIES ADVERSELY AFFECTED BY THE PROJECT

ATTACHMENT 4 – LISTS OF INVITED AND PARTICIPATING CONSULTING PARTIES

ATTACHMENT 5 - MITIGATION FUNDING OPTIONS PROPOSED BY SIGNATORIES AND CONSULTING PARTIES

ATTACHMENT 6 – HISTORIC PROPERTY TREATMENT PLAN FOR THE REVOLUTION WIND FARM: ANCIENT SUBMERGED LANDFORM FEATURE, OUTER CONTINENTAL SHELF, FEDERAL AND RHODE ISLAND WATERS OF RHODE ISLAND SOUND

ATTACHMENT 7 – HISTORIC PROPERTY TREATMENT PLAN FOR THE REVOLUTION WIND FARM: THE [REDACTED] #1 AND #2 SITES, TOWN OF NORTH KINGSTOWN, WASHINGTON COUNTY, RHODE ISLAND

ATTACHMENT 8 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE REVOLUTION WIND FARM: THE [REDACTED] TRADITIONAL CULTURAL PROPERTY [REDACTED] MASSACHUSETTS & ATLANTIC OUTER CONTINENTAL SHELF

ATTACHMENT 9 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE REVOLUTION WIND FARM: THE [REDACTED] TRADITIONAL CULTURAL PROPERTY [REDACTED] MASSACHUSETTS & ATLANTIC OUTER CONTINENTAL SHELF – FEDERALLY-RECOGNIZED NATIVE AMERICAN TRIBES

ATTACHMENT 10 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE REVOLUTION WIND FARM: THE VINEYARD SOUND & MOSHUP’S BRIDGE TRADITIONAL CULTURAL PROPERTY DUKES COUNTY, MASSACHUSETTS & ATLANTIC OUTER CONTINENTAL SHELF – NON-FEDERALLY-RECOGNIZED NATIVE AMERICAN TRIBES

ATTACHMENT 11 – HISTORIC PROPERTY TREATMENT PLAN FOR THE REVOLUTION WIND FARM: DOCUMENTATION OF TWENTY-SIX HISTORIC PROPERTIES IN RHODE ISLAND

ATTACHMENT 12– HISTORIC PROPERTIES TREATMENT PLAN FOR THE REVOLUTION WIND FARM: NINE HISTORIC PROPERTIES, TOWN OF MIDDLETOWN, NEWPORT COUNTY, RHODE ISLAND

ATTACHMENT 13 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE REVOLUTION WIND FARM, NINE HISTORIC PROPERTIES SUBJECT TO ADVERSE EFFECTS IN THE TOWN OF AQUINNAH, DUKES COUNTY, MASSACHUSETTS

ATTACHMENT 14 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE REVOLUTION WIND FARM: THE GAY HEAD LIGHTHOUSE, TOWN OF AQUINNAH, DUKES COUNTY, MASSACHUSETTS

ATTACHMENT 15 – REVOLUTION WIND EXPORT CABLE ONSHORE SUBSTATION AND INTERCONNECTION FACILITY, NORTH KINGSTOWN, RHODE ISLAND: PROCEDURES GUIDING THE DISCOVERY OF UNANTICIPATED CULTURAL RESOURCES AND HUMAN REMAINS

ATTACHMENT 16 – UNANTICIPATED DISCOVERIES PLAN FOR SUBMERGED ARCHAEOLOGICAL SITES, HISTORIC PROPERTIES, AND CULTURAL RESOURCES INCLUDING HUMAN REMAINS: REVOLUTION WIND FARM FOR LEASE AREA OCS A-0486 CONSTRUCTION AND OPERATIONS PLAN

DRAFT

ATTACHMENT 1 –PROGRAMMATIC AGREEMENT

MAY 23 2012

PROGRAMMATIC AGREEMENT

Among

The U.S. Department of the Interior, Bureau of Ocean Energy Management;
the State Historic Preservation Officers of Massachusetts and Rhode Island;

The Mashpee Wampanoag Tribe;

The Narragansett Indian Tribe;

The Wampanoag Tribe of Gay Head (Aquinnah); and

The Advisory Council on Historic Preservation;

Regarding

the “Smart from the Start” Atlantic Wind Energy Initiative:

Leasing and Site Assessment Activities offshore Massachusetts and Rhode Islands

WHEREAS, the Energy Policy Act of 2005, Pub. L. No. 109-58, added Section 8(p)(1)(C) to the Outer Continental Shelf Lands Act (OCSLA), which grants the Secretary of the Interior the authority to issue leases, easements, or rights-of-way on the Outer Continental Shelf (OCS) for the purpose of renewable energy development, including wind energy development. *See* 43 U.S.C. § 1337(p)(1)(C); and

WHEREAS, the Secretary delegated this authority to the former Minerals Management Service (MMS), now the Bureau of Ocean Energy Management (BOEM), and promulgated final regulations implementing this authority at 30 CFR Part 585; and

WHEREAS, under the renewable energy regulations, the issuance of leases and subsequent approval of wind energy development on the OCS is a staged decision-making process that occurs in distinct phases: lease issuance; approval of a site assessment plan (SAP); and approval of a construction and operation plan (COP); and

WHEREAS, BOEM is currently identifying areas that may be suitable for wind energy leasing through collaborative, consultative, and analytical processes; and

WHEREAS, the issuance of a commercial wind energy lease gives the lessee the exclusive right to subsequently seek BOEM approval of plans (SAPs and COPs) for the development of the leasehold; and

WHEREAS, the lease does not grant the lessee the right to construct any facilities; rather, the lease grants the lessee the right to use the leased area to develop its plans, which must be approved by BOEM before the lessee implements them. *See* 30 CFR 585.600 and 585.601; and

WHEREAS, the SAP contains the lessee’s detailed proposal for the construction of a meteorological tower and/or the installation of meteorological buoys (“site assessment activities”) on the leasehold. *See* 30 CFR 585.605 - 585.618; and

WHEREAS, the lessee’s SAP must be approved by BOEM before it conducts these “site assessment” activities on the leasehold; and

Programmatic Agreement concerning the “Smart from the Start” Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

WHEREAS, BOEM may approve, approve with modification, or disapprove a lessee’s SAP. *See* 30 CFR 585.613; and

WHEREAS, the COP is a detailed plan for the construction and operation of a wind energy project on the lease. *See* 30 CFR 585.620-585.638; and

WHEREAS, BOEM approval of a COP is a precondition to the construction of any wind energy facility on the OCS. *See* 30 CFR 585.600; and

WHEREAS, the regulations require that a lessee provide the results of surveys with its SAP and COP for the areas affected by the activities proposed in each plan, including an archaeological resource survey. *See* 30 CFR 585.610(b)(3) and 30 CFR 585.626(a)(5). BOEM refers to surveys undertaken to acquire this information as “site characterization” activities. *See Guidelines for Providing Geological and Geophysical, Hazards, and Archaeological Information Pursuant to 30 CFR Part 585* at: <http://www.boem.gov/Renewable-Energy-Program/Regulatory-Information/GGARCH4-11-2011-pdf.aspx>; and

WHEREAS, BOEM has embarked upon the “Smart from the Start” Atlantic Wind Energy Initiative for the responsible development of wind energy resources on the Atlantic OCS; and

WHEREAS, under the “Smart from the Start” Initiative, BOEM has identified areas on the OCS that appear most suitable for future wind energy activities offshore the Commonwealth of Massachusetts (MA) and the State of Rhode Island (RI); and

WHEREAS these areas are located: (1) within the Rhode Island-Massachusetts Wind Energy Area (WEA); and (2) within the MA Call area east of the Rhode Island-Massachusetts WEA (hereafter known as “Areas”); and

WHEREAS BOEM may issue multiple renewable energy leases and approve multiple SAPs on leases issued within these Areas; and

WHEREAS, BOEM has determined that issuing leases and approving SAPs within these Areas constitute multiple undertakings subject to Section 106 of the National Historic Preservation Act (NHPA; 16 U.S.C. § 470f), and its implementing regulations (36 CFR 800); and

WHEREAS, BOEM has determined that the implementation of the program is complex as the decisions on these multiple undertakings are staged, pursuant to 36 CFR § 800.14(b); and

WHEREAS, the implementing regulations for Section 106 (36 CFR § 800) prescribe a process that seeks to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among parties with an interest in the effects of the undertakings, commencing at the early stages of the process; and

Programmatic Agreement concerning the “Smart from the Start” Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

WHEREAS, the Section 106 consultations have been initiated and coordinated with other reviews, including the National Environmental Policy Act (NEPA), in accordance with 36 CFR § 800.3(b); and

WHEREAS, 36 CFR § 800.14(b)(3) provides for developing programmatic agreements (Agreements) for complex or multiple undertakings and § 800.14(b)(1)(ii) and (v) provide for developing Agreements when effects on historic properties cannot be fully determined prior to approval of an undertaking and for other circumstances warranting a departure from the normal section 106 process; and

WHEREAS, 36 CFR § 800.4(b)(2) provides for phased identification and evaluation of historic properties where alternatives consist of large land areas, and for the deferral of final identification and evaluation of historic properties when provided for in a Agreement executed pursuant to 36 CFR §800.14(b); and

WHEREAS, BOEM has determined that the identification and evaluation of historic properties shall be conducted through a phased approach, pursuant to 36 CFR § 800.4(b)(2), where the final identification of historic properties will occur after the issuance of a lease or leases and before the approval of a SAP; and

WHEREAS, the Section 106 consultations described in this Agreement will be used to establish a process for identifying historic properties located within the undertakings’ Areas of Potential Effects (APE) that are listed in or eligible for listing in the National Register of Historic Places (National Register), and assess the potential adverse effects and avoid, reduce, or resolve any such effects through the process set forth in this Agreement; and

WHEREAS, according to 36 CFR § 800.16(l)(1) “historic property” means

any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria; and

WHEREAS, the APEs, as defined in 36 CFR § 800.16(d) of the Advisory Council on Historic Preservation’s (ACHP’s) regulations implementing Section 106 of the NHPA, for the undertakings that are the subject of this Agreement, are: (1) the depth and breadth of the seabed that could potentially be impacted by seafloor/bottom-disturbing activities associated with the undertakings (e.g., core samples, anchorages and installation of meteorological towers and buoys); and (2) the viewshed from which lighted meteorological structures would be visible; and

Programmatic Agreement concerning the “Smart from the Start” Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

WHEREAS, BOEM has identified and consulted with the State Historic Preservation Offices (SHPOs) for MA and RI, (collectively, “the SHPOs”); and

WHEREAS, BOEM initiated consultation in 2011 and 2012 through letters of invitation, telephone calls, emails, meetings, webinars, and the circulation and discussion of this Agreement in draft; and this outreach and notification included contacting over 66 individuals and entities, including federally-recognized Indian Tribes (Tribes), local governments, SHPOs, and the public; and

WHEREAS, BOEM has initiated formal government-to-government consultation with the following Tribes: the Mashpee Wampanoag Tribe, the Narragansett Indian Tribe, the Shinnecock Indian Nation, and the Wampanoag Tribe of Gay Head (Aquinnah); and

WHEREAS, these Tribes have chosen to consult with BOEM and participate in development of this Agreement, in which the term Tribe refers to them, within the meaning of 36 CFR § 800.16(m); and

WHEREAS, BOEM shall continue to consult with these Tribes to identify properties of religious and cultural significance that may be eligible for listing in the National Register of Historic Places (Traditional Cultural Properties or TCPs) and that may be affected by these undertakings; and

WHEREAS, BOEM involves the public and identifies other consulting parties through notifications, requests for comments, existing renewable energy task forces, contact with SHPOs, NEPA scoping meetings and communications for these proposed actions; and

WHEREAS, BOEM, the SHPOs, the Mashpee Wampanoag Tribe, the Narragansett Indian Tribe, and the Wampanoag Tribe of Gay Head (Aquinnah) and the ACHP are Signatories to this Agreement, and

WHEREAS, future submission of a COP and commercial-scale development that may or may not occur within the Areas would be separate undertakings and considered under future, separate Section 106 consultation(s) not under this Agreement; and

WHEREAS, BOEM requires a SAP to include the results of site characterization surveys that will identify potential archaeological resources that could be affected by the installation and operation of meteorological facilities. *See* (30 CFR § 585.611 (b)(6)); and

WHEREAS, consultations conducted prior to the execution of this Agreement included all steps in the Section 106 process up to and including consulting on the scope of identification efforts that would be used to conduct site characterization surveys that would identify historic properties that may be impacted by activities described in the SAP pursuant to 36 CFR § 800.4(a); and

WHEREAS, these consultations resulted in recommendations to BOEM that the following items should be added to leases issued within the Areas, both to ensure that

Programmatic Agreement concerning the “Smart from the Start” Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

historic properties that may be impacted by activities described in the SAP are identified through a reasonable and good faith effort (§ 800.4(b)(1)), and also to ensure that properties identified through the geophysical surveys are not impacted by geotechnical sampling:

The lessee may only conduct geotechnical (sub-bottom) sampling activities in areas of the leasehold in which an analysis of the results of geophysical surveys has been completed for that area. The geophysical surveys must meet BOEM’s minimum standards (see Guidelines for Providing Geological and Geophysical, Hazards, and Archaeological Information Pursuant to 30 CFR Part 285 at <http://www.boem.gov/Renewable-Energy-Program/Regulatory-Information/GGARCH4-11-2011-pdf.aspx>), and the analysis must be completed by a qualified marine archaeologist who both meets the Secretary of the Interior’s Professional Qualifications Standards (48 FR 44738- 44739) and has experience analyzing marine geophysical data. This analysis must include a determination whether any potential archaeological resources are present in the area and the geotechnical (sub-bottom) sampling activities must avoid potential archaeological resources by a minimum of 50.0 meters (m; 164.0 feet). The avoidance distance must be calculated from the maximum discernible extent of the archaeological resource. In no case may the lessee’s actions impact a potential archaeological resource without BOEM’s prior approval;

NOW, THEREFORE, BOEM, the ACHP, the SHPOs, Tribes, and the other concurring parties (the Parties), agree that Section 106 consultation shall be conducted in accordance with the following stipulations in order to defer final identification and evaluation of historic properties.

STIPULATIONS

- I. SAP Decisions. Before making a decision on a SAP from a lessee, BOEM will treat all potential historic properties identified as a result of site characterization studies and consultations as historic properties potentially eligible for inclusion on the National Register and avoid them by requiring the lessee to relocate the proposed project, resulting in a finding of *No historic properties affected* (36 CFR § 800.4(d)(1)). If a potential historic property is identified, and the lessee chooses to conduct additional investigations, and:
 - A. If additional investigations demonstrate that a historic property does not exist, then BOEM will make a determination of *No historic properties affected* and follow 36 CFR § 800.4(d)(1).

Programmatic Agreement concerning the “Smart from the Start” Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

- B. If additional investigations demonstrate that a historic property does exist and may be affected, BOEM will evaluate the historic significance of the property, in accordance with 800.4(c); make a determination of *Historic properties affected* and follow 36 CFR § 800.4(d)(2); and resolve any adverse effects by following 800.5.
- II. Tribal Consultation. BOEM shall continue to consult with the Tribes throughout the implementation of this Agreement in a government-to-government manner consistent with Executive Order 13175, Presidential memoranda, and any Department of the Interior policies, on subjects related to the undertakings.
- III. Public Participation
- A. Because BOEM and the Parties recognize the importance of public participation in the Section 106 process, BOEM shall continue to provide opportunities for public participation in Section 106-related activities, and shall consult with the Parties on possible approaches for keeping the public involved and informed throughout the term of the Agreement.
 - B. BOEM shall keep the public informed and may produce reports on historic properties and on the Section 106 process that may be made available to the public at BOEM’s headquarters, on the BOEM website, and through other reasonable means insofar as the information shared conforms to the confidentiality clause of this Agreement (Stipulation IV).
- IV. Confidentiality. Because BOEM and the Parties agree that it is important to withhold from disclosure sensitive information such as that which is protected by NHPA Section 304 (16 U.S.C. § 470w-3) (*e.g.*, the location, character and ownership of an historic resource, if disclosure would cause a significant invasion of privacy, risk harm to the historic resources, or impede the use of a traditional religious site by practitioners), BOEM shall:
- A. Request that each Party inform the other Parties if, by law or policy, it is unable to withhold sensitive data from public release.
 - B. Arrange for the Parties to consult as needed on how to protect such information collected or generated under this Agreement.
 - C. Follow, as appropriate, 36 CFR 800.11(c) for authorization to withhold information pursuant to NHPA Section 304, and otherwise withhold sensitive information to the extent allowable by laws including the Freedom of Information Act, 5 U.S.C. § 552, through the Department of the Interior regulations at 43 CFR Part 2.

Programmatic Agreement concerning the “Smart from the Start” Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

- D. Request that the Parties agree that materials generated during consultation be treated by the Parties as internal and pre-decisional until they are formally released, although the Parties understand that they may need to be released by one of the Parties if required by law.
- V. Administrative Stipulations
- A. In coordinating reviews, BOEM shall follow this process:
 - 1. Standard Review: The Parties shall have a standard review period of thirty (30) calendar days for commenting on all documents which are developed under the terms of this Agreement, from the date they are sent by BOEM.
 - 2. Expedited Request for Review: The Parties recognize the time-sensitive nature of this work and shall attempt to expedite comments or concurrence when BOEM so requests. The expedited comment period shall not be less than fifteen (15) calendar days from the date BOEM sends such a request.
 - 3. If a Party cannot meet BOEM’s expedited review period request, it shall notify BOEM in writing within the fifteen (15) calendar day period. If a Party fails to provide comments or respond within the time frame requested by BOEM (either standard or expedited), then BOEM may proceed as though it has received concurrence from that Party. BOEM shall consider all comments received within the review period.
 - 4. All Parties will send correspondence and materials for review via electronic media unless a Party requests, in writing, that BOEM transmit the materials by an alternate method specified by that Party. Should BOEM transmit the review materials by the alternate method, the review period will begin on the date the materials were received by the Party, as confirmed by delivery receipt.
 - 5. MA and RI SHPO Review Specifications: All submittals to the MA and RI SHPOs shall be in paper format and shall be delivered to the MA and RI SHPOs’ offices by US Mail, by a delivery service, or by hand. Plans and specifications submitted to the MA and RI SHPOs shall measure no larger than 11" x 17" paper format (unless another format is specified in consultation). The MA and RI SHPOs shall review and comment on all adequately documented project submittals within 30 calendar days of receipt unless a response has been requested within the expedited review period specified in Stipulation V.A.2.

Programmatic Agreement concerning the “Smart from the Start” Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

6. Each Signatory shall designate a point of contact for carrying out this Agreement and provide this contact’s information to the other Parties, updating it as necessary while this Agreement is in force. Updating a point of contact alone shall not necessitate an amendment to this Agreement.
- B. **Dispute Resolution.** Should any Signatory object in writing to BOEM regarding an action carried out in accordance with this Agreement, or lack of compliance with the terms of this Agreement, the Signatories shall consult to resolve the objection. Should the Signatories be unable to resolve the disagreement, BOEM shall forward its background information on the dispute as well as its proposed resolution of the dispute to the ACHP. Within 45 calendar days after receipt of all pertinent documentation, the ACHP shall either: (1) provide BOEM with written recommendations, which BOEM shall take into account in reaching a final decision regarding the dispute; or (2) notify BOEM that it shall comment pursuant to 36 CFR 800.7(c), and proceed to comment. BOEM shall take this ACHP comment into account, in accordance with 36 CFR 800.7(c)(4). Any ACHP recommendation or comment shall be understood to pertain only to the subject matter of the dispute; BOEM’s responsibility to carry out all actions under this Agreement that are not subjects of dispute shall remain unchanged.
 - C. **Amendments.** Any Signatory may propose to BOEM in writing that the Agreement be amended, whereupon BOEM shall consult with the Parties to consider such amendment. This Agreement may then be amended when agreed to in writing by all Signatories, becoming effective on the date that the amendment is executed by the ACHP as the last Signatory.
 - D. **Adding Federal Agencies.** In the event that another Federal agency believes it has Section 106 responsibilities related to the undertakings which are the subject of this Agreement, that agency may attempt to satisfy its Section 106 responsibilities by agreeing in writing to the terms of this Agreement and notifying and consulting with the SHPOs and the ACHP. Any modifications to this agreement that may be necessary for meeting that agency’s Section 106 obligations shall be considered in accordance with this Agreement.
 - E. **Adding Concurring Parties.** In the event that another party wishes to assert its support of this Agreement, that party may prepare a letter indicating its concurrence, which BOEM will attach to the Agreement and circulate among the Signatories.
 - F. **Term of Agreement.** The Agreement shall remain in full force until BOEM makes a final decision on the last SAP submitted under a lease issued under this portion of the “Smart from the Start” initiative, or for ten (10) years from the date the Agreement is executed, defined as the date the last signatory

Programmatic Agreement concerning the “Smart from the Start” Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

signs, whichever is earlier, unless otherwise extended by amendment in accordance with this Agreement.

G. Termination.

1. If any Signatory determines that the terms of the Agreement cannot or are not being carried out, that Party shall notify the other Signatories in writing and consult with them to seek amendment of the Agreement. If within sixty (60) calendar days, an amendment cannot be made, any Signatory may terminate the Agreement upon written notice to the other Signatories.
2. If termination is occasioned by BOEM’s final decision on the last SAP contemplated under this portion of the “Smart from the Start” Initiative, BOEM shall notify the Parties and the public, in writing.

H. Anti-Deficiency Act. Pursuant to 31 U.S.C. § 1341(a)(1), nothing in this Agreement shall be construed as binding the United States to expend in any one fiscal year any sum in excess of appropriations made by Congress for this purpose, or to involve the United States in any contract or obligation for the further expenditure of money in excess of such appropriations.

I. Existing Law and Rights. Nothing in this Agreement shall abrogate existing laws or the rights of any consulting party or agency party to this Agreement.

J. Compliance with Section 106. Execution and implementation of this Agreement evidences that BOEM has satisfied its Section 106 responsibilities for all aspects of these proposed undertakings by taking into account the effects of these undertakings on historic properties and affording the ACHP a reasonable opportunity to comment with regard to the undertakings.

Programmatic Agreement concerning the "Smart from the Start" Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

By:



Date: 5-23-12

Maureen A. Bornholdt
Program Manager, Office of Renewable Energy Programs
Bureau of Ocean Energy Management

Programmatic Agreement concerning the "Smart from the Start" Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

Brona Simon

Date: *5/31/12*

Brona Simon
Massachusetts Historical Commission
Massachusetts State Historic Preservation Officer

Programmatic Agreement concerning the "Smart from the Start" Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island

 _____

Date: 6/4/2012

[NAME] Edward F. Sanderson

[TITLE] Executive Director, Rhode Island Historical Preservation & Heritage Commission
Rhode Island State Historic Preservation Officer

Programmatic Agreement concerning the "Smart from the Start" Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island



Date: 05 June 2012

John Brown
Tribal Historic Preservation Officer
Narragansett Indian Tribe

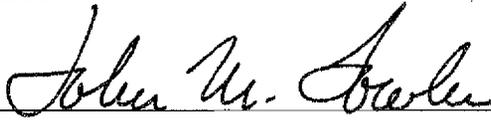
Programmatic Agreement concerning the "Smart from the Start" Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island



Date: 

Cedric Cromwell
Tribal Chairman
Mashpee Wampanoag Tribe

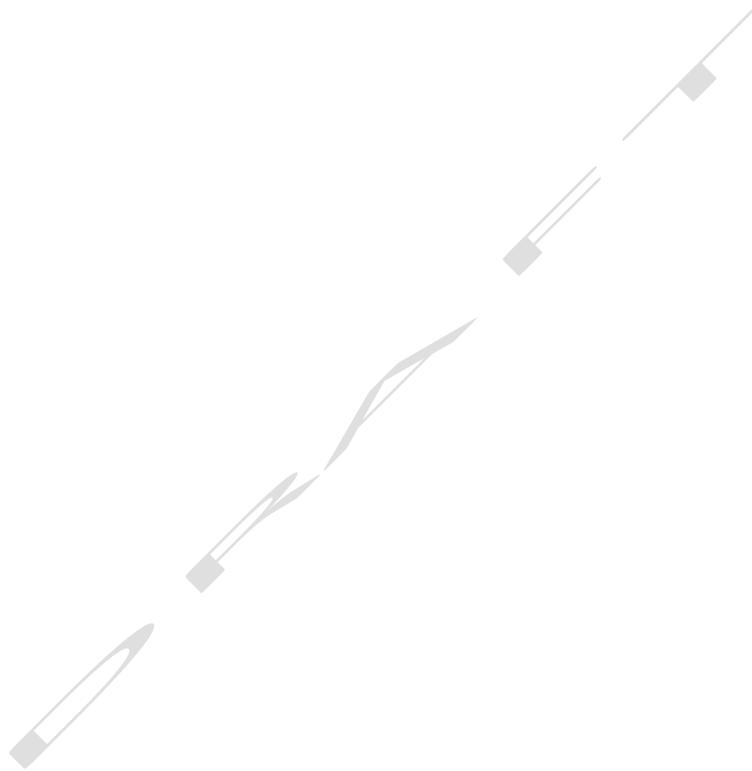
Programmatic Agreement concerning the "Smart from the Start" Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities offshore Massachusetts and Rhode Island



Date: 6/8/12

John M. Fowler
Executive Director
Advisory Council on Historic Preservation

ATTACHMENT 2 – AREA OF POTENTIAL EFFECTS MAPS



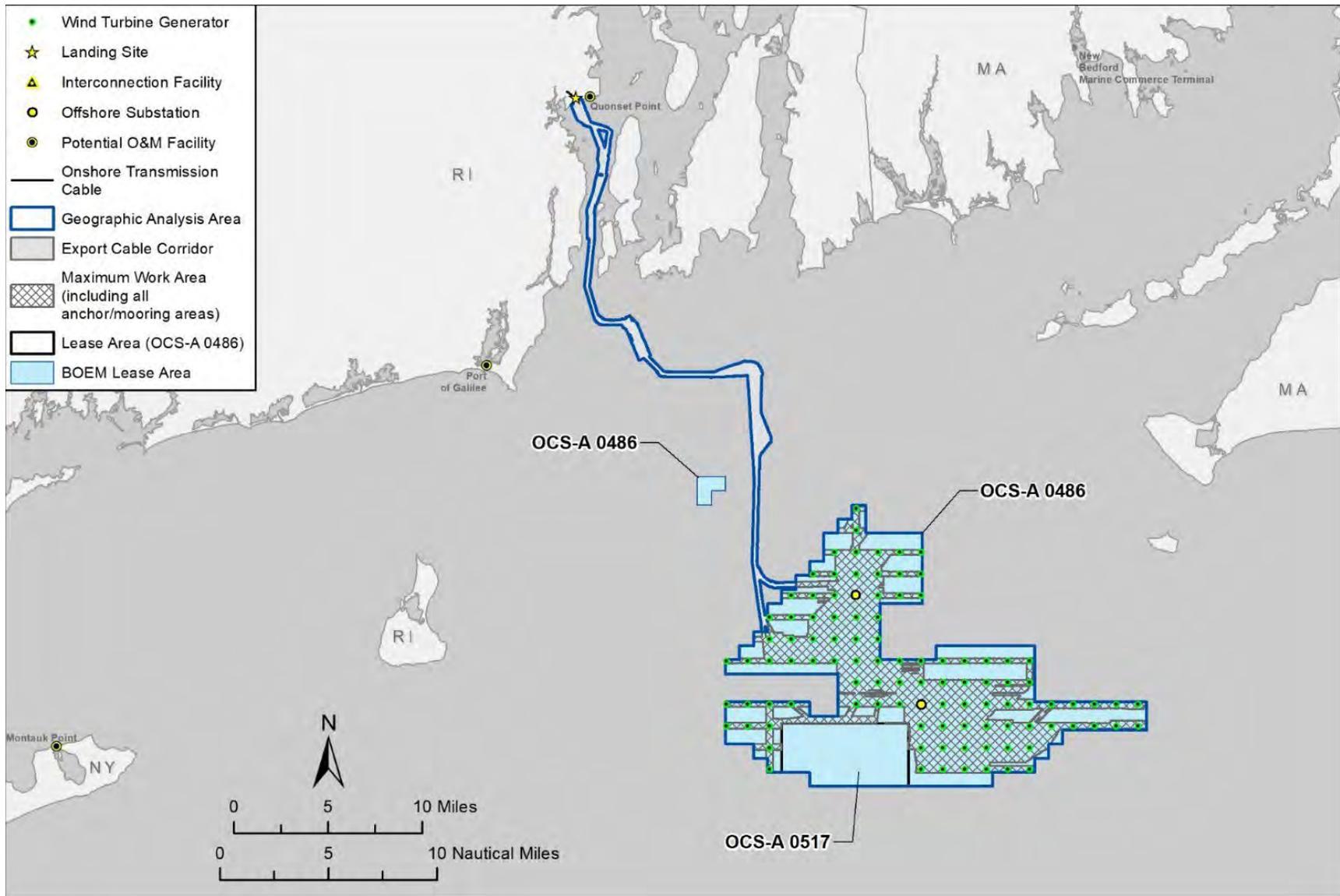


Figure 1. Revolution Wind construction and operations plan proposed offshore Project elements.

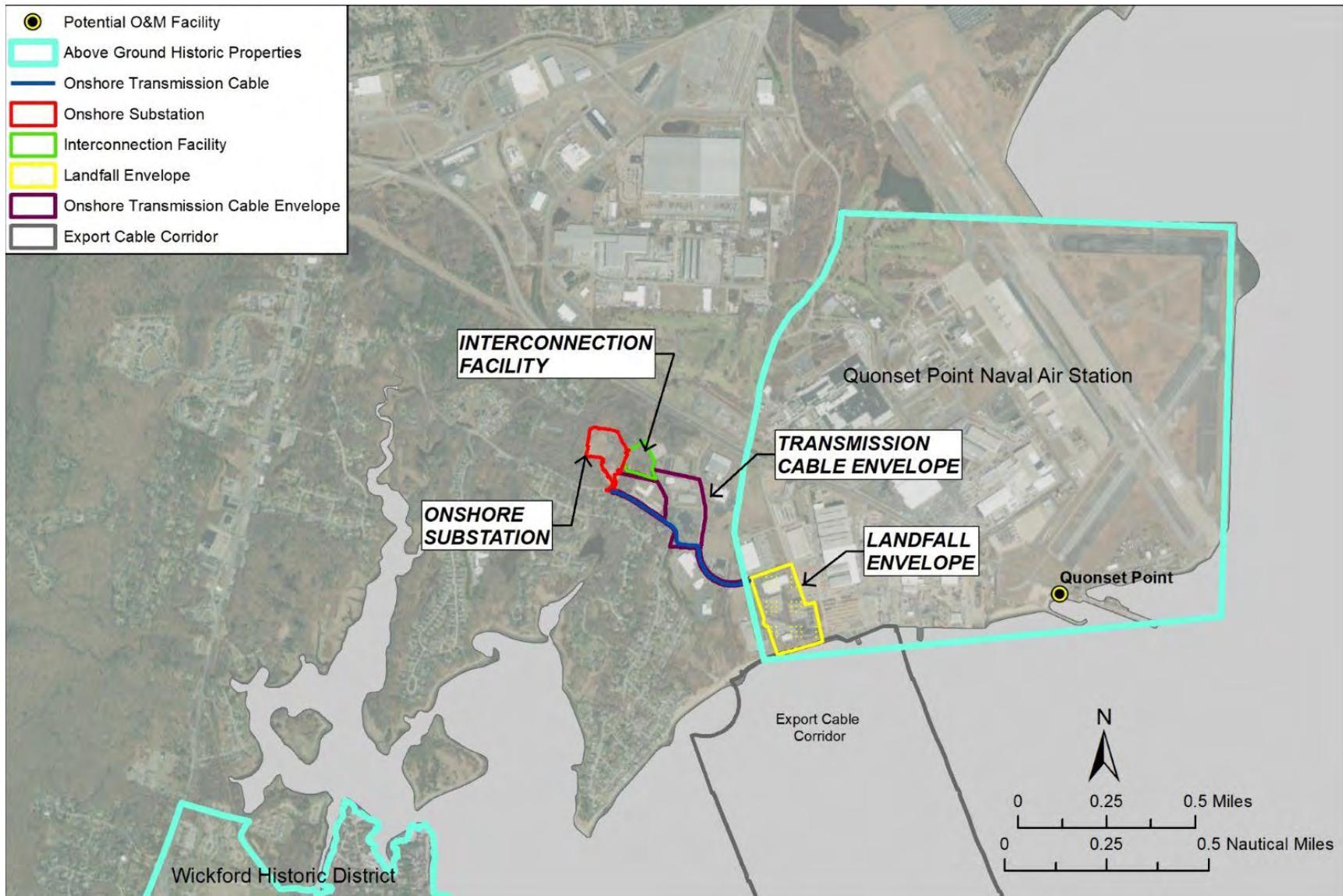


Figure 2. Revolution Wind construction and operations plan proposed onshore Project elements.

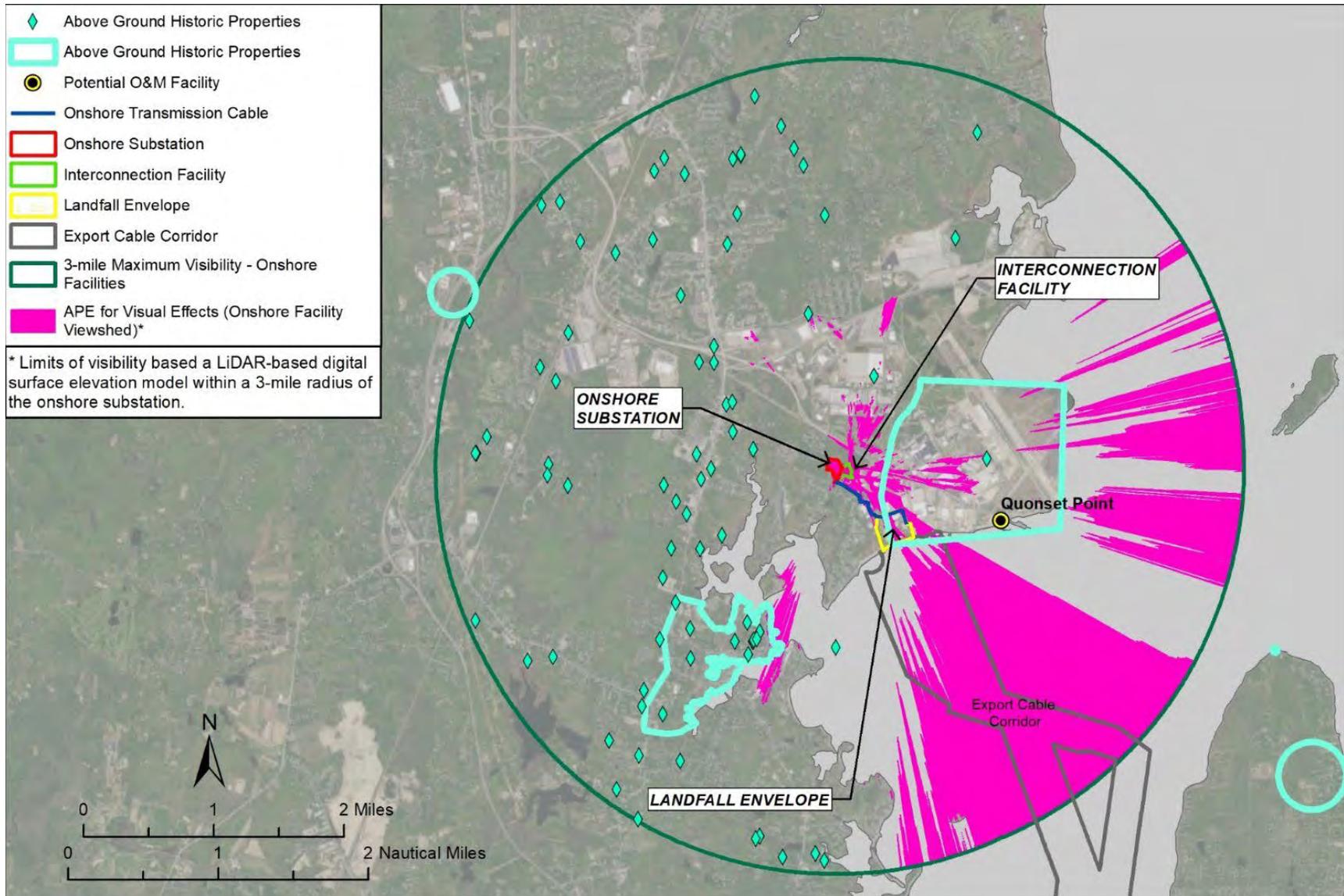
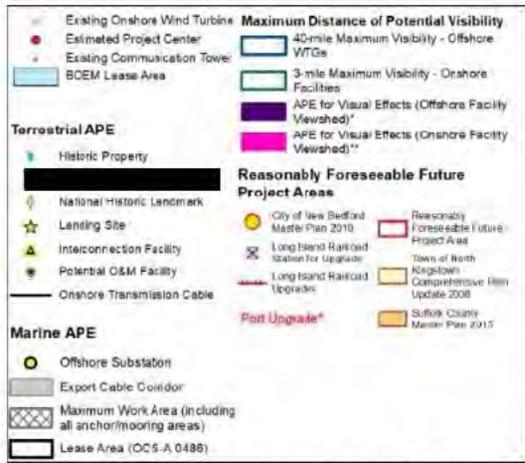


Figure 3. Visual area of potential effects and visual effects assessment geographic analysis area – onshore.



* Limits of visibility based on curvature of the earth and 4-meter digital surface elevation model within a 40-mile radius of a 873-foot-tall WTG blade tip.

** Limits of visibility based a LiDAR-based digital surface elevation model within a 3-mile radius of the onshore substation.

Figure 4. Visual area of potential effects and visual effects assessment geographic analysis area – offshore.

**ATTACHMENT 3 – ABOVE GROUND HISTORIC PROPERTIES ADVERSELY AFFECTED
BY THE PROJECT**

Table 1. Above Ground Historic Properties Adversely Affected by the Project, in Order of Nearest Distance to Project WTGs

Survey ID	Visually Sensitive Resource	Municipality	County	State	Property Designation	Distance to nearest RWF WTG (miles)
TCP-3	████████████████████	████████	██████	MA	NRHP-eligible (BOEM determined)	6*
300	Sakonnet Light Station	Little Compton	Newport	RI	NRHP-listed resource	12.7
297	Warren Point Historic District	Little Compton	Newport	RI	NRHP-eligible resource (RIHPHC determined)	12.9
299	Abbott Phillips House	Little Compton	Newport	RI	RIHPHC historic resource	13
504	Flaghole	Chilmark	Dukes	MA	MHC historic inventory site	13.3
296	Stone House Inn	Little Compton	Newport	RI	NRHP-listed resource	13.4
503	Simon Mayhew House	Chilmark	Dukes	MA	MHC historic inventory site	13.5
496	71 Moshup Trail	Aquinnah	Dukes	MA	MHC historic inventory site	13.7
484	Vanderhoop, Edwin DeVries Homestead	Aquinnah	Dukes	MA	NRHP-listed resource	13.7
480	Gay Head - Aquinnah Shops Area	Aquinnah	Dukes	MA	MHC historic inventory site	13.7
474	Flanders, Ernest House, Shop, Barn	Aquinnah	Dukes	MA	MHC historic inventory site	13.8
495	3 Windy Hill Drive	Aquinnah	Dukes	MA	MHC historic inventory site	13.9
479	Gay Head Light	Aquinnah	Dukes	MA	NRHP-listed resource	13.9
485	Tom Cooper House	Aquinnah	Dukes	MA	MHC historic inventory site	14
497	Leonard Vanderhoop House	Aquinnah	Dukes	MA	MHC historic inventory site	14
490	Theodore Haskins House	Aquinnah	Dukes	MA	MHC historic inventory site	14.1
486	Gay Head - Aquinnah Coast Guard Station Barracks	Aquinnah	Dukes	MA	MHC historic inventory site	14.1
491	Gay Head - Aquinnah Town Center Historic District	Aquinnah	Dukes	MA	NRHP-listed resource	14.2
303	Gooseneck Causeway	Westport	Bristol	MA	MHC historic inventory site	14.8
304	Gooseberry Neck Observation Towers	Westport	Bristol	MA	MHC historic inventory site	14.8
540	Spring Street	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	14.9
590	Capt. Mark L. Potter House	New Shoreham	Washington	RI	RIHPHC historic resource	14.9
276	Tunipus Goosewing Farm	Little Compton	Newport	RI	NRHP-Eligible Resource (RIHPHC Determined)	15
543	WWII Lookout Tower – Spring Street	New Shoreham	Washington	RI	NRHP-Eligible Resource (RIHPHC Determined)	15.1
251	Westport Harbor	Westport	Bristol	MA	MHC historic inventory site	15.2
290	Bellevue Avenue Historic District NHL	Newport	Newport	RI	NHL	15.2
548	Block Island Southeast Lighthouse NHL	New Shoreham	Washington	RI	NHL	15.2
595	New Shoreham Historic District	New Shoreham	Washington	RI	Local Historic	15.3
536	Spring Cottage	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.3
531	Old Harbor Historic District	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC-determined)	15.3
538	Captain Welcome Dodge Sr.	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.3
541	Caleb W. Dodge Jr. House	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.3
535	Spring House Hotel	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.4
545	Pilot Hill Road and Seaweed Lane	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.4
222	Ocean Drive Historic District NHL	Newport	Newport	RI	NHL	15.7
298	Marble House NHL	Newport	Newport	RI	NHL	15.7
597	Ochre Point – Cliffs Historic District	Newport	Newport	RI	NRHP-listed resource	15.8

Survey ID	Visually Sensitive Resource	Municipality	County	State	Property Designation	Distance to nearest RWF WTG (miles)
546	WWII Lookout Tower at Sands Pond	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.8
552	Sea View Villa	Middletown	Newport	RI	RIHPHC historic resource	15.9
295	Rosecliff/Oelrichs (Hermann) House/ Mondroe (J. Edgar) House	Newport	Newport	RI	NRHP-listed resource	15.9
293	The Breakers NHL	Newport	Newport	RI	NHL	15.9
516	Corn Neck Road	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	15.9
302	Clam Shack Restaurant	Westport	Bristol	MA	MHC historic inventory site	15.9
301	Horseneck Point Lifesaving Station	Westport	Bristol	MA	MHC historic inventory site	15.9
553	Whetstone	Middletown	Newport	RI	RIHPHC historic resource	16
284	The Bluff/John Bancroft Estate	Middletown	Newport	RI	RIHPHC historic resource	16
288	Clambake Club of Newport	Middletown	Newport	RI	NRHP-listed resource	16
530	Old Town and Center Roads	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16
526	Beach Avenue	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.1
519	Mitchell Farm	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.1
523	Indian Head Neck Road	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.2
168	Westport Pt. Revolutionary War Properties	Westport	Bristol	MA	MHC historic inventory site	16.2
261	Indian Avenue Historic District	Middletown	Newport	RI	NRHP-listed resource	16.2
278	St. Georges School	Middletown	Newport	RI	NRHP-listed resource	16.3
528	Hygeia House	New Shoreham	Washington	RI	NRHP-listed resource	16.3
527	U.S. Weather Bureau Station	New Shoreham	Washington	RI	NRHP-listed resource	16.3
549	Miss Abby E. Vaill/1 of 2 Vaill cottages	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.4
550	Hon. Julius Deming Perkins / "Bayberry Lodge"	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.4
542	Lakeside Drive and Mitchell Lane	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.5
280	Land Trust Cottages	Middletown	Newport	RI	NRHP-eligible resource (RIHPHC determined)	16.6
482	Russell Hancock House	Chilmark	Dukes	MA	MHC historic inventory site	16.6
163	Westport Point Historic District (1 of 2)	Westport	Bristol	MA	NRHP-eligible resource (MHC determined)	16.7
164	Westport Point Historic District (2 of 2)	Westport	Bristol	MA	NRHP-listed resource	16.7
551	Mohegan Cottage/Everett D. Barlow House	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.7
266	Paradise Rocks Historic District	Middletown	Newport	RI	RIHPHC historic resource	16.8
547	Lewis- Dickens Farm	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.8
525	Island Cemetery/Old Burial Ground	New Shoreham	Washington	RI	RI Historical Cemetery	16.8
279	Kay St.-Catherine St.-Old Beach Rd. Historic District/The Hill	Newport	Newport	RI	NRHP-listed resource	16.9
532	Beacon Hill Road	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.9
533	Nathan Mott Park	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	16.9
515	Block Island North Lighthouse	New Shoreham	Washington	RI	NRHP-listed resource	17.1
522	Champlin Farm	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	17.1
517	Hippocampus/Boy's Camp/ Beane Family	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	17.2
520	U.S. Lifesaving Station	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPHC determined)	17.4

Survey ID	Visually Sensitive Resource	Municipality	County	State	Property Designation	Distance to nearest RWF WTG (miles)
518	U.S. Coast Guard Brick House	New Shoreham	Washington	RI	NRHP-eligible resource (RIHPC determined)	17.4
521	Peleg Champlin House	New Shoreham	Washington	RI	NRHP-listed resource	17.5
469	Hancock, Captain Samuel - Mitchell, Captain West House	Chilmark	Dukes	MA	NRHP-eligible resource (MHC determined)	17.6
508	Scrubby Neck Schoolhouse	West Tisbury	Dukes	MA	MHC historic inventory site	18
345	Point Judith Lighthouse	Narragansett	Washington	RI	NRHP-listed resource	18.2
245	Bailey Farm	Middletown	Newport	RI	NRHP-listed resource	18.3
226	Beavertail Light	Jamestown	Newport	RI	NRHP-listed resource	18.4
582	Horsehead/Marbella	Jamestown	Newport	RI	NRHP-listed resource	18.6
333	Ocean Road Historic District	Narragansett	Washington	RI	NRHP-listed resource	18.9
335	Dunmere	Narragansett	Washington	RI	NRHP-listed resource	19.1
86	Puncatest Neck Historic District	Tiverton	Newport	RI	RIHPC historic resource	19.4
576	Fort Varnum/Camp Varnum	Narragansett	Washington	RI	NRHP-eligible resource (RIHPC determined)	19.6
156	Salters Point	Dartmouth	Bristol	MA	MHC historic inventory site	19.7
578	Dunes Club	Narragansett	Washington	RI	NRHP-listed resource	19.8
329	Life Saving Station at Narragansett Pier	Narragansett	Washington	RI	NRHP-listed resource	19.8
330	The Towers Historic District	Narragansett	Washington	RI	NRHP-listed resource	19.8
591	Narragansett Pier MRA	Narragansett	Washington	RI	NRHP-listed resource	19.8
328	The Towers/Tower Entrance of Narragansett Casino	Narragansett	Washington	RI	NRHP-listed resource	19.9
TCP-1	██████████ TCP	██████████	██████████	MA	NRHP-eligible resource (BOEM determined)	20
343	Brownings Beach Historic District	South Kingstown	Washington	RI	NRHP-listed resource	21.8
444	Tarpaulin Cove Light	Gosnold	Dukes	MA	NRHP-listed resource	22.2
391	Clark's Point Light	New Bedford	Bristol	MA	NRHP-listed resource	24.6
390	Fort Rodman Historic District	New Bedford	Bristol	MA	NRHP-eligible resource (MHC determined)	24.6
392	Fort Taber Historic District	New Bedford	Bristol	MA	NRHP-listed resource	24.6
386	Butler Flats Light Station	New Bedford	Bristol	MA	NRHP-listed resource	25.6
389	744 Scotcut Neck Road	Fairhaven	Bristol	MA	MHC historic inventory site	25.9
449	Nobska Point Lighthouse	Falmouth	Barnstable	MA	NRHP-listed resource	28

Notes: MHC = Massachusetts Historical Commission, RIHPC = Rhode Island Historical Preservation & Heritage Commission.

ATTACHMENT 4 – LIST OF CONSULTING PARTIES

Table 1. Parties Invited to Participate in Section 106 Consultation

Participants in the Section 106 Process	Invited Consulting Parties
SHPOs and state agencies	Connecticut State Historic Preservation Office
	Connecticut Department of Economic and Community Development
	Rhode Island Historical Preservation & Heritage Commission
	New York State Division for Historic Preservation
	Massachusetts Historical Commission
	Massachusetts Board of Underwater Archaeological Resources
	Massachusetts Commissioner on Indian Affairs
	Rhode Island Department of Environmental Management
Federal agencies	National Park Service (NPS)
	National Oceanic and Atmospheric Administration – Habitat and Ecosystem Services Division
	U.S. Army Corps of Engineers, New England District
	U.S. Army Corps of Engineers, New York District
	Office of the Deputy Assistant Secretary of the Navy for Environment (DASN(E))
	Chief of Naval Operations, Installations Division
	Naval Facilities Engineering Systems Command Headquarters– Cultural Resources
	Naval History and Heritage Command – Underwater Archaeology Branch
	Bureau of Safety and Environmental Enforcement
	U.S. Department of Defense - Office of the Deputy Assistant Secretary of Defense (Environment), Environmental Compliance and Planning
	U.S. Department of Defense - Office of the Assistant Secretary of Defense for Sustainment
	Advisory Council on Historic Preservation
	U.S. Coast Guard -Sector SE New England
	U.S. Coast Guard - Marine Transportation Systems (CG-5PW)
	U.S. Coast Guard – First Coast Guard District
	U.S. Fish and Wildlife Service
	Environmental Protection Agency
Federal Aviation Administration	
Federally recognized Tribal Nations	Mashpee Wampanoag Tribe

Participants in the Section 106 Process	Invited Consulting Parties
	Shinnecock Indian Nation Mashantucket (Western) Pequot Tribal Nation Wampanoag Tribe of Gay Head (Aquinnah) Mohegan Tribe of Indians of Connecticut Narragansett Indian Tribe Delaware Tribe of Indians The Delaware Nation
Non-federally recognized Tribal Nations	Chappaquiddick Tribe of Wampanoag Nation The Golden Hill Paugussett Eastern Pequot Tribal Nation Schaghticoke Tribal Nation Unkechaug Nation
Local governments	Cape Cod Commission City of Newport County of Dukes (MA) Town of Charlestown Town of East Hampton Town of Middletown Town of Nantucket Nantucket Planning & Economic Development Commission Town of Narragansett Town of North Kingstown City of Cranston City of East Providence City of Fall River City of New Bedford City New Bedford Historical Commission City of Providence City of Rehoboth City of Taunton County of Barnstable (MA) County of Bristol (MA) County of Plymouth (MA) County of Suffolk (NY) Town of Acushnet Town of Aquinnah Town of Barnstable Town of Barrington Town of Berkley

Participants in the Section 106 Process	Invited Consulting Parties
	Town of Bourne
	Town of Bristol
	Town of Chilmark
	Town of Coventry
	Town of Dartmouth
	Town of Dighton
	Town of East Greenwich
	Town of Edgartown
	Town of Exeter
	Town of Fairhaven
	Town of Falmouth
	Town of Freetown
	Town of Gosnold
	Town of Griswold
	Town of Groton
	Town of Hopkinton
	Town of Jamestown
	Town of Johnston
	Town of Lakeville
	Town of Ledyard
	Town of Little Compton
	Town of Marion
	Town of Mashpee
	Town of Mattapoisett
	Town of Middleborough
	Town of Nantucket
	Town of New Shoreham
	Town of North Stonington
	Town of Oak Bluffs
	Town of Portsmouth
	Town of Richmond
	Town of Rochester
	Town of Sandwich
	Town of Scituate
	Town of Seekonk
	Town of Somerset
	Town of South Kingstown
	Town of South Kingstown Historic District Commission

Participants in the Section 106 Process	Invited Consulting Parties
	Town of Southold Town of Stonington Town of Swansea Town of Tisbury Town of Tiverton Town of Tiverton Historic Preservation Advisory Board Town of Voluntown Town of Wareham Town of Warren Town of Warwick Town of West Greenwich Town of West Tisbury Town of West Tisbury Historic District Commission Town of West Warwick Town of Westerly Town of Westport Town of Westport Historical Commission
Non-governmental organizations or groups	Alliance to Protect Nantucket Sound Balfour Beatty Communities Beavertail Lighthouse Museum Association Block Island Historical Society Bristol Historical and Preservation Society Butler Flats Lighthouse (Mass Light Ltd) Clambake Club of Newport Cuttyhunk Historical Society East Greenwich Historic Preservation Society Friends of Sakonnet Light Gay Head Lighthouse Advisory Committee Martha's Vineyard Commission Montauk Historical Society Newport Historical Society Newport Restoration Foundation Norman Bird Sanctuary Preservation Massachusetts Rhode Island Historical Society Salve Regina University Southeast Lighthouse Foundation The Preservation Society of Newport County Revolution Wind, LLC (lessee)

Table 2. Consulting Parties Participating in Section 106 Consultation

Participants in the Section 106 Process	Participating Consulting Parties
SHPOs and state agencies	Connecticut State Historic Preservation Office
	Connecticut Department of Economic and Community Development
	Rhode Island Historical Preservation & Heritage Commission
	New York State Division for Historic Preservation
	Massachusetts Historical Commission
	Rhode Island Department of Environmental Management
Federal agencies	NPS
	U.S. Army Corps of Engineers, New England District
	U.S. Army Corps of Engineers, New York District
	Office of the Deputy Assistant Secretary of the Navy for Environment (DASN(E))
	Chief of Naval Operations, Installations Division
	Naval Facilities Engineering Systems Command Headquarters–Cultural Resources
	Naval History and Heritage Command – Underwater Archaeology Branch
	U.S. Department of Defense - Office of the Deputy Assistant Secretary of Defense (Environment), Environmental Compliance and Planning
	U.S. Department of Defense - Office of the Assistant Secretary of Defense for Sustainment
	Advisory Council on Historic Preservation
	U.S. Coast Guard -Sector SE New England
	U.S. Coast Guard - Marine Transportation Systems (CG-5PW)
	Bureau of Safety and Environmental Enforcement
	Environmental Protection Agency
	Federal Aviation Administration
Federally recognized Tribal Nations	Mashpee Wampanoag Tribe
	Shinnecock Indian Nation
	Mashantucket (Western) Pequot Tribal Nation
	Wampanoag Tribe of Gay Head (Aquinnah)
	Mohegan Tribe of Indians of Connecticut
	Narragansett Indian Tribe
	Delaware Tribe of Indians
	The Delaware Nation
Non-federally recognized Tribal Nations	Chappaquiddick Tribe of Wampanoag Nation
	Unkechaug Nation
Local governments	City of Newport
	County of Dukes (MA)
	Town of Charlestown
	Town of East Hampton
	Town of Little Compton

Participants in the Section 106 Process	Participating Consulting Parties
	Town of Middletown
	Town of Nantucket
	Nantucket Planning & Economic Development Commission
	Town of Narragansett
	Town of North Kingstown
Nongovernmental organizations or groups	Town of New Shoreham
	Block Island Historical Society
	Clambake Club of Newport
	Friends of Sakonnet Light
	Gay Head Lighthouse Advisory Committee
	Newport Restoration Foundation
	Norman Bird Sanctuary
	The Preservation Society of Newport County
	Rhode Island Historical Society
	Salve Regina University
	Southeast Lighthouse Foundation
Revolution Wind, LLC (lessee)	

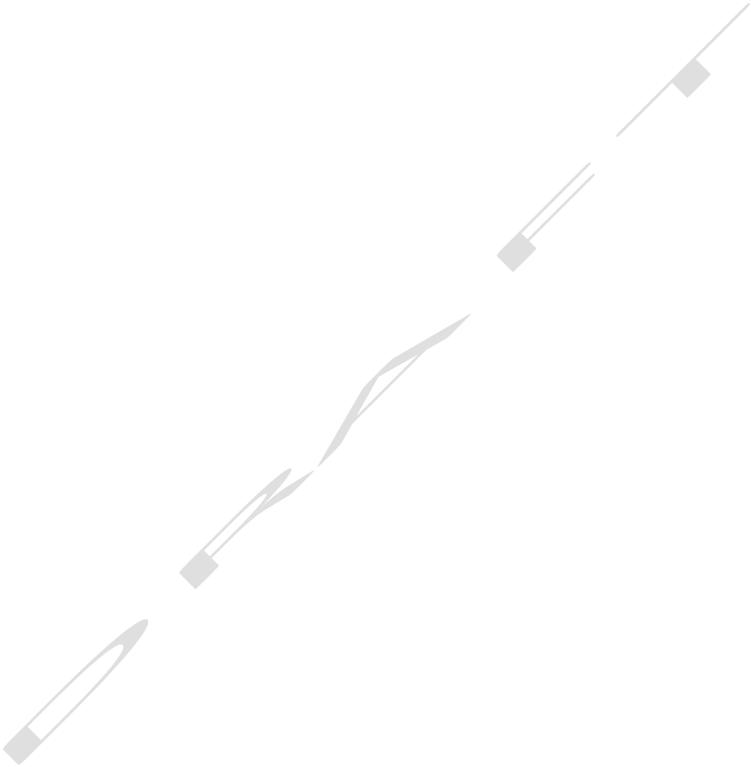
Table 3. Parties Invited to Consult under Section 106 and that Did Not Participate Consultation

Invited Parties to the Section 106 Process	Non-Participating, Invited Parties
SHPOs and state agencies	Massachusetts Board of Underwater Archaeological Resources
	Massachusetts Commissioner on Indian Affairs
Federal agencies	U.S. Fish and Wildlife Service
	National Oceanic and Atmospheric Administration – Habitat and Ecosystem Services Division
Non-federally recognized Tribal Nations	The Golden Hill Paugussett
	Eastern Pequot Tribal Nation
	Schaghticoke Tribal Nation
Local Government	Cape Cod Commission
	City of Cranston
	City of East Providence
	City of Fall River
	City of New Bedford and its Historical Commission
	City of Providence
	City of Rehoboth
	City of Taunton
	County of Barnstable (MA)
	County of Bristol (MA)
	County of Plymouth (MA)
	County of Suffolk (NY)
	Town of Acushnet
	Town of Aquinnah
	Town of Barnstable

Invited Parties to the Section 106 Process	Non-Participating, Invited Parties
	Town of Barrington
	Town of Berkley
	Town of Bourne
	Town of Bristol
	Town of Chilmark
	Town of Coventry
	Town of Dartmouth
	Town of Dighton
	Town of East Greenwich
	Town of Edgartown
	Town of Exeter
	Town of Fairhaven
	Town of Falmouth
	Town of Freetown
	Town of Gosnold
	Town of Griswold
	Town of Groton
	Town of Hopkinton
	Town of Jamestown
	Town of Johnston
	Town of Lakeville
	Town of Ledyard
	Town of Little Compton
	Town of Marion
	Town of Mashpee
	Town of Mattapoissett
	Town of Middleborough
	Town of North Stonington
	Town of Oak Bluffs
	Town of Portsmouth
	Town of Richmond
	Town of Rochester
	Town of Sandwich
	Town of Scituate
	Town of Seekonk
	Town of Somerset
	Town of South Kingstown and Historic District Commission
	Town of Southold
	Town of Stonington
	Town of Swansea
	Town of Tisbury
	Town of Tiverton and Historic Preservation Advisory Board
	Town of Voluntown
	Town of Wareham
	Town of Warren

Invited Parties to the Section 106 Process	Non-Participating, Invited Parties
	Town of Warwick
	Town of West Greenwich
	Town of West Tisbury and Historic District Commission
	Town of West Warwick
	Town of Westerly
	Town of Westport and Historical Commission
Nongovernmental Organizations or Groups	Alliance to Protect Nantucket Sound
	Balfour Beatty Communities
	Beavertail Lighthouse Museum Association
	Bristol Historical and Preservation Society
	Butler Flats Lighthouse (Mass Light Ltd)
	Cuttyhunk Historical Society
	East Greenwich Historic Preservation Society
	Martha's Vineyard Commission
	Montauk Historical Society
	Newport Historical Society
	Preservation Massachusetts

ATTACHMENT 5 –MITIGATION FUNDING OPTIONS PROPOSED BY SIGNATORIES AND CONSULTING PARTIES



ATTACHMENT 5 – MITIGATION FUNDING AMOUNTS PROPOSED BY SIGNATORIES AND CONSULTING PARTIES

The mitigation measures proposed in Stipulation III have been developed by individuals who meet the qualifications specified in the SOL's Qualifications Standards for Archaeology, History, Architectural History, and/or Architecture (36 CFR 61) and are based on input from consulting parties. The proposed mitigation measures consider the nature, scope, and magnitude of adverse effects caused by the Project, the qualifying characteristics of each historic property that would be affected. The funding amounts that follow were considered by signatories, invited signatories, and consulting parties for historic properties mitigation measures based on budgets proposed by lessee for each mitigation effort. Revolution Wind would provide a total of \$9,246,000 to support mitigation of adverse effects from the Project as described in the MOA, of which \$3,873,000 would be placed in escrow to provide a mitigation fund as described under Stipulation III.C.6. These budgets are good-faith estimates, based on the experience of these qualified consultants with similar activities and comparable historic properties. The proposed level of funding is appropriate to accomplish the identified preservation goals and result in meaningful benefits to the affected properties, resolving adverse effects. Therefore, the funding amounts indicated here for activities required by the MOA represent the maximum amounts the Lessee is required to spend to fund these activities.

- Marine APE
 - \$2,178,000 for mitigation to resolve adverse effects at the nine ASLFs (Targets 21-26 and Targets 28 through 30), including:
 - Pre-construction geoarchaeology
 - Marine Survey Vessel Tenders
 - GIS development
 - Tribal participation.

- [REDACTED] TCP
 - \$1,300,000 to the consulting federally recognized Native American Tribes for mitigation to resolve adverse effects at the TCP, including:
 - \$75,000 for [REDACTED]
 - \$200,000 to the [REDACTED] and \$300,000 to the [REDACTED] for Scholarships and Training for Tribal Resource Stewardship
 - \$300,000 to the [REDACTED] and \$300,000 to the [REDACTED] for Coastal Resilience and Habitat Restoration
 - \$75,000 for Archaeological and Cultural Sites Data Compilation and GIS Database
 - \$50,000 to the [REDACTED] for mitigation to resolve adverse effects at the TCP, including the public interpretation of interconnected marine cultural landscapes.

- [REDACTED] TCP, [REDACTED], MA
 - \$275,000 for mitigation to resolve adverse effects at the TCP including:
 - \$25,000 for a GIS database of the contributing resources to the TCP

- \$100,000 for Interpretative materials to educate the public on the TCP
 - \$150,000 for Climate adaptation planning study for the TCP.
- [REDACTED] #1 and [REDACTED] #2, North Kingstown, RI
 - \$390,000 for mitigation to resolve adverse effects including Phase III Data Recovery at the Sites, including Tribal participation.
- Aquinnah, MA
 - \$350,000 for mitigation to resolve adverse effects to the Gay Head Light by providing a financial contribution towards the completion of physical repairs and/or restoration planned by the Gay Head Lighthouse Advisory Board.
 - \$250,000 for mitigation to resolve adverse effects to the Gay Head - Aquinnah Town Center Historic District, the Edwin D. Vanderhoop Homestead, the Gay Head – Aquinnah Shops Area, 71 Moshup Trail, the Leonard Vanderhoop House, the Tom Cooper House, the Theodore Haskins House, the Stone wall boundary system, and 3 Windy Hill Drive including providing Americans with Disabilities Act (ADA) compliant access at the Gay Head – Aquinnah Shops Area and the weatherization of the Edwin D. Vanderhoop Homestead.
- Middletown, RI
 - \$125,000 for the mitigation to resolve adverse effects to the Bluff/John Bancroft Estate, the Bailey Farm, the Clambake Club of Newport, the Paradise Rocks Historic District, the Sea View Villa, the St. George's School: Church of St. George, Little Chapel, and Memorial Schoolhouse, the Indian Avenue Historic District, and Whetstone including updating the existing *Historic and Architectural Resources of Middletown, Rhode Island: A Preliminary Report* and for Support of the Ongoing Maintenance and Aesthetic Improvements to the Third Beach Road and Hanging Rocks Road through Stone Wall Preservation and Observation Trails within the Paradise Rocks Historic District.

Based on consultation with RIHPHC also referred to as the Rhode Island SHPO in the MOA, the below mitigation measures to resolve adverse effects, in combination with the other mitigation measures identified in this MOA Attachment, will be funded and implemented for the following historic properties:

- Little Compton, RI
 - \$60,000 for the mitigation of adverse effects to the Tunipus Goosewing Farm, the Warren's Point Historic District, the Abbott Phillips House, and the Stone House Inn through the development of National Register of Historic Places (NRHP) nominations.
- Narragansett, RI
 - \$50,000 for the mitigation of adverse effects to the Fort Varnum/Camp Varnum, Narragansett Pier MRA, the Life Saving Station at Narragansett Pier, the Towers Historic District, the Towers/Entrance of Narragansett Casino, Dunmere, and the Ocean Road

Historic District through an update to the existing *Historic and Architectural Resources of Middletown, Rhode Island*.

- New Shoreham, RI
 - \$200,000 for the mitigation of adverse effects to the Champlin Farm Historic District, Mitchell Farm Historic District, Beacon Hill, Lewis-Dickens Farm, Lakeside Drive and Mitchell Lane, Indian Head Neck Road, Beach Avenue, Old Town and Center Roads, Corn Neck Road, Pilot Hill Road and Seaweed Lane, and the New Shoreham Historic District through the development of NRHP nominations.
- Newport, RI
 - \$100,000 for the mitigation of adverse effects to the Ochre Point - Cliffs Historic District, and the Ocean Drive Historic District NHL through the development of updates to the Ochre Point-Cliffs Historic District NRHP nomination and the Ocean Drive Historic District NHL nomination.
 - \$50,000 for the mitigation of adverse effects to the Bellevue Avenue Historic District NHL through the development of an update to the Bellevue Avenue Historic District NHL nomination.
- South Kingstown, RI
 - \$25,000 for the mitigation of adverse effects to the Brownings Beach Historic District through the development of architectural surveys for the Matunuck and Green Hill neighborhoods.
- Tiverton, RI
 - \$20,000 for the mitigation of adverse effects to the Puncatest Neck Historic District through the development of a NRHP nomination.

In consultation with BOEM, the consulting parties recommended a mitigation fund in lieu of previously considered mitigation measures (for a description of those previous measures see Draft Environmental Impact Statement [DEIS] Appendix J draft MOA and its attached draft HPTPs). Using the previously proposed mitigation measures (outlined below and from DEIS Appendix J), or specifically revised measures based on consultation with the consulting parties as a financial basis for the mitigation fund described in Stipulation III.C.

- Chilmark, MA
 - \$50,000 for mitigation to resolve adverse effects to the Capt. Samuel Hancock and the Capt. West Mitchell House, the Russell Hancock House, the Ernest Flanders House, Shop, and Barn, the Simon Mayhew House, and Flaghole through the development of a Hazard Mitigation Plan for Historic Properties.
- Dartmouth, MA
 - \$15,000 for mitigation to resolve adverse effects to Salters Point through the development of a NRHP nomination form.

- Fairhaven, MA
 - \$8,000 for mitigation to resolve adverse effects to 744 Sconticut Neck Road through the development of a NRHP nomination form.

- New Bedford, MA
 - \$25,000 for mitigation to resolve adverse effects to Fort Rodman and the Fort Taber Historic District through the implementation of restoration or universal access per the *Fort Taber Park Master Plan*.

- West Tisbury, MA
 - \$15,000 for mitigation to resolve adverse effects to the Scrubby Neck Schoolhouse through the development of an adaptive reuse plan or a landscape vegetation plan.

- Westport, MA
 - \$15,000 for mitigation to resolve adverse effects to the Gooseberry Neck Observation Towers, the Gooseneck Causeway, the Westport Harbor, the Horseneck Point Lifesaving Station, the Clam Shack Restaurant, the Westport Point Historic District, the Westport Point Revolutionary War Properties, and the Westport Point Historic District through the development of a Historic Maritime Infrastructure Survey and Adaptive Use Guidance for historic wharves, docks, and buildings within the Westport Harbor and Westport Point historic districts.

- Jamestown, RI
 - \$25,000 for the mitigation of adverse effects to Horsehead/Marbella through the development of Historic Architectural Building Survey (HABS) Level II Documentation.

- Little Compton, RI
 - \$75,000 for the mitigation of adverse effects to the Tunipus Goosewing Farm, the Warren's Point Historic District, the Abbott Phillips House, and the Stone House Inn through the development of Interpretive Exhibits/Signage.

- Narragansett, RI
 - \$100,000 for the mitigation of adverse effects to the Fort Varnum/Camp Varnum, Narragansett Pier MRA, the Life Saving Station at Narragansett Pier, the Towers Historic District, the Towers/Entrance of Narragansett Casino, Dunmere and the Ocean Road historic District through an assessment of the Ocean Road Seawall.

- New Shoreham, RI
 - \$600,000 for the mitigation of adverse effects to the Block Island Southeast Lighthouse, NHL through cyclical maintenance activity and restoration.
 - \$700,000 for the mitigation of adverse effects to the Island Cemetery/Old Burial Ground, the New Shoreham Historic District, the Old Harbor Historic District, the Capt. Mark L. Potter House, the Spring Cottage, the Spring House Hotel, Spring Street, the WWII

Lookout Tower – Spring Street, the Caleb W. Dodge Jr. House, the Capt. Noah Dodge House, the Capt. Welcome Dodge Sr. House, Pilot Hill Road and Seaweed Lane, the WWII Lookout Tower at Sands Pond, the Mohegan Cottage, the Lewis-Dickens Farm, the Miss Abby E. Vaill/1 of 2 Vaill cottages, the Hon. Julius Deming Perkins/"Bayberry Lodge", West Side and Grace Cove Roads, the Peleg Champlin House, Lakeside Drive and Mitchell Lane, the African American Settlement, the Nathan Mott Park, the Champlin Farm, Old Town and Center Roads, Beacon Hill , Beach Avenue, Indian Head Neck Road, Corn Neck Road, the Hippocampus/Boy's camp/Beane Family, the Mitchell Farm, the U.S. Coast Guard Brick House, the U.S. Lifesaving Station, the U.S. Weather Bureau Station, and the Hygeia House through implementation of the Coastal Resiliency Plan, and a town-wide NRHP Nomination.

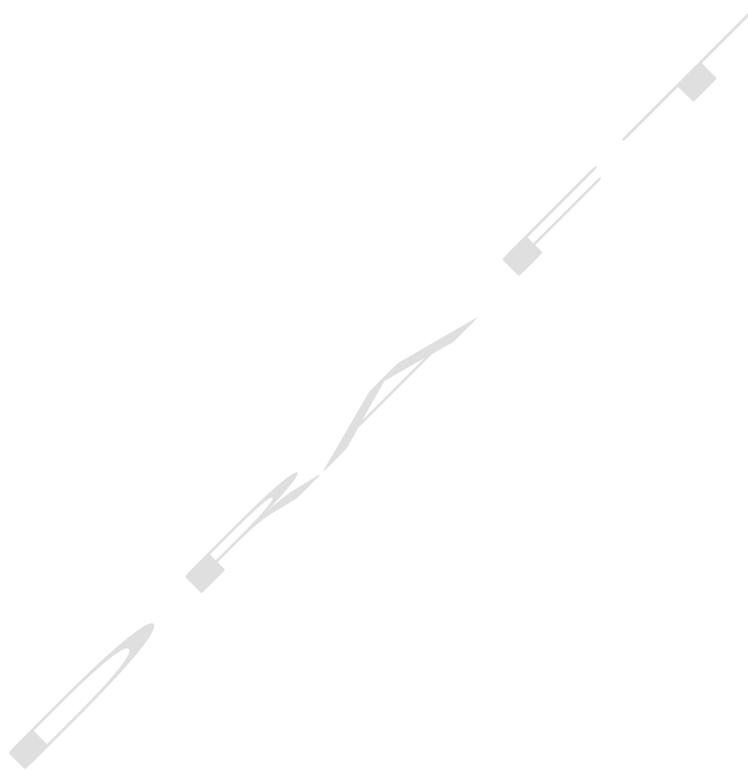
- Newport, RI
 - \$650,000 for the mitigation of adverse effects to the Ochre Point - Cliffs Historic District, the Kay St.-Catherine St.-Old Beach Rd. Hist. Dist. / The Hill, and the Ocean Drive Historic District NHL through the development of a Historic Property Owner Guidebook and the development of Stormwater Drainage Improvement Plans for the Historic Districts.
 - \$800,000 for the mitigation of adverse effects to the Bellevue Avenue Historic District NHL, the Marble House NHL, Rosecliff / Oelrichs (Hermann) House / Mondroe (J. Edgar) House, and the Breakers NHL through ongoing maintenance, the development of a Resiliency Plan, and Invasive Species Maintenance Plan, a Volunteer Ambassador Program, and a Mobile Application for the Cliff Walk.

- South Kingstown, RI
 - \$25,000 for the mitigation of adverse effects to the Brownings Beach Historic District through the development of a historic context for summer cottage and resort development in Rhode Island.

- Tiverton, RI
 - \$20,000 for the mitigation of adverse effects to the Puncatest Neck Historic District through the development of a historic context for summer cottage and resort development in Rhode Island.

- Lighthouses in RI and MA
 - \$750,000 for the mitigation of adverse effects to the below lighthouses through Assessment, Planning, Restoration, and Institutional Development:
 - Sakonnet Light Station, Little Compton, RI
 - Block Island North Lighthouse, New Shoreham, RI
 - Point Judith Lighthouse, Narragansett, RI
 - Beavertail Light, Jamestown, RI
 - Tarpaulin Cove Light, Gosnold, MA
 - Clark's Point Light, New Bedford, MA
 - Butler Flats Light Station, New Bedford, MA
 - Nobska Point Lighthouse, Falmouth, MA

**ATTACHMENT 6 – HISTORIC PROPERTY TREATMENT PLAN FOR THE REVOLUTION
WIND FARM ANCIENT SUBMERGED LANDFORM FEATURE, OUTER CONTINENTAL
SHELF, FEDERAL AND RHODE ISLAND WATERS OF RHODE ISLAND SOUND**



REDACTED – Includes Archaeological Site Location Information

Historic Property Treatment Plan

for the

Revolution Wind Farm

Ancient Submerged Landform Feature
Outer Continental Shelf, Federal and Rhode Island State Waters

Submitted to:



Bureau of Ocean Energy Management
U.S. Department of the Interior

Prepared for:



Revolution Wind, LLC
<https://revolutionwind.com/>

Prepared by:



Environmental Design & Research, D.P.C.
217 Montgomery Street, Suite 1100
Syracuse, New York 13202
www.edrdpc.com

June 2023

ABSTRACT

Federal Undertaking: Revolution Wind Farm and Revolution Wind Export Cable Project

Location: Outer Continental Shelf and Rhode Island State Waters

Federal and
State Agencies: Bureau of Ocean Energy Management
National Park Service
U.S. Army Corps of Engineers
Massachusetts Historical Commission
Rhode Island Historical Preservation & Heritage Commission
New York Historic Preservation Office
Connecticut Historic Preservation Office
Advisory Council on Historic Preservation

Regulatory Process: National Environmental Policy Act
Section 106 of the National Historic Preservation Act

Purpose: This Historic Property Treatment Plan provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects from the Revolution Wind Project.

Adverse
Effect Finding for: Ancient Submerged Landform Feature, Outer Continental Shelf and Rhode Island State Waters

Submitted By: Revolution Wind, LLC

Date: June 2023

TABLE OF CONTENTS

1.0 Executive Summary1

2.0 Background Information3

 2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable.....3

 2.2 Section 106 of the National Historic Preservation Act (NHPA)5

 2.3 Participating Parties5

3.0 Existing Conditions and Historic Significance.....6

 3.1 Historic Properties6

 3.2 Ancient Submerged Landform Features (ASLFs)..... 12

 3.2.1 Physical Description and Existing Conditions..... 12

 3.2.2 Historic Context..... 14

 3.2.3 NRHP Criteria..... 15

4.0 Mitigation Measures..... 16

 4.1 Target 21 through Target 26 and Target 28 through Target 30..... 16

 4.1.1 Preconstruction Geoarchaeology 16

 4.1.2 Open-Source GIS and Story Maps 19

5.0 Implementation 22

 5.1 Timeline..... 22

 5.2 Organizational Responsibilities 22

 5.2.1 Bureau of Ocean Energy Management (BOEM) 22

 5.2.2 Revolution Wind, LLC 22

 5.2.3 Other Parties, as Appropriate..... 22

 5.3 Participating Party Consultation 22

6.0 References..... 24

LIST OF FIGURES

Figure 2.1-1. Project Location.....4

Figure 3.1-1. Historic Property Location..... 7

LIST OF TABLES

Table 3.1-1. Historic Property included in the ASLF HPTP6

LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
ADLS	Aircraft Detection Lighting System
ASLFs	Ancient Submerged Landform Features
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
COP	Construction and Operations Plan
DEIS	Draft Environmental Impact Statement
EDR	Environmental Design and Research, D.P.C.
FEIS	Final Environmental Impact Statement
FR	Federal Register
HPTP	Historic Property Treatment Plan
MARA	Marine Archaeological Resources Assessment
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act of 1966
NRHP	National Register of Historic Places
OCS	Outer Continental Shelf
PAPE	Preliminary Area of Potential Effect
QMA	Qualified Marine Archaeologist
RFP	Request for Proposals
ROD	Record of Decision
RWEC	Revolution Wind Export Cable
RWF	Revolution Wind Farm
SOI	Secretary of the Interior
WTG	Wind Turbine Generator

1.0 EXECUTIVE SUMMARY

This Historic Property Treatment Plan (HPTP) for Ancient Submerged Landform Features (ASLFs), which are recommended as eligible for listing on the National Register of Historic Places (NRHP), provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects identified in the *Marine Archaeological Resources Assessment (MARA)*, dated February 2023 (SEARCH, 2023) for the Revolution Wind Farm (RWF) and Revolution Wind Export Cable (RWECC) Project (collectively, the Undertaking). Revolution Wind LLC (Revolution Wind) has provided this HPTP in accordance with the Bureau of Ocean Energy Management's (BOEM) Findings of Adverse Effect (FoAE) for the Undertaking under the National Historic Preservation Act of 1966 (NHPA).

BOEM has used the National Environmental Policy Act (NEPA) substitution process to fulfill its Section 106 obligations as provided for in the NHPA implementing regulations (36 CFR § 800.8(c)), and BOEM has consulted with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, federally recognized Native American Tribes, and other NHPA Section 106 consulting parties in accordance with this process. Revolution Wind has provided this HPTP to BOEM for inclusion in the Final Environmental Impact Statement (FEIS).

This HPTP describes the mitigation measures to resolve adverse effects on historic properties, the implementation steps, and timeline for actions. The mitigation measures are based on the evaluations and outreach performed by Revolution Wind prior to the issuance of the DEIS as well as outreach to consulting parties performed by BOEM. This HPTP document has undergone revision and refinement in consultation with the Massachusetts State Historic Preservation Officer, the Rhode Island State Historic Preservation Officer, the ACHP, and other consulting parties throughout the NEPA substitution process. This HPTP is included in the Memorandum of Agreement (MOA) issued in accordance with 36 CFR §§ 800.8, 800.10.

This HPTP is organized into the following sections:

- **Section 1.0, Introduction**, outlines the content of this HPTP.
- **Section 2.0, Cultural Resources Regulatory Context**, briefly summarizes the Undertaking while focusing on cultural resources regulatory contexts (federal, tribal, state, and local, including preservation restrictions), identifies the historic properties discussed in this HPTP that will be adversely affected by the Undertaking, and summarizes the pertinent provisions and attachments of the *Marine Archaeological Resources Assessment – Revolution Wind Farm Project Construction and Operations Plan* (MARA; SEARCH, 2023) and *Revolution Wind Farm Construction and Operations Plan* (COP; Revolution Wind, 2022) that guided the development of this document.
- **Section 3.0, Existing Conditions, Historic Significance, and Maritime Setting**, provides a physical description of the historic properties included in this HPTP. Set within its historic context, the applicable NRHP criteria for the historic properties are discussed with a focus on the contribution of a maritime visual setting to its significance and integrity.

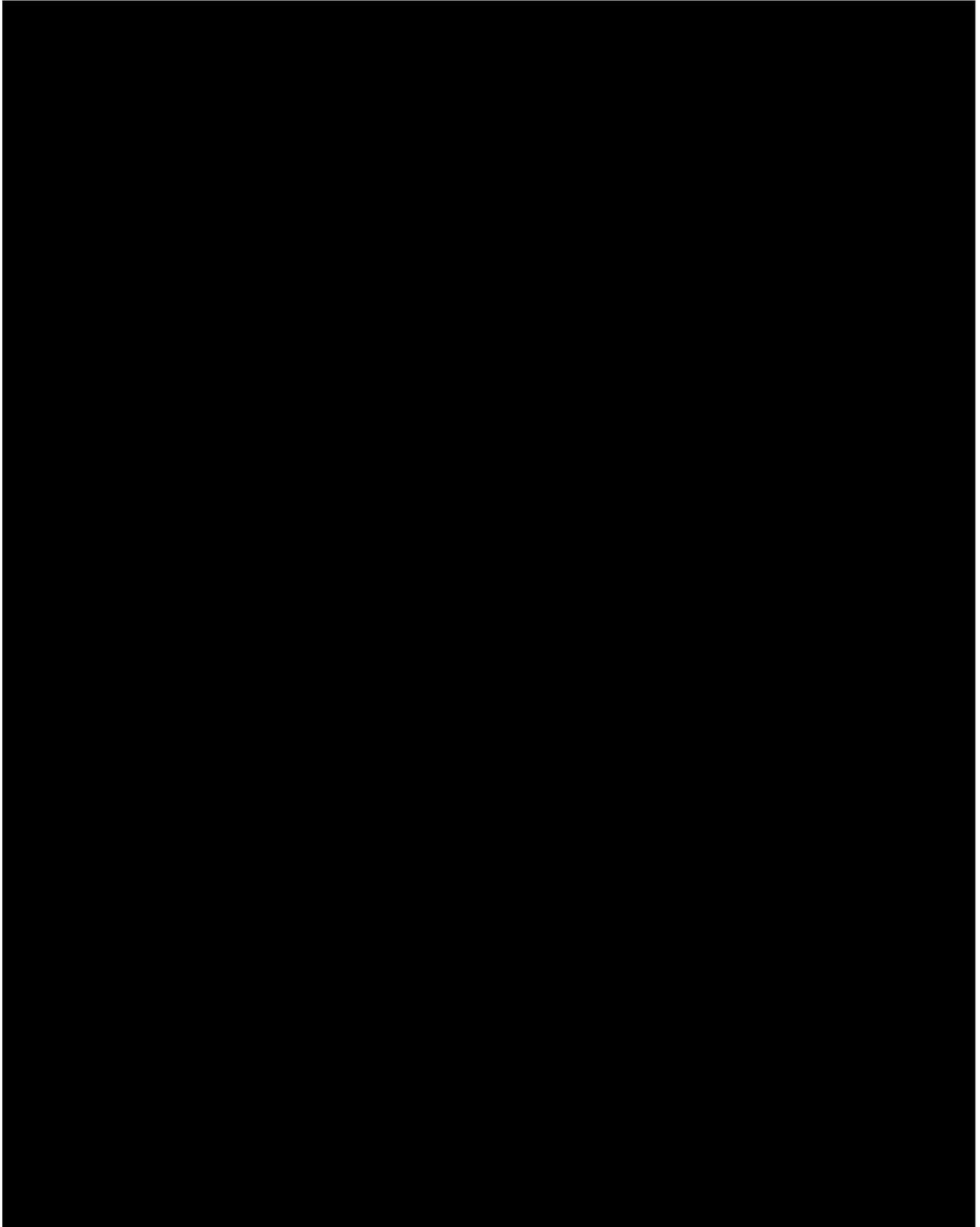
- **Section 4.0, Mitigation Measures**, presents specific steps to carry out the mitigation actions. The mitigation action includes a detailed description, intended outcome, methods, standards, and requirements for documentation.
- **Section 5.0, Implementation**, establishes the process for executing mitigation actions at the historic properties, as identified in Section 4.0 of this HPTP. For each/the action, organizational responsibilities are outlined, a timeline is provided, and regulatory reviews are listed.
- **Section 6.0, References**, is a list of works cited in this HPTP.

2.0 BACKGROUND INFORMATION

2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable

The Undertaking is a wind-powered electric generating facility composed of up to 100 wind turbine generators (WTGs) and associated foundations, two offshore substations, and inter-array cables connecting the WTGs and the offshore substations (see Figure 2.1-1). The WTGs, offshore substations, array cables, and substation interconnector cables would be located on the Outer Continental Shelf approximately 15 nautical miles (18 statute miles) southeast of Point Judith, Rhode Island, approximately 13 nautical miles (15 statute miles) east of Block Island, Rhode Island, approximately 7.5 nautical miles (8.5 statute miles) south of Nomans Land Island National Wildlife Refuge (uninhabited island), and between approximately 10 to 12.5 nautical miles (12 to 14 statute miles) south/southwest of varying points of the Rhode Island and Massachusetts coastlines (62 FR 33708). In addition, two submarine export cables located in both federal waters and Rhode Island State waters, will connect the offshore substation to the electrical grid. Export cables will be buried below the seabed. The proposed interconnection location for the Undertaking is the existing Davisville Substation, which is owned and operated by The Narragansett Electric Company d/b/a National Grid and located in North Kingstown, Rhode Island.

Figure 2.1-1. Project Location



2.2 Section 106 of the National Historic Preservation Act (NHPA)

The regulations at 36 CFR § 800.8 provide for use of the NEPA process to fulfill a federal agency's NHPA Section 106 review obligations in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6. Under these provisions, issuance of a ROD and implementation of relevant conditions will resolve adverse effects to historic properties caused by the Undertaking.

The measures to avoid and minimize adverse effects to identified historic properties are described in the MARA Report (SEARCH 2023). This HPTP addresses the treatment plans to resolve the remaining adverse effects after application of the above-referenced measures. The mitigation measures reflect consultations among consulting parties to refine a conceptual mitigation framework proposed by Revolution Wind.

All activities implemented under this HPTP will be conducted in accordance with any conditions imposed by BOEM in its ROD and with applicable local, state, and federal regulations and permitting requirements. Responsibilities for specific compliance actions are described in further detail in Section 5.2, Organizational Responsibilities.

2.3 Participating Parties

BOEM initiated consultation under Section 106 with invitations to consulting parties on April 30, 2021. BOEM hosted the first Section 106-specific meeting with consulting parties on December 17, 2021, pursuant to Sections 106 of the NHPA and in accordance with 36 CFR 800.8.

Following BOEM's initial Section 106 meeting with consulting parties, Revolution Wind held stakeholder outreach meetings (see Section 5.3) to review conceptual mitigation measures for the historic properties and invited the following parties:

- Mashantucket Pequot Tribal Nation;
- Mohegan Tribe of Indians;
- Narragansett Indian Tribe;
- Shinnecock Indian Nation;
- Wampanoag Tribe of Gay Head (Aquinnah);
- Mashpee Wampanoag Tribe; and
- Historical Chappaquiddick Tribe of the Wampanoag Nation.

3.0 EXISTING CONDITIONS AND HISTORIC SIGNIFICANCE

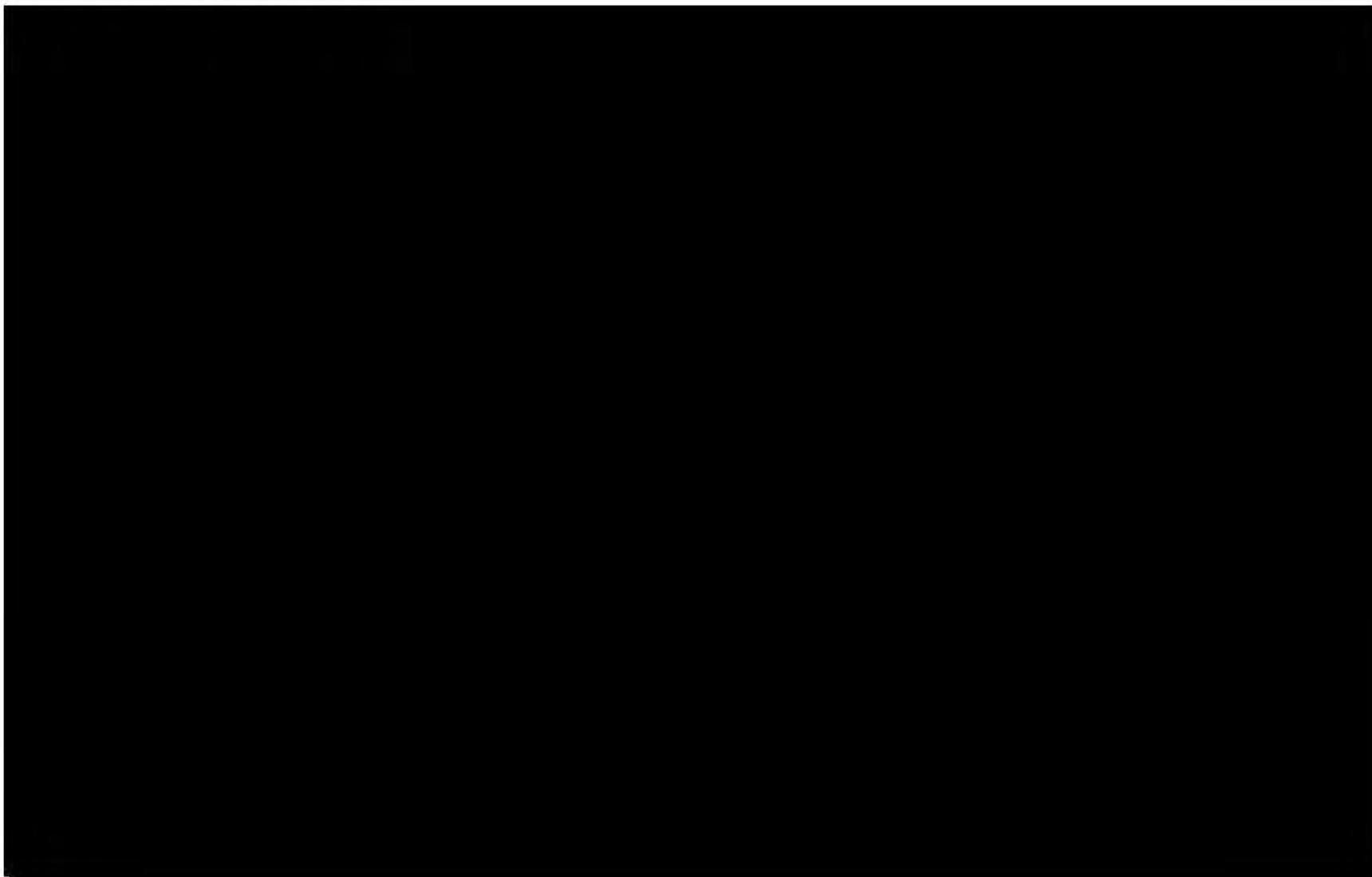
3.1 Historic Properties

This HPTP involves nine historic properties, as identified in Table 3.1-1 and located on Figure 3.1-1. Revolution Wind has committed to avoidance of impacts to Target 27 and Targets 31-33 during all phases of construction and operations.

Table 3.1-1. Historic Properties included in the ASLF HPTP

Name	Municipality	State	Site No. (Agency)	Ownership
Target 21	N/A	RI	N/A	State waters
Target 22	N/A	RI	N/A	State waters
Target 23	N/A	N/A	N/A	Federal waters
Target 24	N/A	N/A	N/A	Federal waters
Target 25	N/A	N/A	N/A	Federal waters
Target 26	N/A	N/A	N/A	Federal waters
Target 28	N/A	N/A	N/A	Federal waters
Target 29	N/A	RI	N/A	State waters
Target 30	N/A	RI	N/A	State waters

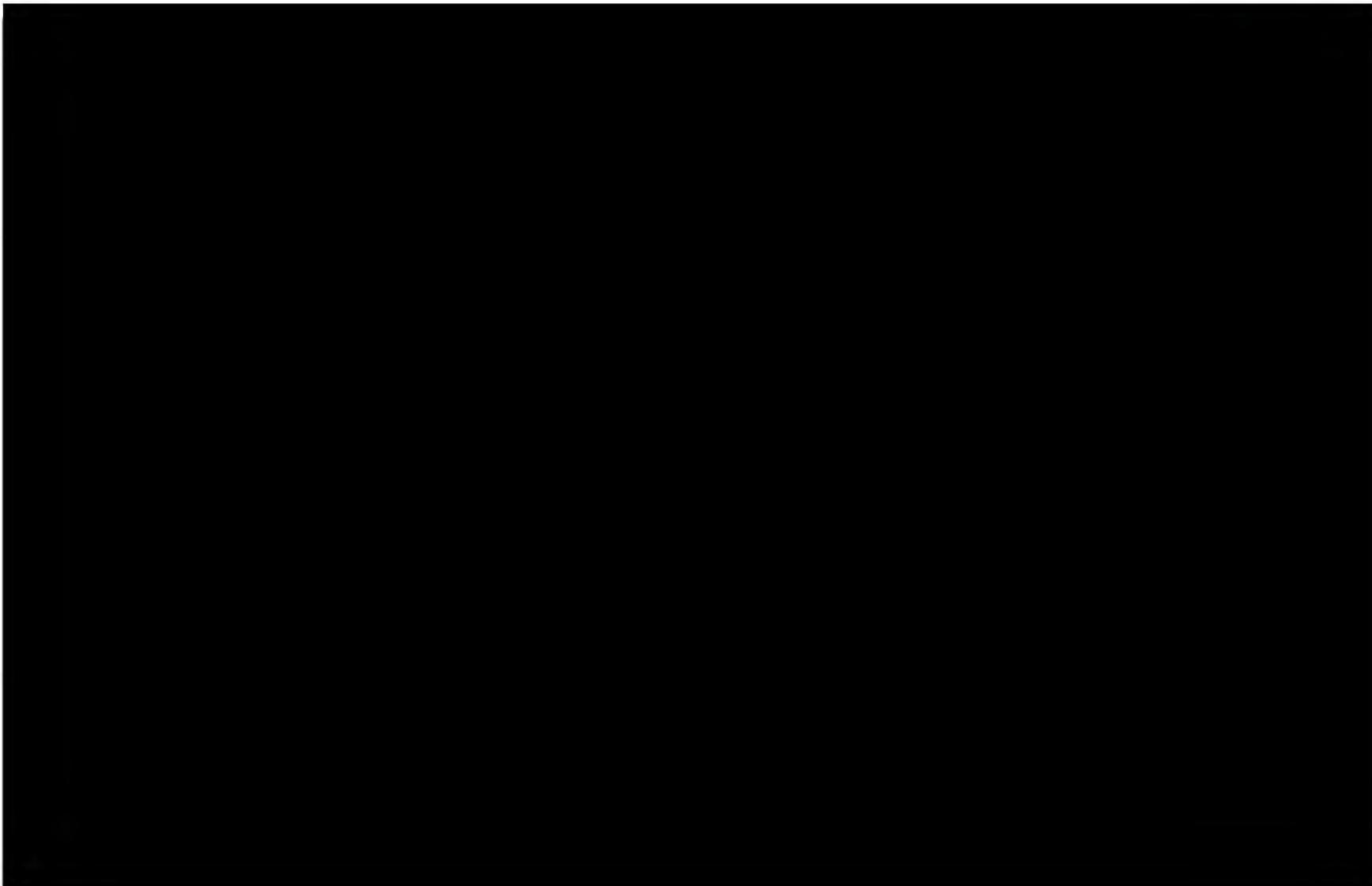
Figure 3.1-1. Historic Property Location



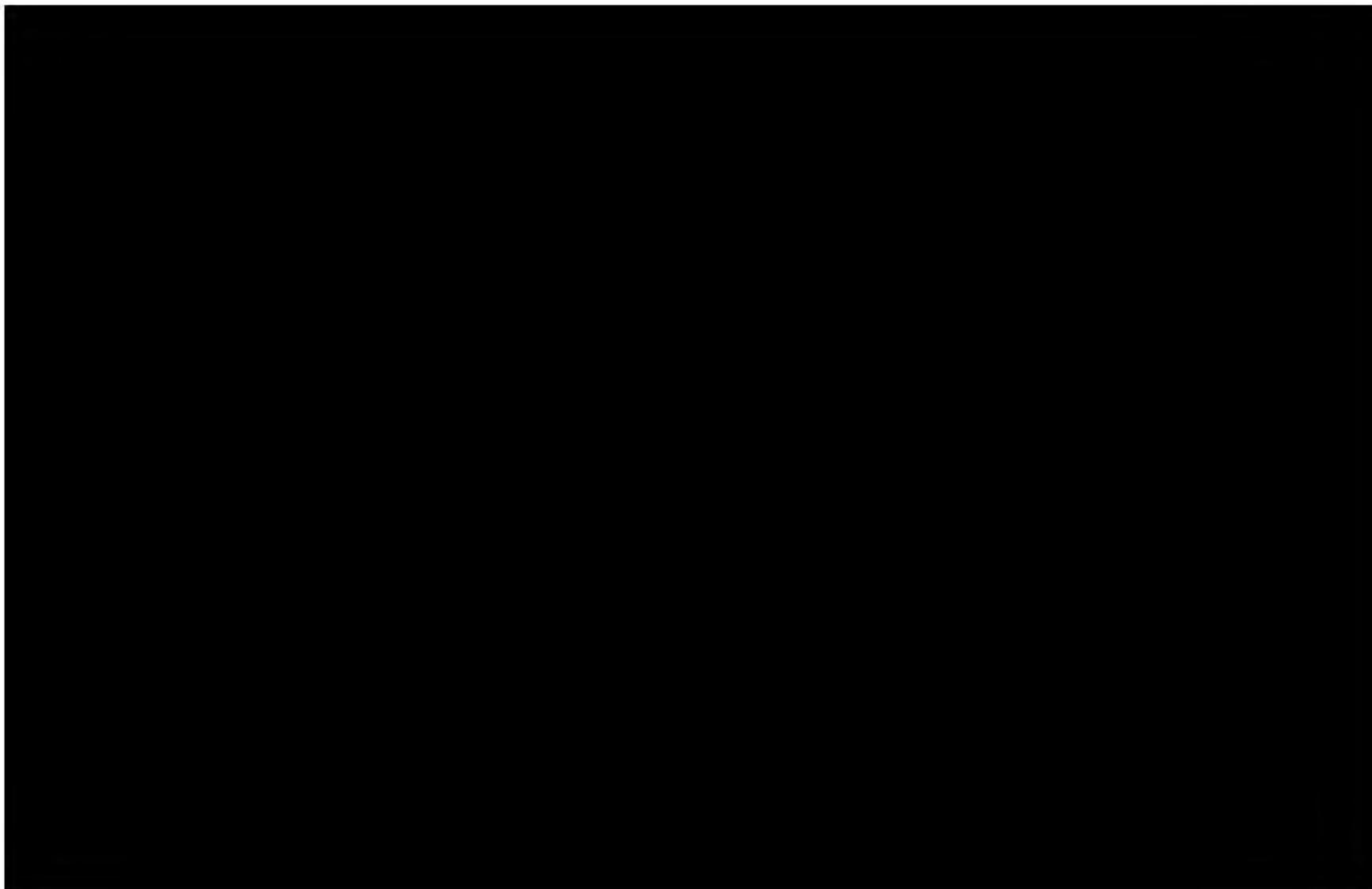
Location of ASLFs ("Geomorphic Feature of Archaeological Interest") within Preliminary Area of Potential Effect (PAPE) – Sheet 1 of 5

Historic Property Treatment Plan

Ancient Submerged Landform Feature, Outer Continental Shelf and RI State Waters



Location of ASLFs ("Geomorphic Feature of Archaeological Interest") within PAPE – Sheet 2 of 5



Location of ASLFs ("Geomorphic Feature of Archaeological Interest") within PAPE – Sheet 3 of 5



Location of ASLFs ("Geomorphic Feature of Archaeological Interest") within PAPE – Sheet 4 of 5



Location of ASLFs ("Geomorphic Feature of Archaeological Interest") within PAPE – Sheet 5 of 5

3.2 Ancient Submerged Landform Features (ASLFs)

3.2.1 *Physical Description and Existing Conditions*

[REDACTED]

3.2.2 *Historic Context*

Based on radiocarbon data collected for the MARA and detailed reconstructions of the paleolandscapes within the PAPE, the identified ASLFs included in this treatment plan are associated with terminal Pleistocene/Early Holocene drainage systems. Many of these fluvial networks likely represent incisions of the

[REDACTED]

(Cacciopoli, 2015). The potential indigenous use of the preserved landforms would likely have been restricted to a period between approximately 15,000 and 9150 cal. B.P. roughly correlating with the archaeologically defined Paleoindian Period and extending into the earliest phases of the antecedent Early Archaic Period. The younger age limit for archaeological sites that could be preserved at

each ASLF is based on marine transgression and would vary in specific timing depending on the elevation of each valley floor.

The dating program and interpretations suggest that each ASLF is associated with a stable terrestrial landform within an ancient valley that could have supported indigenous occupation or other activities. No direct evidence of human use of these locations has been recovered, but the settings of each are consistent with terrestrial locations used by indigenous peoples in the northeastern United States after 13,000 cal. B.P. Although direct evidence of indigenous settlements on the post-glacial OCS landscapes is currently lacking, paleoenvironmental reconstructions suggest the RWEC and RWF ASLFs are the types of locations where evidence of occupations might be expected. Current models for Paleoindian settlement and subsistence patterns indicate people living in the region between approximately 15,000 and 11,000 years ago were highly mobile. Reported Paleoindian site locations occur in a wide range of environmental settings, including river valleys and wetland margins comparable to those inferred at each ASLF.

It is important to note that very little is known about potential coastal adaptations during this time period. The submerged continental shelf contains the vast majority of coastal habitats that would have been available to people living in the region more than 15,000 years ago. Practical and technological challenges have limited the range of surveys that might yield direct evidence of now-submerged coastal sites. Where terminal Pleistocene or very early Holocene coastal sites have been identified elsewhere in North America, those sites have yielded different types of stone tools than typically associated with Paleoindian sites in the Northeast. As such, it is plausible that archaeological expressions of Pleistocene coastal occupations in the New England region may look quite different than their counterparts in the interior sections (now on the mainlands).

Further, each of the ASLFs is associated with a preserved element of the ancient terrestrial landscape that the consulting Native American tribes have identified as having traditional cultural significance. As shared with Revolution Wind by tribal representatives, several of the consulting tribes' traditions hold that their people have always been here. They did not migrate from ancient Asia or Europe or anywhere else. Their origins are rooted here, in the Northeast, and at the interface between the seas and lands. Important events in tribal histories occurred on the OCS and preserved elements of the ancient landscapes with which their ancestors and culture heroes interacted are important.

3.2.3 NRHP Criteria

Based on prior BOEM consultations for the South Fork Wind Farm and Vineyard Wind 1 Wind Farm undertakings and Revolution Wind's assessments, the identified ASLFs are potentially eligible for listing in the NRHP under Criterion D for their potential to yield important information about the indigenous settlement of the northeastern United States and development of coastal subsistence adaptations. Each ASLF may also be eligible for listing under Criterion A for their association with and importance in maintaining the cultural identities of multiple Native American tribes.

4.0 MITIGATION MEASURES

Mitigation measures at the historic properties are detailed in this section. The conceptual mitigation measures were developed in consultation with the Participating Parties by individuals who met Secretary of the Interior (SOI) Qualifications Standards for Archeology and/or History (62 FR 33708) and are appropriate to fully address the nature, scope, size, and magnitude of adverse effects including cumulative effects caused by the Project, and NRHP-qualifying characteristics of each historic property that would be affected.

Based on the commitment to establish a no-anchor zone encompassing Target-31 and the location of Targets 32 and 33 beneath the vertical limits of disturbance, no adverse effects to these three ASLF are anticipated. Target 27 will be avoided due to its location on the margin of the RWF and the South Fork Wind Farm. The measures developed to resolve potential adverse effects to the remaining ASLFs are summarized below.

4.1 Target 21 through Target 26 and Target 28 through Target 30

4.1.1 *Preconstruction Geoarchaeology*

4.1.1.1 Purpose and Intended Outcome

This mitigation measure will consist of the collection of vibracores within the affected portions of each ASLF prior to Project construction. The collected cores, the locations which will be selected in consultation with Native American tribes, will be analyzed in collaboration with the tribes to provide a more detailed understanding of ancient terrestrial landscapes along the RWEC and within the RWF and how such settings may have been used by Pleistocene-age indigenous peoples. Data acquired from this effort is expected to refine the age estimates for each stable landform, the timing and character of ecological transitions evidenced in the MARA report and provide an additional opportunity to recover evidence of ancient indigenous use of each ASLF.

This measure will provide for a more detailed analysis of the stratigraphy, chronology, and evolving ecological conditions at each ancient landform. Two separate reports on the analyses and interpretations will be developed. The first will be focused on content of specific interest the consulting tribes, including a broad approach to integrating available data collected from other recent archaeological research and surveys on the Atlantic OCS. The specific content and formatting of this report will be refined in consultation with the tribes to align the work product with intended intra- and inter-tribal audiences. The second report will be geared primarily toward technical, Tribal/State Historic Preservation Officer and agency audiences.

4.1.1.2 Scope of Work

The scope of work will consist of the following:

- Collaborative review of existing geophysical and geotechnical data with Native American tribes
- Selection of coring locations in consultation with tribes;
- Collection of two to three vibracores within each affected ASLF with a sampling focus on areas that will be disturbed by Project construction activities;

- Written verification to BOEM that the samples collected are sufficient for the planned analyses and consistent with the agreed scope of work;
- Collaborative laboratory analyses at a laboratory located in Rhode Island or Massachusetts;
- Screening of recovered sediments for debitage or micro-debitage associated with indigenous land uses;
- Third-party laboratory analyses, including micro- and macro-faunal analyses, micro- and macro-botanical analyses, radiocarbon dating of organic subsamples, and/or chemical analyses for potential indirect evidence of indigenous occupations;
- Temporary curation of archival core sections
- Draft reports for review by participating parties;
- Final reporting; and
- Public or professional presentations summarizing the results of the investigations, developed with the consent of the consulting tribes.

4.1.1.3 Methodology

Revolution Wind will conduct the Preconstruction Geoarchaeology in consultation with the participating parties. The research, analyses, and interpretations are intended to be a collaborative effort with the consulting tribes. The research will be conducted in collaboration with the consulting Native American tribes, who will be invited by Revolution Wind to series of working sessions to:

- Review existing data;
- Develop specific research questions addressing the tribes' interests in the ASLF;
- Select candidate coring locations;
- Split, document, and sample recovered vibracores in the laboratory;
- Review analytic results and preliminary interpretations; and
- Review draft reporting.

Vibracores placed within the affected sections of each ASLF will extend a maximum depth of approximately 20 feet (6 meters) below the sea floor. The cores will be cut on the survey vessel into approximately 1-meter-long sections and sealed to minimize the risk of environmental contamination. The core segments will be logged on the survey vessel and a chain of custody will be maintained to ensure all samples are accounted for and that all samples are transferred to the laboratory for geoarchaeological analyses. Once the core segments are transferred to the Qualified Marine Archaeologist (QMA), Revolution Wind will invite tribal representatives to participate in the splitting, documentation, and subsampling of each core, if feasible due to COVID-19 restrictions. Each core segment will be split longitudinally into working and archival halves. Subsamples collected from working halves for specific third-party analyses will be packaged in a manner appropriate to the specific analysis for which they are intended. Archival halves will be sealed and stored horizontally on shelves or racks in a climate-controlled facility for at least one year following completion of laboratory analyses. Revolution Wind will prioritize reasonable access to archival core segments by Consulting Parties when selecting the storage facility. All samples collected from the working halves will be submitted to third party laboratories within approximately 6 months of core transfer to the QMA facilities.

As an option, both halves of the core may be consumed to extract the highest amount of quality data possible. This option will be determined through coordination with any participating tribes/tribal nations.

Revolution Wind will prepare a presentation of the preliminary results and interpretations for discussion with the Tribes (see work session schedule above). Revolution Wind will consider the Tribes' comments and suggestions when preparing the draft reports and will seek to resolve any disagreements among the parties through supplemental consultations prior to preparing the draft reports.

Revolution Wind will submit the draft reports to the participating parties for review and comment. Revolution Wind will consider all comments received when developing the final reports. Final digital copies of the completed reports will be provided to all participating parties. Hard copies of the final reports will be submitted to the State Historic Preservation Officers, tribes or other parties upon request.

Following the one-year retention period, Revolution Wind will offer transfer of the archival core segments to the Consulting Tribes, SHPOs and related state agencies, and regional research institutions with an interest in and capacity to conduct further analyses. Revolution Wind currently anticipates research institutions with potential interests/capacities to include the University of Rhode Island, University of Connecticut, and Eastern Connecticut State University. Revolution Wind will notify the Consulting Parties of its intent to transfer archival core segments to any party at least 45 days prior to initiating such transfer and will consider any comments provided by Consulting Parties before proceeding. If no external parties agree to accept the archival core segments, Revolution Wind will water-screen the retained segments to identify and collect potential physical evidence of ancient Native American activity at the ASLFs. In such circumstances, Revolution Wind will prepare a technical memorandum summarizing the results of the archival core segment processing and analyses and submit that memorandum to the Consulting Parties.

4.1.1.4 Standards

The Preconstruction Geoarchaeology effort will be conducted in accordance with BOEM's *Guidelines for Providing Archaeological and Historic Property Information Pursuant to 30 CFR Part 585* (May 2020). The QMA leading the research will meet the SOI professional qualification standards for archeology (62 FR 33708) and BOEM's standards for QMAs.

4.1.1.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- Draft Tribal Audience Report;
- Draft Technical Report;
- Final Tribal Audience Report;
- Final Technical Report; and
- Draft Public or Professional Presentations.

4.1.1.6 Curation

The geoarchaeological collections associated with the ASLF investigations will be curated at the Public Archaeology Laboratory (PAL) facility at 26 Main Street, Pawtucket, Rhode Island. PAL is an approved curatorial facility under specific project permits issued by the Rhode Island RIHPHC and the Massachusetts Historical Commission (MHC) for collections originating in Rhode Island and Massachusetts. PAL currently curates multiple collections for state and federal agencies in accordance with all applicable state and federal standards. The curation section of the laboratory is inspected regularly by state and federal agencies to ensure the proper maintenance of the cultural materials entrusted to PAL's care.

PAL is an approved institution for curating cultural materials and project-related documentation according to the Code of Federal Regulations 36 CFR 79 (Curation of Federally-Owned and Administered Archeological Collections). Laboratory employees are experienced with the curation protocols of many states and federal agencies and the current standards for curation practices as set forth in the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44716-44742, 1983). The Laboratory Manager is a Registered Professional Archaeologist (RPA) and follows the Code of Conduct for that organization as well as the principles of archaeological ethics specified by the Society of American Archaeology and the Society for Historical Archaeology.

4.1.1.7 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an Attachment to the MOA.

4.1.2 *Open-Source GIS and Story Maps*

4.1.2.1 Purpose and Intended Outcome

This mitigation measure will consist of the compilation and transfer of relevant geophysical, geotechnical, and geoarchaeological datasets pertaining to the ASLFs to a non-proprietary GIS system for use by Native American tribes. The datasets will include sub-bottom (seismic) data used to characterize the seabed and ASLFs, the location of all geotechnical/geoarchaeological samples collected, and the vertical and horizontal extents of the affected features or sub-features within each ASLF. The GIS will be, to the extent feasible and practicable, compatible with GIS datasets compiled for other OCS projects to assist in the tribes' on-going research and stewardship efforts. Story Maps or equivalent digital media presentations will be prepared to integrate and present the complex technical data compiled during the MARA and mitigation investigations in a manner best suited for inter- and intra-tribal audiences. Story Map content would be developed in close consultation and collaboration with the consulting Native American tribes.

Incorporation of Revolution Wind datasets into a broader GIS framework will allow the tribes to better understand and protect preserved elements of the ASLFs. The intent of this measure is to enhance the Tribes understanding of existing conditions for a range of ASLFs located in the northeastern Atlantic OCS. This knowledge would allow for more effective Government to Government consultations regarding similar features that may be affected by future federal undertakings. The value of the GIS will increase as additional

datasets are acquired and incorporated. Access to the GIS will support each Tribes' capacity to pursue their own research or intra-tribal educational programs related to the OCS and traditional cultural uses of the now-submerged landscapes of their ancestors. The combined MARA and Preconstruction Geoarchaeology investigations will provide an important perspective on the preservation of ASLFs within formerly glaciated sections of the OCS and within the footprint of former glacial lakes. Integrated GIS that can accommodate datasets collected from other OCS development projects and surveys would allow for comparisons to areas south of the maximum glacial limits on the OCS to provide a more comprehensive view of the ancient landscapes within the region. Revolution Wind will provide reasonable compensation to tribal representative working with Revolution Wind on implementation of this measure. Story Maps created within the GIS will provide a flexible approach to incorporating media from a variety of sources, including geospatial data, interviews with traditional knowledge-holders, photographs, audio recordings, and archival cartography for a compelling interpretive experience. Story Maps can be tailored for specific tribal audiences and uses and would be developed in consultation with the consulting tribes.

4.1.2.2 Scope of Work

The scope of work will consist of the following:

- Consultation with the Tribes to determine the appropriate open-source GIS platform;
- Review of candidate datasets and attributes for inclusion in the GIS;
- Data integration;
- Development of custom reports or queries to assist in future research or tribal maintenance of the GIS;
- Work Sessions with Tribes to develop Story Map content;
- Training session with Tribes to review GIS functionality;
- Review of Draft Story Maps with Tribes;
- Delivery of GIS to Tribes; and
- Delivery of Final Story Maps.

4.1.2.3 Methodology

Revolution Wind will develop the GIS in consultation with the Participating Parties. At least one work session will be scheduled to refine specific functionality of interest to the Tribes. That session will be conducted after the preliminary data analyses for the Preconstruction Geoarchaeology effort has been completed. This will allow for a more focused walk-through of the data and options for organizing and integrating different datasets. Revolution Wind will request from the Tribes details on any existing open-source GIS systems currently in use by each Tribe to minimize any issues with data integration or interoperability. Once the work session has been conducted Revolution Wind will proceed with development of the GIS, taking into account the Tribes' comments and suggestions. The draft GIS system will be shared with the Tribes in a training session that presents the functions of the GIS and familiarizes the tribal representatives with the interfaces, data organization, and any custom features developed to enhance useability. Revolution Wind will consider any feedback from the Tribes on the draft GIS before proceeding with finalizing the system design and implementation. Revolution Wind will provide the GIS to the Tribes by physical storage media

or as a secure digital file transfer, as appropriate to each Tribes IT infrastructure and preference. Revolution Wind does not intend to be responsible for the upkeep of the GIS database.

Story Map content will be developed with the consulting Tribes through one or more scheduled work sessions. Potential options for content intended for youth audiences, tribal governments, and/or general tribal membership will be discussed to refine the conceptual framework and develop draft Story Maps for review by the Tribes. Revolution Wind will consider all comments and feedback provided by the Tribes when preparing the final Story Maps.

4.1.2.4 Standards

The GIS developed under this measure will be free to use and free to modify by the tribes. To the extent feasible, all data will be provided in formats that allow for interoperability with other GIS platforms that the tribes may use. All datasets incorporated in the GIS will comply with Federal Geographic Data Committee data and metadata standards.

4.1.2.5 Documentation

Revolution Wind will provide draft descriptions and documentation of the GIS for review by the Participating Parties and will provide a description of the draft Story Maps to the consulting Tribes following the initial working sessions.

The following documentation is to be provided for review by Participating Parties:

- Draft Description of the GIS with appropriate schema, data organization, and custom reports/queries;
- Draft Story Map descriptions with details on content, formatting, and intended audiences; and
- Final Technical Description of the GIS with schema, data organization, and custom reports/queries.

4.1.2.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an Attachment to the MOA.

5.0 IMPLEMENTATION

5.1 Timeline

The timeline for implementation of the mitigation measures is identified in the MOA.

5.2 Organizational Responsibilities

5.2.1 *Bureau of Ocean Energy Management (BOEM)*

BOEM remains responsible for making all federal decisions and determining compliance with Section 106. BOEM has reviewed this HPTP to ensure, at minimum, it includes the content required.

- BOEM remains responsible for making all federal decisions and determining compliance with Section 106;
- BOEM, in consultation with the Participating Parties, will ensure that mitigation measures adequately resolve adverse effects, consistent with the NHPA;
- BOEM will be responsible for sharing the annual summary report with Participating Parties; and
- BOEM is responsible for consultation related to dispute resolution.

5.2.2 *Revolution Wind, LLC*

Revolution Wind will be responsible for the following:

- Considering the comments provided by the Participating Parties in the development of this HPTP;
- Funding the mitigation measures specified in Section 4.0;
- Completion of the scope/s of work in Section 4.0;
- Ensuring all Standards in Section 4.0 are met;
- Providing the Documentation in Section 4.0 to the Participating Parties for review and comment;
- Annual Reporting to BOEM; and
- Revolution Wind will be responsible for ensuring that all work that requires consultation with Tribal Nations are performed by professionals who have demonstrated professional experience consulting with federally recognized Tribes.

5.2.3 *Other Parties, as Appropriate*

Revolution Wind does not anticipate additional consulting parties, should any be determined, this will be updated.

5.3 Participating Party Consultation

This HPTP was provided by Revolution Wind for review by Participating Parties to provide meaningful input on the resolution of adverse effects to and form(s) of implementing mitigation at the historic properties. Participating Parties were provided the opportunity for review and comment on the HPTP concurrent with BOEM's NEPA substitution schedule for the Project. This HPTP was further refined through informational

and consultation meetings, conference calls, HPTP draft reviews and document exchanges, or similar means of communication of information.

6.0 REFERENCES

Cacciopoli, Brian. 2015. *Reconstructing Submerged Paleoenvironments: Mud Hole, RI Sound and Greenwich Bay, RI*, MS Thesis, Department of Oceanography, University of Rhode Island.

Code of Federal Regulations (CFR). 2021a. 36 CFR 800 – Protection of Historic Properties [incorporating amendments effective December 15, 2021]. Available at <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800>. Accessed December 21, 2021.

CFR. 2021b. 36 CFR 61.4(e)(1) – Procedures for State, Tribal, and Local Government Historic Preservation Programs [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4\(e\)\(1\)](https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4(e)(1)). Accessed December 21, 2021.

CFR. 2021c. 36 CFR 65.2(c)(2) – National Historic Landmarks Program – Effects of Designation [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2\(c\)\(2\)](https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2(c)(2)). Accessed December 21, 2021.

CFR. 2022. 40 CFR 1500 – National Environmental Policy Act Implementing Regulations. Available at <https://www.ecfr.gov/current/title-40/chapter-V/subchapter-A>. Accessed January 7, 2022.

Federal Register. 1997. 62 FR 33708 – The Secretary of the Interior’s Historic Preservation Professional Qualifications Standards. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/app/details/FR-1997-06-20/97-16168>. Accessed December 21, 2021.

Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR). 2023. *Historic Resources Visual Effects Analysis, Revolution Wind Farm*. Syracuse, NY.

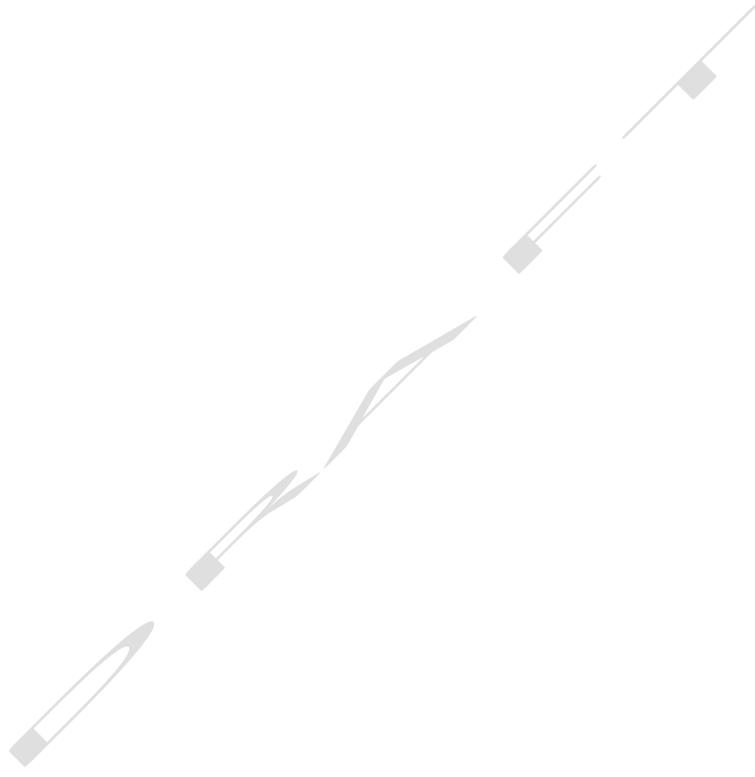
Federal Register. 2021. FR30068 -Department of the Interior, Bureau of Ocean Energy Management, Docket No.: BOEM-2021-0029. *Notice of Intent to Prepare an Environmental Impact Statement for Revolution Wind LLC’s Proposed Wind Energy Facility Offshore Rhode Island; Reopening of Comment Period and Corrections*. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/content/pkg/FR-2021-06-04/pdf/2021-11727.pdf>. Accessed February 8, 2022.

Revolution Wind, LLC. 2022. *Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project*. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan>.

SEARCH, Inc. (SEARCH) 2023. *Marine Archaeological Resources Assessment*. Revolution Wind Farm Construction and Operations Plan.

United States Code. 2016. Title 54 - National Historic Preservation Act [as amended through December 16, 2016]. Available at <https://www.achp.gov/sites/default/files/2018-06/nhpa.pdf>. Accessed December 21, 2021.

**ATTACHMENT 7 – HISTORIC PROPERTY TREATMENT PLAN FOR THE REVOLUTION
WIND FARM, THE [REDACTED] #1 AND #2 SITES, TOWN OF NORTH
KINGSTOWN, WASHINGTON COUNTY, RHODE ISLAND**



Historic Property Treatment Plan

for the

Revolution Wind Farm



Submitted to:



Bureau of Ocean Energy Management
U.S. Department of the Interior

Prepared for:



Revolution Wind, LLC
<https://revolutionwind.com/>

Prepared by:



Environmental Design & Research, D.P.C.
217 Montgomery Street, Suite 1100
Syracuse, New York 13202
www.edrdpc.com

June 2023

ABSTRACT

Federal Undertaking: Revolution Wind Farm and Revolution Wind Export Cable Project

Location: Outer Continental Shelf and Rhode Island

Federal and
State Agencies: Bureau of Ocean Energy Management
National Park Service
U.S. Army Corps of Engineers
Massachusetts Historical Commission
Rhode Island Historical Preservation & Heritage Commission
New York Historic Preservation Office
Connecticut Historic Preservation Office
Advisory Council on Historic Preservation

Regulatory Process: National Environmental Policy Act
Section 106 of the National Historic Preservation Act
Section 110(f) of the National Historic Preservation Act

Purpose: This Historic Property Treatment Plan provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects from the Revolution Wind Project.

Adverse Physical Effect
Finding for: [REDACTED]

Submitted By: Revolution Wind, LLC

Date: June 2023

TABLE OF CONTENTS

1.0 Executive Summary 1

2.0 Background information 3

 2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable 3

 2.2 Section 106 and Section 110(f) of the National Historic Preservation Act..... 5

 2.3 Participating Parties 6

3.0 Existing Conditions and Historic Significance..... 8

 3.1 Historic Properties 8

 3.2 [REDACTED] 9

 3.2.1 Physical Description and Existing Conditions 9

 3.2.2 Historic Context 10

 3.2.3 NRHP Criteria..... 11

 3.3 [REDACTED] 12

 3.3.1 Physical Description and Existing Conditions 12

 3.3.2 Historic Context 13

 3.3.3 NRHP Criteria..... 13

4.0 Mitigation Measures 14

 4.1 [REDACTED] 14

 4.1.1 Data Recovery Investigations 14

 4.1.2 Archaeological Construction Monitoring Plan 16

 4.1.3 Historic Property Archaeological Protection Plan 16

 4.1.4 Documentation 16

 4.1.5 Funds and Accounting 16

5.0 Implementation 17

 5.1 Timeline..... 17

 5.2 Organizational Responsibilities 17

 5.2.1 Bureau of Ocean Energy Management (BOEM) 17

 5.2.2 Revolution Wind, LLC 17

 5.2.3 Other Parties, as Appropriate..... 17

 5.3 Participating Party Consultation 17

6.0 References..... 19

LIST OF FIGURES

Figure 2.1-1. Onshore Facilities Regional Location 4

Figure 2.1-2. Onshore Facilities Overview..... 5

Figure 3.1-1. [REDACTED] 8

Historic Property Treatment Plan

[REDACTED]

LIST OF TABLES

Table 3.1-1. Historic Resources included in the HPTP 8

Table 3.2-1. Native American Cultural Materials by Stratum, [REDACTED] 9

Table 3.3-1. Native American Cultural Materials by Stratum, [REDACTED] 12

LIST OF ATTACHMENTS

- Attachment A. Phase III Archaeological Data Recovery Program
- Attachment B. Archaeological Construction Monitoring Plan

LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
ADLS	Aircraft Detection Lighting System
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
cmbgs	centimeters below ground surface
COP	Construction and Operations Plan
EDR	Environmental Design and Research, D.P.C.
FEIS	Final Environmental Impact Statement
FR	Federal Register
HPTP	Historic Property Treatment Plan
MOA	Memorandum of Agreement
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
QDC	Quonset Development Corporation
RFP	Request for Proposals
RIHPHC	Rhode Island Historical Preservation & Heritage Commission
RI SHPO	Rhode Island State Historic Preservation Officer
ROD	Record of Decision
RWF	Revolution Wind Farm
STP	shovel test pit
THPO	Tribal Historic Preservation Officer
USCG	United States Coast Guard
WTG	Wind Turbine Generator

1.0 EXECUTIVE SUMMARY

This Historic Property Treatment Plan (HPTP) for two archaeological historic properties, [REDACTED] (the historic properties) provides background data, resource-specific information, and detailed steps that will be implemented to carry out the mitigation actions in the *Terrestrial Archaeological Resources Assessment and Site Identification Survey, Revolution Wind Farm Project, Onshore Facilities* (TARA) dated February 2023 (PAL, 2023) for the Revolution Wind Farm (RWF) and Revolution Wind Export Cable Project (collectively, the Undertaking). Revolution Wind, LLC (Revolution Wind) has provided this HPTP in accordance with the Bureau of Ocean Energy Management's (BOEM) Findings of Adverse Effect (FoAE) for the Undertaking under the National Historic Preservation Act (NHPA).

BOEM has used the National Environmental Policy Act (NEPA) substitution process to fulfill its Section 106 obligations as provided for in the NHPA implementing regulations (36 CFR § 800.8(c)), and BOEM has consulted with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, federally recognized Native American Tribes, and other NHPA Section 106 consulting parties in accordance with this process. Revolution Wind has provided this HPTP to BOEM for inclusion in the Final Environmental Impact Statement (FEIS).

This HPTP describes the mitigation measures to resolve potential adverse effects on historic properties, the implementation steps, and timeline for actions. The mitigation measures are based on the evaluations and outreach performed by Revolution Wind prior to the issuance of the DEIS as well as outreach to consulting parties performed by BOEM. This HPTP document has undergone revision and refinement in consultation with the Massachusetts State Historic Preservation Officer, the Rhode Island State Historic Preservation Officer, the ACHP, and other consulting parties throughout the NEPA substitution process. This HPTP is included in the Memorandum of Agreement (MOA) issued in accordance with 36 CFR §§ 800.8, 800.10.

Pursuant to the terms and conditions of the MOA, Revolution Wind will implement these mitigation measures.

This HPTP is organized into the following sections:

- **Section 1.0, Introduction**, outlines the content of this HPTP.
- **Section 2.0, Cultural Resources Regulatory Context**, briefly summarizes the Undertaking while focusing on cultural resources regulatory contexts (federal, tribal, state, and local, including preservation restrictions), identifies the historic properties discussed in this HPTP that will be adversely affected by the Undertaking, and summarizes the pertinent provisions and attachments of the *Historic Resources Visual Effects Analysis – Revolution Wind Farm* (EDR, 2023) and *Revolution Wind Farm Construction and Operations Plan* (COP; Revolution Wind, 2022) that guided the development of this document.
- **Section 3.0, Existing Conditions and Historic Significance**, provides a physical description of the historic properties included in this HPTP. Set within its historic context, the applicable NRHP criteria

for the historic properties are discussed with a focus on the contribution of a maritime visual setting to its significance and integrity.

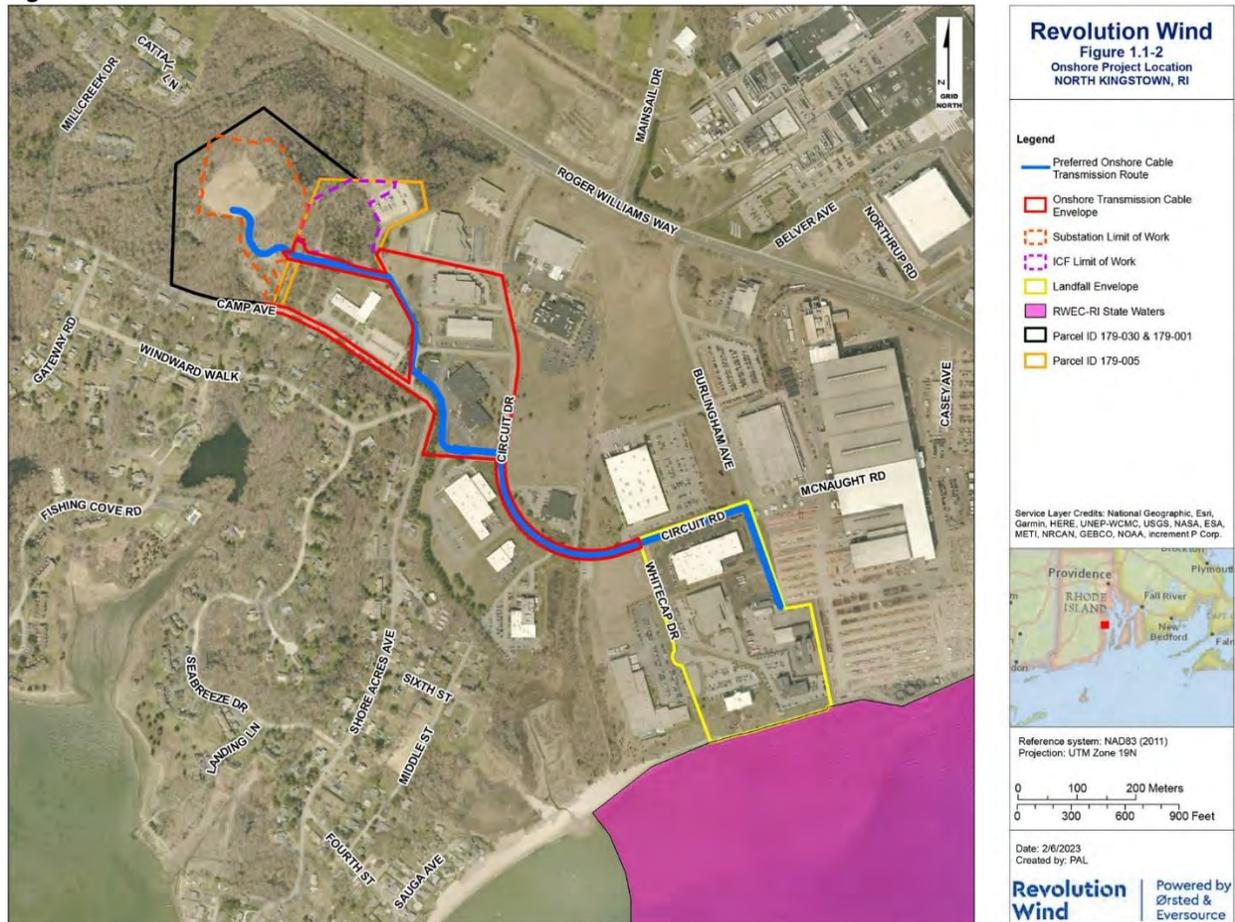
- **Section 4.0, Mitigation Measures**, presents specific steps to carry out the mitigation actions. The mitigation action includes a detailed description, intended outcome, methods, standards, and requirements for documentation.
- **Section 5.0, Implementation**, establishes the process for executing mitigation actions at the historic properties, as identified in Section 4.0 of this HPTP. For each/the action, organizational responsibilities are outlined, a timeline is provided, and regulatory reviews are listed.
- **Section 6.0, References**, is a list of works cited in this HPTP.
- **Attachment A**, [REDACTED]
- **Attachment B**, [REDACTED]

2.0 BACKGROUND INFORMATION

2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable

The Undertaking is a wind-powered electric generating facility composed of up to 100 wind turbine generators (WTGs) and associated foundations, two offshore substations, and inter-array cables connecting the WTGs and the offshore substations (see Figure 2.1-1). The WTGs, offshore substations, array cables, and substation interconnector cables would be located on the Outer Continental Shelf approximately 15 nautical miles (18 statute miles) southeast of Point Judith, Rhode Island, approximately 13 nautical miles (15 statute miles) east of Block Island, Rhode Island, approximately 7.5 nautical miles (8.5 statute miles) south of Nomans Land Island National Wildlife Refuge (uninhabited island), and between approximately 10 to 12.5 nautical miles (12 to 14 statute miles) south/southwest of varying points of the Rhode Island and Massachusetts coastlines (62 FR 33708). In addition, two submarine export cables located in both federal waters and Rhode Island State territorial waters, will connect the offshore substation to the electrical grid. The proposed interconnection location for the Undertaking is the existing Davisville Substation, which is owned and operated by The Narragansett Electric Company d/b/a National Grid and located in North Kingstown, Rhode Island. The visible offshore components of the operational Undertaking will be located on Lease OCS-A 0486 in water depths ranging from approximately 108 to 125 feet.

Figure 2.1-2. Onshore Facilities Overview



2.2 Section 106 and Section 110(f) of the National Historic Preservation Act

This HPTP was developed in accordance with the TARA and COP and reflects consultations conducted by BOEM with multiple consulting parties, including the Rhode Island State Historic Preservation Officer (RI SHPO), the Narragansett Indian Tribe, Wampanoag Tribe of Gay Head/Aquinnah, Mashpee Wampanoag, Shinnecock Indian Nation and Mashantucket Pequot Historic Preservation Offices (THPOs). The regulations at 36 CFR § 800.8 provide for use of the National Environmental Policy Act (NEPA) process to fulfill a Federal agency’s National Historic Preservation Act (NHPA) Section 106 review obligations in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6. Under these provisions, issuance of a Record of Decision (ROD) and implementation of relevant conditions will resolve adverse effects to historic properties caused by the Undertaking, including to National Historic Landmarks for which BOEM must provide a higher standard of care, as required by Section 110(f) of the National Historic Preservation Act.

The measures to avoid and minimize adverse effects to identified historic properties are described in the *Terrestrial Archaeological Resources Assessment and Site Identification Survey*.

This HPTP addresses the mitigation requirements identified by BOEM to resolve the remaining adverse effects after application of the above-referenced measures. The mitigation measures reflect consultations among consulting parties to refine a conceptual mitigation framework proposed by Revolution Wind. That framework identified the following measures as appropriate means of resolving adverse effects to [REDACTED]

[REDACTED]

- a. Phase III Data recovery investigations to document and recover critical information regarding the ancient Native American use of the impacted sites.
 - i. All excavations will be conducted under a permit issued by the Rhode Island Historical Preservation & Heritage Commission.
 - ii. Excavations are intended to extend over approximately 20% of the affected section of each site.
 - iii. The research design and specific research questions to be addressed through field research and laboratory analyses have been developed in consultation with the consulting Native American Tribes.
 - iv. Representatives from the consulting Native American Tribes will be invited to monitor the field investigations and participate in the interpretation of data collected.
- b. Technical reports for peer review and dissemination of data at professional conferences/publications will be produced at the conclusion of the field investigations.
- c. An Archaeological Construction Monitoring Plan developed to ensure that impacts to the areas of the [REDACTED] to be protected do not occur during ground disturbing activities.
- d. A Historic Property Archaeological Protection Plan to be developed following Phase III data recovery to ensure that protection measures are carried out during ongoing Operations and Maintenance of the Project.

All activities implemented under this HPTP will be conducted in accordance with any conditions imposed by BOEM in its Record of Decision (ROD) and with applicable state and federal regulations and permitting requirements. Responsibilities for specific compliance actions are described in further detail in Section 5.2 – Organizational Responsibilities.

2.3 Participating Parties

BOEM initiated consultation under Section 106 with invitations to consulting parties on April 30, 2021. BOEM hosted the first Section 106-specific meeting with consulting parties on December 17, 2021, and additional meetings pursuant to Sections 106 and 110(f) of the NHPA and in accordance with 36 CFR 800.8.

Following BOEM initial Section 106 meeting with consulting parties, Revolution Wind held stakeholder outreach meetings (see Section 5.3) to review conceptual mitigation measures for the historic property and invited the following parties:

- RI SHPO;

- The Narragansett Indian Tribe THPO;
- The Wampanoag Tribe of Gay Head/Aquinnah THPO;
- The Mashpee Wampanoag Tribe THPO;
- The Mashantucket Pequot Tribal Nation THPO; and
- The Shinnecock Indian Nation THPO.

This HPTP provides details and specifications for mitigation measures to resolve the adverse effects within the APE for the [REDACTED]

3.0 EXISTING CONDITIONS AND HISTORIC SIGNIFICANCE

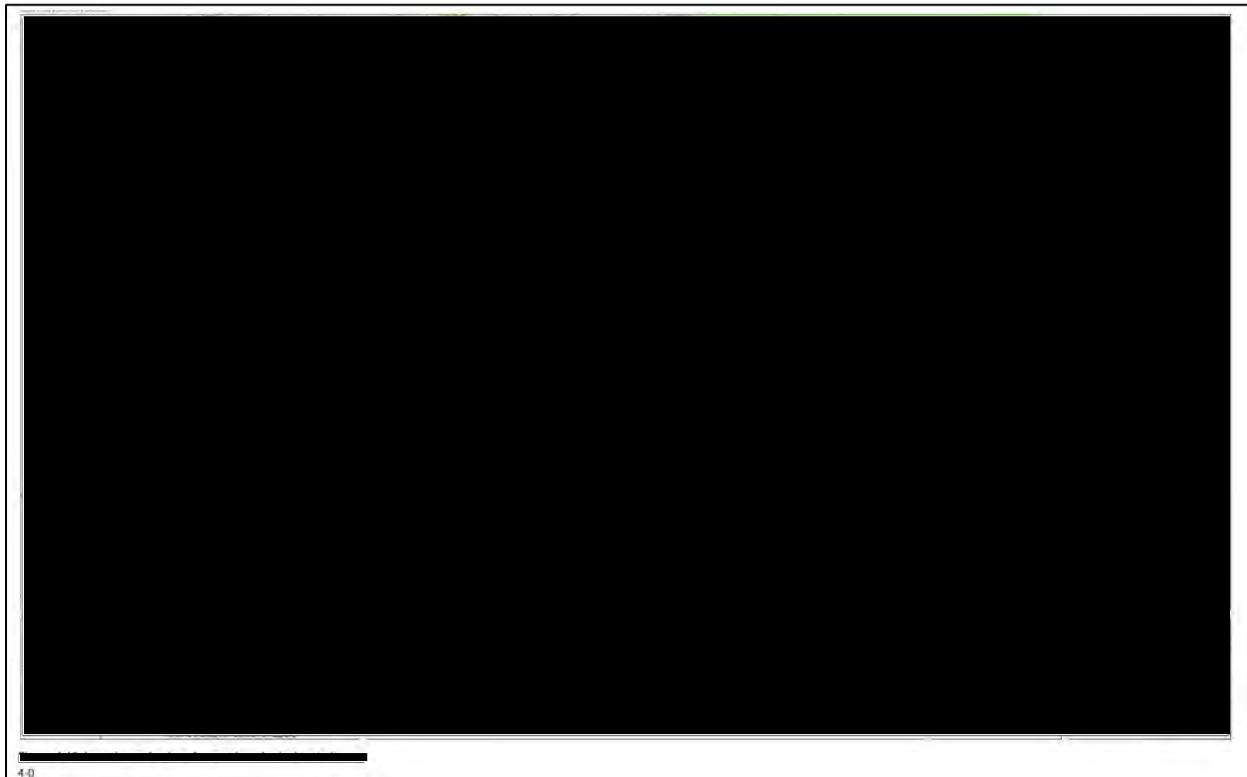
3.1 Historic Properties

The HPTP involves two historic properties, as identified in 3.1-1 and located on Figure 3.1-1.

Table 3.1-1. Historic Resources included in the HPTP

Name	Municipality	State	Site No.	Property Designation	Ownership
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Figure 3.1-1. [REDACTED]



In Section 3.22 and 3.33, each historic property is individually considered, described both physically and historically. Information on each historic property, relevant historic context, and potential NRHP eligibility is summarized from the *Terrestrial Archaeological Resources Assessment and Site Identification Survey* (TARA; PAL, 2021) prepared in support of the Undertaking's COP submittal to BOEM.

3.2 [REDACTED]

3.2.1 *Physical Description and Existing Conditions*

[REDACTED]

[REDACTED]

[REDACTED]

Table 3.2-1. Native American Cultural Materials by Stratum, [REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]						[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]					[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]					[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]					[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]						[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]			[REDACTED]		[REDACTED]
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		[REDACTED]					[REDACTED]
	[REDACTED]		[REDACTED]					[REDACTED]
	[REDACTED]		[REDACTED]					[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]					[REDACTED]
[REDACTED]	[REDACTED]				[REDACTED]	[REDACTED]		[REDACTED]
	[REDACTED]							

Excavation of TP TB-04 [REDACTED]
[REDACTED]
[REDACTED] Feature 01 was observed to be a dark grayish brown, fine silty medium sand that contrasted with the natural dark yellowish brown B horizon subsoil. The feature was semi-circular in plan in the TP's south wall and extended south beyond the limits of excavation. A moderate density of argillite chipping debris and several bivalve shell fragments were recovered from the feature before excavation was suspended (Table 3.2-1). The Public Archaeology Laboratory, Inc. (PAL), who conducted the archaeological survey, provided a preliminary interpretation that Feature 01 was a possible Native American refuse pit.

Excavation of TP TK-01 on the [REDACTED]
[REDACTED]
Feature 02 was observed to be a very dark grayish brown, silty coarse sand anomaly beneath apparent B horizon subsoils. Charcoal, lithic chipping debris, and shell fragments were recovered from Feature 02 before excavation was suspended. Charcoal collected from 40 to 50 cmbgs in Feature 02 yielded a radiocarbon date of 670 ± 30 radiocarbon years before present (B.P.), falling within the Late Woodland temporal period (1,000-450 B.P.). PAL provided a preliminary interpretation that Feature 02 was a Native American hearth or cook fire.

[REDACTED]
[REDACTED]. Thus, no Phase III Data Recovery investigations are planned around either of these two previously recorded features.

Six twentieth-century artifacts included molded glass shards, window glass, and a 1972 penny were also recovered from A horizon topsoil in test pits excavated within [REDACTED]

[REDACTED]
[REDACTED]

3.2.2 *Historic Context*

Based on the Small Stemmed projectile point recovered from TP TJ-1, [REDACTED]
[REDACTED]. The Small Stemmed archaeological tradition is one of three traditions associated with the Late Archaic, with projectile points typically made from quartz, quartzite, or argillite. Late Archaic period sites in the New England region show use of large wetland systems (Thorbahn, 1982). Shellfish exploitation also intensified during this time period. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

[REDACTED] The variety of lithic materials, range of representative artifact types, and their distribution along with the identification of two suspected Native American cultural features indicate [REDACTED]

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

3.3 [REDACTED]

3.3.1 *Physical Description and Existing Conditions*

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Table 3.3-1. Native American Cultural Materials by Stratum, [REDACTED]

Material	Object	Stratum				Count
		A1	A _p	B1	B2	
[REDACTED]	[REDACTED]	■			■	■
[REDACTED]	[REDACTED]	■	■	■		■
	[REDACTED]	■				■
[REDACTED]	[REDACTED]	■		■		■
[REDACTED]	[REDACTED]			■		■
	[REDACTED]	■	■	■	■	■

A small brock fragment was also recovered from the same test pit as the projectile point (TP TH-02). No evidence of suspected Native American features was encountered during test pit excavation [REDACTED]

3.3.2 *Historic Context*

Based on the Wading River Small Stemmed projectile point recovered from TP TH-02, [REDACTED] [REDACTED] The similarity in stone tool forms used during the Late Archaic and Early Woodland periods suggest that some Small Stemmed tradition sites may include Early Woodland components (Juli and McBride 1984). See Section 3.2.2 for a discussion of the historic context of the Late Archaic period [REDACTED]

The Early Woodland period (from 1,000 to 450 B.P.) is characterized by limited use of upland areas and more intensive occupation of the coastal zone. In the absence of radiocarbon dates to attribute sites to the specified time range, Early Woodland occupations in Rhode Island have been identified by the presence of associated archaeological traditions including Meadowood, Lagoon, and Rossville type projectile points and by grit-tempered, cord-marked Vinette I ceramics.

Due to the close spatial proximity of the two sites, the early sixteenth to late twentieth century historic context of the [REDACTED] [REDACTED] (see Section 3.2.2).

3.3.3 *NRHP Criteria*

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]. Additional archaeological investigations may contribute new information on Late/Transitional Archaic and Early Woodland Period settlement, Late Archaic exploitation of wetland resources, occupation of an interior esker, similarities and differences between Late Archaic and Early Woodland cultural materials and artifact assemblages, coastal vs. interior subsistence economy preferences during the Archaic Period, and general cultural evolution and change within southern Rhode Island's near interior and coastal zone. In the TARA (PAL, 2021), [REDACTED]

4.0 MITIGATION MEASURES

Revolution Wind recognizes the significance of the [REDACTED] and is committed to avoiding or minimizing impacts to these sites to the extent feasible. This HPTP addresses the mitigation requirements identified by BOEM to resolve the remaining adverse effects. The mitigation measures for the [REDACTED] (detailed below) reflect consultations among consulting parties to refine a conceptual mitigation framework proposed by Revolution Wind. BOEM and Revolution Wind have identified steps to implement these measures in consultation with Participating Parties, led by individuals who meet the qualifications specified in the Secretary of the Interior’s Qualifications Standards for Archaeology (36 CFR 61) and have demonstrated experience in the interpretation of Precontact Period archaeological sites in the Northeast region.

4.1 [REDACTED]

4.1.1 *Data Recovery Investigations*

4.1.1.1 Purpose and Intended Outcome

This HPTP proposes to complete Phase III data recovery investigations within the affected sections of the sites to document and recover critical information regarding the ancient Native American use of the [REDACTED]. The intended outcome is to provide funding to Secretary of the Interior’s Qualified Archaeologists (36 CFR 61) to conduct a data recovery investigation within the affected sections of the historic properties.

4.1.1.2 Scope of Work

The scope of work will consist of the following:

- The Phase III Data Recovery Program specifying the scope of the proposed Phase III investigation (Attachment A);
- Field investigation of approximately 20% of the impact areas of both historic properties, including 1-x-1 and 2-x-2-meter excavation units (EUs) to document the stratigraphic integrity of the site, investigate artifact concentrations, and/or investigate potential features more precisely;
- Feature documentation and excavation; and
- Artifact recovery, processing, and analysis.

4.1.1.3 Methodology

The research design and specific research questions to be addressed through field research and laboratory analyses will be developed in consultation with the RI SHPO and the Participating Parties. Representatives from the consulting Native American Tribes will be invited to monitor the field investigations and participate in the interpretation of collected data. Excavations are anticipated to include up to 20 percent of the impacted areas of the historic properties in order to provide a representative sample of cultural materials and to support detailed analyses.

4.1.1.4 Standards

The archaeological data recovery investigations will comply with the following standards:

- Rhode Island Historical Preservation & Heritage Commission's (RIHPHC) Performance Standards and Guidelines for Archaeology in Rhode Island (the Guidelines, 2021); and
- Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 Federal Register 44716–44742, 1983).

4.1.1.5 Reporting

The results of the Phase III data recovery investigations will be presented in a Phase III illustrated report. The report will include the results of the Phase III field investigations, artifact analyses, appropriate maps, photographs, and illustrations, and conclusion regarding significance. It is anticipated that the Phase III report will include the following sections:

1. Introduction: The report will describe the purpose and goals of the investigation and describe the proposed development/construction within the historic properties.
2. Project Background: The report will include a summary of the TARA (PAL, 2021), as well as a summary of correspondence with involved state and federal agencies and Participating Parties.
3. Research Design/Research Questions: The Phase III report will include the research design and specific research questions to be addressed by data recovery and analysis at each site.
4. Field Investigations: The Phase III report will include a summary of the methods and results of field investigations. This will include:
 - one or more artifact density maps,
 - representative stratigraphic profiles for test units
 - stratigraphic profiles and plan views of all investigated potential features.
5. Analyses: The report will include a complete artifact inventory, as well as a synthesis and interpretation of the artifact assemblages recovered, and features documented during the Phase I investigation described in the TARA and the proposed Phase III investigations.
6. Conclusions: The report will offer additional preservation and management recommendations and the need (if any) for additional archaeological investigations.

An electronic copy of the Phase III report will be submitted to the RI SHPO, BOEM, and THPOs for review and comment. Revolution Wind will provide two bound copies of the final report to the RI SHPO reflecting the consideration of all consulting party comments and recommendations.

4.1.1.6 Curation

The archaeological collections associated with [REDACTED] will be curated at PAL facility at 26 Main Street, Pawtucket, Rhode Island. Curation of the collections will be in accordance with a RIHPHC-issued archaeological permit authorizing the data recovery excavations. PAL is an approved curatorial facility under specific project permits issued by the RIHPHC and the Massachusetts Historical Commission (MHC) for collections originating in Rhode Island and Massachusetts. PAL currently curates

multiple collections for state and federal agencies in accordance with all applicable state and federal standards. The curation section of the laboratory is inspected regularly by state and federal agencies to ensure the proper maintenance of the cultural materials entrusted to PAL's care.

PAL is an approved institution for curating cultural materials and project-related documentation according to the Code of Federal Regulations 36 CFR 79 (*Curation of Federally-Owned and Administered Archeological Collections*). Laboratory employees are experienced with the curation protocols of many states and federal agencies and the current standards for curation practices as set forth in the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44716-44742, 1983). The Laboratory Manager is a Registered Professional Archaeologist (RPA) and follows the Code of Conduct for that organization as well as the principles of archaeological ethics specified by the Society of American Archaeology and the Society for Historical Archaeology.

4.1.2 Archaeological Construction Monitoring Plan

Following the completion of the data recovery field investigations an Archaeological Construction Monitoring Plan (Attachment B) will be implemented during all ground disturbing activities within and adjacent to the archaeological sites' impact areas.

4.1.3 Historic Property Archaeological Protection Plan

A Historic Property Archaeological Protection Plan will be developed following the Phase III data recovery investigations in order to ensure that the areas of [REDACTED] that remain intact will be protected throughout ongoing Operations and Maintenance of the Project. The draft plan will be circulated to the Participating Parties for review.

4.1.4 Documentation

The following documentation is to be provided for review by Participating Parties:

- [REDACTED];
- Draft Historic Property Archaeological Protection Plan;
- Final Historic Property Archaeological Protection Plan;
- Draft Archaeological Construction Monitoring Report;
- Final Archaeological Construction Monitoring Report;
- Draft Phase III Archaeological Data Recovery Report; and
- Final Phase III Archaeological Data Recovery Report.
- Draft Historic Property Archaeological Protection Plan
- Final Historic Property Archaeological Protection Plan

4.1.5 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an Attachment to the MOA.

5.0 IMPLEMENTATION

5.1 Timeline

The timeline for implementation of the mitigation measures is identified in the MOA.

5.2 Organizational Responsibilities

5.2.1 *Bureau of Ocean Energy Management (BOEM)*

BOEM remains responsible for making all federal decisions and determining compliance with Section 106 of the NHPA. BOEM has reviewed this HPTP to ensure, at minimum, it includes the content required.

- BOEM remains responsible for making all federal decisions and determining compliance with Section 106;
- BOEM, in consultation with the Participating Parties, will ensure that mitigation measures adequately resolve adverse effects, consistent with the NHPA;
- BOEM will be responsible for sharing the annual summary report with Participating Parties; and
- BOEM is responsible for consultation related to dispute resolution.

5.2.2 *Revolution Wind, LLC*

Revolution Wind will be responsible for the following:

- Considering the comments provided by the Participating Parties in the development of this HPTP;
- Funding the mitigation measures specified in Section 4.0;
- Completion of the scope/s of work in Section 4.0;
- Ensuring all Standards in Section 4.0 are met;
- Providing the Documentation in Section 4.0 to the Participating Parties for review and comment;
- Annual Reporting to BOEM; and
- Revolution Wind will be responsible for ensuring that all work that requires consultation with Tribal Nations are performed by professionals who have demonstrated professional experience consulting with federally recognized Tribes.

5.2.3 *Other Parties, as Appropriate*

Revolution Wind does not anticipate additional consulting parties, should any be determined, this will be updated.

5.3 Participating Party Consultation

This HPTP was provided by Revolution Wind for review by Participating Parties to provide meaningful input on the resolution of adverse effects to and form(s) of implementing mitigation at the historic properties. Participating Parties were provided the opportunity for review and comment on the HPTP concurrent with BOEM's NEPA substitution schedule for the Project. This HPTP was further refined through informational

6.0 REFERENCES

Code of Federal Regulations (CFR). 2021a. 36 CFR 800 – Protection of Historic Properties [incorporating amendments effective December 15, 2021]. Available at <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800>. Accessed December 21, 2021.

CFR. 2021b. 36 CFR 61.4(e)(1) – Procedures for State, Tribal, and Local Government Historic Preservation Programs [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4\(e\)\(1\)](https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4(e)(1)). Accessed December 21, 2021.

CFR. 2021c. 36 CFR 65.2(c)(2) – National Historic Landmarks Program – Effects of Designation [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2\(c\)\(2\)](https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2(c)(2)). Accessed December 21, 2021.

CFR. 2022. 40 CFR 1500 – National Environmental Policy Act Implementing Regulations. Available at <https://www.ecfr.gov/current/title-40/chapter-V/subchapter-A>. Accessed January 7, 2022.

Cole, W.R. 1889. *History of Washington and Kent Counties, Rhode Island*. W.W. Preston & Co., New York, NY.

Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR). 2023. *Historic Resources Visual Effects Analysis, Revolution Wind Farm*. Syracuse, NY. November 2021.

Juli, H., and K. McBride. 1984. The Early and Middle Woodland Periods of Connecticut Prehistory: Focus on the Lower Connecticut River Valley. *Bulletin of the Archaeological Society of Connecticut* 47:89–98.

The Public Archaeology Laboratory (PAL). 2021. *Terrestrial Archaeological Resources Assessment and Site Identification Survey, Revolution Wind Farm Project, Onshore Facilities*. Prepared for Revolution Wind, Providence, RI by D. Forrest and J. Waller, Jr. at the Public Archaeology Laboratory, Pawtucket, RI. PAL Report No. 3500.01. Revised August 2021.

Revolution Wind, LLC (Revolution Wind). 2022. *Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project*. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan>. Accessed January 12, 2022.

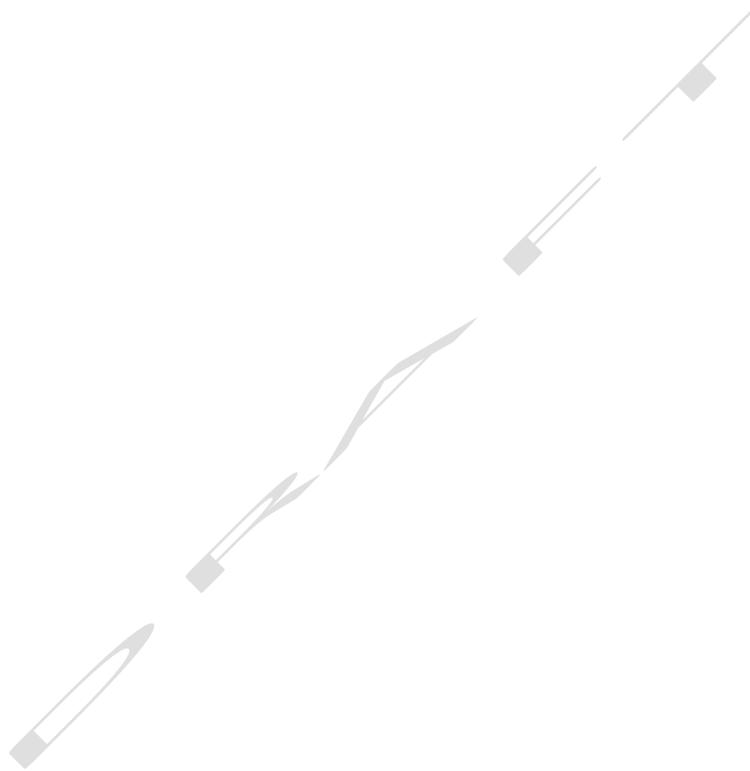
Rhode Island Historical Preservation & Heritage Commission (RIHPHC). 2021. *Performance Standards and Guidelines for Archaeology in Rhode Island*. Rhode Island Historical Preservation & Heritage Commission, Providence, RI. Revised June, 2021.

Thorbahn, P. 1982. *The Prehistoric Settlement Systems of Southern New England: Final Report of The Interstate 495 Archaeological Data Recovery Program, Vol. I*. Public Archaeology Laboratory, Department of Anthropology, Brown University Report. Submitted to the Massachusetts Department of Public Works, Boston, MA.

U.S. Secretary of the Interior. 1983. *Standards and Guidelines for Archeology and Historic Preservation* (48 Federal Register 44716–44742).

VHB. 2019. *Phase I Environmental Site Assessment - Revolution Wind Proposed Onshore Cable Route and Interconnection Facility: Whitecape Drive, Circuit Drive and Camp Avenue, North Kingstown, Rhode Island.* Prepared for Ørsted North America, Inc. Providence, Rhode Island.

**ATTACHMENT 8 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE REVOLUTION
WIND FARM: THE [REDACTED] TRADITIONAL CULTURAL PROPERTY
[REDACTED] MASSACHUSETTS & ATLANTIC OUTER CONTINENTAL SHELF**



REDACTED – Includes Archaeological Site Location Information

Historic Property Treatment Plan

for the

Revolution Wind Farm

The Chappaquiddick Island Traditional Cultural Property
Dukes County, Massachusetts & Atlantic Outer Continental Shelf

Submitted to:



Bureau of Ocean Energy Management
U.S. Department of the Interior

Prepared for:



Revolution Wind, LLC
<https://revolutionwind.com/>

Prepared by:



Environmental Design & Research, D.P.C.
217 Montgomery Street, Suite 1100
Syracuse, New York 13202
www.edrdpc.com

June 2023

ABSTRACT

Federal Undertaking: Revolution Wind Farm and Revolution Wind Export Cable Project

Location: Outer Continental Shelf and Rhode Island

Federal and
State Agencies: Bureau of Ocean Energy Management
National Park Service
U.S. Army Corps of Engineers
Massachusetts Historical Commission
Rhode Island Historical Preservation & Heritage Commission
New York Historic Preservation Office
Connecticut Historic Preservation Office
Advisory Council on Historic Preservation

Regulatory Process: National Environmental Policy Act
Section 106 of the National Historic Preservation Act
Section 110(f) of the National Historic Preservation Act

Purpose: This Historic Property Treatment Plan provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects from the Revolution Wind Project.

Adverse Visual
Effect Finding for: The Chappaquiddick Island Traditional Cultural Property (TCP)

Submitted By: Revolution Wind, LLC

Date: June 2023

TABLE OF CONTENTS

1.0 Executive Summary1

2.0 Background Information3

 2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable.....3

 2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)4

 2.2.1 Municipal Regulations.....4

 2.3 Participating Parties4

3.0 Existing Conditions, Historic Significance, and Maritime Setting5

 3.1 Historic Properties5

 3.2 Maritime Setting.....6

 3.3 The Chappaquiddick Island TCP6

 3.3.1 Historic Context.....7

 3.3.2 NRHP Criteria and the Maritime Visual Setting8

4.0 Mitigation Measures9

 4.1 GIS Database of Contributing Resources to the TCP.....9

 4.1.1 Purpose and Intended Outcome9

 4.1.2 Scope of Work.....9

 4.1.3 Methodology10

 4.1.4 Standards10

 4.1.5 Documentation10

 4.1.6 Funds and Accounting10

 4.2 Development of Interpretative Materials10

 4.2.1 Purpose and Intended Outcome10

 4.2.2 Scope of Work.....11

 4.2.3 Methodology11

 4.2.4 Standards11

 4.2.5 Documentation12

 4.2.6 Funds and Accounting12

 4.3 Climate Adaptation Planning Study12

 4.3.1 Purpose and Intended Outcome12

 4.3.2 Scope of Work.....13

 4.3.3 Methodology13

 4.3.4 Standards13

4.3.5 Documentation 13

4.3.6 Funds and Accounting 13

5.0 Implementation 14

5.1 Timeline..... 14

5.2 Organizational Responsibilities 14

5.2.1 Bureau of Ocean Energy Management (BOEM) 14

5.2.2 Revolution Wind, LLC 14

5.2.3 Other Parties, as Appropriate..... 14

5.3 Participating Party Consultation 14

6.0 References..... 16

LIST OF FIGURES

Figure 2.1-1. Project Location.....3

Figure 3.1-1. Historic Property Location.....5

LIST OF TABLES

Table 3.1-1. Historic Property included in the HPTP5

LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
ADLS	Aircraft Detection Lighting System
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
COP	Construction and Operations Plan
EDR	Environmental Design and Research, D.P.C.
DEIS	Draft Environmental Impact Statement
FEIS	Final Environmental Impact Statement
FR	Federal Register
HPTP	Historic Property Treatment Plan
MHC	Massachusetts Historical Commission
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
RFP	Request for Proposals
ROD	Record of Decision
RWF	Revolution Wind Farm
SOI	Secretary of the Interior

TCP	Traditional Cultural Property
USCG	United States Coast Guard
WTG	Wind Turbine Generator

1.0 EXECUTIVE SUMMARY

This Historic Property Treatment Plan (HPTP) for the Chappaquiddick Island Traditional Cultural Property (the historic property), which was determined eligible for listing in the National Register of Historic Places by the Bureau of Ocean Energy Management in 2021, provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects identified in the *Historic Resources Visual Effects Analysis – Revolution Wind Farm*, (HRVEA; EDR, 2023) for the Revolution Wind Farm (RWF) and Revolution Wind Export Cable Project (collectively, the Undertaking). Revolution Wind LLC (Revolution Wind) has provided this HPTP in accordance with the Bureau of Ocean Energy Management's (BOEM) Findings of Adverse Effect (FoAE) for the Undertaking under the National Historic Preservation Act of 1966 (NHPA).

BOEM has used the National Environmental Policy Act (NEPA) substitution process to fulfill its Section 106 obligations as provided for in the NHPA implementing regulations (36 CFR § 800.8(c)), and BOEM has consulted with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, federally recognized Native American Tribes, and other NHPA Section 106 consulting parties in accordance with this process. Revolution Wind has provided this HPTP to BOEM for inclusion in the Final Environmental Impact Statement (FEIS).

This HPTP describes the mitigation measures to resolve potential adverse effects on historic properties, the implementation steps, and timeline for actions. The mitigation measures are based on the evaluations and outreach performed by Revolution Wind prior to the issuance of the DEIS as well as outreach to consulting parties performed by BOEM. This HPTP document has undergone revision and refinement in consultation with the Massachusetts State Historic Preservation Officer, the Rhode Island State Historic Preservation Officer, the ACHP, and other consulting parties throughout the NEPA substitution process. This HPTP is included in the Memorandum of Agreement (MOA) issued in accordance with 36 CFR §§ 800.8, 800.10.

This HPTP is organized into the following sections:

- **Section 1.0, Introduction**, outlines the content of this HPTP.
- **Section 2.0, Cultural Resources Regulatory Context**, briefly summarizes the Undertaking while focusing on cultural resources regulatory contexts (federal, tribal, state, and local, including preservation restrictions), identifies the historic properties discussed in this HPTP that will be adversely affected by the Undertaking, and summarizes the pertinent provisions and attachments of the HRVEA (EDR, 2023) and *Revolution Wind Farm Construction and Operations Plan (COP)*; Revolution Wind, 2022) that guided the development of this document.
- **Section 3.0, Existing Conditions, Historic Significance, and Maritime Setting**, provides a physical description of the historic properties included in this HPTP. Set within its historic context, the applicable NRHP criteria for the historic properties are discussed with a focus on the contribution of a maritime visual setting to its significance and integrity.

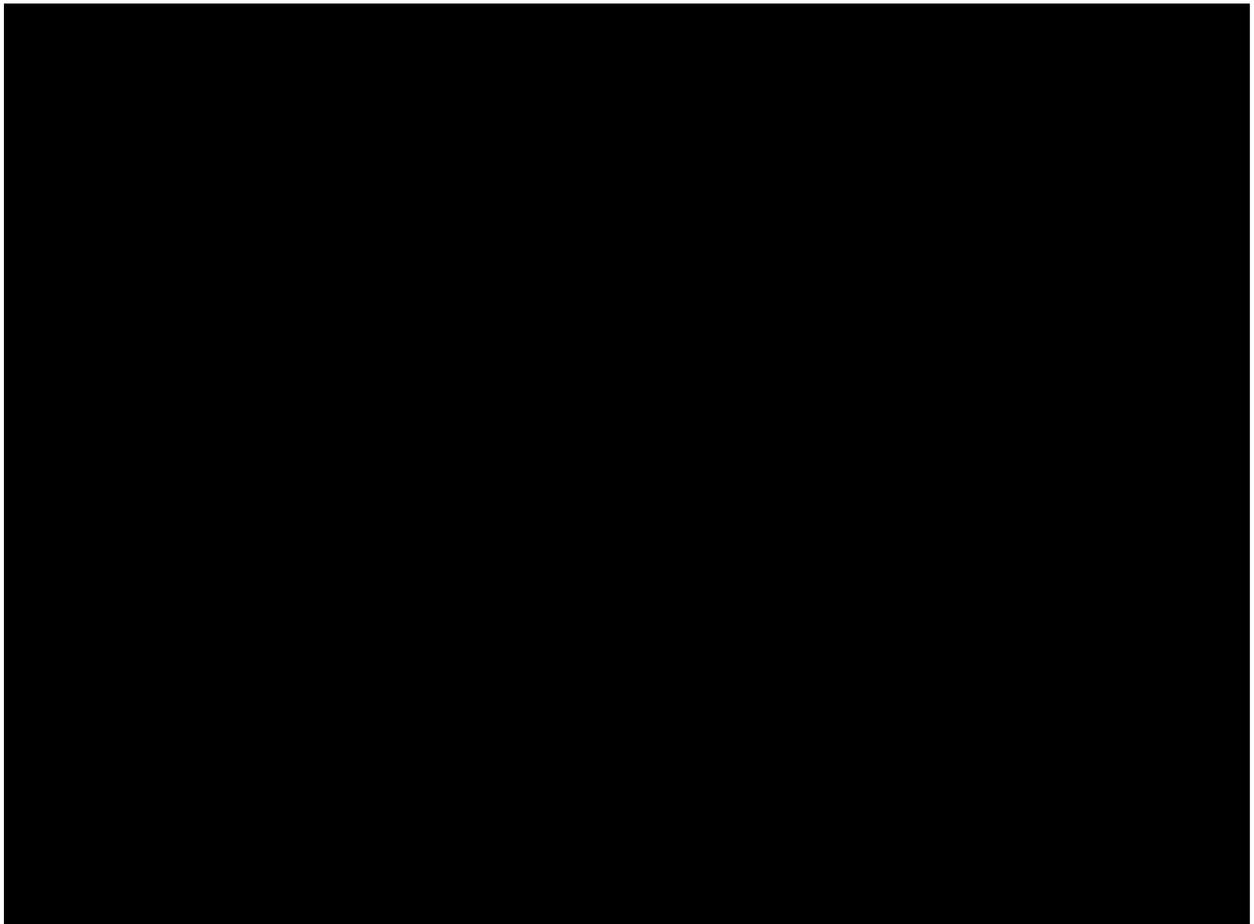
- **Section 4.0, Mitigation Measures**, presents specific steps to carry out the mitigation actions. The mitigation action includes a detailed description, intended outcome, methods, standards, and requirements for documentation.
- **Section 5.0, Implementation**, establishes the process for executing mitigation actions at the historic properties, as identified in Section 4.0 of this HPTP. For each/the action, organizational responsibilities are outlined, a timeline is provided, and regulatory reviews are listed.
- **Section 6.0, References**, is a list of works cited in this HPTP.

2.0 BACKGROUND INFORMATION

2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable

The Undertaking is a wind-powered electric generating facility composed of up to 100 wind turbine generators (WTGs) and associated foundations, two offshore substations, and inter-array cables connecting the WTGs and the offshore substations (see Figure 2.1-1). The WTGs, offshore substations, array cables, and substation interconnector cables would be located on the Outer Continental Shelf approximately 15 nautical miles (18 statute miles) southeast of Point Judith, Rhode Island, approximately 13 nautical miles (15 statute miles) east of Block Island, Rhode Island, approximately 7.5 nautical miles (8.5 statute miles) south of Nomans Land Island National Wildlife Refuge (uninhabited island), and between approximately 10 to 12.5 nautical miles (12 to 14 statute miles) south/southwest of varying points of the Rhode Island and Massachusetts coastlines (62 FR 33708). In addition, two submarine export cables located in both federal waters and Rhode Island State territorial waters, will connect the offshore substation to the electrical grid. The proposed interconnection location for the Undertaking is the existing Davisville Substation, which is owned and operated by The Narragansett Electric Company d/b/a National Grid and located in North Kingstown, Rhode Island. The visible offshore components of the operational Undertaking will be located on Lease OCS-A 0486 in water depths ranging from approximately 108 to 125 feet.

Figure 2.1-1. Project Location



2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)

The regulations at 36 CFR § 800.8 provide for use of the NEPA process to fulfill a federal agency's NHPA Section 106 review obligations in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6. Under these provisions, issuance of an ROD and implementation of relevant conditions will resolve adverse effects to historic properties caused by the Undertaking, including to National Historic Landmarks for which BOEM must provide a higher standard of care, as required by Section 110(f) of the NHPA.

The measures to avoid and minimize adverse effects to identified historic properties are described in the COP (Section 4.4.1.3 and Appendix BB). This HPTP addresses the mitigation requirements identified by BOEM to resolve the remaining adverse effects after application of the above-referenced measures. The mitigation measures reflect consultations among consulting parties to refine a conceptual mitigation framework proposed by Revolution Wind.

All activities implemented under this HPTP will be conducted in accordance with any conditions imposed by BOEM in its ROD and with applicable local, state and federal regulations and permitting requirements. Responsibilities for specific compliance actions are described in further detail in Section 5.2 – Organizational Responsibilities.

2.2.1 *Municipal Regulations*

Before implementation, any on-site mitigation measures will be coordinated with local municipalities and commissions to obtain approvals, as appropriate. These may include, but are not limited to building permits, zoning, land use, planning, historic commissions, and design review boards. Additional information regarding compliance with local requirements appears in Section 5.0, Implementation.

2.3 Participating Parties

BOEM initiated consultation under Section 106 with invitations to consulting parties on April 30, 2021. BOEM hosted the first Section 106-specific meeting with consulting parties on December 17, 2021, pursuant to Sections 106 and 110(f) of the NHPA and in accordance with 36 CFR 800.8.

Following BOEM initial Section 106 meeting with consulting parties, Revolution Wind held stakeholder outreach meetings (see Section 5.3) to review conceptual mitigation measures for the historic property and invited the following party:

- The historical Chappaquiddick Tribe of the Wampanoag Nation.

3.0 EXISTING CONDITIONS, HISTORIC SIGNIFICANCE, AND MARITIME SETTING

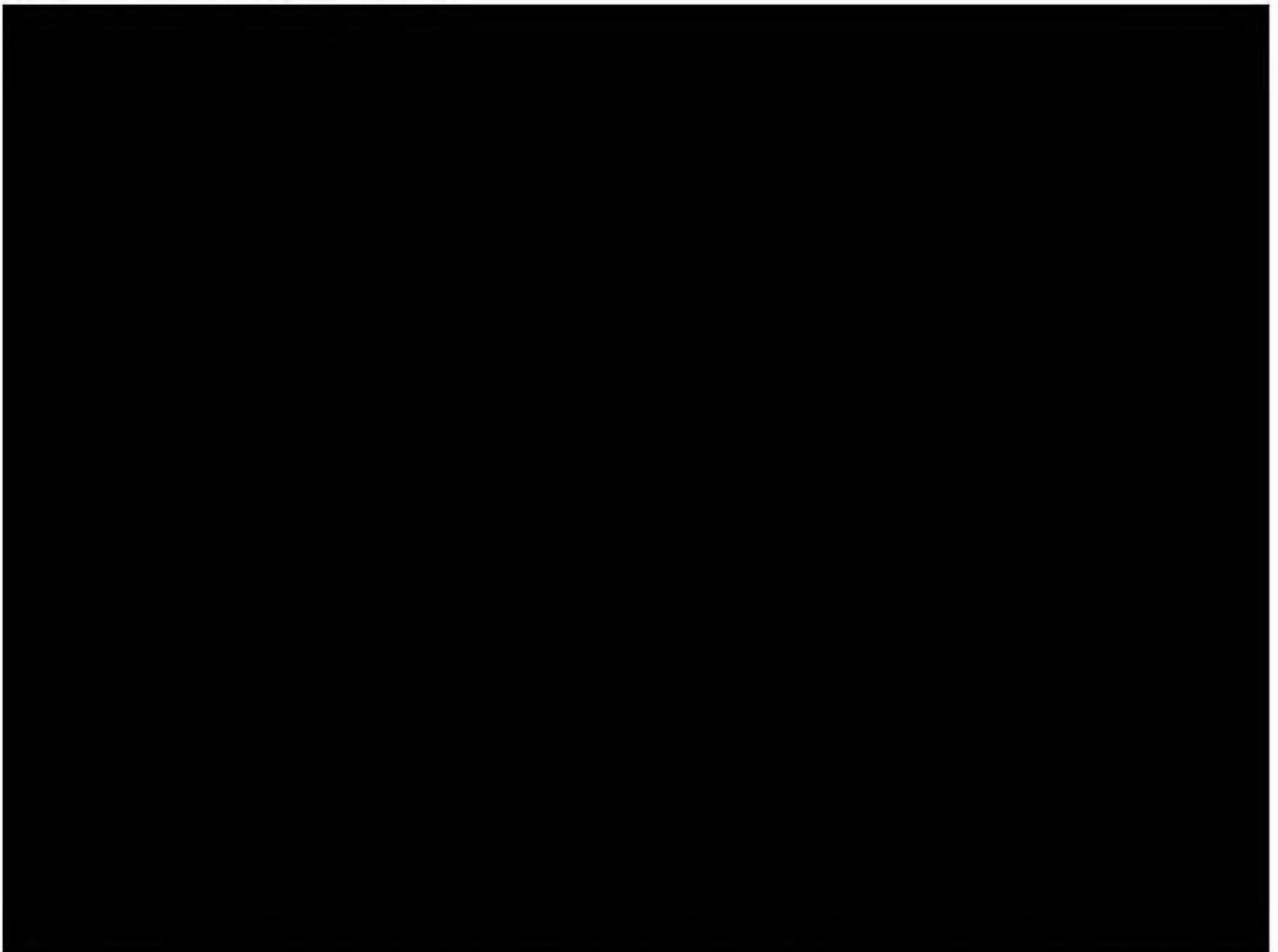
3.1 Historic Properties

This HPTP involves one historic property, as identified in Table 3.1-1 and depicted on Figure 3.1-1.

Table 3.1-1. Historic Property included in the HPTP

Name	Municipality	State	Site No. (Agency)	Ownership	Historic Property Type
The Chappaquiddick Island TCP	Edgartown	MA	N/A	Multiple	TCP

Figure 3.1-1. Historic Property Location



In Section 3.3 the historic property is described both physically and within its historic context, with a focus on the contribution of a maritime visual setting to the property’s significance and integrity.

3.2 Maritime Setting

For the purposes of this analysis and assessment, views of marine waters are considered critical aspects of maritime settings. The influence of the marine environment and related human activities on historical development patterns is extensive and may be expressed in areas without direct lines of sight to the sea. Although these types of setting may contribute to the significance of historic properties, they would not be subject to alteration as a result of the proposed undertaking and are not considered further in this report.

3.3 The Chappaquiddick Island TCP

Chappaquiddick Island, [REDACTED] is a traditional cultural property encompassing multiple individual places associated with the traditional cultural practices of the historical Chappaquiddick Tribe of the Wampanoag Nation (BOEM, 2020).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3.3.1 *Historic Context*

The Chappaquiddick Island TCP is one of at least three inter-related Wampanoag maritime traditional cultural properties [REDACTED]

[REDACTED] are each distinguishable entities within a broader maritime cultural landscape associated with ancient and enduring traditional beliefs and practices

of Wampanoag peoples. Each of the identified TCPs is associated with specific cultural practices and traditions related to the formation of the constituent lands and waters, the origins of the Wampanoag peoples, and the relationships among the Tribes and the worlds in which they have lived since time immemorial.



Traditional ceremonies honoring Chappaquiddick Wampanoag ancestors and the enduring relationships among the indigenous people of Chappaquiddick Island and the woodland, grassland, estuarine, and marine species upon which they relied are still practiced today (BOEM, 2019). Based on BOEM's previous consultations, some ceremonies and cultural connections with the physical and spiritual worlds of which the Tribe is part include activities tied to astronomical events (sunrise, sunset, and moon phases) observed from land-based vantages over the ocean's waters. Traditional cultural connections with the seas, finfish, shellfish, whales, and seals are embodied in the contributing resources to the TCP district and the ancestors buried there or lost at sea.

3.3.2 NRHP Criteria and the Maritime Visual Setting

BOEM determined the Chappaquiddick Island TCP is potentially eligible for listing in the National Register of Historic Places under Criterion A for its association with and importance in maintaining the continuing cultural identity of the Chappaquiddick Tribe of the Wampanoag Nation.



4.0 MITIGATION MEASURES

Mitigation measures at these historic properties are detailed in this section. These mitigation measures were developed in consultation with the Participating Parties by individuals who met Secretary of the Interior (SOI) Qualifications Standards for Archeology, History, Architectural History and/or Architecture (62 FR 33708) and are appropriate to fully address the nature, scope, size, and magnitude of adverse effects including cumulative effects caused by the Project, and the NRHP-qualifying characteristics of each historic property that would be affected. These mitigation measures also include actions to respond to some reasonably foreseeable hazards unrelated to the Project that pose risks to the long-term preservation of affected historic properties, such as climate change.

4.1 GIS Database of Contributing Resources to the TCP

4.1.1 *Purpose and Intended Outcome*

Stewardship of the Chappaquiddick Island TCP is of critical importance to the Chappaquiddick Wampanoag Tribe. The historical Tribe's efforts to preserve and sustain both the physical elements of the historic property and the associated traditional practices with the landscape features, within, will be enhanced with a detailed and current GIS database based on documentation studies being conducted by others. This HPTP proposes the development of a non-proprietary spatial database of contributing resources and associated physical features to assist in prioritizing preservation efforts and ensure that accurate information is available to support local, state, and federal consideration of TCP impacts in future permitting processes.

A GIS database incorporating the results of on-going documentation of the TCP will be developed and include information on existing conditions at each contributing resource and/or significant element of the TCP district. The GIS will include simple data collection and update interfaces to enhance the Tribe's capacity to maintain the database and associated records pertaining to the TCP. The GIS will allow for overlays of other publicly available that may assist in identifying sites and places at-risk due to coastal erosion, storm surge, habitat degradation, or other climate change related threats.

4.1.2 *Scope of Work*

The scope of work will consist of the following:

- Request for Proposals (RFP)¹;
- Proposals by qualified consultants in response to the RFP;
- Preliminary platform, schema, proposed interfaces, and database structures with associated narrative descriptions that accommodate the following mitigation measure (Section 4.2) for review by the Participating Parties;
- Final development and deployment plan for the GIS; and
- Development and delivery of the GIS with associated datasets.

¹ At the Chappaquiddick Wampanoag's discretion, the RFP for measures described in Sections 4.1 and 4.2 may be combined, provided the scoping is appropriate to encompass the separate deliverable.

Final deliverables produced by the consultant will incorporate further comments and any additional information provided by the participating parties.

4.1.3 Methodology

Revolution Wind will release a RFP for consultant services in consultation with the Participating Parties and will seek input from the Participating Parties on the criteria for selection and priorities for the consultant team's qualifications and experience.

Final deliverables produced by Revolution Wind or their consultant team will incorporate further comments and any additional information provided by the Participating Parties.

4.1.4 Standards

Documentation will be prepared by professionals meeting the qualifications specified in the Secretary of the Interior's *Professional Qualifications Standards* (36 CFR Part 61). The GIS will be developed by professionals with demonstrated experience in the creation and organization of spatial databases of cultural resources and the relevant and specific attributes necessary for recordation and management. The GIS development will be overseen by a qualified Geographic Information Systems Professional.

4.1.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Consultant bids in response to RFPs;
- Draft deliverables; and
- Final deliverables.

4.1.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

4.2 Development of Interpretative Materials

4.2.1 Purpose and Intended Outcome

Development of the TCP GIS database (see Section 4.1) will allow for incorporation of other digital media pertaining to the physical and cultural elements of the historic property in a manner that enhances intra-tribal and extra-tribal appreciation. GIS story maps or comparable presentations could include relevant archival data, oral histories, news stories, video footage, and public domain datasets to help the historical

Chappaquiddick Wampanoag Tribe share the history of the TCP and its meaning to members of their community.

The intended outcome of this measure is to support the historical Chappaquiddick Wampanoag Tribe's efforts to integrate existing information from disparate sources in a compelling, flexible interpretative format that suits the needs and priorities of their community. Story maps and comparable presentations would allow the Tribe to focus on educational opportunities within their community, share important information about the TCP with tribal members who have limited physical access to the island, and tell their collective stories in a format that enhances mutual understanding and supports effective decision-making for future preservation efforts.

4.2.2 Scope of Work

The scope of work will consist of the following:

- RFPs²;
- Proposals by qualified consultants in response to the RFP;
- Community charette(s) to select topics to be addressed in story maps or other interpretive exhibits;
- Draft story maps for review and comment by participating parties; and
- Final story maps.

4.2.3 Methodology

Revolution Wind will release a RFP for consultant services in consultation with the Participating Parties and will seek input from the Participating Parties on the criteria for selection and priorities for the consultant team's qualifications and experience.

Revolution Wind will host a meeting with the Participating Parties to review the draft Story Maps including a walk-through of the user interface, functions and associated media content. Revolution Wind will solicit feedback on the draft work product during the meeting. No more than 30 days following the meeting, Revolution Wind will provide to BOEM and the Participating Parties a summary of the discussions, comments shared, and the steps Revolution Wind will take to incorporate comments in the final work products. Final deliverables produced by Revolution Wind or their consultant team will incorporate further comments and any additional information provided by the Participating Parties.

4.2.4 Standards

The GIS media (story maps or other work products) will be developed under the supervision of a qualified Geographic Information Systems Professional. Unless otherwise agreed by the Chappaquiddick Wampanoag Tribe and Revolution Wind, the work products will be accessible by parties without access to

² At the Chappaquiddick Wampanoag's discretion, the RFP for measures described in Sections 4.1 and 4.2 may be combined, provided the scoping is appropriate to encompass the separate deliverable.

proprietary software and at no cost to the end-user. At the Tribe's discretion, access to sensitive content may be restricted to limited audiences where disclosure would pose a risk to the contributing resources within the TCP or other historic properties.

4.2.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Consultant bids in response to RFPs;
- Draft deliverables; and
- Final deliverables.

4.2.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

4.3 Climate Adaptation Planning Study

4.3.1 Purpose and Intended Outcome

Multiple elements of the Chappaquiddick Island TCP are threatened by coastal erosion, habitat degradation, storm impacts, invasive species and other climate change-related risks. Rates of shoreline retreat along [REDACTED] are among the fastest in the Commonwealth of Massachusetts (Vineyard Gazette, 2013) and future losses to coastal bluffs associated with the TCP can be expected. Breaches to [REDACTED] may affect the marine habitats within [REDACTED] that support numerous plant and animal species that form important elements of traditional subsistence patterns. Likewise, rising winter temperatures threaten the viability of cranberry propagation on Martha's Vineyard, as a whole. Archaeological sites associated with past uses of the TCP by the Chappaquiddick Wampanoag Tribe are also threatened by erosion associated with rising seas and the increased frequency and intensity of storms affecting the island. The Climate Adaptation Planning Study would assess future threats to elements of the TCP included in the integrated GIS database (see Section 4.1) and define a series of options to mitigate those threats.

The intended outcome of this measure is a Climate Adaptation Plan that is focused on the specific resources and characteristics of the Chappaquiddick Island TCP and needs of the associated traditional community. The plan and data compiled during the implementation of the other mitigation measures will assist the historical Tribe in determining the most appropriate and feasible actions to help preserve the TCP from foreseeable threats. The plan may also foster collaborative efforts among the municipal, state, and private parties to preserve the unique physical and cultural assets of Chappaquiddick Island.

4.3.2 Scope of Work

The scope of work will consist of the following:

- RFPs³;
- Proposals by qualified consultants in response to the RFP;
- Community charette(s) to select priority resources and/or risks;
- Draft plan for review and comment by participating parties; and
- Final plan.

4.3.3 Methodology

Revolution Wind will release a RFP for consultant services in consultation with the Participating Parties and will seek input from the Participating Parties on the criteria for selection and priorities for the consultant team's qualifications and experience.

Final deliverables produced by Revolution Wind or their consultant team will incorporate further comments and any additional information provided by the Participating Parties.

4.3.4 Standards

The Climate Adaptation Planning Study will be conducted by qualified professionals with Global Association of Risk Professionals' Sustainability and Climate Risk certification and/or demonstrated experience in the preparation of climate change risk assessments for municipal, state, or federal governments.

4.3.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Consultant bids in response to RFPs;
- Draft Plan for review and comment by participating parties; and
- Final Plan.

4.3.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an Attachment to the MOA.

³ At the Chappaquiddick Wampanoag's discretion, the RFP for measures described in Sections 4.1 and 4.2 may be combined, provided the scoping is appropriate to encompass the separate deliverable.

5.0 IMPLEMENTATION

5.1 Timeline

The timeline for implementation of the mitigation measures is identified in the MOA.

5.2 Organizational Responsibilities

5.2.1 *Bureau of Ocean Energy Management (BOEM)*

BOEM remains responsible for making all federal decisions and determining compliance with Section 106. BOEM has reviewed this HPTP to ensure, at minimum, it includes the content required.

- BOEM remains responsible for making all federal decisions and determining compliance with Section 106;
- BOEM, in consultation with the Participating Parties, will ensure that mitigation measures adequately resolve adverse effects, consistent with the NHPA;
- BOEM will be responsible for sharing the annual summary report with Participating Parties; and
- BOEM is responsible for consultation related to dispute resolution.

5.2.2 *Revolution Wind, LLC*

Revolution Wind will be responsible for the following:

- Considering the comments provided by the Participating Parties in the development of this HPTP;
- Funding the mitigation measures specified in Section 4.0;
- Completion of the scope/s of work in Section 4.0;
- Ensuring all Standards in Section 4.0 are met;
- Providing the Documentation in Section 4.0 to the Participating Parties for review and comment;
- Annual Reporting to BOEM; and
- Revolution Wind will be responsible for ensuring that all work that requires consultation with tribal nations are performed by professionals who have demonstrated professional experience consulting with Native American tribes and descendant communities.

5.2.3 *Other Parties, as Appropriate*

Revolution Wind does not anticipate additional consulting parties, should any be determined, this will be updated.

5.3 Participating Party Consultation

This HPTP was provided by Revolution Wind for review by Participating Parties to provide meaningful input on the resolution of adverse effects to and form(s) of implementing mitigation at the historic properties. Participating Parties were provided the opportunity for review and comment on the HPTP concurrent with BOEM's NEPA substitution schedule for the Project. This HPTP was further refined through informational

and consultation meetings, conference calls, HPTP draft reviews and document exchanges, or similar means of communication of information.

6.0 REFERENCES

Bureau of Ocean Energy Management (BOEM). 2020. Finding of Adverse Effect for the Vineyard Wind 1 Project Construction and Operations Plan, Revised November 13, 2020. Available at: <https://www.boem.gov/sites/default/files/documents/oil-gas-energy/Vineyard-Wind-Finding-of-Adverse-Effect.pdf>

Capece, Joseph. 2001. *Land-Use History of Cape Poge and Wasque*. The Trustees of Reservations, Islands Regional Office. 3rd Printing. Available at <https://thetrustees.org/wp-content/uploads/2020/07/Land-Use-Cape-Poge.pdf>. Accessed April 14, 2022.

Code of Federal Regulations (CFR). 2021a. 36 CFR 800 – Protection of Historic Properties [incorporating amendments effective December 15, 2021]. Available at <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800>. Accessed December 21, 2021.

CFR. 2021b. 36 CFR 61.4(e)(1) – Procedures for State, Tribal, and Local Government Historic Preservation Programs [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4\(e\)\(1\)](https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4(e)(1)). Accessed December 21, 2021.

CFR. 2021c. 36 CFR 65.2(c)(2) – National Historic Landmarks Program – Effects of Designation [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2\(c\)\(2\)](https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2(c)(2)). Accessed December 21, 2021.

CFR. 2022. 40 CFR 1500 – National Environmental Policy Act Implementing Regulations. Available at <https://www.ecfr.gov/current/title-40/chapter-V/subchapter-A>. Accessed January 7, 2022.

Detwiller, F.C. 2014. Stone Barn Farm. Massachusetts Historical Commission Inventory Form A. Massachusetts Historical Commission, Boston, MA.

Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR). 2023. *Historic Resources Visual Effects Analysis, Revolution Wind Farm*. Syracuse, NY. July 2022.

Federal Register. 1997. 62 FR 33708 – The Secretary of the Interior’s Historic Preservation Professional Qualifications Standards. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/app/details/FR-1997-06-20/97-16168>. Accessed December 21, 2021.

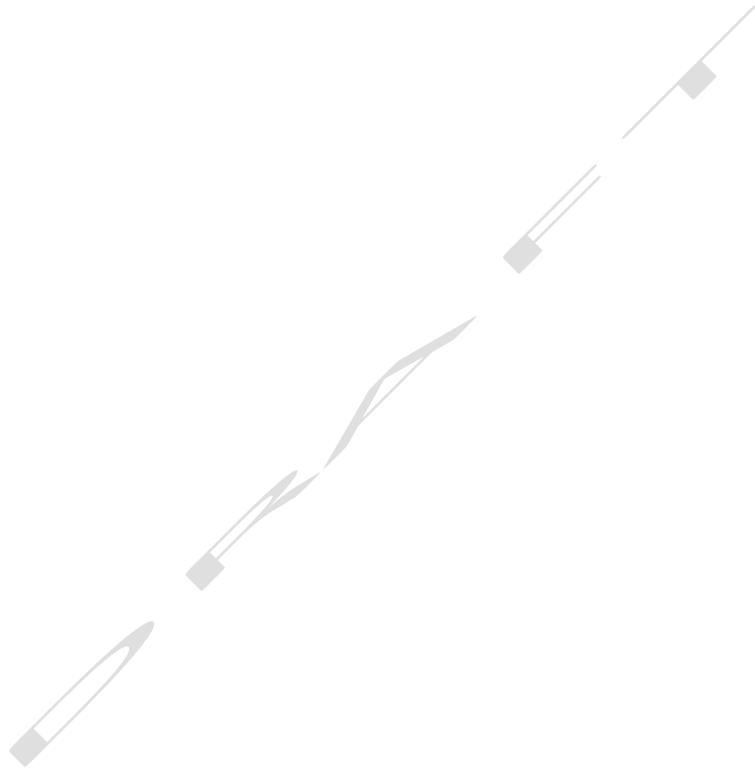
Federal Register. 2021. FR30068 -Department of the Interior, Bureau of Ocean Energy Management, Docket No.: BOEM-2021-0029. *Notice of Intent to Prepare an Environmental Impact Statement for Revolution Wind LLC’s Proposed Wind Energy Facility Offshore Rhode Island; Reopening of Comment Period and Corrections*. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/content/pkg/FR-2021-06-04/pdf/2021-11727.pdf>. Accessed February 8, 2022.

Perry, Jonathan (2010) "Moshup's Bridge" In *Trickster: Native American Tales - A Graphic Collection*. Edited by Matt Dembicki. Golden, Colorado: Fulcrum Publishers.

Revolution Wind, LLC. 2022. *Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project*. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan>.

Vineyard Gazette. 2013. "As Breach Retreats, Erosion Picks Up Speed" by Tom Dunlop. December 13, 2013. Available at <https://vineyardgazette.com/news/2013/12/19/breach-retreats-erosion-picks-speed>. Accessed February 14, 2022.

**ATTACHMENT 9 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE REVOLUTION
WIND FARM: THE [REDACTED] TRADITIONAL CULTURAL
PROPERTY [REDACTED] MASSACHUSETTS & ATLANTIC OUTER CONTINENTAL
SHELF - FEDERALLY-RECOGNIZED NATIVE AMERICAN TRIBES**



REDACTED– Includes Archaeological Site Location Information

Historic Property Treatment Plan

for the

Revolution Wind Farm

The Vineyard Sound & Moshup’s Bridge Traditional Cultural Property
Dukes County, Massachusetts & Atlantic Outer Continental Shelf
Federally-Recognized Native American Tribes

Submitted to:



Bureau of Ocean Energy Management
U.S. Department of the Interior

Prepared for:



Revolution Wind, LLC
<https://revolutionwind.com/>

Prepared by:



Environmental Design & Research, D.P.C.
217 Montgomery Street, Suite 1100
Syracuse, New York 13202
www.edrdpc.com

June 2023

ABSTRACT

Federal Undertaking: Revolution Wind Farm and Revolution Wind Export Cable Project

Location: Outer Continental Shelf and Rhode Island

Federal and
State Agencies: Bureau of Ocean Energy Management
National Park Service
U.S. Army Corps of Engineers
Massachusetts Historical Commission
Rhode Island Historical Preservation & Heritage Commission
New York Historic Preservation Office
Connecticut Historic Preservation Office
Advisory Council on Historic Preservation

Regulatory Process: National Environmental Policy Act
Section 106 of the National Historic Preservation Act
Section 110(f) of the National Historic Preservation Act

Purpose: This Historic Property Treatment Plan provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects from the Revolution Wind Project.

Adverse Visual
Effect Finding for: The Vineyard Sound & Moshup's Bridge Traditional Cultural Property (TCP), Dukes County, Massachusetts and Atlantic Outer Continental Shelf

Submitted By: Revolution Wind, LLC

Date: June 2023

TABLE OF CONTENTS

1.0 Executive Summary 1

2.0 Background Information 3

 2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable..... 3

 2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA) 4

 2.2.1 Municipal Regulations..... 4

 2.2.2 Preservation Easements and Restrictions..... 4

 2.3 Participating Parties 4

3.0 Existing Conditions, Historic Significance, and maritime setting 6

 3.1 Historic Properties 6

 3.2 Maritime Setting..... 7

 3.3 The Vineyard Sound & Moshup’s Bridge TCP..... 7

 3.3.1 Historic Context..... 9

 3.3.2 NRHP Criteria and the Maritime Visual Setting 10

4.0 Mitigation Measures 11

 4.1 Support for Improved Tribal Connections to Nomans Land Island..... 11

 4.1.1 Purpose and Intended Outcome 11

 4.1.2 Scope of Work..... 11

 4.1.3 Methodology 12

 4.1.4 Standards 12

 4.1.5 Documentation 12

 4.1.6 Funds and Accounting 12

 4.2 Scholarships and Training for Tribal Resource Stewardship..... 12

 4.2.1 Purpose and Intended Outcome 12

 4.2.2 Scope of Work..... 13

 4.2.3 Methodology 13

 4.2.4 Standards 13

 4.2.5 Documentation 13

 4.2.6 Funds and Accounting 14

 4.3 Coastal Resilience and Habitat Restoration..... 14

 4.3.1 Purpose and Intended Outcome 14

 4.3.2 Scope of Work..... 14

 4.3.3 Methodology 15

 4.3.4 Standards 15

 4.3.5 Documentation 15

4.3.6 Funds and Accounting 15

4.4 Archaeological and Cultural Sites Data Compilation..... 15

4.4.1 Purpose and Intended Outcome 15

4.4.2 Scope of Work..... 16

4.4.3 Methodology 16

4.4.4 Standards 17

4.4.5 Documentation 17

4.4.6 Funds and Accounting 17

4.5 Maritime Cultural Landscapes & Interconnected Contexts 17

4.5.1 Purpose and Intended Outcome 17

4.5.2 Scope of Work..... 18

4.5.3 Methodology 18

4.5.4 Standards 18

4.5.5 Documentation 19

4.5.6 Funds and Accounting 19

5.0 Implementation 20

5.1 Timeline..... 20

5.2 Organizational Responsibilities 20

5.2.1 Bureau of Ocean Energy Management (BOEM) 20

5.2.2 Other Parties, as Appropriate..... 20

5.3 Participating Party Consultation 20

6.0 References..... 22

LIST OF FIGURES

Figure 2.1-1. Project Location..... 3

Figure 3.1-1. Historic Property Location..... 6

LIST OF TABLES

Table 3.1-1. Historic Property included in the HPTP 6

LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
ADLS	Aircraft Detection Lighting System
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
COP	Construction and Operations Plan
EDR	Environmental Design and Research, D.P.C.
FEIS	Final Environmental Impact Statement

FR	Federal Regulation
HPTP	Historic Property Treatment Plan
MHC	Massachusetts Historical Commission
MOA	Memorandum of Agreement
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
RFP	Request for Proposals
ROD	Record of Decision
RWF	Revolution Wind Farm
TCP	Traditional Cultural Property
WTG	Wind Turbine Generator

1.0 EXECUTIVE SUMMARY

This draft applicant-proposed Historic Property Treatment Plan (HPTP) for the Vineyard Sound & Moshup's Bridge Traditional Cultural Property (the historic property), which was determined eligible for listing in the National Register of Historic Places by the Bureau of Ocean Energy Management in 2021, provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve potential adverse effects preliminarily identified by the applicant in the *Historic Resources Visual Effects Analysis – Revolution Wind Farm*, dated May 2023 (HRVEA; EDR, 2023) for the Revolution Wind Farm (RWF) and Revolution Wind Export Cable Project (collectively, the Undertaking). Revolution Wind, LLC (Revolution Wind) has provided this HPTP in accordance with the Bureau of Ocean Energy Management's (BOEM) Findings of Adverse Effect (FoAE) for the Undertaking under the National Historic Preservation Act (NHPA).

BOEM has used the National Environmental Policy Act (NEPA) substitution process to fulfill its Section 106 obligations as provided for in the NHPA implementing regulations (36 CFR § 800.8(c)), and BOEM has consulted with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, federally recognized Native American Tribes, and other NHPA Section 106 consulting parties in accordance with this process. Revolution Wind has provided this HPTP to BOEM for inclusion in the Final Environmental Impact Statement (FEIS).

This HPTP describes the mitigation measures to resolve potential adverse effects on historic properties, the implementation steps, and timeline for actions. The mitigation measures are based on the evaluations and outreach performed by Revolution Wind prior to the issuance of the DEIS as well as outreach to consulting parties performed by BOEM. This HPTP document has undergone revision and refinement in consultation with federally-recognized Native American Tribes, the Massachusetts State Historic Preservation Officer, the Rhode Island State Historic Preservation Officer, the ACHP, and/or other consulting parties throughout the NEPA substitution process. This HPTP is included in the Memorandum of Agreement (MOA) issued in accordance with 36 CFR §§ 800.8, 800.10.

Pursuant to the terms and conditions of the MOA, Revolution Wind will implement these mitigation measures.

This HPTP is organized into the following sections:

- **Section 1.0, Introduction**, outlines the content of this HPTP.
- **Section 2.0, Cultural Resources Regulatory Context**, briefly summarizes the Undertaking while focusing on cultural resources regulatory contexts (federal, tribal, state, and local, including preservation restrictions), identifies the historic properties discussed in this HPTP that will be adversely affected by the Undertaking, and summarizes the pertinent provisions and attachments of the HRVEA (EDR, 2023) and *Revolution Wind Farm Construction and Operations Plan (COP)*; Revolution Wind, 2022) that guided the development of this document.

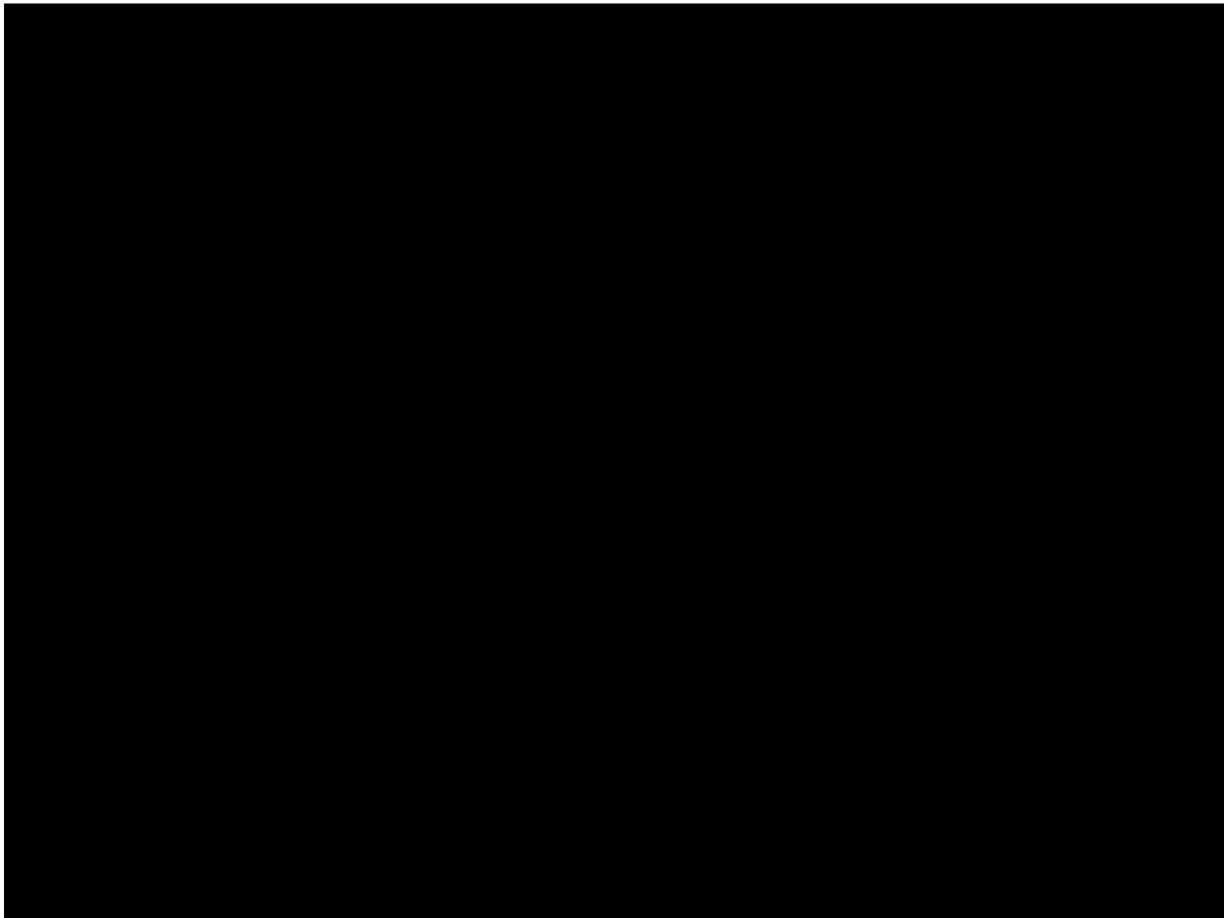
- **Section 3.0, Existing Conditions, Historic Significance, and Maritime Setting**, provides a physical description of the historic property included in this HPTP. Set within its historic context, the applicable NRHP criteria for the historic property are discussed with a focus on the contribution of a maritime visual setting to its significance and integrity.
- **Section 4.0, Mitigation Measures**, presents specific steps to carry out the mitigation actions. The mitigation action includes a detailed description, intended outcome, methods, standards, and requirements for documentation.
- **Section 5.0, Implementation**, establishes the process for executing mitigation actions at the historic property, as identified in Section 4.0 of this HPTP. For each/the action, organizational responsibilities are outlined, a timeline is provided, and regulatory reviews are listed.
- **Section 6.0, References**, is a list of works cited in this HPTP.

2.0 BACKGROUND INFORMATION

2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable

The Undertaking is a wind-powered electric generating facility composed of up to 100 wind turbine generators (WTGs) and associated foundations, two offshore substations, and inter-array cables connecting the WTGs and the offshore substations (see Figure 2.1-1). The WTGs, offshore substations, array cables, and substation interconnector cables would be located on the Outer Continental Shelf approximately 15 nautical miles (18 statute miles) southeast of Point Judith, Rhode Island, approximately 13 nautical miles (15 statute miles) east of Block Island, Rhode Island, approximately 7.5 nautical miles (8.5 statute miles) south of Nomans Land Island National Wildlife Refuge (uninhabited island), and between approximately 10 to 12.5 nautical miles (12 to 14 statute miles) south/southwest of varying points of the Rhode Island and Massachusetts coastlines (62 FR 33708). In addition, two submarine export cables located in both federal waters and Rhode Island State territorial waters, will connect the offshore substation to the electrical grid. The proposed interconnection location for the Undertaking is the existing Davisville Substation, which is owned and operated by The Narragansett Electric Company d/b/a National Grid and located in North Kingstown, Rhode Island. The visible offshore components of the operational Undertaking will be located on Lease OCS-A 0486 in water depths ranging from approximately 108 to 125 feet.

Figure 2.1-1. Project Location



2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)

The regulations at 36 CFR § 800.8 provide for use of the NEPA process to fulfill a federal agency’s NHPA Section 106 review obligations in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6. Under these provisions, issuance of an ROD and implementation of relevant conditions will resolve adverse effects to historic properties caused by the Undertaking, including to National Historic Landmarks for which BOEM must provide a higher standard of care, as required by Section 110(f) of the NHPA.

The measures to avoid and minimize adverse effects to identified historic properties are described in the COP (Section 4.4.1.3 and Appendix BB).

This HPTP describes the measures to resolve the remaining adverse effects after application of the above-referenced measures. The mitigation measures reflect a refinement of the conceptual mitigation framework proposed by Revolution Wind (see Appendix BB in the COP).

All activities implemented under this HPTP will be conducted in accordance with any conditions imposed by BOEM in its ROD and with applicable local, state and federal regulations and permitting requirements. Responsibilities for specific compliance actions are described in further detail in Section 5.2, Organizational Responsibilities.

2.2.1 Municipal Regulations

Before implementation, any on-site mitigation measures will be coordinated with local municipalities and commissions to obtain approvals, as appropriate. These may include, but are not limited to building permits, zoning, land use, planning, historic commissions, and design review boards. Additional information regarding compliance with local requirements appears in Section 5.0, Implementation.

2.2.2 Preservation Easements and Restrictions

Preservation easements and restrictions protect significant historic, archaeological, or cultural resources. The State of Massachusetts preservation restrictions are outlined in Massachusetts General Law Chapter 184, Sections 31-33.



Additional information regarding compliance with extant preservation restrictions appears in Section 5.0, Implementation.

2.3 Participating Parties

BOEM initiated consultation under Section 106 with invitations to consulting parties on April 30, 2021. BOEM hosted the first Section 106-specific meeting with consulting parties on December 17, 2021 pursuant to Sections 106 and 110(f) of the NHPA and in accordance with 36 CFR 800.8.

Following BOEM initial Section 106 meeting with consulting parties, Revolution Wind held stakeholder outreach meetings (see Section 5.3) with Federally recognized Native American Tribes and interested consulting parties to review conceptual mitigation measures for the historic property.

3.0 EXISTING CONDITIONS, HISTORIC SIGNIFICANCE, AND MARITIME SETTING

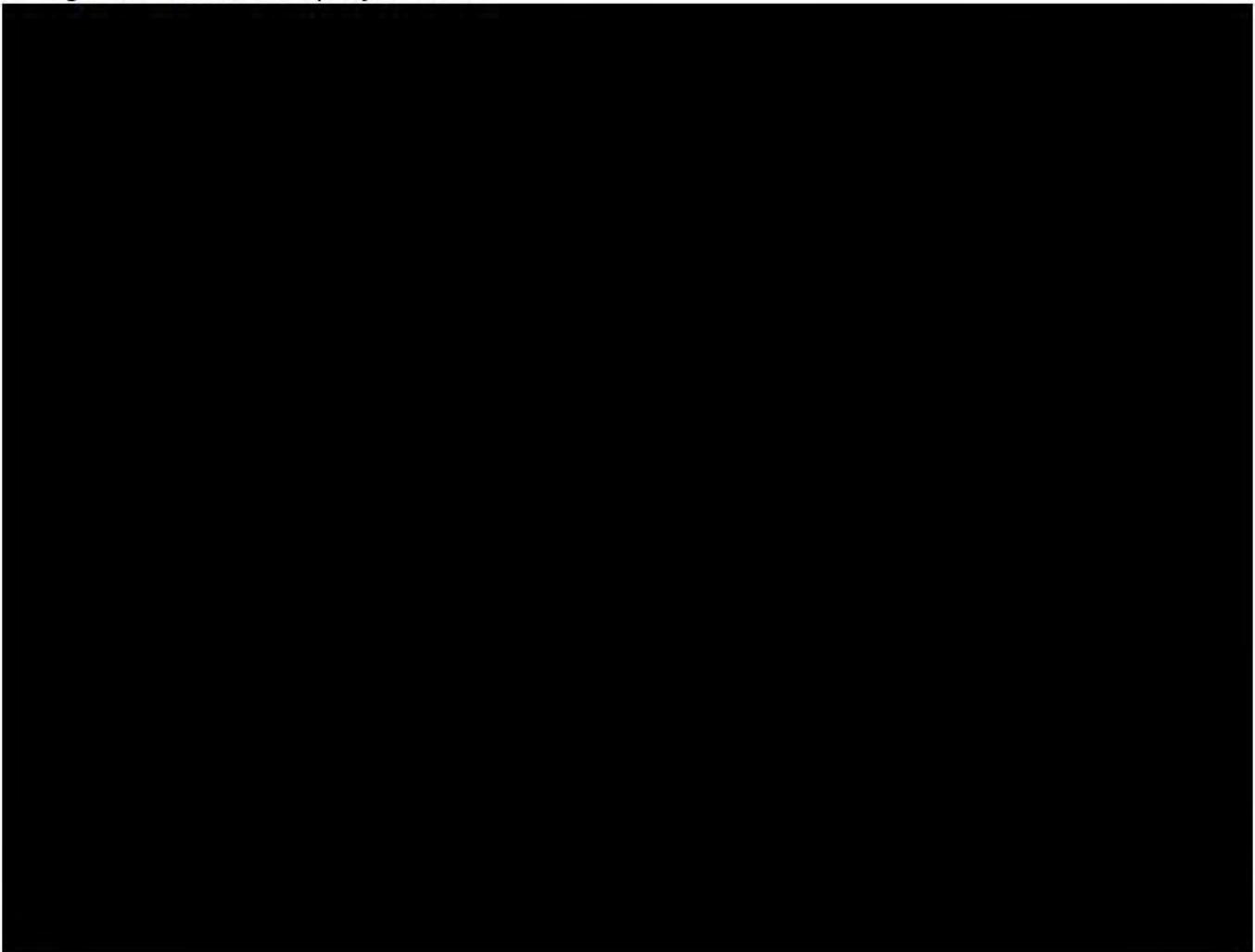
3.1 Historic Properties

This HPTP involves one historic property, as identified in Table 3.1-1 and located on Figure 3.1-1.

Table 3.1-1. Historic Property included in the HPTP

Name	Municipality	State	Site No. (Agency)	Ownership
The Vineyard Sound & Moshup’s Bridge TCP	Multiple	MA	N/A	Multiple

Figure 3.1-1. Historic Property Location



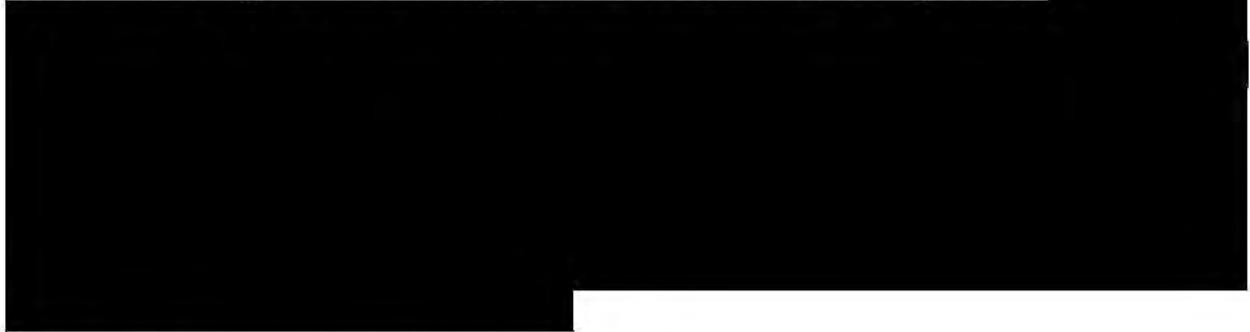
In Section 3.3, the historic property is described both physically and within its historic context, with a focus on the contribution of a maritime visual setting to the property’s significance and integrity.

3.2 Maritime Setting

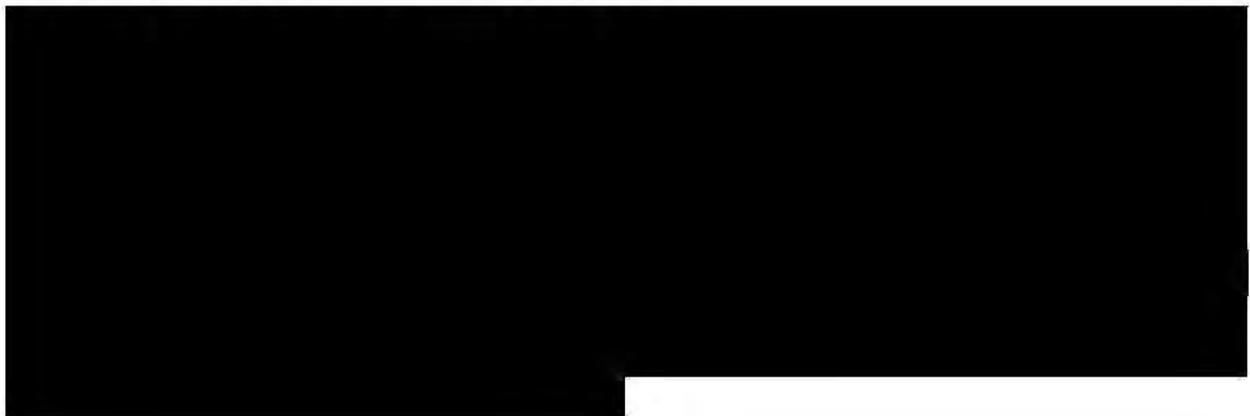
For the purposes of this analysis and assessment, views of marine waters are considered critical aspects of maritime settings. The influence of the marine environment and related human activities on historical development patterns is extensive and may be expressed in areas without direct lines of sight to the sea. Although these types of setting may contribute to the significance of historic properties, they would not be subject to alteration as a result of the proposed undertaking and are not considered further in this report.

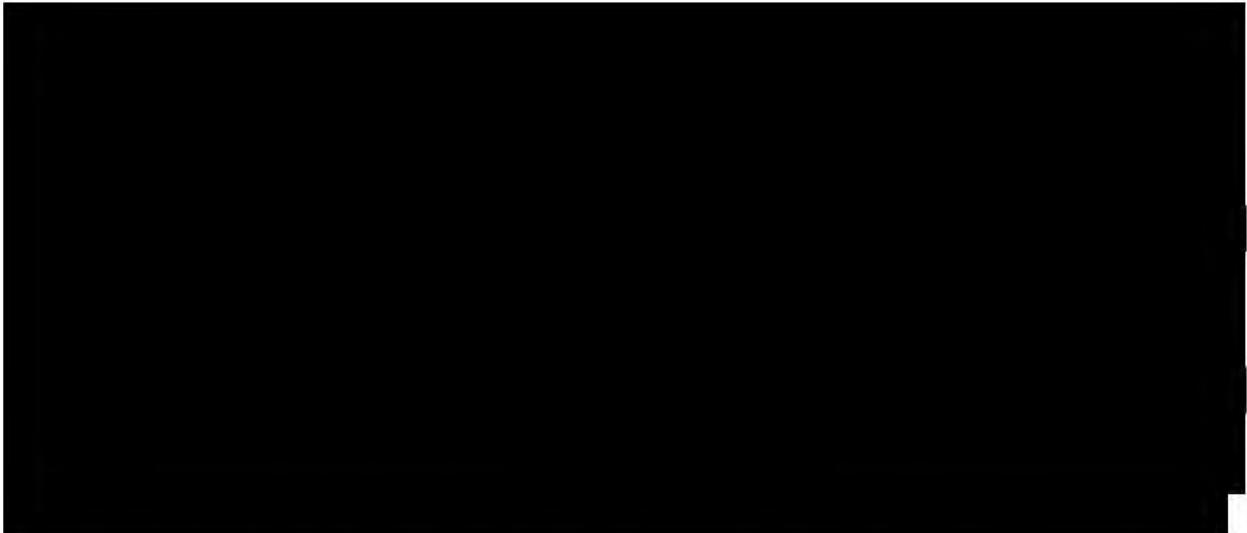


The maritime setting of the TCP is integral to its historical and cultural significance.



3.3 The Vineyard Sound & Moshup's Bridge TCP





The TCP maintains a high degree of integrity despite alterations through time due to post-glacial sea-level rise, coastal erosion, grazing, bombing, clay mining, and modern development. The landforms, themselves, are associated with central events and figures in Wampanoag creation traditions. The historic property continues to support traditional cultural practices, including the sharing of stories related to the formation of the associated landforms and the importance of reciprocal relationships among the Wampanoag peoples and other beings of land, sea, and air as central elements of Wampanoag identities.

3.3.1 *Historic Context*

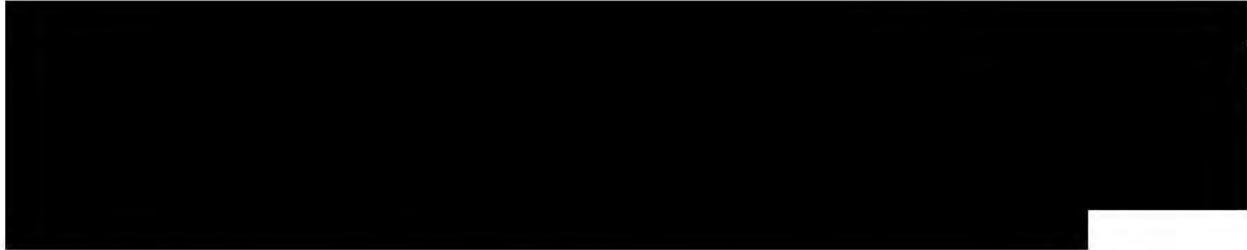
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



3.3.2 *NRHP Criteria and the Maritime Visual Setting*

The Vineyard Sound and Moshup's Bridge TCP is eligible for listing in the National Register under the following criteria:

- Criterion A for its association with ancient and historic Native American exploration and settlement of Aquinnah, central events in Moshup's and the Aquinnah tribe's history, and the character of the lands within;
- Criterion B for its association with Moshup;
- Criterion C as a distinguishable and significant component of Aquinnah lifeways, cosmology, economies, traditions, beliefs, and cultural practices; and
- Criterion D for its potential to yield information through archaeology, ethnography, and ethnohistory significant to understanding the Native American settlement, economies, land use and cultural practices prior to and after the inundation of Vineyard Sound.



4.0 MITIGATION MEASURES

Mitigation measures at these historic properties are detailed in this section. This HPTP addresses the mitigation requirements identified by BOEM to resolve adverse effects to the Vineyard Sound & Moshup’s Bridge TCP. BOEM and Revolution Wind have identified steps to implement these measures in consultation with Participating Parties, led by individuals who meet the qualifications specified in the Secretary of the Interior’s Qualifications Standards for History, Architectural History and/or Architecture (62 FR 33708) and have demonstrated experience in the interpretation of Precontact Period archaeological sites in the Northeast region.

4.1 Support for Improved Tribal Connections to [REDACTED]

4.1.1 Purpose and Intended Outcome

[REDACTED]

The mitigation measure would help improve tribal connections to the cultural landscapes of the island for those community members who cannot currently visit through the creation of virtual interpretative or physical exhibits.

This measure is intended to support and enhance the traditional cultural connections [REDACTED] through the development of interpretative exhibits which may include virtual experiences of the island’s existing and past conditions and Wampanoag traditions of the island’s creation.

4.1.2 Scope of Work

The scope of work will consist of the following:

- Identification of appropriate printed and/or digital media for interpretative exhibits;
- Archival research on the history, development, and historical/cultural significance of [REDACTED];
- Consultation with Participating Parties;
 - Consultation meetings and discussions including the Wampanoag Tribe of Gay Head (Aquinnah) and Mashpee Wampanoag Tribe will be bilateral with Revolution Wind unless otherwise requested and agreed upon by the federally-recognized Native American Tribes.
- Design and production of draft interpretive materials;
- Design and production of final printed and/or digital interpretive materials; and

Final deliverables produced by the consultant will incorporate further comments and any additional information provided by the Participating Parties.

4.1.3 Methodology

Revolution Wind will release a Request for Proposals (RFP) for consultant services in consultation with the Participating Parties and will seek input from the consulting Tribes on the criteria for selection and the Tribes' priorities for the consultant team's qualifications and experience.

Final deliverables produced by Revolution Wind or their consultant team will incorporate further comments and any additional information provided by the Participating Parties.

4.1.4 Standards

Documentation will be prepared by professionals meeting the qualifications specified in the Secretary of the Interior's *Professional Qualifications Standards* (36 CFR Part 61).

4.1.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Consultant bids in response to RFPs;
- Draft deliverables; and
- Final deliverables.

4.1.6 Funds and Accounting

Funding amounts were determined by BOEM in consultation with the consulting parties and are identified in an Attachment to the MOA.

4.2 Scholarships and Training for Tribal Resource Stewardship

4.2.1 Purpose and Intended Outcome

The Aquinnah and Mashpee tribes have protected and cherished the Vineyard Sound & Moshup's Bridge TCP for generations. Development of the lands and seas within and near the TCP will continue to alter the character-defining elements of the historic property. Climate change is also threatening multiple culturally significant habitats and associated plant and animal communities upon which the Tribes have relied since time immemorial, and which are of great importance in maintaining the distinct cultural identities of the Tribes and Tribe members. Effective analyses, consultation, and decision-making within each Tribal government and to support each Tribe's consultations with external agencies require a broad range of skills and knowledge. The purpose of this measure is to enhance the capacity of each Tribe to preserve the critical physical and cultural attributes of the TCP through training and education of tribal members. Revolution Wind would fund scholarships and fees for professional training or certification programs in the fields of

Astronomy, Archaeology/Anthropology, Marine Sciences, Aquaculture, Marine Fisheries, Marine Construction, Native American Studies, Ethnohistory, History, Biology, and related fields through this measure. At the discretion of each Tribe, recipients of financial support funded through this measure may be required to perform a limited period of service in the tribal government offices related to their field of study or training.

The intended outcome of this measure is to support and strengthen the Tribes' capacity to protect and preserve the TCP and its constituent elements through education and professional development. Traditional stewardship activities, including finfishing, shellfishing, plant harvesting and tending, and respectful treatment of plant and animal communities that form critical elements of the TCP would be enhanced through incorporation of professional and academic training with traditional knowledge.

4.2.2 Scope of Work

The scope of work will consist of the following:

- Development of selection criteria for qualified applicants to receive financial support for educational and training opportunities;
- Development of specific accreditation requirements for educational and training programs to which qualified tribal members may enroll;
- Establishment of the appropriate Tribal Council, Tribal Department of Education, or committees of such governing bodies or departments to select among applicants to the funding program;
- Development of fiscal control measures and annual reporting standards for all disbursements; and
- Development of a Scholarship Program Proposal for review by Revolution Wind prior to initial disbursements, with proposed administrative costs to compensate each Tribal government for administration of the program.

4.2.3 Methodology

Revolution Wind will release a RFP for consultant services in consultation with the Participating Parties and will seek input from the consulting Tribes on the criteria for selection and the Tribes' priorities for the consultant team's qualifications and experience.

Final deliverables produced by Revolution Wind or their consultant team will incorporate further comments and any additional information provided by the Participating Parties.

4.2.4 Standards

Documentation will be prepared by professionals with demonstrated experience in education and training program management and fiscal reporting.

4.2.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Consultant bids in response to RFPs;
- Executed contracts between the implementing party and selected consultants; and
- Draft Scholarship Program Proposal; and
- Final Scholarship Program Proposal.

4.2.6 Funds and Accounting

Funding amounts were determined by BOEM in consultation with the consulting parties and are identified in an Attachment to the MOA.

4.3 Coastal Resilience and Habitat Restoration

4.3.1 Purpose and Intended Outcome

Climate change poses a significant threat to archaeological, architectural, habitat, and landscape elements of the TCP. Rising seas and water temperatures, expansion of invasive species, trends towards shorter, warmer winters, and the increased frequency and intensity of coastal storms are expected to result in future losses of character defining features and contributing resources to the historic property. This measure will provide funding for planning and implementation of targeted efforts to mitigate such foreseeable losses, support economically sustainable traditional shellfishing/finfishing and plant collection practices, and documentation and/or recover of threatened elements of cultural sites associated with the TCP.

The intended outcome of this measure is to identify, and where appropriate, implement projects to preserve, recover, and enhance culturally sensitive species habitat, cultural sites, and to offset the foreseeable impacts of climate change. The structure of this measure is intended to provide for appropriate flexibility for each Tribe to respond to changing conditions over the period of funding and accounts for the unpredictability of certain future environmental conditions. The proposed funding would support phased planning and implementation of related activities. Separate funding would be provided to the Wampanoag Tribe of Gay Head (Aquinnah) and Mashpee Wampanoag Tribe to support each tribe's priorities and needs.

4.3.2 Scope of Work

The scope of work will consist of the following:

- Development of selection criteria for qualified planning and implementation activities;
- Development of specific professional qualifications for support of funded activities;
- Designation of the appropriate Tribal government body to select project proposals for funding; and
- Development of fiscal control measures, including conflict of interest provisions, and annual reporting on all funded activities.

4.3.3 Methodology

Revolution Wind will release a RFP for consultant services in consultation with the Participating Parties and will seek input from the consulting Tribes on the criteria for selection and the Tribes' priorities for the consultant team's qualifications and experience.

Final deliverables produced by Revolution Wind or their consultant team will incorporate further comments and any additional information provided by the Participating Parties.

4.3.4 Standards

Documentation will be prepared by professionals with demonstrated experience in archaeology, habitat restoration, coastal resilience planning program management and fiscal reporting, as appropriate to the specific funded activities.

All archaeological surveys or other subsurface terrestrial investigations on any land owned or controlled by the Commonwealth of Massachusetts, its agencies or political subdivisions or on any historical or archeological landmarks or on any lands restricted by Massachusetts General Law (MGL) c. 184, § 31 will be conducted in accordance MHC regulations (950 CMR 70). This HPTP does not require MHC permitting for activities that would not otherwise require such permitting.

4.3.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Consultant bids in response to RFPs;
- Draft deliverables; and
Final deliverables.

4.3.6 Funds and Accounting

Funding amounts were determined by BOEM in consultation with the consulting parties and are identified in an Attachment to the MOA.

4.4 Archaeological and Cultural Sites Data Compilation

4.4.1 Purpose and Intended Outcome

The Wampanoag Tribe of Gay Head (Aquinnah) and Mashpee Wampanoag Tribe have each identified a need for updated inventories of archaeological and cultural resource data pertaining to the TCP and the preparation of updated historic contexts for the interpretation of such resources. The measure would provide for a systematic update of existing Massachusetts Historical Commission (MHC)-maintained resource inventories for sites associated with the affected TCP. A historic context for the TCP, drawing upon

a NRHP-nomination prepared by others, would be developed to integrate newly compiled information and enhance each Tribe's stewardship efforts.

The intended outcome of this measure is an updated open-source GIS inventory of archaeological/cultural sites that contribute to the significance of the Vineyard Sound & Moshup's Bridge TCP and a companion historic context that assists each Tribe in prioritizing preservation and stewardship efforts. Where feasible, the inventory will include updated information on the existing conditions of contributing resources.

4.4.2 Scope of Work

The scope of work will consist of the following:

- Collection and review of existing MHC and THPO documentation of contributing resources to the Vineyard Sound & Moshup's Bridge TCP;
- Coordination with the parties preparing the NRHP nomination for the TCP to verify resource inventory;
- Field visits and photo-documentation, as feasible, to document existing conditions at contributing archaeological and cultural resources within the TCP;
 - Field visits and documentation will be coordinated with the parties preparing the NRHP nomination to avoid duplicative efforts.
- Development of one or more historic contexts for interpretation of contributing resources in alignment with the draft NRHP nomination;
- Preparation and submittal of revised MHC archaeological site forms or comparable documentation for non-archaeological resources to MHC;
- Preparation of GIS data in an open-source format suitable for incorporation in each Tribe's existing GIS infrastructure;
- Submittal of draft historic context(s) and inventory forms to Participating Parties for review and comment; and
- Submittal of final work historic context(s) and MHC inventory forms to participating parties.
 - All submittals to MHC will follow agency guidelines regarding document formatting and print size.

4.4.3 Methodology

Revolution Wind will release a RFP for consultant services in consultation with the Participating Parties and will seek input from the consulting Tribes on the criteria for selection and the Tribes' priorities for the consultant team's qualifications and experience.

Final deliverables produced by Revolution Wind or their consultant team will incorporate further comments and any additional information provided by the Participating Parties.

4.4.4 Standards

The updated inventory will be prepared by professionals meeting the Secretary of the Interior's professional qualification standards in archeology and/or history (36 CFR 60) and in direct consultation with the Wampanoag Tribe of Gay Head (Aquinnah) and Mashpee Wampanoag Tribe THPOs.

4.4.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Consultant bids in response to RFPs;
- Draft and Final Historic Context(s) and MHC Inventory Forms; and
- Open source GIS database will be for sole use by the Wampanoag Tribe of Gay Head (Aquinnah) and Mashpee Wampanoag Tribe or sharing with other Participating Parties at each Tribe's discretion.

4.4.6 Funds and Accounting

Funding amounts were determined by BOEM in consultation with the consulting parties and are identified in an Attachment to the MOA.

4.5 Maritime Cultural Landscapes & Interconnected Contexts

4.5.1 Purpose and Intended Outcome

The Vineyard Sound & Moshup's Bridge TCP is a distinguishable element of a broader maritime cultural landscape significant to Wampanoag peoples and other Native American Tribes in the northeastern United States (BOEM, 2021). The consulting Native American Tribes have expressed an interest in greater recognition of the maritime landscapes associated with their individual tribe's and shared traditional beliefs and practices. This measure will draw upon on-going ethnographic studies and documentation of the Vineyard Sound & Moshup's Bridge and Chappaquiddick Island TCPs, interviews with traditional knowledge holders among the consulting Tribes, and supplemental archival research to document the interconnected components of a broader maritime cultural landscape. The measure will afford opportunities for the associated Tribes to share, as appropriate and at their sole discretion, their traditional knowledge and stories relating to the formation of the lands and seas, significant events in their community's history associated with the maritime cultural landscape, and how their maritime traditions continue to support and sustain their distinctive cultural identities. The intended outcome is a publicly-available and inclusive synthesis of information and knowledge about the maritime cultural landscapes along the shores, coastal islands, and waters of southern New England and Long Island. In accordance with requests from several of the consulting Tribes, documentation and presentation of the maritime cultural landscape will incorporate traditional Wampanoag and other Tribes' names for places, people, and events associated the cultural landscape.

4.5.2 Scope of Work

The scope of work will consist of the following:

- Collection and review of available documentation regarding Native American traditions associated with the coastal and submerged lands and waters of the region;
- Consultations¹ with the consulting Tribes to refine the geographic extent of a potential maritime cultural landscape;
- Consultations with the Wampanoag Tribe of Gay Head (Aquinnah) and Mashpee Wampanoag Tribe to identify appropriate knowledge-holders with an interest in sharing traditions and beliefs associated with the maritime cultural landscape;
- Consultations with appropriate knowledge-holder to identify appropriate names and terms for significant elements of the cultural landscape;
- Preparation of draft mapping depicting the boundaries and sub-divisions or significant elements of the landscape;
- Interviews with traditional knowledge-holders to collect information regarding traditions and variations on traditions associated with the cultural landscape;
- Creation of GIS data layers depicting the boundaries and names of significant maritime cultural landscape elements;
 - To the extent feasible and practicable, GIS data will be formatted to be compatible with open-source platforms used by the Tribes or employed to share data generated from other offshore wind projects in the region;
- Submittal of a preliminary draft report and mapping synthesizing the information gathered;
- Review of all comments and suggestions provided by the consulting Tribes on the preliminary draft report;
- Submittal of a second draft report to Participating Parties for review and comment; and
- Submittal of final report to Participating Parties.

4.5.3 Methodology

Revolution Wind will release a RFP for consultant services in consultation with the Participating Parties and will seek input from the consulting Tribes on the criteria for selection and the Tribes' priorities for the consultant team's qualifications and experience.

Final deliverables produced by Revolution Wind or their consultant team will incorporate further comments and any additional information provided by the Participating Parties.

4.5.4 Standards

The report will be prepared by professionals meeting the Secretary of the Interior's professional qualification standards in cultural anthropology, archeology, and/or history (36 CFR 60) and in direct consultation with

¹ Consultations under this Scope of Work will be conducted separately for each federally-recognized Tribe unless requested and agreed upon by all such Tribes.

the Wampanoag Tribe of Gay Head (Aquinnah) and Mashpee Wampanoag Tribe's Tribal Historic Preservation Offices or other designated tribal representative(s).

4.5.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Consultant bids in response to RFPs;
- Draft and Final reports; and
- Open-source GIS database will be for sole use by the Wampanoag Tribe of Gay Head (Aquinnah) and the Mashpee Wampanoag Tribe or sharing with other Participating Parties at each Tribe's discretion.
- If mutually agreed by the Wampanoag Tribe of Gay Head (Aquinnah) and the Mashpee Wampanoag Tribe, a publicly-available Open-source GIS will be created for access by other Participating Parties and members of the surrounding communities.

4.5.6 Funds and Accounting

Funding amounts were determined by BOEM in consultation with the consulting parties and are identified in an Attachment to the MOA.

5.0 IMPLEMENTATION

5.1 Timeline

The timeline for implementation of the mitigation measures is identified in the MOA.

5.2 Organizational Responsibilities

5.2.1 *Bureau of Ocean Energy Management (BOEM)*

BOEM remains responsible for making all federal decisions and determining compliance with Section 106. BOEM has reviewed this HPTP to ensure, at minimum, it includes the content required.

- BOEM remains responsible for making all federal decisions and determining compliance with Section 106;
- BOEM, in consultation with the Participating Parties, will ensure that mitigation measures adequately resolve adverse effects, consistent with the NHPA;
- BOEM will be responsible for sharing the annual summary report with Participating Parties; and
- BOEM is responsible for consultation related to dispute resolution.
- BOEM may, at its discretion, assist the implementing party in inter-agency coordination with USFWS and the Navy.

Revolution Wind will be responsible for the following:

- Considering the comments provided by the Participating Parties in the development of this HPTP;
- Funding the mitigation measures specified in Section 4.0;
- Completion of the scope/s of work in Section 4.0;
- Ensuring all Standards in Section 4.0 are met;
- Providing the Documentation in Section 4.0 to the Participating Parties for review and comment;
- Annual Reporting to BOEM; and
- Revolution Wind will be responsible for ensuring that all work that requires consultation with Tribal Nations are performed by professionals who have demonstrated professional experience consulting with federally recognized Tribes.

5.2.2 *Other Parties, as Appropriate*

Revolution Wind does not anticipate additional consulting parties, should any be determined, this will be updated.

5.3 Participating Party Consultation

This HPTP was provided by Revolution Wind for review by Participating Parties to provide meaningful input on the resolution of adverse effects to and form(s) of implementing mitigation at the historic properties. Participating Parties were provided the opportunity for review and comment on the HPTP concurrent with BOEM's NEPA substitution schedule for the Project. This HPTP was further refined through informational

and consultation meetings, conference calls, HPTP draft reviews and document exchanges, or similar means of communication of information.

6.0 REFERENCES

Bureau of Ocean Energy Management (BOEM), 2021. Supplement to the Finding of Adverse Effect For the Vineyard Wind 1 Project Construction and Operations Plan, March 9, 2021. Available at: <https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/Supplemental-FoAE.pdf>.

Code of Federal Regulations (CFR). 2022. 40 CFR 1500 – National Environmental Policy Act Implementing Regulations. Available at <https://www.ecfr.gov/current/title-40/chapter-V/subchapter-A>. Accessed January 7, 2022.

CFR. 2021a. 36 CFR 800 – Protection of Historic Properties [incorporating amendments effective December 15, 2021]. Available at <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800>. Accessed December 21, 2021.

CFR. 2021b. 36 CFR 61.4(e)(1) – Procedures for State, Tribal, and Local Government Historic Preservation Programs [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4\(e\)\(1\)](https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4(e)(1)). Accessed December 21, 2021.

CFR. 2021c. 36 CFR 65.2(c)(2) – National Historic Landmarks Program – Effects of Designation [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2\(c\)\(2\)](https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2(c)(2)). Accessed December 21, 2021.

Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR). 2023. *Historic Resources Visual Effects Analysis, Revolution Wind Farm*. Syracuse, NY. May 2023.

Federal Register. 1997. 62 FR 33708 – The Secretary of the Interior’s Historic Preservation Professional Qualifications Standards. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/app/details/FR-1997-06-20/97-16168>. Accessed December 21, 2021.

Federal Register. 2021. FR30068 -Department of the Interior, Bureau of Ocean Energy Management, Docket No.: BOEM-2021-0029. *Notice of Intent to Prepare an Environmental Impact Statement for Revolution Wind LLC’s Proposed Wind Energy Facility Offshore Rhode Island; Reopening of Comment Period and Corrections*. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/content/pkg/FR-2021-06-04/pdf/2021-11727.pdf>. Accessed February 8, 2022.

Massachusetts General Law (MGL). 2020. Chapter 184, Section 31: Restrictions, Defined [incorporating Revolution Wind, LLC. 2021. *Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project*. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan-april-2021>. Accessed January 12, 2022.

National Park Service (NPS). 2010. *Nantucket Sound, Massachusetts*. Department of the Interior. Available at <https://saveoursound.org/wp-content/uploads/2021/10/Nantucket-Sound-TCP.pdf>. Accessed February 2022.

Perry, Jonathan (2010) "Moshup's Bridge" In Trickster: *Native American Tales - A Graphic Collection*. Edited by Matt Dembicki. Golden, Colorado: Fulcrum Publishers.

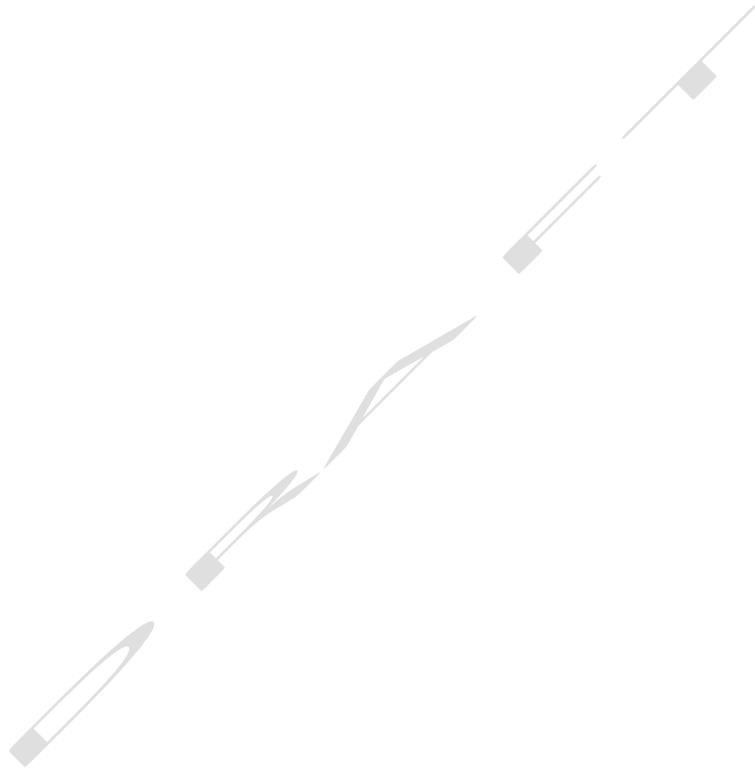
Revolution Wind, LLC (Revolution Wind). 2022. *Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project*. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan>. Accessed January 12, 2022.

Sayet, Rachel. 2012. *Moshup's Continuance: Sovereignty and the Literature of the Land in the Aquinnah Wampanoag Nation*. Masters Thesis. Harvard University. May 2021.

United States Code. 2016. Title 54 - National Historic Preservation Act [as amended through December 16, 2016]. Available at <https://www.achp.gov/sites/default/files/2018-06/nhpa.pdf>. Accessed December 21, 2021.

Wampanoag Tribe of Gay Head (Aquinnah) (WTGH/H). 2020. Wampanoag History. Webpage. Accessed March 2022. Available at <https://wampanoagtribe-nsn.gov/wampanoag-history>.

**ATTACHMENT 10 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE
REVOLUTION WIND FARM: THE [REDACTED]
TRADITIONAL CULTURAL PROPERTY [REDACTED] MASSACHUSETTS &
ATLANTIC OUTER CONTINENTAL SHELF – NON-FEDERALLY-RECOGNIZED NATIVE
AMERICAN TRIBES**



REDACTED – Includes Archaeological Site Location Information

Historic Property Treatment Plan

for the

Revolution Wind Farm

The Vineyard Sound & Moshup’s Bridge Traditional Cultural Property
Dukes County, Massachusetts & Atlantic Outer Continental Shelf
Consulting Parties

Submitted to:



Bureau of Ocean Energy Management
U.S. Department of the Interior

Prepared for:



Revolution Wind, LLC
<https://revolutionwind.com/>

Prepared by:



Environmental Design & Research, D.P.C.
217 Montgomery Street, Suite 1100
Syracuse, New York 13202
www.edrdpc.com

June 2023

ABSTRACT

Federal Undertaking: Revolution Wind Farm and Revolution Wind Export Cable Project

Location: Outer Continental Shelf and Rhode Island

Federal and
State Agencies: Bureau of Ocean Energy Management
National Park Service
U.S. Army Corps of Engineers
Massachusetts Historical Commission
Rhode Island Historical Preservation & Heritage Commission
New York Historic Preservation Office
Connecticut Historic Preservation Office
Advisory Council on Historic Preservation

Regulatory Process: National Environmental Policy Act
Section 106 of the National Historic Preservation Act
Section 110(f) of the National Historic Preservation Act

Purpose: This Historic Property Treatment Plan provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects from the Revolution Wind Project.

Adverse Visual
Effect Finding for: The Vineyard Sound & Moshup’s Bridge Traditional Cultural Property (TCP), Dukes County, Massachusetts and Atlantic Outer Continental Shelf

Submitted By: Revolution Wind, LLC

Date: June 2023

TABLE OF CONTENTS

1.0 Executive Summary 1

2.0 Background Information 3

 2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable..... 3

 2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA) 4

 2.2.1 Municipal Regulations..... 4

 2.2.2 Preservation Easements and Restrictions..... 4

 2.3 Participating Parties 4

3.0 Existing Conditions, Historic Significance, and maritime setting 6

 3.1 Historic Properties 6

 3.2 Maritime Setting..... 7

 3.3 The Vineyard Sound & Moshup’s Bridge TCP..... 7

 3.3.1 Historic Context..... 9

 3.3.2 NRHP Criteria and the Maritime Visual Setting 10

4.0 Mitigation Measures 12

 4.1 Public Interpretation of Interconnected Maritime Cultural Landscapes 12

 4.1.1 Purpose and Intended Outcome 12

 4.1.2 Scope of Work..... 12

 4.1.3 Methodology 13

 4.1.4 Standards 13

 4.1.5 Documentation 13

 4.1.6 Funds and Accounting 14

5.0 Implementation 15

 5.1 Timeline..... 15

 5.2 Organizational Responsibilities 15

 5.2.1 Bureau of Ocean Energy Management (BOEM) 15

 5.2.2 Other Parties, as Appropriate..... 15

 5.3 Participating Party Consultation 15

6.0 References..... 17

LIST OF FIGURES

Figure 2.1-1. Project Location..... 3

Figure 3.1-1. Historic Property Location..... 6

LIST OF TABLES

Table 3.1-1. Historic Property included in the HPTP 6

LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
ADLS	Aircraft Detection Lighting System
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
COP	Construction and Operations Plan
EDR	Environmental Design and Research, D.P.C.
FEIS	Final Environmental Impact Statement
FR	Federal Regulation
HPTP	Historic Property Treatment Plan
MHC	Massachusetts Historical Commission
MOA	Memorandum of Agreement
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
RFP	Request for Proposals
ROD	Record of Decision
RWF	Revolution Wind Farm
TCP	Traditional Cultural Property
WTG	Wind Turbine Generator

1.0 EXECUTIVE SUMMARY

This Historic Property Treatment Plan (HPTP) for the Vineyard Sound & Moshup's Bridge Traditional Cultural Property (the historic property), which was determined eligible for listing in the National Register of Historic Places by the Bureau of Ocean Energy Management in 2021, provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects caused by the Revolution Wind Farm (RWF) and Revolution Wind Export Cable Project (collectively, the Undertaking). Revolution Wind, LLC (Revolution Wind) has provided this HPTP in accordance with the Bureau of Ocean Energy Management's (BOEM) Findings of Adverse Effect (FoAE) for the Undertaking under the National Historic Preservation Act (NHPA).

BOEM has used the National Environmental Policy Act (NEPA) substitution process to fulfill its Section 106 obligations as provided for in the NHPA implementing regulations (36 CFR § 800.8(c)), and BOEM has consulted with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, federally recognized Native American Tribes, and other NHPA Section 106 consulting parties in accordance with this process. Revolution Wind has provided this HPTP to BOEM for inclusion in the Final Environmental Impact Statement (FEIS).

This HPTP describes the mitigation measures to resolve adverse effects on historic properties, the implementation steps, and timeline for actions. The mitigation measures are based on the evaluations and outreach performed by Revolution Wind prior to the issuance of the DEIS as well as outreach to consulting parties performed by BOEM. This HPTP documents has undergone revision and refinement in consultation with federally-recognized Native American Tribes, the Massachusetts State Historic Preservation Officer, the Rhode Island State Historic Preservation Officer, the ACHP, and/or other consulting parties throughout the NEPA substitution process. This HPTP is included in the Memorandum of Agreement (MOA) issued in accordance with 36 CFR §§ 800.8, 800.10.

Pursuant to the terms and conditions of the MOA, Revolution Wind will implement these mitigation measures.

This HPTP is organized into the following sections:

- **Section 1.0, Introduction**, outlines the content of this HPTP.
- **Section 2.0, Cultural Resources Regulatory Context**, briefly summarizes the Undertaking while focusing on cultural resources regulatory contexts (federal, tribal, state, and local, including preservation restrictions), identifies the historic properties discussed in this HPTP that will be adversely affected by the Undertaking, and summarizes the pertinent provisions and attachments of the HRVEA (EDR, 2023) and *Revolution Wind Farm Construction and Operations Plan (COP;* Revolution Wind, 2022) that guided the development of this document.
- **Section 3.0, Existing Conditions, Historic Significance, and Maritime Setting**, provides a physical description of the historic property included in this HPTP. Set within its historic context,

the applicable NRHP criteria for the historic property are discussed with a focus on the contribution of a maritime visual setting to its significance and integrity.

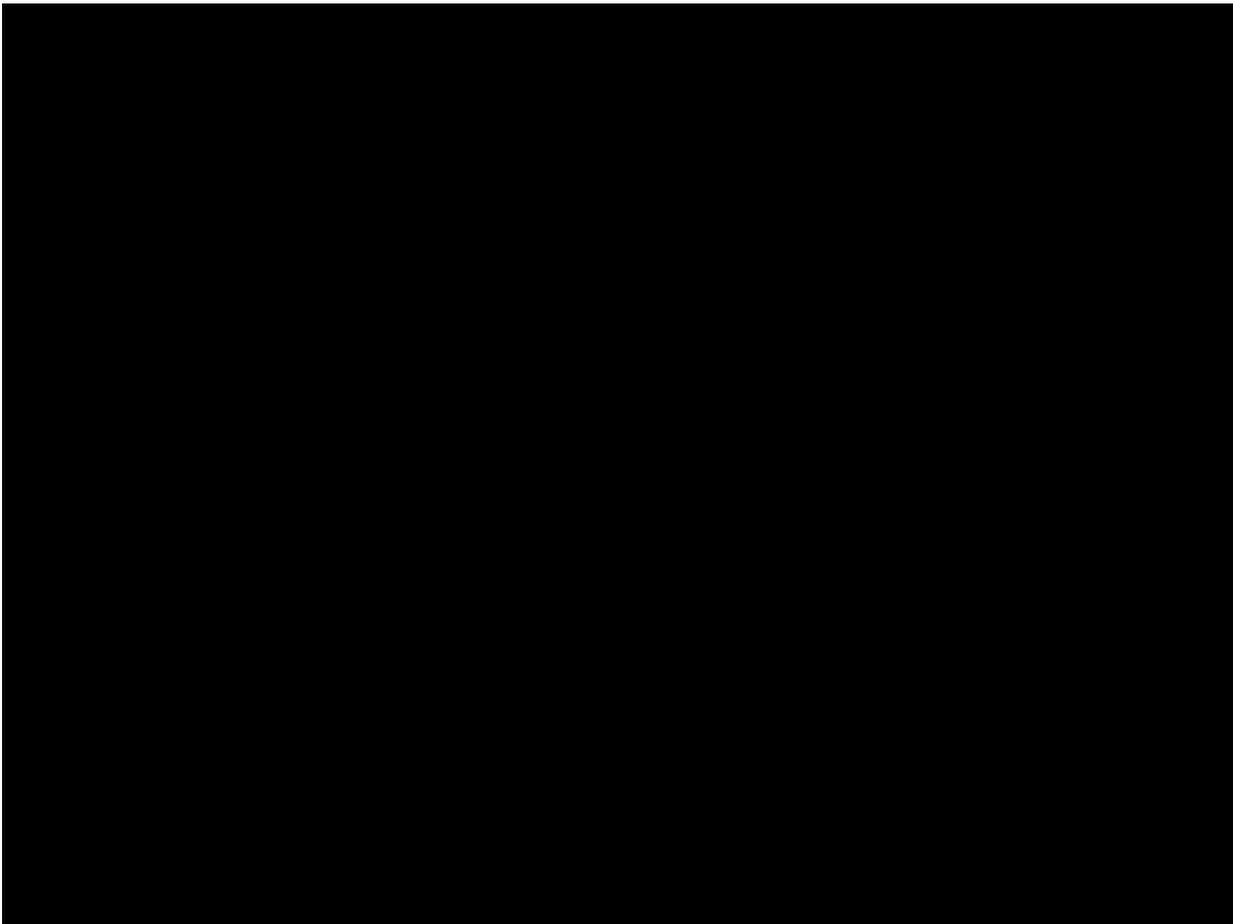
- **Section 4.0, Mitigation Measures**, presents specific steps to carry out the mitigation actions. The mitigation action includes a detailed description, intended outcome, methods, standards, and requirements for documentation.
- **Section 5.0, Implementation**, establishes the process for executing mitigation actions at the historic property, as identified in Section 4.0 of this HPTP. For each/the action, organizational responsibilities are outlined, a timeline is provided, and regulatory reviews are listed.
- **Section 6.0, References**, is a list of works cited in this HPTP.

2.0 BACKGROUND INFORMATION

2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable

The Undertaking is a wind-powered electric generating facility composed of up to 100 wind turbine generators (WTGs) and associated foundations, two offshore substations, and inter-array cables connecting the WTGs and the offshore substations (see Figure 2.1-1). The WTGs, offshore substations, array cables, and substation interconnector cables would be located on the Outer Continental Shelf approximately 15 nautical miles (18 statute miles) southeast of Point Judith, Rhode Island, approximately 13 nautical miles (15 statute miles) east of Block Island, Rhode Island, approximately 7.5 nautical miles (8.5 statute miles) south of Nomans Land Island National Wildlife Refuge (uninhabited island), and between approximately 10 to 12.5 nautical miles (12 to 14 statute miles) south/southwest of varying points of the Rhode Island and Massachusetts coastlines (62 FR 33708). In addition, two submarine export cables located in both federal waters and Rhode Island State territorial waters, will connect the offshore substation to the electrical grid. The proposed interconnection location for the Undertaking is the existing Davisville Substation, which is owned and operated by The Narragansett Electric Company d/b/a National Grid and located in North Kingstown, Rhode Island. The visible offshore components of the operational Undertaking will be located on Lease OCS-A 0486 in water depths ranging from approximately 108 to 125 feet.

Figure 2.1-1. Project Location



2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)

The regulations at 36 CFR § 800.8 provide for use of the NEPA process to fulfill a federal agency's NHPA Section 106 review obligations in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6. Under these provisions, issuance of an ROD and implementation of relevant conditions will resolve adverse effects to historic properties caused by the Undertaking, including to National Historic Landmarks for which BOEM must provide a higher standard of care, as required by Section 110(f) of the NHPA.

The measures to avoid and minimize adverse effects to identified historic properties are described in the COP (Section 4.4.1.3 and Appendix BB).

This HPTP describes the measures to resolve the remaining adverse effects after application of the above-referenced measures. The mitigation measures reflect a refinement of the conceptual mitigation framework proposed by Revolution Wind (see Appendix BB in the COP).

All activities implemented under this HPTP will be conducted in accordance with any conditions imposed by BOEM in its ROD and with applicable local, state and federal regulations and permitting requirements. Responsibilities for specific compliance actions are described in further detail in Section 5.2, Organizational Responsibilities.

2.2.1 Municipal Regulations

Before implementation, any on-site mitigation measures will be coordinated with local municipalities and commissions to obtain approvals, as appropriate. These may include, but are not limited to building permits, zoning, land use, planning, historic commissions, and design review boards. Additional information regarding compliance with local requirements appears in Section 5.0, Implementation.

2.2.2 Preservation Easements and Restrictions

Preservation easements and restrictions protect significant historic, archaeological, or cultural resources. The State of Massachusetts preservation restrictions are outlined in Massachusetts General Law Chapter 184, Sections 31-33.



Additional information regarding compliance with extant preservation restrictions appears in Section 5.0, Implementation.

2.3 Participating Parties

BOEM initiated consultation under Section 106 with invitations to consulting parties on April 30, 2021. BOEM hosted the first Section 106-specific meeting with consulting parties on December 17, 2021, and Revolution

Wind anticipates that BOEM will hold additional meetings pursuant to Sections 106 and 110(f) of the NHPA and in accordance with 36 CFR 800.8.

Following BOEM initial Section 106 meeting with consulting parties, Revolution Wind held stakeholder outreach meetings (see Section 5.3) with interested consulting parties to review conceptual mitigation measures for the historic property.

3.0 EXISTING CONDITIONS, HISTORIC SIGNIFICANCE, AND MARITIME SETTING

3.1 Historic Properties

This HPTP involves one historic property, as identified in Table 3.1-1 and located on Figure 3.1-1.

Table 3.1-1. Historic Property included in the HPTP

Name	Municipality	State	Site No. (Agency)	Ownership
The Vineyard Sound & Moshup’s Bridge TCP	Multiple	MA	N/A	Multiple

Figure 3.1-1. Historic Property Location



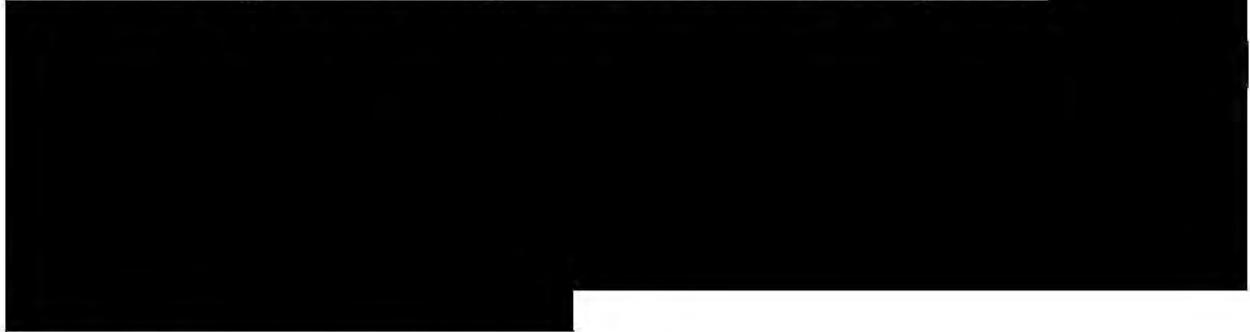
In Section 3.3, the historic property is described both physically and within its historic context, with a focus on the contribution of a maritime visual setting to the property’s significance and integrity.

3.2 Maritime Setting

For the purposes of this analysis and assessment, views of marine waters are considered critical aspects of maritime settings. The influence of the marine environment and related human activities on historical development patterns is extensive and may be expressed in areas without direct lines of sight to the sea. Although these types of setting may contribute to the significance of historic properties, they would not be subject to alteration as a result of the proposed undertaking and are not considered further in this report.

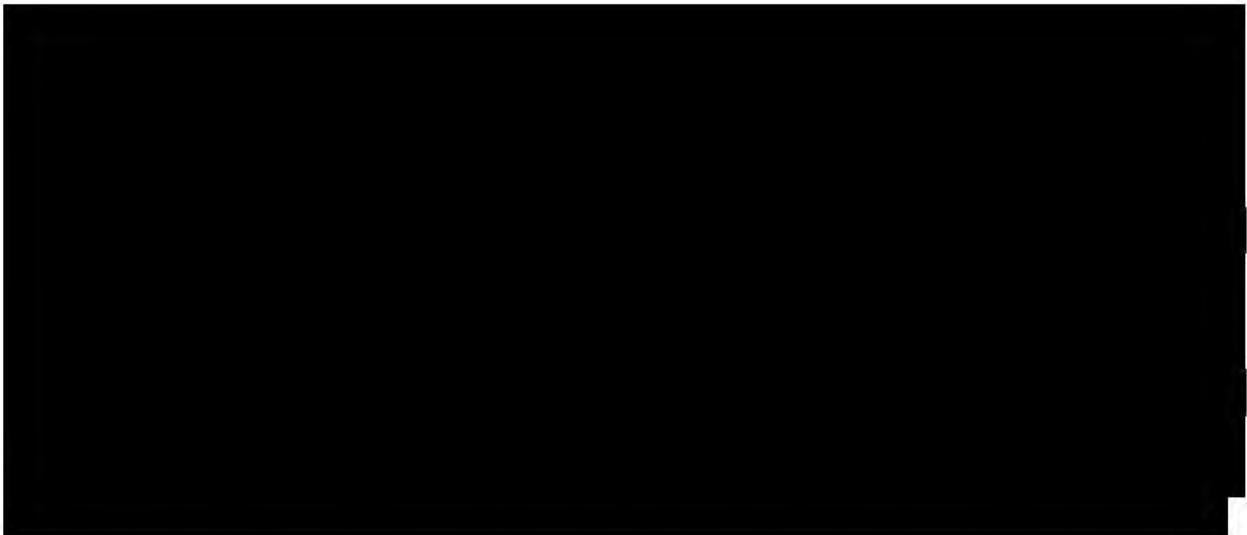
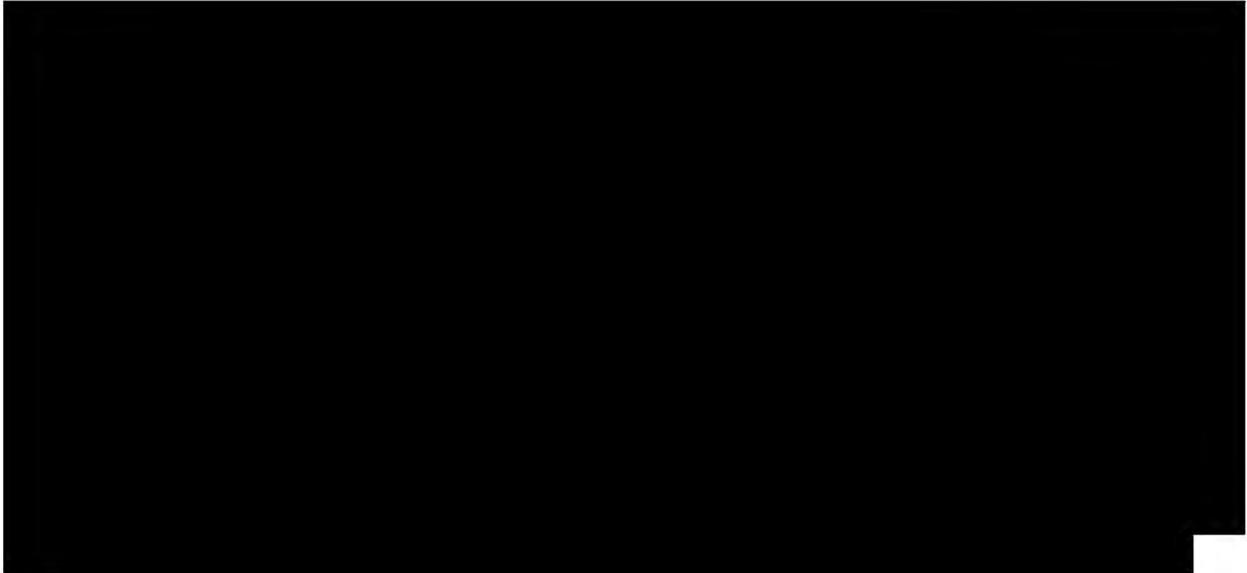


The maritime setting of the TCP is integral to its historical and cultural significance.



3.3 The Vineyard Sound & Moshup's Bridge TCP





The TCP maintains a high degree of integrity despite alterations through time due to post-glacial sea-level rise, coastal erosion, grazing, bombing, clay mining, and modern development. The landforms, themselves, are associated with central events and figures in Wampanoag creation traditions. The historic property continues to support traditional cultural practices, including the sharing of stories related to the formation of the associated landforms and the importance of reciprocal relationships among the Wampanoag peoples and other beings of land, sea, and air as central elements of Wampanoag identities.

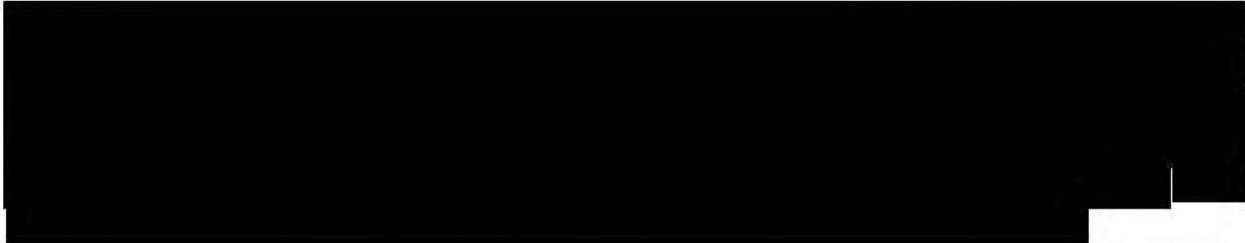
3.3.1 *Historic Context*

[REDACTED]

[REDACTED]

[REDACTED]

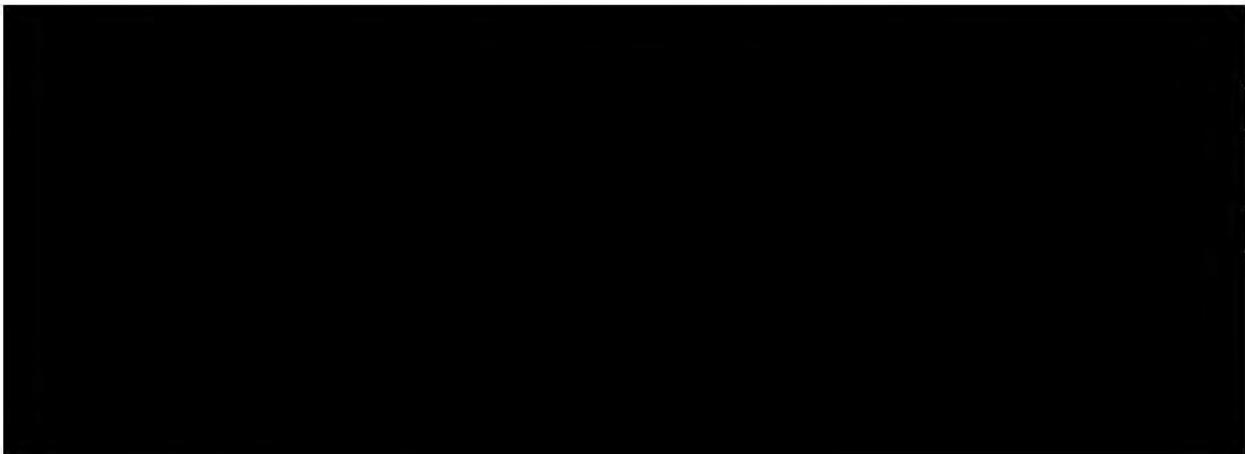
[REDACTED]



3.3.2 *NRHP Criteria and the Maritime Visual Setting*

The Vineyard Sound and Moshup’s Bridge TCP is eligible for listing in the National Register under the following criteria:

- Criterion A for its association with ancient and historic Native American exploration and settlement of Aquinnah, central events in Moshup’s and the Aquinnah tribe’s history, and the character of the lands within;
- Criterion B for its association with Moshup;
- Criterion C as a distinguishable and significant component of Aquinnah lifeways, cosmology, economies, traditions, beliefs, and cultural practices; and
- Criterion D for its potential to yield information through archaeology, ethnography, and ethnohistory significant to understanding the Native American settlement, economies, land use and cultural practices prior to and after the inundation of Vineyard Sound.





4.0 MITIGATION MEASURES

Mitigation measures at these historic properties are detailed in this section. This HPTP addresses the mitigation requirements identified by BOEM to resolve adverse effects to the Vineyard Sound & Moshup's Bridge TCP. BOEM and Revolution Wind have identified steps to implement these measures in consultation with Participating Parties, led by individuals who meet the qualifications specified in the Secretary of the Interior's Qualifications Standards for History, Architectural History and/or Architecture (62 FR 33708) and have demonstrated experience in the interpretation of Precontact Period archaeological sites in the Northeast region.

4.1 Public Interpretation of Interconnected Maritime Cultural Landscapes

4.1.1 *Purpose and Intended Outcome*

The Vineyard Sound & Moshup's Bridge TCP is a distinguishable element of a broader maritime cultural landscape significant to Wampanoag peoples and other Native American Tribes in the northeastern United States (BOEM, 2021). The consulting Native American Tribes have expressed an interest in greater recognition of the maritime landscapes associated with their individual tribe's and shared traditional beliefs and practices. This measure will draw upon on-going ethnographic studies and documentation of the Vineyard Sound & Moshup's Bridge and Chappaquiddick Island TCPs, interviews with traditional knowledge holders, and supplemental archival research to document the interconnected components of a broader maritime cultural landscape. The measure will afford opportunities for consulting parties to share, as appropriate and at their sole discretion, their traditional knowledge and stories relating to the formation of the lands and seas, significant events in their community's history associated with the maritime cultural landscape, and how their maritime traditions continue to support and sustain their distinctive cultural identities. The intended outcome is a publicly-available and inclusive synthesis of information and knowledge about the maritime cultural landscapes along the shores, coastal islands, and waters of southern New England and Long Island. In accordance with requests from several of the consulting parties, documentation and presentation of the maritime cultural landscape will incorporate traditional Wampanoag and other Tribes' names for places, people, and events associated the cultural landscape.

4.1.2 *Scope of Work*

The scope of work will consist of the following:

- Collection and review of available documentation regarding Native American traditions associated with the coastal and submerged lands and waters of the region;
- Consultations¹ with the consulting parties to refine the geographic extent of a potential maritime cultural landscape;
- Consultations with the consulting parties to identify appropriate knowledge-holders with an interest in sharing traditions and beliefs associated with the maritime cultural landscape;

¹ Consultations under this Scope of Work will be conducted separately for each consulting party unless requested and agreed upon by all consulting parties.

- Consultations with appropriate knowledge-holder to identify appropriate names and terms for significant elements of the cultural landscape;
- Preparation of draft mapping depicting the boundaries and sub-divisions or significant elements of the landscape;
- Interviews with traditional knowledge-holders to collect information regarding traditions and variations on traditions associated with the cultural landscape;
- Creation of GIS data layers depicting the boundaries and names of significant maritime cultural landscape elements;
 - To the extent feasible and practicable, GIS data will be formatted to be compatible with open-source platforms used by the consulting parties or employed to share data generated from other offshore wind projects in the region;
- Submittal of a preliminary draft report and mapping synthesizing the information gathered;
- Review of all comments and suggestions provided by the consulting parties on the preliminary draft report;
- Submittal of a second draft report to Participating Parties for review and comment; and
- Submittal of final report to Participating Parties.

4.1.3 Methodology

Revolution Wind will release a RFP for consultant services in consultation with the Participating Parties and will seek input from the consulting parties on the criteria for selection and the parties' priorities for the consultant team's qualifications and experience.

Final deliverables produced by Revolution Wind or their consultant team will incorporate further comments and any additional information provided by the Participating Parties.

4.1.4 Standards

The report will be prepared by professionals meeting the Secretary of the Interior's professional qualification standards in cultural anthropology, archeology, and/or history (36 CFR 60) and in direct consultation with each of the consulting Tribe's Tribal Historic Preservation Office or other designated tribal representative(s).

4.1.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Consultant bids in response to RFPs;
- Draft and Final reports; and
- Open-source GIS database will be for sole use by the Wampanoag Tribe of Gay Head (Aquinnah) and the Mashpee Wampanoag Tribe or sharing with other Participating Parties at each Tribe's discretion.

- If mutually agreed by the Wampanoag Tribe of Gay Head (Aquinnah) and the Mashpee Wampanoag Tribe, a publicly-available Open-source GIS will be created for access by other Participating Parties and members of the surrounding communities.

4.1.6 *Funds and Accounting*

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

5.0 IMPLEMENTATION

5.1 Timeline

The timeline for implementation of the mitigation measures is identified in the MOA.

5.2 Organizational Responsibilities

5.2.1 *Bureau of Ocean Energy Management (BOEM)*

BOEM remains responsible for making all federal decisions and determining compliance with Section 106. BOEM has reviewed this HPTP to ensure, at minimum, it includes the content required.

- BOEM remains responsible for making all federal decisions and determining compliance with Section 106;
- BOEM, in consultation with the Participating Parties, will ensure that mitigation measures adequately resolve adverse effects, consistent with the NHPA;
- BOEM will be responsible for sharing the annual summary report with Participating Parties; and
- BOEM is responsible for consultation related to dispute resolution.
- BOEM may, at its discretion, assist the implementing party in inter-agency coordination with USFWS and the Navy.

Revolution Wind will be responsible for the following:

- Considering the comments provided by the Participating Parties in the development of this HPTP;
- Funding the mitigation measures specified in Section 4.0;
- Completion of the scope/s of work in Section 4.0;
- Ensuring all Standards in Section 4.0 are met;
- Providing the Documentation in Section 4.0 to the Participating Parties for review and comment;
- Annual Reporting to BOEM; and
- Revolution Wind will be responsible for ensuring that all work that requires consultation with Tribal Nations are performed by professionals who have demonstrated professional experience consulting with federally recognized Tribes, historical Tribes, and descendant communities.

5.2.2 *Other Parties, as Appropriate*

Revolution Wind does not anticipate additional consulting parties, should any be determined, this will be updated.

5.3 Participating Party Consultation

This HPTP was provided by Revolution Wind for review by Participating Parties to provide meaningful input on the resolution of adverse effects to and form(s) of implementing mitigation at the historic properties. Participating Parties were provided the opportunity for review and comment on the HPTP concurrent with BOEM's NEPA substitution schedule for the Project. This HPTP was further refined through informational

and consultation meetings, conference calls, HPTP draft reviews and document exchanges, or similar means of communication of information.

6.0 REFERENCES

Bureau of Ocean Energy Management (BOEM), 2021. Supplement to the Finding of Adverse Effect For the Vineyard Wind 1 Project Construction and Operations Plan, March 9, 2021. Available at: <https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/Supplemental-FoAE.pdf>.

Code of Federal Regulations (CFR). 2022. 40 CFR 1500 – National Environmental Policy Act Implementing Regulations. Available at <https://www.ecfr.gov/current/title-40/chapter-V/subchapter-A>. Accessed January 7, 2022.

CFR. 2021a. 36 CFR 800 – Protection of Historic Properties [incorporating amendments effective December 15, 2021]. Available at <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800>. Accessed December 21, 2021.

CFR. 2021b. 36 CFR 61.4(e)(1) – Procedures for State, Tribal, and Local Government Historic Preservation Programs [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4\(e\)\(1\)](https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4(e)(1)). Accessed December 21, 2021.

CFR. 2021c. 36 CFR 65.2(c)(2) – National Historic Landmarks Program – Effects of Designation [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2\(c\)\(2\)](https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2(c)(2)). Accessed December 21, 2021.

Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR). 2023. *Historic Resources Visual Effects Analysis, Revolution Wind Farm*. Syracuse, NY. May 2023.

Federal Register. 1997. 62 FR 33708 – The Secretary of the Interior’s Historic Preservation Professional Qualifications Standards. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/app/details/FR-1997-06-20/97-16168>. Accessed December 21, 2021.

Federal Register. 2021. FR30068 -Department of the Interior, Bureau of Ocean Energy Management, Docket No.: BOEM-2021-0029. *Notice of Intent to Prepare an Environmental Impact Statement for Revolution Wind LLC’s Proposed Wind Energy Facility Offshore Rhode Island; Reopening of Comment Period and Corrections*. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/content/pkg/FR-2021-06-04/pdf/2021-11727.pdf>. Accessed February 8, 2022.

Massachusetts General Law (MGL). 2020. Chapter 184, Section 31: Restrictions, Defined [incorporating Revolution Wind, LLC. 2021. *Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project*. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan-april-2021>. Accessed January 12, 2022.

National Park Service (NPS). 2010. *Nantucket Sound, Massachusetts*. Department of the Interior. Available at <https://saveoursound.org/wp-content/uploads/2021/10/Nantucket-Sound-TCP.pdf>. Accessed February 2022.

Perry, Jonathan (2010) "Moshup's Bridge" In Trickster: *Native American Tales - A Graphic Collection*. Edited by Matt Dembicki. Golden, Colorado: Fulcrum Publishers.

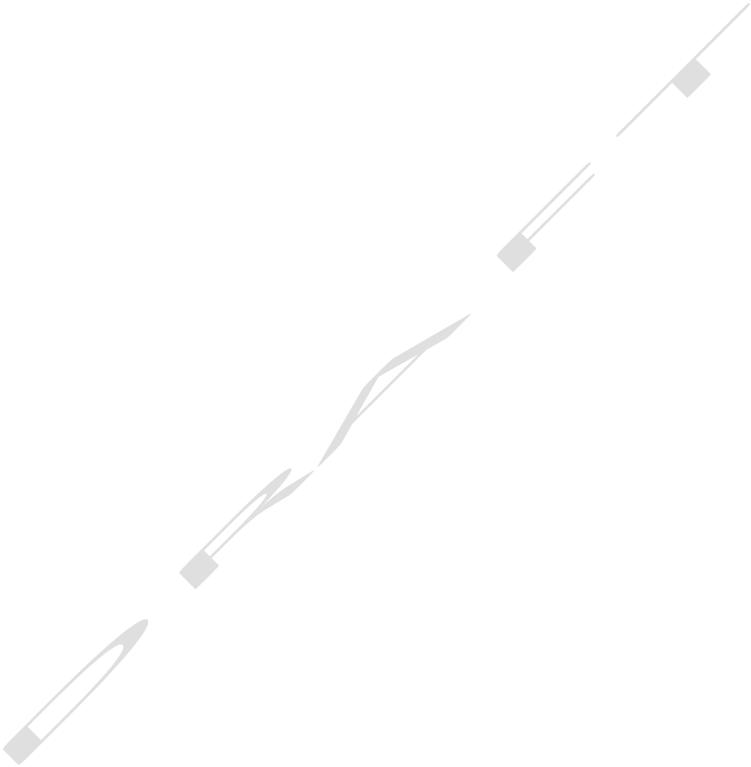
Revolution Wind, LLC (Revolution Wind). 2022. *Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project*. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan>. Accessed January 12, 2022.

Sayet, Rachel. 2012. *Moshup's Continuance: Sovereignty and the Literature of the Land in the Aquinnah Wampanoag Nation*. Masters Thesis. Harvard University. May 2021.

United States Code. 2016. Title 54 - National Historic Preservation Act [as amended through December 16, 2016]. Available at <https://www.achp.gov/sites/default/files/2018-06/nhpa.pdf>. Accessed December 21, 2021.

Wampanoag Tribe of Gay Head (Aquinnah) (WTGH/H). 2020. Wampanoag History. Webpage. Accessed March 2022. Available at <https://wampanoagtribe-nsn.gov/wampanoag-history>.

**ATTACHMENT 11 – HISTORIC PROPERTY TREATMENT PLAN FOR THE REVOLUTION
WIND FARM: DOCUMENTATION OF TWENTY-SIX HISTORIC PROPERTIES IN RHODE
ISLAND**



Historic Property Treatment Plan

for the

Revolution Wind Farm

Documentation of Twenty-Six Historic Properties in Rhode Island

Submitted to:



Bureau of Ocean Energy Management
U.S. Department of the Interior

Prepared for:



Revolution Wind, LLC
<https://revolutionwind.com/>

Prepared by:



Environmental Design & Research, D.P.C.
217 Montgomery Street, Suite 1100
Syracuse, New York 13202
www.edrdpc.com

June 2023

ABSTRACT

Federal Undertaking: Revolution Wind Farm and Revolution Wind Export Cable Project

Location: Outer Continental Shelf and Rhode Island

Federal and
State Agencies: Bureau of Ocean Energy Management
National Park Service
U.S. Army Corps of Engineers
Massachusetts Historical Commission
Rhode Island Historical Preservation & Heritage Commission
New York Historic Preservation Office
Connecticut Historic Preservation Office
Advisory Council on Historic Preservation

Regulatory Process: National Environmental Policy Act
Section 106 of the National Historic Preservation Act
Section 110(f) of the National Historic Preservation Act

Purpose: This Historic Property Treatment Plan provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects from the Revolution Wind Project.

Adverse Visual
Effect Finding for: Abbott Phillips House, Little Compton
Warren Point Historic District, Little Compton
Tunipus Goosewing Farm, Little Compton
Fort Varnum/Camp Varnum, Narragansett
Narragansett Pier MRA, Narragansett
Life Saving Station at Narragansett Pier, Narragansett
The Towers Historic District, Narragansett
The Towers/Tower Entrance of Narragansett Casino, Narragansett
Dunmere, Narragansett
Ocean Road Historic District, Narragansett
Champlain Farm Historic District, New Shoreham
Mitchell Farm Historic District, New Shoreham
Beacon Hill Historic District, New Shoreham
Lewis-Dickens Farm Historic District, New Shoreham
Lakeside Drive and Mitchell Lane Historic District, New Shoreham
Indian Head Neck Road Historic District, New Shoreham
Beach Avenue Historic District, New Shoreham
Old Town and Center Roads Historic District, New Shoreham

Corn Neck Road Historic District, New Shoreham
Pilot Hill Road and Seaweed Lane Historic District, New Shoreham
New Shoreham Historic District, New Shoreham
Ochre Point-Cliffs Historic District, Newport
Ocean Drive Historic District, Newport
Bellevue Avenue Historic District, Newport
Brownings Beach Historic District, South Kingstown
Puncatest Neck Historic District, Tiverton

Submitted By: Revolution Wind, LLC

Date: June 2023

TABLE OF CONTENTS

1.0	Executive Summary	7
2.0	Background Information	10
2.1	Project Overview: Revolution Wind Farm and Revolution Wind Export Cable.....	10
2.2	Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)	10
2.2.1	Municipal Regulations.....	10
2.2.2	Preservation Easements and Restrictions.....	11
2.3	Participating Parties	11
3.0	Historic Properties	13
3.1	Maritime Setting.....	13
3.2	Little Compton	16
3.2.1	The Abbott Phillips House.....	16
3.2.2	The Stone House Inn	17
3.2.3	The Warren’s Point Historic District.....	18
3.2.4	Tunipus Goosewing Farm	19
3.3	Narragansett	20
3.3.1	Dunmere.....	20
3.3.2	The Ocean Road Historic District.....	21
3.3.3	The Towers Historic District	21
3.3.4	The Towers.....	23
3.4	The Life Saving Station at Narragansett Pier	24
3.4.2	Fort Varnum/Camp Varnum	25
3.4.3	Narragansett Pier MRA.....	25
3.4.4	The Dunes Club.....	26
3.5	New Shoreham.....	27
3.5.1	Historic Context of New Shoreham	27
3.5.2	New Shoreham Historic District	28
3.5.3	Corn Neck Road Historic District	28
3.5.4	Indian Head Neck Road Historic District	29
3.5.5	The Mitchell Farm Historic District.....	29
3.5.6	The Beach Avenue Historic District.....	29
3.5.7	The Lakeside Drive and Mitchell Lane Historic District.....	29
3.5.8	The Champlin Farm Historic District.....	30
3.5.9	The Old Town and Center Roads Historic District	30
3.5.10	The Beacon Hill Historic District.....	30

3.5.11	Lewis-Dickens Farm.....	30
3.5.12	The Pilot Hill Road and Seaweed Lane Historic District.....	30
3.6	Newport.....	31
3.6.1	The Ochre Point – Cliffs Historic District.....	31
3.6.2	The Ocean Drive Historic District, National Historic Landmark.....	31
3.6.3	Bellevue Avenue Historic District National Historic Landmark.....	32
3.7	South Kingstown.....	34
3.7.1	Browning’s Beach Historic District.....	34
3.8	Tiverton.....	35
3.8.1	Puncatost Neck Historic District.....	35
4.0	Mitigation Measures.....	37
4.1	NRHP Nominations for the Abbott Phillips House, the Warren Point Historic District, and the Tunipus Goosewing Farm.....	37
4.1.1	Purpose and Intended Outcome.....	37
4.1.2	Scope of Work.....	37
4.1.3	Methodology.....	37
4.1.4	Standards.....	38
4.1.5	Documentation.....	38
4.1.6	Funds and Accounting.....	38
4.2	Update the Existing <i>Historic and Architectural Resources of Narragansett, Rhode Island</i>	38
4.2.1	Purpose and Intended Outcome.....	38
4.2.2	Scope of Work.....	39
4.2.3	Methodology.....	39
4.2.4	Standards.....	39
4.2.5	Documentation.....	39
4.2.6	Funds and Accounting.....	40
4.3	NRHP Nominations for the following NRHP-eligible historic properties: Champlin Farm Historic District, Mitchell Farm Historic District, Beacon Hill, Lewis-Dickens Farm, Lakeside Drive and Mitchell Lane, Indian Head Neck Road, Beach Avenue, Old Town and Center Roads, Corn Neck Road, Pilot Hill Road and Seaweed Lane, and the New Shoreham Historic District.....	40
4.3.1	Purpose and Intended Outcome.....	40
4.3.2	Scope of Work.....	40
4.3.3	Methodology.....	41
4.3.4	Standards.....	41
4.3.5	Documentation.....	41
4.3.6	Funds and Accounting.....	41

4.4	Update the NRHP Nomination for the Ochre Point – Cliffs Historic District	42
4.4.1	Purpose and Intended Outcome	42
4.4.2	Scope of Work.....	42
4.4.3	Methodology	42
4.4.4	Standards	43
4.4.5	Documentation	43
4.4.6	Funds and Accounting	43
4.5	NHL Nomination Form for the Ocean Drive Historic District.....	43
4.5.1	Purpose and Intended Outcome	43
4.5.2	Scope of Work.....	43
4.5.3	Methodology	44
4.5.4	Standards	44
4.5.5	Documentation	44
4.5.6	Funds and Accounting	44
4.6	NHL Nomination Form for the Bellevue Avenue Historic District	45
4.6.1	Purpose and Intended Outcome	45
4.6.2	Scope of Work.....	45
4.6.3	Methodology	45
4.6.4	Standards	45
4.6.5	Documentation	46
4.6.6	Funds and Accounting	46
4.7	Updated Historic Resources Surveys of the Green Hill and Matunuck Neighborhoods.....	46
4.7.1	Purpose and Intended Outcome	46
4.7.2	Scope of Work.....	46
4.7.3	Methodology	46
4.7.4	Standards	47
4.7.5	Documentation	47
4.7.6	Funds and Accounting	47
4.8	NRHP Nomination for Puncatest Neck Historic District.....	47
4.8.1	Purpose and Intended Outcome	47
4.8.2	Scope of Work.....	47
4.8.3	Methodology	48
4.8.4	Standards	48
4.8.5	Documentation	48
4.8.6	Funds and Accounting	48

5.0	Implementation	49
5.1	Timeline.....	49
5.2	Organizational Responsibilities	49
5.2.1	Bureau of Ocean Energy Management (BOEM)	49
5.2.2	Revolution Wind, LLC	49
5.2.3	Other Parties, as Appropriate.....	49
5.3	Participating Party Consultation	49
6.0	References.....	50

LIST OF TABLES

Table 1-1	Historic Properties included in the HPTP	7
-----------	--	---

LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
ADLS	Aircraft Detection Lighting System
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
COP	Construction and Operations Plan
EDR	Environmental Design and Research, D.P.C.
DEIS	Draft Environmental Impact Statement
FEIS	Final Environmental Impact Statement
FR	Federal Register
HPTP	Historic Property Treatment Plan
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
RFP	Request for Proposals
RIHPHC	Rhode Island Historical Preservation & Heritage Commission
ROD	Record of Decision
RWF	Revolution Wind Farm
USCG	United States Coast Guard
WTG	Wind Turbine Generator

1.0 EXECUTIVE SUMMARY

This Historic Property Treatment Plan (HPTP) was developed in consultation with the Rhode Island Historical Preservation & Heritage Commission (RIHPHC). The HPTP provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects in the *Historic Resources Visual Effects Analysis – Revolution Wind Farm* (HRVEA; EDR, 2023) for the Revolution Wind Farm (RWF) and Revolution Wind Export Cable Project (collectively, the Undertaking) for twenty-six aboveground historic properties located in Rhode Island (hereinafter, the Historic Properties).

Table 1-1 Historic Properties included in the HPTP

Historic Property Name	Municipality	Property Designation
Abbott Phillips House	Little Compton	RIHPHC Historic Resource
Warren Point Historic District	Little Compton	National Register of Historic Places (NRHP)-Eligible Resource (RIHPHC-Determined)
Tunipus Goosewing Farm	Little Compton	NRHP-Eligible Resource (RIHPHC-Determined)
Fort Varnum/Camp Varnum	Narragansett	NRHP-Eligible Resource (RIHPHC-Determined)
Narragansett Pier MRA	Narragansett	NRHP-Listed Resource
Life Saving Station at Narragansett Pier	Narragansett	NRHP-Listed Resource
The Towers Historic District	Narragansett	NRHP-Listed Resource
The Towers/Tower Entrance of Narragansett Casino	Narragansett	NRHP-Listed Resource
Dunmere	Narragansett	NRHP-Listed Resource
Ocean Road Historic District	Narragansett	NRHP-Listed Resource
Champlain Farm Historic District	New Shoreham	NRHP-Eligible Resource (RIHPHC-Determined)
Mitchell Farm Historic District	New Shoreham	NRHP-Eligible Resource (RIHPHC-Determined)
Beacon Hill Historic District	New Shoreham	NRHP-Eligible Resource (RIHPHC-Determined)
Lewis-Dickens Farm Historic District	New Shoreham	NRHP-Eligible Resource (RIHPHC-Determined)
Lakeside Drive and Mitchell Lane Historic District	New Shoreham	NRHP-Eligible Resource (RIHPHC-Determined)
Indian Head Neck Road Historic District	New Shoreham	NRHP-Eligible Resource (RIHPHC-Determined)
Beach Avenue Historic District	New Shoreham	NRHP-Eligible Resource (RIHPHC-Determined)
Old Town and Center Roads Historic District	New Shoreham	NRHP-Eligible Resource (RIHPHC-Determined)
Corn Neck Road Historic District	New Shoreham	NRHP-Eligible Resource (RIHPHC-Determined)
Pilot Hill Road and Seaweed Lane Historic District	New Shoreham	NRHP-Eligible Resource (RIHPHC-Determined)
New Shoreham Historic District	New Shoreham	Local Historic District
Ochre Point-Cliffs Historic District	Newport	NRHP-Listed

Historic Property Name	Municipality	Property Designation
Ocean Drive Historic District	Newport	National Historic Landmark (NHL)
Bellevue Avenue Historic District	Newport	NHL
Brownings Beach Historic District	South Kingstown	NRHP-Listed Resource
Puncateest Neck H.D.	Tiverton	RIHPHC Historic Resource

Revolution Wind LLC (Revolution Wind) has provided this HPTP in accordance with the Bureau of Ocean Energy Management’s (BOEM) Findings of Adverse Effect (FoAE) for the Undertaking under the National Historic Preservation Act of 1966 (NHPA).

BOEM has used the National Environmental Policy Act (NEPA) substitution process to fulfill its Section 106 obligations as provided for in the NHPA implementing regulations (36 CFR § 800.8(c)), and BOEM has consulted with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, federally recognized Native American Tribes, and other NHPA Section 106 consulting parties in accordance with this process. Revolution Wind has provided this HPTP to BOEM for inclusion in the Final Environmental Impact Statement (FEIS).

This HPTP describes the mitigation measures to resolve potential adverse effects on historic properties, the implementation steps, and timeline for actions. The mitigation measures are based on the evaluations and outreach performed by Revolution Wind prior to the issuance of the DEIS as well as outreach to consulting parties performed by BOEM. This HPTP document has undergone revision and refinement in consultation with the Massachusetts State Historic Preservation Officer, the Rhode Island State Historic Preservation Officer, the ACHP, and other consulting parties throughout the NEPA substitution process. This HPTP is included in the Memorandum of Agreement (MOA) issued in accordance with 36 CFR §§ 800.8, 800.10.

This HPTP is organized into the following sections:

- **Section 1.0, Introduction**, outlines the content of this HPTP.
- **Section 2.0, Cultural Resources Regulatory Context**, briefly summarizes the Undertaking while focusing on cultural resources regulatory contexts (federal, tribal, state, and local, including preservation restrictions), identifies the historic properties discussed in this HPTP that will be adversely affected by the Undertaking, and summarizes the pertinent provisions and attachments of the HRVEA (EDR, 2023) and *Revolution Wind Farm Construction and Operations Plan (COP*; Revolution Wind, 2022) that guided the development of this document.
- **Section 3.0, Existing Conditions, Historic Significance, and Maritime Setting**, provides a physical description of the historic properties included in this HPTP. Set within its historic context, the applicable NRHP criteria for the historic properties are discussed with a focus on the contribution of a maritime visual setting to its significance and integrity.

- **Section 4.0, Mitigation Measures**, presents specific steps to carry out the mitigation actions. The mitigation action includes a detailed description, intended outcome, methods, standards, and requirements for documentation.
- **Section 5.0, Implementation**, establishes the process for executing mitigation actions at the historic properties, as identified in Section 4.0 of this HPTP. For each/the action, organizational responsibilities are outlined, a timeline is provided, and regulatory reviews are listed.
- **Section 6.0, References**, is a list of works cited in this HPTP.

2.0 BACKGROUND INFORMATION

2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable

The Undertaking is a wind-powered electric generating facility composed of up to 100 wind turbine generators (WTGs) and associated foundations, two offshore substations, and inter-array cables connecting the WTGs and the offshore substations. The WTGs, offshore substations, array cables, and substation interconnector cables would be located on the Outer Continental Shelf approximately 15 nautical miles (18 statute miles) southeast of Point Judith, Rhode Island, approximately 13 nautical miles (15 statute miles) east of Block Island, Rhode Island, approximately 7.5 nautical miles (8.5 statute miles) south of Nomans Land Island National Wildlife Refuge (uninhabited island), and between approximately 10 to 12.5 nautical miles (12 to 14 statute miles) south/southwest of varying points of the Rhode Island and Massachusetts coastlines (62 FR 33708). In addition, two submarine export cables located in both federal waters and Rhode Island State territorial waters, will connect the offshore substation to the electrical grid. The proposed interconnection location for the Undertaking is the existing Davisville Substation, which is owned and operated by The Narragansett Electric Company d/b/a National Grid and located in North Kingstown, Rhode Island. The visible offshore components of the operational Undertaking will be located on Lease OCS-A 0486 in water depths ranging from approximately 108 to 125 feet.

2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)

The regulations at 36 CFR § 800.8 provide for use of the NEPA process to fulfill a federal agency's NHPA Section 106 review obligations in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6. Under these provisions, issuance of an ROD and implementation of relevant conditions will resolve adverse effects to historic properties caused by the Undertaking, including to National Historic Landmarks for which BOEM must provide a higher standard of care, as required by Section 110(f) of the NHPA.

The measures to avoid and minimize adverse effects to identified historic properties are described in the COP (Section 4.4.1.3 and Appendix BB). This HPTP addresses the mitigation requirements identified by BOEM to resolve the remaining adverse effects after application of the above-referenced measures. The mitigation measures reflect consultations among consulting parties to refine a conceptual mitigation framework proposed by Revolution Wind.

All activities implemented under this HPTP will be conducted in accordance with any conditions imposed by BOEM in its ROD and with applicable local, state and federal regulations and permitting requirements. Responsibilities for specific compliance actions are described in further detail in Section 5.2, Organizational Responsibilities.

2.2.1 Municipal Regulations

Before implementation, any on-site mitigation measures will be coordinated with local municipalities and commissions to obtain approvals, as appropriate. These may include, but are not limited to building permits, zoning, land use, planning, historic commissions, and design review boards. Additional information regarding compliance with local requirements appears in Section 5.0, Implementation.

2.2.2 Preservation Easements and Restrictions

Preservation easements and restrictions protect significant historic, archaeological, or cultural resources. The MOA identifies certain preservation restrictions and easements applicable to specific properties in Stipulation III.C.1. The Rhode Island General Law Title 42, Section 42-45-9.1 established a historic preservation easement fund. The RIHPHC holds Historic Preservation Easements on the following historic properties:

- The Towers, Narragansett
- Spring House Hotel, New Shoreham
- Redwood Library, Newport
- Griswold House (Newport Art Museum), Newport
- Cushing Gallery, Newport
- The Kedge, Newport
- Harbor Court, Newport
- Touro Synagogue National Historic Site, Newport
- Bienvenue, Newport
- Ochre Court, Newport
- The Breakers, Newport
- Seaward, Newport
- Newport Casino, Newport
- Kingscote, Newport
- Chateau-sur-Mer, Newport
- Chinese Tea House at Marble House, Newport
- Faxon Lodge, Newport
- Edward King House, Newport

Any mitigation work associated with the Historic Properties will comply with the conditions of all extant historic preservation easements.

2.3 Participating Parties

BOEM initiated consultation under Section 106 with invitations to consulting parties on April 30, 2021. BOEM hosted the first Section 106-specific meeting with consulting parties on December 17, 2021, pursuant to Sections 106 and 110(f) of the NHPA and in accordance with 36 CFR 800.8.

Following BOEM initial Section 106 meeting with consulting parties, Revolution Wind held stakeholder outreach meetings (see Section 5.3) to review conceptual mitigation measures for the historic properties and invited the following parties:

- The Town of Little Compton
- The Town of Narragansett
- The Narragansett Historic District Commission

- The Narragansett Historical Society
- The Town of New Shoreham
- The Block Island Historical Society
- The City of Newport
- The Newport Restoration Foundation
- The Newport Historic District Commission
- The Preservation Society of Newport County
- The Town of South Kingstown
- The Town of Tiverton
- The U.S. Coast Guard
- The Rhode Island Historical Preservation & Heritage Commission.

3.0 HISTORIC PROPERTIES

This HPTP involves twenty-six historic properties, as identified above in Table 1.1-1. In the below section, each historic property is individually considered, described both physically and within its historic context, with a focus on the contribution of a maritime visual setting to the property's significance and integrity.

3.1 Maritime Setting

For the purposes of this analysis and assessment, views of marine waters are considered critical aspects of maritime settings. The influence of the marine environment and related human activities on historical development patterns is extensive and may be expressed in areas without direct lines of sight to the sea. Although these types of setting may contribute to the significance of historic properties, they would not be subject to alteration as a result of the proposed undertaking and are not considered further in this report.

The historic properties identified in this HPTP are included within the following property types as defined in the HRVEA: "Historic Buildings and Structures," "Historic Cemeteries and Burial Grounds," "Agricultural Properties," "Recreational Properties," "Maritime Safety and Defense Facilities," "Lighthouses and Navigational Aids," and "Estates and Estate Complexes." Each property type is defined below as well as the characteristics typical of their maritime setting.

"Historic Buildings and Structures" includes buildings and associated properties historically used as residences (in some instances their current use may be commercial, municipal, institutional, or otherwise non-residential) and is the largest grouping of above-ground historic properties within the PAPE. Historic Buildings and Structures within the PAPE consist mostly of vernacular residences, or groupings of residences, although this above-ground historic property type also includes historic parks and stone markers. The overall character of these individual above-ground historic properties and districts is residential or intended for public enjoyment, as opposed to the grand mansions and summer "cottages" built by wealthy industrialist families that typified the "Estates and Estate Complexes" property type (see below). These above-ground historic properties are typically listed due to each resource's unique significance or the combined significance of the resources forming an historic district, and usually qualify under National Register Criteria A and C. These factors are shared among the resource to a degree which justifies their grouping as an above-ground historic property type.

Historic buildings and structures not fitting within the previously described types occur throughout the study area and in a variety of local contexts. Location and orientation of such properties is critical to understanding the nature of any associated maritime settings. Many historic structures were oriented to local roadways, with the front and rear elevations parallel to the nearby road's alignment. Local roadways along the region's shorelines often parallel the water's edge and Historic Buildings frequently shift in orientation along such coastal roads. This variation in orientation may strongly influence the associated views of marine waters that may form important elements of a property's historic setting.

"Historic Cemeteries and Burial Grounds" consists of cemeteries identified by federal, state, or local governmental agencies as having historic significance. These above-ground historic properties may be

municipally owned cemeteries on public land, small family plots on private land, or abandoned burial grounds. Historic cemeteries are lasting memorials to the past, provide a guide to the changing values and composition of communities in the course of their historic development.

Historic cemeteries and burial grounds vary throughout the study area. Small, private, non-denominational and family cemeteries were relatively common in New England, and many have survived to present-day. Many examples of small cemeteries were associated with specific farms or families and were frequently placed within the available agricultural lands surrounding a farmstead or near multiple associated family farms. Where such burial grounds are located near the water they may be associated with ocean or other maritime viewsheds, however, ocean vistas are less likely to have been a significant consideration in the siting of such cemeteries than their larger, more formal counterparts in the region. Where cemeteries are located within districts or other historic settlements strongly associated with maritime settings, such burial grounds may be sited to maintain a visual connection to the waters in order to maintain a sense of continuity linking the departed's final resting places with the environment in which they lived. Cemeteries in urban locations expressing such patterns may include formal design elements associated with the "rural cemetery movement" of the 19th century, which sought to create naturalistic, park-like settings to express "an appreciation of nature and a sense of the continuity of life" (Potter and Boland, 1992). Maritime views from hillside cemeteries that were intentionally incorporated or framed by landscape designs may be more sensitive to discordant modern elements than those associated with less formal burial grounds that may not have been specifically located to provide ocean views.

"Agricultural Properties" consist of historic farm buildings and landscapes which have retained a high degree of integrity and are generally no longer used for their original purpose. These above-ground historic properties feature barns, farmhouses, and large, open tracts of pastureland. Generally, these above-ground historic properties do not derive their significance in any direct way from the ocean or maritime activities.

Historic agricultural properties, including farms, farmhouses, barns and related buildings and structures are relatively common in the study area. Many of these properties were built between 1700 and 1850, after which agricultural economies in New England and New York declined sharply. The historic settings for such properties typically include open, agrarian landscapes which once may have afforded open views of the seas when sited along the shoreline or at higher elevations within the coastal interior. Few of the once expansive agrarian landscapes associated with the historic use of the region's farms survive. Some have been altered by later residential and commercial development and many have been transformed by reforestation. Despite these changes, historic agricultural properties remain an important part of the region's heritage and tangible expression of several centuries of intensive farming that transformed the landscapes throughout southern New England and eastern Long Island.

"Recreational Properties" is defined by the role these properties served in their original functions as places for the resort tourism economy of the late-nineteenth century to flourish. These above-ground historic properties feature beaches, casinos, restaurants, and other buildings and structures built to entertain seasonal vacationers. They are typically located near the shoreline or immediately adjacent to the sea, and in some cases, are the beaches themselves. The enjoyment of, and interaction with, the sea are integral

features of the significance of these above-ground historic properties. In many cases, the beachfront, shoreline, and adjacent ocean waters are prominent features of the historic setting due to their close association with historic recreational activities.

The same macroeconomic trends that saw the decline of the quintessential New England farm in the mid-19th century are associated with a population shift to cities and rise in affluence for some segments of society. Summer resorts, supported by steamships, rail transportation, and eventually, automobiles were developed in numerous locations in the study area in the late 19th century. These resorts varied between properties intended to serve the rising group of "upper middle income" families living in the region's cities to estate-like developments serving a more affluent set. Seaside resorts, like many other shoreline recreational, commercial, and residential properties, were often sited to take advantage of aesthetically pleasing ocean or maritime views. Depending on location and the conformation of the local shoreline, such properties may be associated with specific bay or cove viewsheds that include limited areas of the open ocean waters. Recreational activities at resorts frequently included swimming and designated beaches where residents and visitors may have spent considerable time during the summer months. Where these features are still present and express a tangible association with the historic resort property, views from beaches may be as important as views from more formal elements of the designed landscape. Likewise, historic hotels and inns became more common elements of the region's shoreline communities in the late 19th century. Such properties were often sited near harbors, ferry landings, rail stations, and public or private beaches and may be associated with similar historic maritime settings. Views to ocean waters or the more intimate bays and coves of the region may have been an integral part of the visitor's motivation for staying in such establishments. Such considerations can be expressed through the inclusion of building and landscape features clearly intended to afford views of ocean. Older taverns and inns in the study area may be found along the working harbors and ports and were intended to serve the fishing, whaling, and related participants in maritime commerce. The design and location of these properties may not show the same influence of aesthetic considerations but will likely also retain a strong association with the waterfront and maritime environment.

"Maritime Safety and Defense Facilities" consists entirely of facilities erected by bureaus of the U.S. Department of Defense or their predecessors and share historic associations with coastal defense. These structures vary in their design and construction materials but are unified by their historic functions of rescuing and protecting maritime transportation in the area, or for coastal defense.

Historic military and maritime safety properties along the shoreline will likely be associated with maritime settings. Aesthetic considerations in the siting of such facilities may or may not be expressed in the design of buildings, structures, and landscapes depending on the age and specific functions of the property. Proximity to navigation channels, defensibility, and the presence of existing shipbuilding or repair infrastructure in a broader maritime context may have been significant considerations in the siting of naval facilities. Such factors may not demonstrate a significant association with open ocean viewsheds. The study area includes several significant examples of World War II-era defense structures, including fire control or observation towers designed to monitor specific parts of the maritime environment. Early lifesaving stations were likewise intended to provide for observation of marine waters in the vicinity of known hazards or where

storms posed specific risks to sea-going or coastal vessels. Lifesaving stations were also frequently located where rescue boats or other vessels might be safely launched under treacherous conditions. These locations may have included inlets, harbors or coves adjacent to open waters where rescue and recovery efforts would likely be made.

“Lighthouses and Navigational Aids” are defined by the historic associations with water-related transportation and defense, prominent views of the sea and dominance of the surrounding landscape, and common architectural forms. These structures present themselves as prominent and iconic features on the coastal landscape, possess elevated views of the ocean horizon, and are sited specifically for those elevated views.

Lighthouses and other historic navigation aids in the study area include properties that were intended to serve mariners plying large areas of open water and other properties that served specific navigation routes through the complex and treacherous waters of the region’s bays. All of these properties have an obvious association with maritime settings, but the scale of those settings will vary due to the conformation of the local landscape and seas and the design and purpose of each navigation aid.

“Estates and Estate Complexes” consists of high-style residences, or groupings of residences, typically designed by prominent architects of the nineteenth and early twentieth centuries, such as Richard Morris Hunt and McKim, Mead and White. This property type consists mainly of the mansions and summer “cottages” built by wealthy industrialist families, drawn to the vicinity of Newport, Rhode Island as it became a prominent vacation and recreation area for the emerging American elite, and to Montauk Point as a naturalistic and remote enclave.

Estates built by or for wealthy families have been part of the region’s landscapes for centuries and many such properties are located along the shorelines. High style, architect-designed mansions and associated landscapes are characteristic of several areas within the study area and many such properties were sited to take advantage of ocean views. The importance of maritime settings to these properties may be apparent in the design of building features such as veranda, porches, and large windows facing the water or through landscape elements and overall designs that were intended to frame specific views towards the seas. As with many other historic property types, the conformation of local shorelines and the specific orientation of each property may be important in assessing the association with specific aspects or elements of each associated viewshed.

3.2 Little Compton

3.2.1 The Abbott Phillips House

3.2.1.1 Physical Description and Existing Conditions

The Abbott Phillips House was built circa 1926-1927 by regional architect Albert Harkness (RIHPHC, 1990). It is sited at 97 Round Pond Road on a 1.8-acre lot, just north of Mill Point, at the Atlantic Ocean. The residence is one-and-one-half stories tall, and approximately 3200 square feet. Its massing is Z-shaped with a central main block (shingled, with mansard roof and hipped dormers), two gabled wings to either side,

and a round stone entrance tower where the southern sections meet. The immediate landscape around the house has been cleared but the parcel retains woodlots as well.

3.2.1.2 Historic Context

Henry Tillinghast Sisson, son of industrialist David Sisson, served with distinction during the Civil War, and after his death was honored by construction of a statue to his memory in Union Cemetery, in the Town of Little Compton. He worked as a mill superintendent for A. & W. Sprague until 1873, then was elected to three terms as Rhode Island Lieutenant Governor. Returning to Little Compton in the late 1870s, Henry Sisson planned a seaside summer resort just north of Mill Point, featuring curving avenues and house lots. The project was never realized and only Round Pond Road itself remains as a remnant of his plans (RIHPHC, 1990).

Architect Albert Harkness of Providence designed the house at 97 Round Pond Road for Abbott Phillips, also of Providence, and a lawyer at the firm of Hinckley, Allen, Phillips & Wheeler. Phillips lived there with his wife and their four children (Little Compton Historical Society, 2020). It remains in use today as a private residence.

3.2.1.3 NRHP Criteria and the Maritime Visual Setting

The Abbott Phillips House is significant under NRHP Criterion C for Architecture. An architectural survey of the building noted “the design of this house draws on sources in French provincial vernacular architecture; the image of picturesque domesticity that it creates was popular in the 1920s and 1930s” (RIHPHC, 1990).

Located on the southern coast of Little Compton, the Abbott Phillips house was designed intentionally with views toward the Atlantic Ocean. Though its significance is derived from the architectural merit of the residence, the location affords unobstructed maritime views from both the house and grounds.

3.2.2 *The Stone House Inn*

3.2.2.1 Physical Description and Existing Conditions

The NRHP-listed Stone House Inn (also known as the David Sisson House) was built circa 1854 at 122 Sakonnet Point Road in the Town of Little Compton. It is sited on a nearly 3-acre lot, facing south and overlooking Round Pond. The imposing stone residence is three-and-one-half stories tall and has an associated circa 1886 barn. The residence is seven bays wide and three bays deep, with a rectangular footprint. Modern replacement windows occupy each bay. A hipped slate roof features two dormers with paired arched windows. Between them is a large octagonal belvedere. An ornate, wood-framed, two-story wraparound porch is located at the south and west sides. Multiple wings extend from the rear of the building.

3.2.2.2 Historic Context

Providence-based industrialist David Sisson of the Fall River Ironworks commissioned a home at 122 Sakonnet Point Road (architect unknown) which was at the time the largest residence in Little Compton,

and the only one constructed of stone (Connors, 2008). The house was passed to his son Henry and following his Lieutenant Governorship, his family used the Stone House as their primary residence. Financial difficulties resulted in the auctioning of the home in 1902 which marks the change of its use from single-family to inn, and interior renovations and stylistic updates occurred regularly over the past 170 years. An exception to its continual operation was a two-decade closure due to flooding resulting from the Hurricane of 1938 (Connors, 2008).

3.2.2.3 NRHP Criteria and the Maritime Visual Setting

The Stone House Inn is listed on the NRHP and is significant under NRHP Criterion C for Architecture. It was the largest single-family dwelling in Little Compton at the time of its construction, and the only one built of fieldstone. In addition, it derives significance from its use as an inn for the past century, the “only public accommodation for travelers in this intensely private seaside community almost exclusively dominated by single-family houses” (Connors, 2008). The Stone House Inn is sited 10 feet above sea level, at an inland location, with interior views of nearby Round Pond. However, the rooftop belvedere was a unique feature designed that affords farther views to the Atlantic Ocean.

3.2.3 *The Warren’s Point Historic District*

3.2.3.1 Physical Description and Existing Conditions

The Warren's Point Historic District is located on Warren Point, in the southern portion of the Town of Little Compton east of Sakonnet Point, on the southeastern tip of an elevated, rocky peninsula. The point is bordered by the Atlantic Ocean to the east and south and Long Pond on the west. The district includes approximately 155 acres centered along Warren Point Road, which runs north-to-south and serves as a central axis for residential development. The area is characterized by large, affluent residences set on large lots, which are for the most open lawns, oriented to afford views of the adjacent waterbodies.

3.2.3.2 Historic Context

Warren’s Point is located east of Sakonnet Point and Long Pond, first colonized by Nathaniel Warren in the seventeenth century. Developed as the Town of Little Compton’s first summer resort colony in the 1880s, its picturesque homes were built by wealthy families from the northeast and Midwest, on land subdivided from the former Kempton Farm (RIHPHC, 1990). Presenting a cohesive aesthetic, the picturesque shingle-sided houses all shared views to the Atlantic Ocean. As time moved forward, so did architectural styles. New buildings of the Cape Cod and Modernist designs were added to the collection of residences at Warren’s Point through the first half of the twentieth century. Regardless of architectural style, most buildings shared similar landscapes that included manicured lawns and stone walls. The neighborhood was designed as a quiet enclave for the enjoyment of idyllic ocean views. Public access was limited by privatizing streets which continue to operate in this manner.

3.2.3.3 NRHP Criteria and the Maritime Visual Setting

The Warren’s Point Historic District has been determined by RIHPHC to be eligible for listing in the NRHP under Criterion A for its association with the establishment of summer coastal resorts in Rhode Island, and

under Criterion C for architecture, including residences that span a wide variety of architectural styles, constructed between 1880 and 1970 and retaining a high degree of integrity. The district is recommended as an appropriate candidate for nomination to the NRHP (RIHPC, 1990) and the *Town of Little Compton Comprehensive Plan* identifies the establishment of a voluntary historic district at Warren Point as a goal for the town relative to historic preservation (Town of Little Compton, 2018a:37).

By deed restriction, early purchasers of the property in Warren's Point were guaranteed overland access to Warren's Point Beach, ensuring a quiet, residential summer colony (Connors, 2008). It was this access and isolation that made Warren's Point a desirable oceanside retreat. Its visual and physical connection to the Atlantic Ocean is at the center of the significance of the district.

3.2.4 Tunipus Goosewing Farm

3.2.4.1 Physical Description and Existing Conditions

The Tunipus Goosewing Farm is located at 540 Long Highway on a peninsula an approximate 60-acre property between Quicksand Pond to the east, Tunipus Pond to the west, and the Atlantic Ocean to the south. According to the property card, the property currently contains a circa 1894 2-story, irregular-shaped house; two one-story circa 1999 guest houses, two one-and-a-half-story guest houses constructed circa 1815; and a circa 1850 two-story limestone, gambrel roof barn with an attached silo (Vision Appraisal, 2022). The property has been recently restored by the current owners (Morgan, 2016).

3.2.4.2 Historic Context

The Tunipus Goosewing Farm was constructed for the Sisson family, who moved to Little Compton from Newport in 1816 (RIHPC, 1990). The property has remained an active farm since the eighteenth century. According to the *Historic and Architectural Resources of Little Compton, Rhode Island*, Lemuel Sisson raised cows on the property during the nineteenth century (RIHPC, 1990).

3.2.4.3 NRHP Criteria and the Maritime Visual Setting

The Tunipus Goosewing Farm is located on a peninsula overlooking Quicksand Pond, Tunipus Pond, and the Atlantic Ocean. The property also provides the only access to the town-owned Goosewing Beach. The farm has a strong maritime setting with views across the open agricultural fields to the water in three directions. The relationship of the fields, buildings, and structures on an elevated ridge to the surrounding waters is an integral part of the historic setting. The Tunipus Goosewing Farm is eligible for listing on the NRHP under Criterion A and C for its architecture and its association with the Sisson family and farming in Little Compton.

3.3 Narragansett

3.3.1 *Dunmere*

3.3.1.1 Physical Description and Existing Conditions

Dunmere, also known as Dunmere Gardener's Cottage, Gate, and Garden, is a 3.4-acre estate located at 560 Ocean Road in Narragansett, Rhode Island, approximately 600 feet from the coastline of Narragansett Bay. The property consists of the original Gardener's Cottage, entrance gate, and associated garden landscape. The Gardener's Cottage is a two-story building featuring granite masonry and wood construction. A three-story conical tower on the south elevation rises above the multi-gabled roof and a massive granite chimney rises from a central point in the roof. Fenestration is varied, with examples of Queen Anne and Eastlake-style windows, including single, fixed-pane and one-over-one, double-hung sash windows, some with colored geometric lights and delicate wood mullions and muntins (Youngken et al., 2005).

The entrance gate is of rough-cut granite construction and features an elliptical arch which appears to emerge from the natural rocky outcrops at the north side of the arch. A two-story conical tower on the south side of the arch features a small rectangular open window. A small, hipped roof projects from the base of the turret over a stone patio. The word "Dunmere" is legible within the design on a pair of decorative wrought-iron gates. Although much of the historic landscape has been removed or destroyed over time, the extant landscape architecture associated with the historic Dunmere estate include some garden terraces, fountains, a man-made pond, stone-arched bridge and stone retaining walls (Youngken et al., 2005).

3.3.1.2 Historic Context

The Dunmere estate was designed by John M. Merrick and constructed in 1883 for investor and financial pioneer Robert G. Dun. Dun began developing his estate after the expansion of Ocean Road and the growth of Narragansett as a recreational resort. Spanning over ten years, the construction at Dunmere included a three-and-one-half-story Queen Anne-style mansion on a rocky outcropping near the sea, a water tower, and a windmill. The landscape design was developed under the direction of the landscape architect Nathan Franklin Barrett, and eventually expended to encompass over 13 acres. The water tower was expanded and renovated to become the present Gardener's Cottage. Several of the estate buildings, including the main house, have been lost over the years to fire and demolition, and the original estate boundaries have been subdivided (Youngken et al., 2005).

3.3.1.3 NRHP Criteria and the Maritime Visual Setting

Dunmere is listed on the NRHP and meets NRHP Criteria A and C for its associations with seasonal maritime recreation in late nineteenth-century New England and for its importance as an example of a seasonal estate complex with Gilded Age landscape design (Youngken et al., 2005). The location of the original mansion near the ocean speaks to the property's historic association with views to and enjoyment of the seascape. The historic properties have views of the open ocean to the east. The remaining buildings are significant due to their importance as elements of a late-nineteenth century seaside estate complex. Dunmere was listed in the NRHP in 2005.

3.3.2 *The Ocean Road Historic District*

3.3.2.1 Physical Description and Existing Conditions

The Ocean Road Historic District is an approximately 92-acre historic district located in Narragansett, Rhode Island, and includes 45 residences situated on portions of Ocean and Wildfield Farm Roads and Hazard and Newton Avenues. This district consists of various examples of Shingle-style houses and estates situated along the coastline that exhibit a range of expressions of the style. Among the most striking examples of architecture within the district is the unique two-and-one-half-story stone Hazard Castle with a 105-foot-tall tower, the Suwanee Villa Carriage House designed by James H. Taft with its conical tower, and the Colonial Revival-style Rose Lea designed by Willard Kent (Roise, 1981).

3.3.2.2 Historic Context

The history of the Ocean Road Historic District began with the acquisition of the land now encompassing the district boundaries by Joseph P. Hazard. Hazard's initial construction efforts included the Hazard Castle, which took nearly 40 years to complete, but which influenced the style and setting of the surrounding area. Based on Hazard's interpretation of English castles and informed by his spiritualist beliefs, Hazard Castle became the touchstone from which the eclectic slant of the Shingle style was expressed through subsequent development of the seaside resort town. In addition, Hazard began planting trees along the bluffs, ancestors of the trees that make up the wooded area in and around the district today. In addition, many of the residences were designed by prominent architects of the late nineteenth century, such as McKim, Mead, and White, and William Gibbons (Roise, 1981). The district was listed in the NRHP in 1982.

3.3.2.3 NRHP Criteria and the Maritime Visual Setting

The NRHP-listed Ocean Road Historic District meets Criterion C for high-style seasonal residences of the wealthy and famous of the Gilded Age. Most of the contributing properties "stand on dramatic sites overlooking the rocky shoreline and are oriented to the ocean" (NPS, 1982). The district also meets NRHP Criterion A for its association with the maritime resort community that developed around Narragansett Pier. Situated along the coastline, its relationship to the water is central to the significance of the district. Many of the contributing properties within the district enjoy expansive views of the Atlantic Ocean and were sited to take advantage of those vistas.

3.3.3 *The Towers Historic District*

3.3.3.1 Physical Description and Existing Conditions

The Towers Historic District is an approximately 10-acre district bounded by Exchange Place, Mathewson Street, Taylor Street, and the Atlantic Ocean in the unincorporated village of Narragansett Pier. The district is comprised of 13 contributing resources including the Towers, the Life Saving Station at Narragansett Pier, a town park, and 10 private residences. Additionally, there is one non-contributing resource within the district, a residence built circa 2006 (Town of Narragansett, 2022).

The Towers and the Life Saving Station at Narragansett Pier are substantial Romanesque Revival-style stone buildings. The Towers span Ocean Road, while the Life Saving Station is sited between Ocean Road and the Atlantic Ocean. North and west of the Towers, Memorial Park occupies approximately 1.6 acres. It consists primarily of open lawn, with a memorial fountain set within a paved plaza at the northeast corner and a group of war memorial monuments at the northwest corner (Roise, 1981).

The remaining contributing resources within the district are residences constructed between circa 1822 and 1900 in popular nineteenth-century styles including the Federal, Italianate, Second Empire, Colonial Revival, and Shingle styles. All of the residences feature wood clapboard or shingle siding and retain a generally high degree of integrity. Three of the residences are sited on Ocean Road facing east to the Atlantic Ocean (Roise, 1981).

3.3.3.2 Historic Context

The Town of Narragansett is named for the Narragansett Indian Tribe, the indigenous people of Rhode Island. The town was primarily agricultural in character from the late seventeenth century through the mid-nineteenth century (RIHPHC, 1991a). Piers and wharves constructed along the shore during this time contributed to a diversified economy based on fishing, shipbuilding, and the export of agricultural products. A pier built in the late eighteenth century near the present site of the Towers gave the village of Narragansett Pier its name. One of the contributing resources within the Towers Historic District, the residence at 16 Mathewson Street, was built during this period, circa 1822 (Roise, 1981).

The transformation of Narragansett Pier from a working port village to a tourist destination began in the 1840s, when the first visitors began to spend the summer season as boarders in private homes. The village's first hotel was built in 1856 and by 1871 ten additional hotels were built to serve guests from throughout the Northeast, Mid-Atlantic, and Midwest. The construction of private summer residences and rental cottages soon followed, and Narragansett Pier became a fashionable resort town popular with businesspeople, industrialists, and members of the professional class. The residences within the Towers Historic District were primarily built during this period, as either private residences or rental properties. The Narragansett Casino and the Life Saving Station at Narragansett Pier were both designed by McKim, Mead and White, and constructed in the 1880s (Roise, 1981; RIHPHC, 1991a).

In 1900 a catastrophic fire destroyed most of the Narragansett Casino, along with the Rockingham Hotel and neighboring commercial buildings. Several of the large nineteenth-century hotels also burned in the early decades of the twentieth century. During this period, Narragansett Pier's tourism economy began to shift away from long-term renters towards day-trippers and short-term guests. Other physical changes included damage or destruction of many buildings in the area by hurricanes in 1938, 1954, and 1991. In the post-World War II era, the year-round population of the village and town increased, further altering the Pier's character as a seasonal resort community. Urban renewal activity in the 1970s resulted in the clearance of nineteenth-century buildings from a 28-acre area northwest of the Towers Historic District. The site of the former Narragansett Hotel was purchased by the Town of Narragansett in 1931 and developed as Memorial Park (Roise, 1981; RIHPHC, 1991a). The Towers Historic District was listed in the NRHP in 1982.

3.3.3.3 NRHP Criteria and the Maritime Visual Setting

The Towers Historic District meets National Register Criteria A and C for its relationship to the development of seaside tourism in Narragansett Pier and as a collection of intact nineteenth-century buildings which directly relate to tourism and maritime activity. The district's period of significance is 1850 to 1924 (Roise, 1981). The district as a whole derives historic significance from its seaside location and maritime visual setting. The siting of the Towers and several of the district's residences, in particular, provide expansive views of the ocean, while the Life Saving Station at Narragansett Pier was sited especially close to the ocean in order to facilitate the launch of lifeboats.

3.3.4 *The Towers*

3.3.4.1 Physical Description and Existing Conditions

The Towers is a multistory stone building with a roughly I-shaped plan formed by two pairs of engaged round towers connected by a massive east-west segmental arch spanning Ocean Road. The building has a steeply pitched main gable roof with multiple dormers while the towers have conical dormered roofs. A wing to the west has dormered hipped roofs. The exterior is of rock faced granite and the roofs are clad in wood shingles. Windows are primarily six-over-one or nine-over-one double hung sash. Primary entrances to the east and west tower sections are located within arched openings below the main arched volume. A small octagonal cupola and lantern are located at the center of the main gable roof. The Towers currently serves as a public event venue and is owned by the Town of Narragansett (Roise 1981; RIHPHC, 1991a).

3.3.4.2 Historic Context

The village of Narragansett Pier was a leading seaside resort town during the last quarter of the nineteenth century. Several grand hotels and numerous private residences and rental cottages were constructed during this period. The Narragansett Casino was built between 1883 and 1886, serving as the center of social activity during the summer season. The rambling casino was designed by McKim, Mead & White, the nationally prominent firm that had designed the Newport Casino just a few years earlier. The stone Towers served as a grand entrance linking the casino to the shore over Ocean Road, while the bulk of the building, consisting of guest rooms, card rooms, and dining rooms, was built of wood. A massive fire on September 12, 1900, destroyed the wood portions of the casino, including the roofs of the Towers, leaving only the stone portions of the Towers standing. The roofs of the Towers were subsequently rebuilt, and the building was acquired by the Town of Narragansett and renovated for use as a town hall. The Towers was individually listed in the NRHP in 1969 and was included as a contributing resource to the Towers Historic District, listed in the NRHP in 1982. Today, the building is utilized as an event venue (Roise, 1981; RIHPHC, 1991a). A major exterior and interior restoration was completed in 2017.

3.3.4.3 NRHP Criteria and the Maritime Visual Setting

The Towers is an iconic building in the village of Narragansett Pier and is the sole remnant of the community's many Gilded Age hotels. The building meets National Register Criteria A and C for its relationship to the development of seaside tourism in Narragansett Pier, as a notable example of seaside recreational architecture in the Romanesque Revival style, and as the work of McKim, Mead & White. The

Narragansett Casino's oceanfront location and orientation provide expansive ocean vistas. This maritime visual setting is a key component of the Towers' historic significance.

3.3.5 The Life Saving Station at Narragansett Pier

3.3.5.1 Physical Description and Existing Conditions

The Life Saving Station at Narragansett Pier, also known as the Coast Guard House, is a two-story stone building located about 50 feet from the Atlantic Ocean on the east side of Ocean Road. The north end of the building is semicircular in plan while the south end is rectangular. The exterior is of rock faced granite ashlar and the gable-conical roof is clad in asphalt shingle. Multiple additions to the north, east, and south, dating from the late twentieth and early-twenty-first centuries, are primarily constructed of wood. The west elevation of the main volume features Roman arch openings which continue along the apsidal north end of the building. A bas-relief sculpture of a ship anchor decorates the parapeted gable end of the south elevation. Three rectangular window openings on this elevation are now obscured by later additions (Jones, 1976).

3.3.5.2 Historic Context

The United States Life-Saving Service was founded in 1848 as a volunteer organization providing rescue services along the New England and Mid-Atlantic coast. Early lifesaving stations consisted of utilitarian structures housing lifeboats and other equipment, often located near dangerous shoals and rocks. The service was nationalized by Congress in 1871, and funding provided for full-time crews to staff lifesaving stations. Congress authorized the construction of two initial stations in Rhode Island in the early 1870s, one on Block Island and the other at Narragansett Pier. This first lifesaving station at Narragansett Pier was a wood structure completed by 1873 north of the public beach (Jones, 1976).

The current Life Saving Station was built in 1888. It was designed by the nationally prominent architecture firm of McKim, Mead & White, which had completed the neighboring Narragansett Casino two years prior. The form and materials of the Life Saving Station complemented those of the casino. The Life Saving Station's ground floor served as a boathouse and had a sloping floor which allowed lifeboats to be launched through the arched openings, while the second floor served as the living quarters for the life station crew (Jones, 1976).

The Life-Saving Service was merged with the Revenue Cutter Service in 1915 to become the United States Coast Guard, which began consolidating lifesaving stations in the 1920s. The Life Saving Station at Narragansett Pier, then known as the Coast Guard House, was closed in 1946. It was subsequently converted into a dining establishment and continues in that function today, having survived damage from Hurricane Carol in 1954 and Hurricane Bob in 1991, as well as a fire shortly before it was listed in the NRHP in 1976. It was included as a contributing resource to the Towers Historic District, listed in the NRHP in 1982 (Jones, 1976; Roise, 1981).

3.3.5.3 NRHP Criteria and the Maritime Visual Setting

The Life Saving Station at Narragansett Pier meets National Register Criteria A and C for its association with the U.S. Life Saving Service and the early development of the U.S. Coast Guard, as a rare surviving example of a nineteenth-century lifesaving station, and as the work of McKim, Mead & White. The building's use as a boat launch necessitated its siting very close to the water on the ocean side of Ocean Road. This maritime visual setting is a key component of the Life Saving Station's historic significance.

3.3.6 Fort Varnum/Camp Varnum

3.3.6.1 Physical Description and Existing Conditions

Fort Varnum/Camp Varnum is currently an Army National Guard training facility located off Cormorant Road on Cormorant Point in Narragansett overlooking Narragansett Bay and the Atlantic Ocean. According to property records, the property currently consists of over 41 acres. Per review of aerial mapping, there are currently approximately 25 buildings on the property, the majority of which were constructed prior to 1963.

3.3.6.2 Historic Context

Fort Varnum/Camp Varnum was established in 1942 at the beginning of World War II as part of the United States military defense of Narragansett Bay. The fort was built to protect the west passage of Narragansett Bay and named after Revolutionary War Brigadier General James Mitchell Varnum (Sevigny, 2012). The original fort consisted of barracks, a mess hall, classrooms, and fire control towers, as well as other buildings (RIHPHC, 1991a). The fort was transferred to the Rhode Island National Guard in 1957 and renamed Camp Varnum (Sevigny, 2012).

3.3.6.3 NRHP Criteria and the Maritime Visual Setting

Fort Varnum/Camp Varnum was constructed to defend Narragansett Bay. Its location on the coast with views of the Bay and the Atlantic Ocean were necessary for the army to defend the coast.

3.3.7 Narragansett Pier MRA

3.3.7.1 Physical Description and Existing Conditions

The Narragansett Pier MRA is located along the coastline of Narragansett Bay and the Atlantic Ocean and consists of residences, resort-related buildings, hotels, religious buildings, the Towers and other buildings dating from circa 1840 to the mid-twentieth century (Roise, 1978).

3.3.7.2 Historic Context

In the late nineteenth century, Narragansett, along with many other coastal New England towns, transformed from a predominately agricultural community to a summer destination. Hotels, summer cottages, and resorts were constructed along the shorelines for the upper-middle- and upper-class residents of nearby New York, Boston and Philadelphia. The first hotel, the Narragansett House was built in 1856 and by 1871, ten hotels existed at the Pier (RIHPHC, 1991a). The Narragansett Casino was designed

by McKim, Mead, and White and was constructed between 1883 and 1860. A fire destroyed the complex and other buildings in the vicinity in 1900, leaving only the Towers.

3.3.7.3 NRHP Criteria and the Maritime Visual Setting

The Narragansett Pier MRA is significant under Criterion A for its association with the transformation of Narragansett from a rural, farming community to a summer resort as well as under Criterion C for its architecture. Many buildings within the MRA were designed by some of the most prominent architects of the time in a variety of styles including Italianate, Second Empire, Stick, Shingle, Queen Anne and Second Empire (Roise, 1978).

The MRA's location along Narragansett Bay as well as its history and existence as a summer resort colony are intrinsic to its maritime setting. Buildings were sited on the water or to have views of the water and were designed for people wanting to escape the heat of the city and be on the water. The most architecturally significant properties are located on the coast, including the Towers and the Life Saving Station.

3.3.8 *The Dunes Club*

3.3.8.1 Physical Description and Existing Conditions

The Dunes Club is addressed as 137 Boston Neck Road. The property is located on 32.16 acres on Little Neck, off Boston Neck Road, on Beach Street, between the road, of Narragansett Bay and the Atlantic Ocean, and the Pettaquamscutt River, also known as the Narrow River (Town of Narragansett, 2022).

There are six resources that contribute to the Dunes Club, the property also has seven noncontributing buildings and structures. The clubhouse is a one-and-a-half-story building with a lantern cupola constructed in 1939 in the colonial revival style. Connected by a wood deck to the east of the clubhouse are a pool constructed in 1928 and one-story bathhouses constructed in 1939. Further east are three U-shaped cabana buildings constructed in 1939. A one-story, gable-roofed staff house constructed in 1939 is located to the north of the clubhouse. The staff house complex is four buildings connected around a central courtyard. The gatehouse is located at the entrance of the property at the intersection of Beach Street and Boston Neck Road. The gatehouse is a hipped-roof turreted building constructed in 1928. All of the buildings, except the gatehouse, have sustained damage in multiple hurricanes and have had alterations and/or partial reconstructions (Youngken, 2015).

3.3.8.2 Historic Context

With the ease of travel by train and ferry, during the mid-to-late nineteenth century, wealthy families from New York, Philadelphia, and Boston began frequenting the southern New England coast in the summer to get away from the heat of the cities. Resort hotels and summer homes were constructed, and summer colonies and resorts were developed.

In the 1920s the Dunes Club was founded by wealthy summer residents of Narragansett to establish a private club after the casino was destroyed by fire in 1900. The original Dunes Club was constructed between

1928 and 1929. Kenneth Murchison, Jr., an architect from New York, was the original architect and designed the club in the Mediterranean Revival style, which was the popular style for these types of clubs at the time (North Carolina Architects and Builders, 2022; RIHPHC. 1991). The complex was destroyed in the hurricane of 1938, and only the gatehouse and pool remain from the original club (Youngken, 2015).

In 1938-1939 the Dunes Club was reconstructed. The new complex was designed by Thomas Pym Cope, an architect from Philadelphia. Cope designed the clubhouse, bathhouses, cabanas, and staff housing complex as part of the original plan for the club (Youngken, 2015).

3.3.8.3 NRHP Criteria and the Maritime Visual Setting

The Dunes Club is listed on the NRHP as an “excellent example of the private American beach club facility of the early-to-mid-20th century.” The club is significant under Criterion A for its association with coastal Rhode Island, and in particular Narragansett, becoming a summer destination. The Dunes Club was established as a members-only club by summer residents from Philadelphia and New York. The Dunes Club is also significant under Criterion C for its architecture. As stated above, Thomas Pym Cope designed the original Dunes Club complex including the clubhouse, gatehouse, bathhouses, cabanas and staff housing complex (Youngken, 2015).

The Dunes Club is located on Little Neck, between the Atlantic Ocean, and the Pettaquamscutt River. As a private beach club, this historic property has a clear maritime setting with access and views of Narragansett Bay and the Atlantic Ocean.

3.4 New Shoreham

3.4.1 *Historic Context of New Shoreham*

Block Island was home to Native Americans for thousands of years prior to its initial “discovery” by European explorers. Archaeological studies indicate indigenous people were visiting or living on the island at least 7,000 years ago. Giovanni da Verrazzano is credited with discovering and describing the inhabited island during a 1524 voyage to the New World. Sixteen families moved to Block Island in 1662, representing the first permanent European settlement in present-day New Shoreham. For the next two centuries the island’s residents developed a significant fishing and processing industry for fish products. Enslaved Africans were among the island’s earliest post-Contact Period inhabitants. A National Harbor was established early in the Island’s history, and seasonal tourism began in the early-to-mid nineteenth century. Block Island’s proximity to major northeastern cities, as well as its natural scenic landscape and charm led to its development as a summer destination. Development of inns, hotels, and other amenities increased around the harbor in the mid-nineteenth century, with the first public house built in 1842 (Gibbs, 1974). As transportation to the island improved with the first recreational steamboat in 1858, the development of summer beach cottages increased. By the mid-nineteenth century it became known as the “Bermuda of the North.” The present harbor was constructed between 1870 and 1876 consisting of two rip-rap granite breakwaters that remain relatively unchanged to this day. Although many tourists stayed in boarding houses, inns, and hotels,

seasonal summer cottages were being constructed in large numbers by the mid-1880s. It was well-established as a recreation destination for the regional elite by 1890 (Scofield and Adams, 2012).

The resort economy had declined in the first half of the twentieth century but rebounded with the construction of an airport in 1950 (Gibbs, 1974). By the early 1970s, pressure from new development spurred the creation of the Block Island Conservancy. This effort has contributed to the preservation of open rural spaces on the island and the historic fabric of much of the island's-built environment (PAL, 2012).

3.4.2 *New Shoreham Historic District*

3.4.2.1 Physical Description and Existing Conditions

The New Shoreham Historic District is a local historic district/historic district overlay (Town of New Shoreham Historic District Commission, 2022a). The historic district is located along Spring, Water, and Ocean Avenues and Corn Neck Road roughly bounded to the southeast by Amy Dodge Lane; to the northeast by Trims Pond; to the north by Great Salt Pond; and to the west at the intersection of West Side and Champlin Roads (Town of New Shoreham GIS, 2022). There are 321 parcels located within the boundaries of the district including the Old Harbor Historic District, residences, commercial buildings, town-owned properties, and vacant land (Town of New Shoreham Historic District Commission, 2022b).

The topography within the district is that of relatively low and gently rolling hills, with some slightly higher elevations around the periphery, such as along Old Town Road to the west and Spring Street to the south. The buildings within the district include three-and-one-half- and four-and-one-half-story hotels and inns facing the ocean along Water Street, and smaller one-and-one-half- and two-and-one-half-story residences inland and just outside of the village center. The extant historic buildings feature architectural styles of the mid- to late-nineteenth century, such as Gothic Revival, Second Empire, and Queen Anne. Many recently constructed buildings feature matching forms and materials evocative of this period, helping to maintain the historic feeling and association with the district's period of significance. Mansard roofs are common, especially on the hotels and inn buildings, while the residences typically feature gables. Powerful storm surges attributed to global climate change have increased in recent years, leading to damage to both man-made and natural resources within the district (Kelly, 2021). This situation has increased the need for major planning and conservation efforts on Block Island.

3.4.3 *Corn Neck Road Historic District*

3.4.3.1 Physical Description and Existing Conditions

The Corn Neck Road Historic District is a cultural landscape that encompasses the entire northern tip of Block Island, surrounded by the Atlantic Ocean on three sides and bounded by Mansion Road to the south. The district includes 29 contributing buildings dating back to the eighteenth century, including the NRHP-listed Block Island North Light (74000008). The landscape features bucolic settings, open fields, forested areas, stone walls, and historic farmsteads. It was determined eligible for listing on the NRHP in 2012 (PAL, 2012).

3.4.4 *Indian Head Neck Road Historic District*

3.4.4.1 Physical Description and Existing Conditions

The Indian Head Neck Road Historic District is located along a peninsula between Corn Neck Road and great Salt Pond on Block Island. The district consists of five one-and-one-half-story summer cottages with wrap-around porches on large parcels. These cottages were built during the late nineteenth century for seasonal tourists and later for year-round residences. The district has clear views of the ocean and was determined eligible for listing on the NRHP in 2012 (PAL, 2012).

3.4.5 *The Mitchell Farm Historic District*

3.4.5.1 Physical Description and Existing Conditions

The Mitchell Farm Historic District is an historic district located along Corn Neck Road on the narrow isthmus between Great Slat Pond and Rhode Island Sound on Block Island. It includes fifteen contributing properties dating from the mid-eighteenth to the mid-twentieth century. Small, forested areas and open fields are delineated by stone walls. It was determined eligible for listing on the NRHP in 2012 (PAL, 2012).

3.4.6 *The Beach Avenue Historic District*

3.4.6.1 Physical Description and Existing Conditions

The Beach Avenue Historic District is a small, compact neighborhood on a narrow spit separating Trims Pond and Harbor Pond. The district encompasses residential and inn properties built in the late nineteenth to early twentieth centuries. The U.S. Weather Bureau Station and Hygeia House properties, both listed on the NRHP, are contributing resources to the historic district. Well-preserved examples of several architectural styles are included, ranging from Second Empire to Gothic Revival to Neoclassical (PAL, 2012). Although eclectic, the district retains its essential cohesiveness and distinction among the compact developments of Block Island.

3.4.7 *The Lakeside Drive and Mitchell Lane Historic District*

3.4.7.1 Physical Description and Existing Conditions

The Lakeside Drive and Mitchell Lane Historic District is an historic district located between Lakeside Drive and Cooneymus Road, just south of the Block Island airport. The district includes Fresh Pond and thirteen contributing buildings. The buildings within the district date from the mid-eighteenth to the mid-twentieth century. The landscape is a significant element of this district, featuring gently rolling topography, stone walls, open fields, and modest homestead which characterize the historic lifeways of Block Island. The district was determined eligible for listing on the NRHP in 2012 (PAL, 2012).

3.4.8 *The Champlin Farm Historic District*

3.4.8.1 Physical Description and Existing Conditions

The Champlin Farm Historic District is an historic farmstead located on approximately 16.6 acres of land along Coast Guard Road on Block Island. The farm complex consists of a two- and-one-half-story frame residence, two frame barns, and four sheds. The farm is associated with the Champlin family, who have been farmers on Block Island since the late eighteenth century. The property was determined eligible for listing on the NRHP in 2012 (PAL, 2012).

3.4.9 *The Old Town and Center Roads Historic District*

3.4.9.1 Physical Description and Existing Conditions

The Old Town and Center Roads Historic District is an historic district located in the center of Block Island consisting of what was once the original town center, from the west boundary of the Old Harbor Historic District to Center Road. The district includes 48 contributing properties that date from the late-seventeenth to the mid-twentieth century. Historic markers denote the locations of non-extant mills and structures. The oldest structure in the district is the Samuel Ball house, constructed in 1680. The district represents the traditional architecture and development of early Block Island and was determined eligible for listing on the NRHP in 2012 (PAL, 2012).

3.4.10 *The Beacon Hill Historic District*

3.4.10.1 Physical Description and Existing Conditions

The Beacon Hill Historic District is an historic district located west of the Block Island airport from Beacon Hill Road to Old Mill Road in the south. It is representative of residential, agricultural, and military development on Block Island and was determined eligible for listing on the NRHP in 2012 (PAL, 2012).

3.4.11 *Lewis-Dickens Farm*

3.4.11.1 Physical Description and Existing Conditions

The Lewis Farm and Dickens Farm Road Historic District is an historic agricultural landscape district encompassing most of the southeast corner of Block Island from Cooneymus Road to the Atlantic Ocean. It consists of thirteen contributing properties dating from the mid-eighteenth to the mid-twentieth century. Landscape features such as stone walls and open fields enhance the pastoral setting of the district. It was determined eligible for listing on the NRHP in 2012 (PAL, 2012).

3.4.12 *The Pilot Hill Road and Seaweed Lane Historic District*

3.4.12.1 Physical Description and Existing Conditions

The Pilot Hill Road and Seaweed Lane Historic District is an historic district located along Pilot Hill Road between Payne Road and Mohegan trail at the southeast corner of Block Island. It includes ten properties that date from the mid-eighteenth to the mid-twentieth century and is also characterized by stone walls

and open agricultural fields that give a pastoral setting to the district. The district represents both the residential development and the seasonal tourism of Block Island and was determined eligible for listing on the NRHP in 2012 (PAL, 2012).

3.5 Newport

3.5.1 *The Ochre Point – Cliffs Historic District*

3.5.1.1 Physical Description and Existing Conditions

The Ochre Point – Cliffs Historic District is located in the eastern portion of Newport and is roughly bounded to the north by Memorial Boulevard, to the east by Easton Bay, to the south by Marine Avenue and to the west Bellevue Avenue. Seventy-one contributing resources are identified in the National Register Nomination Form. The Cliff Walk, which is a 3.5-mile, National Recreational Trail, that runs from First/Easton’s Beach to Baileys Beach, is also a contributing resource to the Ochre Point – Cliffs Historic District.

3.5.1.2 Historic Context

Like many coastal New England cities and towns, Newport became a summer resort destination in the mid-nineteenth century. Properties along and adjacent to Bellevue Avenue were chosen as prime locations for some of the wealthiest Americans to build summer cottages due to their locations on the cliff and views to the water. Most of the properties also had designed landscapes surrounding the buildings.

3.5.1.3 NRHP/NHL Criteria and the Maritime Visual Setting

The Ochre Point – Cliffs Historic District is significant under Criterion A for its contribution to Newport becoming a summer resort and the social history of its summer residents and Criterion C for its architecture and designed landscapes.

As stated above, contributing resources of the Ochre Point – Cliffs Historic District were constructed on or nearby Bellevue Avenue to take advantage of the views of Easton Bay and the Atlantic Ocean. The landscapes surrounding many of the properties were also designed to take advantage of the views. The Cliff Walk features expansive views of the Atlantic Ocean, which are integral to the visual and maritime setting of the trail.

3.5.2 *The Ocean Drive Historic District, National Historic Landmark*

3.5.2.1 Physical Description and Existing Conditions

The Ocean Drive Historic District is both listed on the NRHP and was designated as an NHL district on May 11, 1976 (Longstreth, 1976; Pitts, 1976). The Ocean Drive Historic District is made up of 45 contributing properties located in a 1,509-acre suburban/rural setting encompassing most of the Newport Neck peninsula southwest of the City of Newport, Rhode Island. The summer homes in this district feature great

variety in style and opulence, ranging from Neoclassical-style residences to early nineteenth-century farms. The coastline features promontories and jetty-like rock formations.

3.5.2.2 Historic Context

The first European to occupy Newport Neck was William Brenton, who was an important founding figure in the history of Newport. Brenton and his descendants worked to develop the landscape for agriculture, erected the first buildings, and cut trails for the frequent visitors to the land. The area became a seasonal retreat for the wealthy even prior to the Revolutionary War. After being destroyed by the British during the Revolutionary War, Newport Neck remained rural for decades. By the mid-nineteenth century the community in Newport and along Bellevue Avenue to the north and east of the present-day Ocean Drive Historic District grew and the elite citizens utilized Newport Neck for daytime excursions to enjoy the pastoral setting. By the turn of the twentieth century, overland transportation had improved, and the building of large estates began. Landscape development was carried out by the well-known landscape architect Frederick Law Olmsted and his firm. In the late twentieth century, several of the large estate houses were demolished, but the rural character of the district was cultivated and maintained (Longstreth, 1976).

3.5.2.3 NRHP/NHL Criteria and the Maritime Visual Setting

The summer homes in the Ocean Drive Historic District feature great variety in style and opulence, ranging from Neoclassical-style mansions to early nineteenth-century farms. In contrast to the adjacent Bellevue Avenue Historic District, however, Ocean Drive (aka Ocean Avenue) is decidedly more bucolic and rural, with greater expanses between structures accentuated by natural and designed landscapes. The national significance of the Ocean Drive Historic District is derived from its architecture, which includes works from McKim, Mead and White, John Russell Pope, and landscape architecture by Frederick Law Olmstead (Pitts, 1976). In 2012 an updated statement of significance was appended to the NHL nomination which elaborated and expanded upon the initial areas of Criterion C significance such as architecture and landscape design. The update also addressed additional Criterion A areas of significance such as planning, and engineering related to maritime views and design features purposefully built to interact with the shoreline and the ocean. The updated nomination materials also included a detailed account of the evolution of Ocean Drive as a “pleasure drive” to accompany the development of the inland areas as an upper-income resort suburb. In addition, the landscape architecture firm of Frederick Law Olmstead was involved in at least two subdivisions and 15 private contract designs within the district. These designs include properties situated on dramatic overlooks, and along Ocean Drive. Clearly this roadway was specifically constructed to take advantage of ocean views.

3.5.3 *Bellevue Avenue Historic District National Historic Landmark*

3.5.3.1 Physical Description and Existing Conditions

The Bellevue Avenue Historic District National Historic Landmark is approximately two miles long and consists of 87 contributing properties in a 606-acre district occupying several blocks along Bellevue Avenue, from Memorial Boulevard in the north, to Block Island Sound in the south, in the City of Newport. Spring Street and Cogshell Avenue form the western boundary of the district, while Narragansett Bay forms the

eastern boundary. From north to south, this district features two miles of commercial blocks and villas, notably ending in the south with the grand and palatial nineteenth-century estates of wealthy summer residents.

The Cliff Walk is a contributing resource to the Ochre Point-Cliffs Historic District, which is part of the Bellevue Avenue Historic District, and designated a National Recreational Trail. The Cliff Walk extends approximately 3.5 miles along the eastern coastline of Aquidneck Island and the Bellevue Avenue Historic District, situated on the rocky outcrops of the shore and featuring expansive views of Easton Bay and the Atlantic Ocean. The Cliff Walk is part of the typical experience for visitors to the Newport mansions, is open to the public, and has been described as “Rhode Island’s #1 tourist destination” with (reportedly) over 1.2 million visitors per year (Winthrop, 2021). Portions of the Cliff Walk were washed away in Hurricane Sandy and were recently restored/rebuilt with grant funds from the RIHPHC and National Park Service (RIHPHC, 2019b).

3.5.3.2 Historic Context

During its early decades and up to the mid-nineteenth century, Newport primarily grew around the downtown area to the north of Bellevue Avenue. The notable historic properties within the National Historic Landmark district were built during the Gilded Age, when some of the wealthiest Americans engaged in massive high-style residences for use as summer homes. Many of the estates in this district were designed by world-renowned master architects, including Richard Upjohn, Richard Morris Hunt, and McKim, Mead, and White. The district possesses many distinctive examples of high-style architecture. The district was listed as a National Historic Landmark on May 11, 1976.

3.5.3.3 NRHP/NHL Criteria and the Maritime Visual Setting

The significance by which the district was originally listed is primarily focused on architecture, commerce, and landscape architecture. While the significance attributed to the district does not explicitly reference the ocean, the estates were sited to take advantage of the ocean views. For example, property names such as “Sea View Terrace” and “Ocean View” imply that maritime views are essential to the district’s identity. In addition, the NRHP nomination form for the Ochre Point-Cliffs Historic District (a contributing property to the Bellevue Avenue Historic District NHL), contains the following reference:

[The Ochre Point-Cliffs Historic District] has a fine, elevated north-easterly view over the lower, Easton's Beach, part of Newport, and, easterly out past Middletown's hill and on towards Sakonnet, Westport and Cape Cod, far out into the Atlantic horizon. This high, grassed promontory had its obviously desirable features even though Bellevue Avenue was the first fashionable allee (Harrington, 1974).

A major focus of the Ochre Point-Cliffs Historic District portion of the Bellevue Avenue Historic District is the Cliff Walk. The Cliff Walk was designed specifically to afford maritime views, as illustrated in the following excerpt from the nomination document:

The [Cliff]Walk provides spectacular views at every point, as it winds near many mansions and occasionally dips down to the shore. Originally a fishermen's trail, the Cliff Walk was at one time the subject of a court battle between the owners of the estates bordering the walk-way and the public. The estate-owners wished to prevent public access and viewing across their properties and erected gates and other barriers to close the Walk and prevent such nuisance. Such action outraged the native Newporters, who went to court and won a decision which re-asserted the right of the public to an unobstructed foot-way around the island. Thus, the barriers were removed, and the present foot-path was laid out, with much use ever since, with maintenance undertaken first by the Works Progress Administration in the 1930's-1940's, and by the municipality in more recent years (Harrington, 1974).

3.6 South Kingstown

3.6.1 Browning's Beach Historic District

3.6.1.1 Physical Description and Existing Conditions

The Browning's Beach Historic District is an NRHP-listed district located in South Kingstown along a private drive extending south of Cards Pond Road (also referred to as Card Ponds Road). The district encompasses approximately 20 acres and includes single family residences constructed in the late nineteenth and early twentieth century as part of a residential complex (Youngken, 1997). The district boundaries stretch south from Cards Pond Road, include a small peninsula extending west into Cards Pond and continues south to the barrier beach facing the Atlantic Ocean.

Review of modern aerial photography reveals that only five of the contributing resources are currently extant, including three buildings on the barrier beach, one building on the peninsula in Cards Pond, and one building on the east side of the private drive between the peninsula and the barrier beach. The buildings appear to have been removed or demolished between 2012 and 2014 (Google Earth, 2022).

3.6.1.2 Historic Context

The collection of residences constituting the Browning's Beach Historic District were constructed between circa 1895 and circa 1905 as a coastal Rhode Island summer colony, a popular trend at this time throughout coastal Rhode Island. It originated as a private enclave for a group of prominent Rhode Island families including the Knight, Webster, Lapham-Treat, and Noyes families. The complex was designed to take advantage of the recreation offered by the seaside location. There was a communal boardwalk traversing the ocean dunes, a beach cabana which housed changing rooms for bathing, as well as a tennis court, a large stable, shared water system, and shared private drive providing access to the residences (Youngken, 1997).

The district was listed in the NRHP in 1997 and consisted of 10 contributing buildings and one non-contributing building. The contributing buildings consisted of single dwellings representing Queen Anne, Shingle, and Craftsman/Bungalow-style residences constructed between circa 1895 and circa 1905. The district featured wood-framed, one-story to two-and-one-half-story houses. A variety of roofing forms were

found in the district, including gabled, gambrel, and gable-on-hip roofs. These houses were typically sheathed in wood shingles, but board-and-batten siding was also present. The private drive providing access to the residences was narrow and graveled (Youngken, 1997).

3.6.1.3 NRHP Criteria and the Maritime Visual Setting

The Browning's Beach Historic District meets NRHP Criterion C as a collection of late-nineteenth and early-twentieth century residences constructed as a summer colony in coastal Rhode Island. The district derives its significance from its maritime location on the coast, representing the significant trend of summer colonies in Rhode Island. The beach provided recreation for the residents, and by extension the view and setting of the Atlantic Ocean is a significant element to the historic district.

3.7 Tiverton

3.7.1 *Puncatest Neck Historic District*

3.7.1.1 Physical Description and Existing Conditions

Puncatest Neck is located in the southwestern portion of Tiverton between Nonquit Pond and the Sakonnet River. The 1979 RIHPHC report entitled *Historic and Architectural Resources of Tiverton, Rhode Island: A Preliminary Report*, identified 18 resources within the potential historic district as well as a ferry landing site, three former wharves, and the King Philip's War Battle Site (RIHPHC, 1979c). Of the 18 historic homes identified, it appears 17 are extant. The district runs along Puncatest Neck Road with the northern boundary approximately where Puncatest Neck Road takes a sharp, ninety-degree turn, to the southern end of the road, and along Fogland Road and includes Fogland Point.

While many of the properties have additions, seventeen of the residences appear to retain the integrity and significance to be eligible for listing on the NRHP. One of which, the Cook-Bateman Farm, is individually listed on the NRHP and one, the William Almy Farm/Fogland Farm/Puncatessett at 435 Puncatest Neck Road has been demolished. The former sites of the wharves, ferry land and the King Philip's War Battle Site would also be contributing resources to this historic district. The contributing resources are as follows:

- Cook Almy House – 58 Fogland Road
- Almy House – 103 Fogland Road
- John Almy House – 148 Fogland Road
- Former Site of Almy's Ferry Landing – Fogland Point
- Former Site of Almy's Wharf – Fogland Road
- Captain Gideon Wilcos House – 425 Puncatest Neck Road
- A. Wilcoc House – 481 Puncatest Neck Road
- Captain Fernando Wilcox House – 488 Puncatest Neck Road
- Peleg Cory House – 531 Puncatest Neck Road
- J. Piece House – 532 Puncatest Neck Road
- Captain George Gray House – 560 Puncatest Neck Road
- Isaac G. White House – 563 Puncatest Neck Road

- Robert Gray House – 630 Puncatest Neck Road
- Stephen Grinnell House – 677 Puncatest Neck Road
- Otis Almy House/Heathersfield – 737 Puncatest Neck Road
- Horace Almy House/Nanquit Farm – 807 Puncatest Neck Road
- Samuel E. Almy House – 494 Puncatest Neck Road
- Cook-Bateman Farm – 958 Puncatest Neck Road
- Ferol Bink Farm – 993 Puncatest Neck Road
- King Philip’s Battle Site– Fogland Road
- Cory’s Wharf/White’s Wharf – Fogland Point
- Pierce’s Wharf – Fogland Point

3.7.1.2 Historic Context

In 1659, Puncatest Neck was granted to 75 freeman of Plymouth Colony and 36 lots were defined, although no “substantial structures” were built. On July 8, 1675, one of the battles of King Philip’s War was fought on Puncatest Neck. The first known structures were constructed around 1680 by the Church and Almy families. During the seventeenth and eighteenth centuries, Puncatest Neck was primarily agricultural. In the early eighteenth century a ferry was established on Fogland Point connecting Tiverton to Dartmouth and Newport and in the early nineteenth century the first wharf was established, shifting the economy of Puncatest Neck toward maritime related industries including fishing, oystering, and whaling. The wharf was expanded circa 1863 and in 1870 a second wharf was constructed. As industry increased, new residences were constructed, both modest and more opulent and in the late nineteenth century and through the twentieth century, additional residences were constructed to be used as summer residences (RIHPHC, 1979c).

3.7.1.3 NRHP Criteria and the Maritime Visual Setting

The Puncatest Neck Historic District is eligible for listing under Criterion A for its association with the history of Tiverton, including farming, maritime, and summer colony development as well as the architecture of the contributing resources.

Similar to other coastal communities in the region, in the late nineteenth century and through the twentieth century, summer cottages, resorts, and summer colonies began to develop in Tiverton particularly on Puncatest Neck and Nannaquaket Neck (RIHPHC, 1979). These areas were attractive to the upper class for their proximity to Boston and New York and their locations on the water. As stated above, Puncatest Neck is located between Nonquit Pond to the east and Sakonnet River to the east and Nannaquaket Pond is located on the eastern side of Nannaquaket Neck and the Sakonnet River is located to the west.

4.0 MITIGATION MEASURES

Mitigation measures at the historic properties are detailed in this section. These mitigation measures were developed in consultation with the RIHPHC and consulting parties.

4.1 NRHP Nominations for the Abbott Phillips House, the Warren Point Historic District, and the Tunipus Goosewing Farm

4.1.1 Purpose and Intended Outcome

The purpose of this mitigation measure is to recognize and document the historic and cultural significance of the Abbott Phillips House, the Warren Point Historic District, and the Tunipus Goosewing Farm by completing NRHP Nomination Forms for each property. Listing properties on the NRHP not only documents the history of the area and specific properties but can help build community knowledge and pride. Nomination Forms can be used as educational tools for both the owners of the properties and the community as a whole and can help guide the future restoration and rehabilitation of the buildings. NRHP listing also allows properties to be eligible for state and federal grant funding and historic tax credit programs. NRHP listing does not place any restrictions on a property, nor does it prevent the remodeling or demolition of the building or allow for public access to the building. It does not in any way restrict the rights of the private property owner.

4.1.2 Scope of Work

This work is anticipated to consist of the following:

- Consulting with the Participating Parties and property owners;
- Research of available historic sources and documentation;
- Field survey and conditions assessments;
- Annotated photographs;
- Drafting of the NRHP listing document;
- Submitting the preliminary draft NRHP Nomination for review and comment to the Participating Parties;
- Developing a final draft NRHP Nomination to be provided to the Participating Parties; and
- If the NRHP nomination is formally reviewed by the RIHPHC's State Review Board, then the consultants who prepared the nomination will be available to present the nomination.

4.1.3 Methodology

Revolution Wind will release a request for proposals (RFP) to hire a SOI Qualified Professional consultant to perform the scope of work listed in Section 4.1.2. The consultant selected will prepare a draft nomination form, prepared in accordance with applicable NPS and RIHPHC guidance. The draft document will include a historic context and statement of significance, identification, photographs, and descriptions of all contributing resources, and all maps and photographs required by NPS guidance. A final draft will be produced by the consultant that incorporates comments and additional information provided by the Participating Parties.

4.1.4 Standards

The mitigation measure will comply with following standards:

- The SOL's Guidance on the *Identification of Historic Properties* (36 CFR 800.4);
- The SOL's *Professional Qualifications Standards* (36 CFR Part 61);
- The NPS *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, as applicable (NPS, 1997a);
- *National Register Bulletin 16a: How to Complete the National Register Registration Form* (NPS, 1997b); and
- RIHPHC guidance.

4.1.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Proposals by qualified consultants in response to the RFP;
- Preliminary Draft of the NRHP Nomination Forms; and
- Revised draft of the NRHP Nomination Forms.

4.1.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

4.2 Update the Existing *Historic and Architectural Resources of Narragansett, Rhode Island*

4.2.1 Purpose and Intended Outcome

The purpose of this mitigation measure is to revise and update the 1991 Historic and Architectural Resources of Narragansett, Rhode Island survey to reflect existing conditions within the Town of Narragansett and to identify cultural landscapes and other types of cultural resources that may have been under-emphasized in prior surveys. The survey results will assist the Town of Narragansett, the State of Rhode Island, and members of the public in planning and prioritizing efforts to preserve significant elements of the Town's architectural and historical heritage for future generations. This measure aligns with the key priorities and objectives of *Comprehensive Statewide Historic Preservation Plan for Rhode Island, 2021-2027* to ensure current, accessible information on the full range of historic and heritage resources are available in all Rhode Island communities (RIHPHC, 2021: "Goal One"). The survey will also provide substantive support to the Town of Narragansett and its citizens in meeting the standards established by the Rhode Island Comprehensive Planning Advisory Committee (*The Rhode Island Comprehensive Planning Standards Guidance Handbook Series Guidance Handbook #4: Standard 4.1*)

4.2.2 Scope of Work

The scope of work will consist of the following:

- Research of available historical archival sources and existing documentation, including surveys and assessments conducted in compliance with local, state and federal preservation regulations and ordinances;
- Consultation with the Town of Narragansett, local and state preservation organizations, and other knowledgeable parties to identify and prioritize types of historic architectural or landscape resources under-represented in existing survey data;
- Field survey, annotated photographs, and mapping;
- Drafting of a Survey Report to be distributed to the Participating Parties for review and comment;
- Development of a final Survey Report which addresses comments from the Participating Parties; and
- Distribution of the final Survey Report to the Participating Parties.

4.2.3 Methodology

Revolution Wind will release a RFP for consultant services and select a consultant to perform the scope of work listed in Section 4.2.2. The consultant selected will prepare a draft survey, prepared in accordance with applicable National Park Service and RIHPHC guidance. The draft document will include a methodology, an updated historic context and history of Narragansett, associated maps, photographs, building descriptions, and inventory forms as required by RIHPHC. The draft survey will be distributed to the Participating Parties for review and comment. A final draft will be produced by the consultant that incorporates comments and additional information provided by the Participating Parties.

4.2.4 Standards

The project will comply with the following standards:

- *The Secretary of the Interior's Guidance on the Identification of Historic Properties* (36 CFR 800.4);
- *The Secretary of the Interior's Standards and Guidelines – Professional Qualifications Standards, for Archaeology, History, Architectural History and/or Architecture* (62 FR 33708);
- National Park Service's *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*;
- *National Register Bulletin 16a: How to Complete the National Register Registration Form* (NPS, 1997b); and
- RIHPHC guidance.

4.2.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;

- Proposals by qualified consultants in response to the RFP;
- Preliminary Draft of the Survey Report; and
- Final Survey Report.

4.2.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

4.3 NRHP Nominations for the following NRHP-eligible historic properties: Champlin Farm Historic District, Mitchell Farm Historic District, Beacon Hill, Lewis-Dickens Farm, Lakeside Drive and Mitchell Lane, Indian Head Neck Road, Beach Avenue, Old Town and Center Roads, Corn Neck Road, Pilot Hill Road and Seaweed Lane, and the New Shoreham Historic District

4.3.1 Purpose and Intended Outcome

The purpose of this mitigation measure is to complete NRHP Nomination Forms to recognize and document the historic and cultural significance of each of the following NRHP-eligible historic districts: Mitchell Farm Historic District, Champlain Farm Historic District, Beacon Hill, Lewis-Dickens Farm, Lakeside Drive and Mitchell Lane, Indian Head Neck Road, Beach Avenue, Old Town and Center Roads, Corn Neck Road, Pilot Hill Road and Seaweed Lane, and the New Shoreham Historic District. This measure aligns with the key goals and objectives of the Rhode Island State Preservation Plan (RIHPHC, 2021) and the Town of New Shoreham’s Comprehensive Plan (2016) to recognize and protect historic and heritage assets. The development of the revised nomination would afford multiple opportunities for the Town, and residents to consider the existing, somewhat arbitrary, boundary of the historic district and, in consultation with the RIHPHC, assess whether additional properties in the vicinity contribute to the significance of the district, as a whole.

Listing properties on the NRHP not only documents the history of the area and specific properties but can help build community knowledge and pride. Nomination Forms can be used as educational tools for both the owners of the properties and the community as a whole and can help guide the future restoration and rehabilitation of the buildings. NRHP listing also allows properties to be eligible for state and federal grant funding and historic tax credit programs. NRHP listing does not place any restrictions on a property, nor does it prevent the remodeling or demolition of the building or allow for public access to the building. It does not in any way restrict the rights of the private property owner.

4.3.2 Scope of Work

This work is anticipated to consist of the following:

- Consulting with the Participating Parties and property owners;
- Research of available historic sources and documentation;
- Field survey and conditions assessments;

- Annotated photographs;
- Drafting of the NRHP listing document;
- Submitting the preliminary draft NRHP Nomination for review and comment to the Participating Parties;
- Developing a final draft NRHP Nomination to be provided to the Participating Parties; and
- If the NRHP nomination is formally reviewed by the RIHPHC's State Review Board, then the consultants who prepared the nomination will be available to present the nomination.

4.3.3 Methodology

Revolution Wind will release a RFP for consultant to perform the scope of work listed in Section 4.3.2. The consultant selected will prepare a draft nomination form, prepared in accordance with applicable NPS and RIHPHC guidance. The draft document will include a historic context and statement of significance, identification, photographs, and descriptions of all contributing resources, and all maps and photographs required by NPS guidance. A final draft will be produced by the consultant that incorporates comments and additional information provided by the Participating Parties.

4.3.4 Standards

The project will comply with following standards:

- The SOI's Guidance on the *Identification of Historic Properties* (36 CFR 800.4);
- The SOI's *Professional Qualifications Standards* (36 CFR Part 61);
- The National Park Service's (NPS) *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, as applicable (NPS, 1997a);
- *National Register Bulletin 16a: How to Complete the National Register Registration Form* (NPS, 1997b); and
- RIHPHC guidance.

4.3.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Proposals by qualified consultants in response to the RFP;
- Preliminary Draft of the NRHP Nomination Forms; and
- Revised draft of the NRHP Nomination Forms.

4.3.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

4.4 Update the NRHP Nomination for the Ochre Point – Cliffs Historic District

4.4.1 Purpose and Intended Outcome

The purpose of this mitigation measure is to provide funding to hire a SOI qualified professional to update the existing form. The Ochre Point – Cliffs Historic District NRHP nomination form was completed in 1975. The Ochre Point – Cliffs Historic District is located in the eastern portion of Newport and is significant for its architecture as well as the development of the City of Newport. The intent of this measure is to document the current conditions of the district, confirm the boundaries, and identify and document the contributing and non-contributing resources.

Properties on the NRHP not only document the history of the area and specific properties but can help build community knowledge and pride. Nomination Forms can be used as educational tools for both the owners of the properties and the community as a whole and can help guide the future restoration and rehabilitation of the buildings. NRHP listing also allows properties to be eligible for state and federal grant funding and historic tax credit programs. NRHP listing does not place any restrictions on a property, nor does it prevent the remodeling or demolition of the building or allow for public access to the building. It does not in any way restrict the rights of the private property owner.

4.4.2 Scope of Work

This work is anticipated to consist of the following:

- Consulting with the Participating Parties and property owners;
- Research of available historic sources and documentation;
- Field survey and conditions assessments;
- Annotated photographs;
- Drafting of the NRHP listing document;
- Submitting the preliminary draft NRHP Nomination for review and comment to the Participating Parties;
- Developing a final draft NRHP Nomination to be provided to the Participating Parties; and
- If the NRHP nomination is formally reviewed by the RIHPHC's State Review Board, then the consultants who prepared the nomination will be available to present the nomination.

4.4.3 Methodology

Revolution Wind will release a RFP for consultant to perform the scope of work listed in Section 4.4.2. The consultant selected will prepare a draft updated nomination form, prepared in accordance with applicable NPS and RIHPHC guidance. The draft document will include a historic context and statement of significance, identification, photographs, and descriptions of all contributing resources, and all maps and photographs required by NPS guidance. A final draft will be produced by the consultant that incorporates comments and additional information provided by the Participating Parties.

4.4.4 Standards

The project will comply with following standards:

- The SOI's Guidance on the *Identification of Historic Properties* (36 CFR 800.4);
- The SOI's *Professional Qualifications Standards* (36 CFR Part 61);
- The National Park Service's (NPS) *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, as applicable (NPS, 1997a);
- *National Register Bulletin 16a: How to Complete the National Register Registration Form* (NPS, 1997b); and
- RIHPHC guidance.

4.4.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Proposals by qualified consultants in response to the RFP;
- Preliminary Draft of the NRHP Nomination Form; and
- Revised draft of the NRHP Nomination Form.

4.4.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

4.5 NHL Nomination Form for the Ocean Drive Historic District

4.5.1 Purpose and Intended Outcome

The Ocean Drive Historic District was designated an NHL in 1976 when the original NRHP nomination was completed and accepted by NPS. A subsequent nomination was drafted in 2008 but has not been accepted by NPS. The purpose of this mitigation measure is to provide funding to hire a SOI qualified professional to complete an NHL nomination form for the Ocean Drive Historic District document the current conditions of the district, confirm the boundaries, and identify and document the contributing and non-contributing resources.

4.5.2 Scope of Work

This work is anticipated to consist of the following:

- Consult with NPS, Participating Parties, and property owners;
- Review of existing Ocean Drive Historic District nomination form;
- Research of available historic sources and documentation;
- Field survey, conditions assessments, NRHP-eligibility analysis;
- Annotated photographs;

- Drafting of the NHL nomination;
- Submitting the draft for review and comment to the Participating Parties;
- Developing a final NHL Nomination to be provided to the Participating Parties; and
- If the NRHP nomination is formally reviewed by the RIHPHC's State Review Board, then the consultants who prepared the nomination will be available to present the nomination.

4.5.3 Methodology

Revolution Wind will release a RFP for consultant to perform the scope of work listed in Section 4.5.2. The consultant selected will prepare a draft updated nomination form, prepared in accordance with applicable NPS and RIHPHC guidance. The draft document will include a historic context and statement of significance, identification, photographs, and descriptions of all contributing resources, and all maps and photographs required by NPS guidance. A final draft will be produced by the consultant that incorporates comments and additional information provided by the Participating Parties.

4.5.4 Standards

The project will comply with following standards:

- The SOI's Guidance on the *Identification of Historic Properties* (36 CFR 800.4);
- The SOI's *Professional Qualifications Standards* (36 CFR Part 61);
- The National Park Service's (NPS) *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, as applicable (NPS, 1997a);
- *National Register Bulletin 16a: How to Complete the National Register Registration Form* (NPS, 1997b); and
- RIHPHC guidance.

4.5.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Proposals by qualified consultants in response to the RFP;
- Preliminary Draft of the NRHP Nomination Form; and
- Revised draft of the NRHP Nomination Form.

4.5.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

4.6 NHL Nomination Form for the Bellevue Avenue Historic District

4.6.1 Purpose and Intended Outcome

The Bellevue Avenue Historic District was designated an NHL in 1976 when the original NRHP nomination was completed and accepted by NPS. The purpose of this mitigation measure is to provide funding to hire a SOI qualified professional to complete an NHL nomination form for the Bellevue Avenue Historic District document the current conditions of the district, confirm the boundaries, and identify and document the contributing and non-contributing resources in the historic district.

4.6.2 Scope of Work

This work is anticipated to consist of the following:

- Consult with NPS, Participating Parties, and property owners;
- Review of existing Ocean Drive Historic District nomination form;
- Research of available historic sources and documentation;
- Field survey, conditions assessments, NRHP-eligibility analysis;
- Annotated photographs;
- Drafting of the NHL nomination;
- Submitting the draft for review and comment to the Participating Parties;
- Developing a final NHL Nomination to be provided to the Participating Parties; and
- If the NRHP nomination is formally reviewed by the RIHPHC's State Review Board, then the consultants who prepared the nomination will be available to present the nomination.

4.6.3 Methodology

Revolution Wind will release a RFP for a consultant to perform the scope of work listed in Section 4.6.2. The consultant selected will prepare a draft updated nomination form, prepared in accordance with applicable NPS and RIHPHC guidance. The draft document will include a historic context and statement of significance, identification, photographs, and descriptions of all contributing resources, and all maps and photographs required by NPS guidance. A final draft will be produced by the consultant that incorporates comments and additional information provided by the Participating Parties.

4.6.4 Standards

The project will comply with following standards:

- The SOI's Guidance on the *Identification of Historic Properties* (36 CFR 800.4);
- The SOI's *Professional Qualifications Standards* (36 CFR Part 61);
- The National Park Service's (NPS) *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, as applicable (NPS, 1997a);
- *National Register Bulletin 16a: How to Complete the National Register Registration Form* (NPS, 1997b); and
- RIHPHC guidance.

4.6.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Proposals by qualified consultants in response to the RFP;
- Preliminary Draft of the NRHP Nomination Form; and
- Revised draft of the NRHP Nomination Form.

4.6.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

4.7 Updated Historic Resources Surveys of the Green Hill and Matunuck Neighborhoods

4.7.1 Purpose and Intended Outcome

Per the request of RIHPHC, Revolution Wind will provide funding to hire a SOI qualified professional to complete an update of the existing *Historic and Architectural Resources of South Kingstown, Rhode Island: A Preliminary Report*, which was completed in 1980. The updated historic resources surveys will identify and document historic and potentially historic properties located within the of the Green Hill and Matunuck neighborhoods.

4.7.2 Scope of Work

The scope of work will consist of the following:

- Review the existing *Historic and Architectural Resources of South Kingstown, Rhode Island: A Preliminary Report*;
- Review existing historic property documentation available at local repositories and the RIHPHC files;
- Develop a methodology for completion of the survey to be distributed to the Participating Parties for review and comment;
- Complete survey per the approved methodology;
- Develop a draft survey report to be distributed to the Participating Parties for review and comment;
- Develop final report, addressing the comments received, to be distributed to the Participating Parties.

4.7.3 Methodology

Revolution Wind will release a RFP for consultant services and select a consultant to perform the scope of work listed in Section 4.7.2. The consultant selected will prepare a draft survey, prepared in accordance with applicable National Park Service and RIHPHC guidance. The draft document will include a methodology, an updated historic context and history of the neighborhoods, associated maps, photographs, building

descriptions, and inventory forms as required by RIHPHC. The draft survey will be distributed to the Participating Parties for review and comment. A final draft will be produced by the consultant that incorporates comments and additional information provided by the Participating Parties.

4.7.4 Standards

The exhibit will conform to the following standards:

- The SOI's *Professional Qualifications Standards* (36 CFR Part 61), as applicable;
- RIHPHC guidance;

4.7.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFP;
- Proposals by qualified consultants in response to the RFP;
- Preliminary draft report; and
- Final report.

4.7.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

4.8 NRHP Nomination for Puncatest Neck Historic District

4.8.1 Purpose and Intended Outcome

The purpose of this mitigation measure is to recognize and document the historic and cultural significance of the Puncatest Neck Historic District by completing an NRHP Nomination Form. Listing properties on the NRHP not only documents the history of the area and specific properties but can help build community knowledge and pride. Nomination Forms can be used as educational tools for both the owners of the properties and the community as a whole and can help guide the future restoration and rehabilitation of the buildings. NRHP listing also allows properties to be eligible for state and federal grant funding and historic tax credit programs. NRHP listing does not place any restrictions on a property, nor does it prevent the remodeling or demolition of the building or allow for public access to the building. It does not in any way restrict the rights of the private property owner.

4.8.2 Scope of Work

This work is anticipated to consist of the following:

- Consulting with the Participating Parties and property owners;
- Research of available historic sources and documentation;

- Field survey and conditions assessments;
- Annotated photographs;
- Drafting of the NRHP listing document;
- Submitting the preliminary draft NRHP Nomination for review and comment to the Participating Parties;
- Developing a final draft NRHP Nomination to be provided to the Participating Parties; and
- If the NRHP nomination is formally reviewed by the RIHPHC's State Review Board, then the consultants who prepared the nomination will be available to present the nomination.

4.8.3 Methodology

Revolution Wind will release a RFP to hire a SOI Qualified Professional consultant to perform the scope of work listed in Section 4.8.2. The consultant selected will prepare a draft nomination form, prepared in accordance with applicable NPS and RIHPHC guidance. The draft document will include a historic context and statement of significance, identification, photographs, and descriptions of all contributing resources, and all maps and photographs required by NPS guidance. A final draft will be produced by the consultant that incorporates comments and additional information provided by the Participating Parties.

4.8.4 Standards

The mitigation measure will comply with following standards:

- The SOI's Guidance on the *Identification of Historic Properties* (36 CFR 800.4);
- The SOI's *Professional Qualifications Standards* (36 CFR Part 61);
- The NPS *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, as applicable (NPS, 1997a);
- *National Register Bulletin 16a: How to Complete the National Register Registration Form* (NPS, 1997b); and
- RIHPHC guidance.

4.8.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Proposals by qualified consultants in response to the RFP;
- Preliminary Draft of the NRHP Nomination Form; and
- Revised draft of the NRHP Nomination Form.

4.8.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

5.0 IMPLEMENTATION

5.1 Timeline

The timeline for implementation of the mitigation measures is identified in the MOA.

5.2 Organizational Responsibilities

5.2.1 *Bureau of Ocean Energy Management (BOEM)*

BOEM remains responsible for making all federal decisions and determining compliance with Section 106. BOEM has reviewed this HPTP to ensure, at minimum, it includes the content required.

- BOEM remains responsible for making all federal decisions and determining compliance with Section 106;
- BOEM, in consultation with the Participating Parties, will ensure that mitigation measures adequately resolve adverse effects, consistent with the NHPA;
- BOEM will be responsible for sharing the annual summary report with the Participating Parties; and
- BOEM is responsible for consultation related to dispute resolution.

5.2.2 *Revolution Wind, LLC*

Revolution Wind will be responsible for the following:

- Considering the comments provided by the Participating Parties in the development of this HPTP;
- Funding the mitigation measures specified in Section 4.0;
- Completion of the scope/s of work in Section 4.0;
- Ensuring all Standards in Section 4.0 are met;
- Providing the Documentation in Section 4.0 to the Participating Parties for review and comment;
- Annual Reporting to BOEM; and
- Revolution Wind will be responsible for ensuring that all work that requires consultation with Tribal Nations are performed by professionals who have demonstrated professional experience consulting with federally recognized Tribes.

5.2.3 *Other Parties, as Appropriate*

Revolution Wind does not anticipate additional consulting parties, should any be determined, this will be updated.

5.3 Participating Party Consultation

This HPTP was developed in consultation with the RIHPHC and other Participating Parties to provide meaningful input on the resolution of adverse effects to and form(s) of implementing mitigation at the historic properties.

6.0 REFERENCES

Beers, D.G. & Company. 1870. *Atlas of the State of Rhode Island and Providence Plantations*. D.G. Beers & Company, Philadelphia, PA.

Code of Federal Regulations (CFR). 2021a. 36 CFR 800 – Protection of Historic Properties [incorporating amendments effective December 15, 2021]. Available at <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800>. Accessed December 21, 2021.

CFR. 2021b. 36 CFR 61.4(e)(1) – Procedures for State, Tribal, and Local Government Historic Preservation Programs [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4\(e\)\(1\)](https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4(e)(1)). Accessed December 21, 2021.

CFR. 2021c. 36 CFR 65.2(c)(2) – National Historic Landmarks Program – Effects of Designation [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2\(c\)\(2\)](https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2(c)(2)). Accessed December 21, 2021.

CFR. 2022. 40 CFR 1500 – National Environmental Policy Act Implementing Regulations. Available at <https://www.ecfr.gov/current/title-40/chapter-V/subchapter-A>. Accessed January 7, 2022.

Connors, Edward. 2008. *Stone House Inn*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C.

Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR). 2023. *Historic Resources Visual Effects Analysis, Revolution Wind Farm*. Syracuse, NY. July 2022.

Federal Register. 1997. 62 FR 33708 – The Secretary of the Interior’s Historic Preservation Professional Qualifications Standards. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/app/details/FR-1997-06-20/97-16168>. Accessed December 21, 2021.

Harrington, Richard. 1971. *The Breakers*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C.

Harrington, Richard. 1972. *Rosecliff*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C.

Harrington, Richard. 1974. *Ochre Point-Cliffs Historic District*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C.

Gasner, Pamela. 2007. *Historic House Survey*. Block Island Historical Society. New Shoreham, RI.

Gibbs, James. 1974. *Old Harbor Historic District*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C.

Google Earth Mapping. 2022. Available at: earth.google.com/web/.

Jones, Robert O. 1976. *Life Saving Station at Narragansett Pier*. National Register of Historic Places Inventory – Nomination Form. United States Department of the Interior, National Park Service, Washington, D.C.

Kelly, Grace. 2021. "Group of Friends Track Block Island's Crumbling Shoreline." *EcoRInews*. Online newspaper. June 17, 2021. Available at <https://www.ecori.org/shifting-sands/2021/6/17/group-of-friends-track-block-islands-eroding-shoreline>. Accessed December 2021.

Little Compton Historical Society. 2020. *Catherine (Cay) Philips Eddy*. Available at <https://littlecompton.org/historical-resources/little-compton-womens-history-project/catherine-cay-phillips-eddy/>. Accessed February 2022.

Longstreth, Richard. 1976. *Ocean Drive Historic District - Draft*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C.

Morgan, William. 2016. *This family preserved a 70-acre historic Rhode Island farm with incredible views*. Design New England. Available at <http://realestate.boston.com/design-new-england/2016/10/11/family-preserved-70-acre-historic-rhode-island-farm-incredible-views/>. Accessed June 2022.

National Park Service (NPS). 1997a. *How to Apply the National Register of Historic Places Criteria for Evaluation*. National Register Bulletin No. 15. National Register Branch, National Park Service, United States Department of the Interior, Washington, D.C. Available at <http://www.nps.gov/nr/publications/bulletins/pdfs/nrb15.pdf>. Accessed December 21, 2021.

NPS. 1997b. *How to Complete the National Register Registration Form*. National Register Bulletin No. 16a. National Register Branch, National Park Service, United States Department of the Interior, Washington, D.C. Available at <https://www.nps.gov/subjects/nationalregister/upload/NRB16A-Complete.pdf>. Accessed December 21, 2021.

NPS. 1982. *Ocean Road Historic District*. National Register of Historic Places Inventory Nomination Form. No author listed. Department of the Interior. Washington, DC.

Newport Historic District Commission. <https://www.cityofnewport.com/city-hall/boards-commissions/commissions/historic-district-commission>. Accessed February 8, 2022.

Newport Historical Society. <https://newporthistory.org/>. Accessed February 8, 2022.

Newport Restoration Foundation. <https://www.newportrestoration.org/>. Accessed February 8, 2022.

North Carolina Architects and Builders. 2022. *Kenneth M. Murchison, Jr. (1872-1938)*. Available at <https://ncarchitects.lib.ncsu.edu/people/P000344>. Accessed June 2022.

Pitts, Carolyn. 1976. *Ocean Drive Historic District*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C.

Potter, Elisabeth Walton and Beth M. Boland. 1992. *Guidelines for Evaluating and Register Cemeteries and Burial Places*. U.S. Department of the Interior, National Park Service, Interagency Resources Division, National Register of Historic Places, National Register Bulletin. Available at: <https://www.nps.gov/subjects/nationalregister/upload/NRB41-Complete.pdf>. Accessed January 2022.

Public Archaeology Laboratory, Inc. (PAL). 2012. *Block Island Wind Farm and Block Island Transmission System, New Shoreham, Above-ground Historic Properties Identification, National Register Eligibility Evaluation and Preliminary Effects Assessment*. Prepared for Deepwater Wind and Tetra Tech. April 2012. Pawtucket, RI.

Revolution Wind, LLC. 2022. *Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project*. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan>. Accessed January 12, 2022.

Rhode Island Historical Preservation & Heritage Commission (RIHPC). 1979a. *Historical Architectural Resources of Middletown, R. I.: A Preliminary Report*. June 1979. Available at https://preservation.ri.gov/sites/g/files/xkgbur406/files/pdfs_downloads/survey_pdfs/middletown.pdf. Accessed February 4, 2022.

RIHPC. 1979b. *Bailey Farm*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C.

RIHPC. 1979c. *Historical and Architectural Resources of Tiverton, Rhode Island: A Preliminary Report*. Rhode Island Historical Preservation Commission, Providence, RI.

RIHPHC. 1990. *Historic and Architectural Resources of Little Compton, Rhode Island*. Providence, RI.
Sanborn Map Co. (Sanborn). 1921. *Atlas of Newport, Jamestown, Middletown and Portsmouth, Rhode Island*. New York: 1921.

RIHPHC. 1991a. *Historic and Architectural Resources of Narragansett, Rhode Island*. Rhode Island Historical Preservation & Heritage Commission. Providence, RI.

RIHPHC. 1991b. *Historic and Architectural Resources of Block Island, Rhode Island*. RIHPHC. Providence, RI.

Roise, Charlene K. 1981. *Historic Resources of Narragansett Pier, Rhode Island*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C. Available at <https://preservation.ri.gov/media/6181/download?language=en>. Accessed May 2023.

Scofield, Jenny Fields and Virginia H. Adams. 2012. *Historic and Architectural Resources of New Shoreham (Block Island)*. National Register of Historic Places Multiple Property Documentation Form. United States Department of the Interior. Washington, D.C.

Sevigny, Donald J. 2012. *A Return to Manning the Post: the Adaptive Reuse of Publically Owned Fire Control Stations from the Second World War*. Roger Williams University. Available at https://docs.rwu.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=1001&context=hp_theses. Accessed June 2022.

Town of Little Compton. 2018a. *Comprehensive Plan*. Jamestown, RI. Available at: <https://cms6.revize.com/revize/littlecompton/Adopted%20and%20Approved%20Little%20Compton%202018%20Comprehensive%20Plan%20Digital%20Copy%20May%202018%202018.pdf> Accessed January 27, 2022.

Town of Little Compton. 2018b. *Local Hazard Mitigation Plan*. Jamestown, RI. Available at: <https://cms6.revize.com/revize/littlecompton/LCRI%20LHMP%20Final%20Draft%20adopted%209%2020202018.pdf> Accessed January 27, 2022.

Town of Narragansett. 2022. Real Property Data. Available at <https://narragansettri.mapgeo.io/datasets/properties?abuttersDistance=200&latlng=41.424689%2C-71.470874>. Accessed January 2022.

Town of New Shoreham GIS. 2022. Available at <https://bigis.maps.arcgis.com/home/index.html>. Accessed January 2022.

Town of New Shoreham Historic District Commission. 2022a. Available at <http://www.new-shoreham.com/186/Historic-District-Commission>. Accessed January 2022.

Town of New Shoreham Historic District Commission. 2022b. Available at <https://www.new-shoreham.com/docs/Historic%20District%20Properties.pdf>. Accessed January 2022.

Town of New Shoreham. 2016. *New Shoreham Comprehensive Plan*. Available at https://www.new-shoreham.com/docs/TNS_COMPPLAN16_nomaps_or_append.pdf. Accessed February 2022.

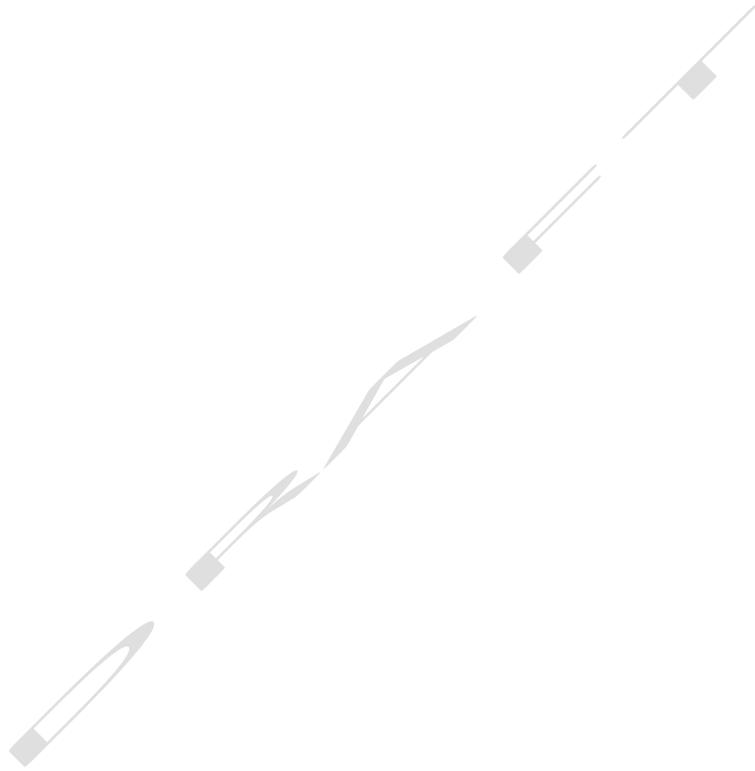
United States Code. 2016. Title 54 - National Historic Preservation Act [as amended through December 16, 2016]. Available at <https://www.achp.gov/sites/default/files/2018-06/nhpa.pdf>. Accessed December 21, 2021.

Vision Appraisal. 2022. *540A Long Highway, Little Compton, Rhode Island*. Available at <https://gis.vgsi.com/LittleComptonRI/Parcel.aspx?Pid=2436>. Accessed June 2022.

Winthrop, Christian. 2021. Cliff Walk Commission launches fundraising program to help preserve Newport's historic Cliff Walk. *Newport Buzz*, May 26, 2021. Available at: <https://www.thenewportbuzz.com/cliff-walk-commission-launches-fundraising-program-to-help-preserve-newports-historic-cliff-walk/30133>.

Youngken, Richard, Linda R. O-Neil, and Robert O. Jones. 2005. *Dunmere*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C.

**ATTACHMENT 12 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE
REVOLUTION WIND FARM: NINE HISTORIC PROPERTIES, TOWN OF MIDDLETOWN,
NEWPORT COUNTY, RHODE ISLAND**



Historic Property Treatment Plan

for the

Revolution Wind Farm

Nine Historic Properties

Town of Middletown, Newport County, Rhode Island

Submitted to:



Bureau of Ocean Energy Management
U.S. Department of the Interior

Prepared for:



Revolution Wind, LLC
<https://revolutionwind.com/>

Prepared by:



Environmental Design & Research, D.P.C.
217 Montgomery Street, Suite 1100
Syracuse, New York 13202
www.edrdpc.com

June 2023

ABSTRACT

Federal Undertaking: Revolution Wind Farm and Revolution Wind Export Cable Project

Location: Outer Continental Shelf and Rhode Island

Federal and
State Agencies: Bureau of Ocean Energy Management
National Park Service
U.S. Army Corps of Engineers
Massachusetts Historical Commission
Rhode Island Historical Preservation & Heritage Commission
New York Historic Preservation Office
Connecticut Historic Preservation Office
Advisory Council on Historic Preservation

Regulatory Process: National Environmental Policy Act
Section 106 of the National Historic Preservation Act
Section 110(f) of the National Historic Preservation Act

Purpose: This Historic Property Treatment Plan provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects from the Revolution Wind Project.

Adverse Visual
Effect Finding for: The Bailey Farm
The Clambake Club of Newport
Paradise Rocks Historic District
Sea View Villa
St. George's School: Church of St. George, Little Chapel, and Memorial Schoolhouse
The Indian Avenue Historic District
Whetstone
The Land Trust Cottages
The Bluff/John Bancroft Estate

Submitted By: Revolution Wind, LLC

Date: June 2023

TABLE OF CONTENTS

1.0	Executive Summary	1
2.0	Background Information	3
2.1	Project Overview: Revolution Wind Farm and Revolution Wind Export Cable.....	3
2.2	Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)	4
2.2.1	Municipal Regulations.....	4
2.3	Participating Parties	4
3.0	Existing Conditions, Historic Significance, and Maritime Setting	5
3.1	Historic Properties	5
3.2	Maritime Setting.....	6
3.3	The Bailey Farm.....	9
3.3.1	Physical Description and Existing Conditions.....	9
3.3.2	Historic Context.....	10
3.3.3	NRHP Criteria and the Maritime Visual Setting	10
3.4	The Clambake Club of Newport.....	10
3.4.1	Physical Description and Existing Conditions.....	10
3.4.2	Historic Context.....	11
3.4.3	NRHP Criteria and the Maritime Visual Setting	11
3.5	The Paradise Rocks Historic District	12
3.5.1	Physical Description and Existing Conditions.....	12
3.5.2	Historic Context.....	12
3.5.3	NRHP Criteria and the Maritime Visual Setting	13
3.6	The Sea View Villa.....	14
3.6.1	Physical Description and Existing Conditions.....	14
3.6.2	Historic Context.....	14
3.6.3	NRHP Criteria and the Maritime Visual Setting	14
3.7	The St. George's School: Church of St. George, Little Chapel, and Memorial Schoolhouse	14
3.7.1	Physical Description and Existing Conditions.....	14
3.7.2	Historic Context.....	16
3.7.3	NRHP Criteria and the Maritime Visual Setting	16
3.8	The Indian Avenue Historic District	17
3.8.1	Physical Description and Existing Conditions.....	17
3.8.2	Historic Context.....	17
3.8.3	NRHP Criteria and the Maritime Visual Setting	18
3.9	The Whetstone.....	18

3.9.1	Physical Description and Existing Conditions	18
3.9.2	Historic Context	18
3.9.3	NRHP Criteria and the Maritime Visual Setting	19
3.10	The Land Trust Cottages	19
3.10.1	Physical Description and Existing Conditions	19
3.10.2	Historic Context	19
3.10.3	NRHP Criteria and the Maritime Visual Setting	19
3.11	The Bluff/John Bancroft Estate	19
3.11.1	Physical Description and Existing Conditions	19
3.11.2	Historic Context	20
3.11.3	NRHP Criteria and the Maritime Visual Setting	20
4.0	Mitigation Measures	21
4.1	Support Ongoing Maintenance and Aesthetic Improvements to the Third Beach Road and Hanging Rocks Road through Stone Wall Preservation and Observation Trails within the Paradise Rocks Historic District	21
4.1.1	Purpose and Intended Outcome	21
4.1.2	Scope of Work	21
4.1.3	Methodology	21
4.1.4	Standards	22
4.1.5	Documentation	22
4.1.6	Funds and Accounting	22
4.2	Updated Town-Wide Historic Resources Survey	22
4.2.1	Purpose and Intended Outcome	22
4.2.2	Scope of Work	22
4.2.3	Methodology	23
4.2.4	Standards	23
4.2.5	Documentation	23
4.2.6	Funds and Accounting	23
5.0	Implementation	24
5.1	Timeline	24
5.2	Organizational Responsibilities	24
5.2.1	Bureau of Ocean Energy Management (BOEM)	24
5.2.2	Revolution Wind, LLC	24
5.2.3	Other Parties, as Appropriate	24
5.3	Participating Party Consultation	24

6.0 References..... 26

LIST OF FIGURES

Figure 2.1-1. Project Location..... 3
 Figure 3.1-1. Historic Property Locations..... 6

LIST OF TABLES

Table 3.1-1. Historic Properties included in the HPTP 5

LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
ADLS	Aircraft Detection Lighting System
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
COP	Construction and Operations Plan
EDR	Environmental Design and Research, D.P.C.
DEIS	Draft Environmental Impact Statement
FEIS	Final Environmental Impact Statement
FR	Federal Register
HPTP	Historic Property Treatment Plan
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
RFP	Request for Proposals
RIHPHC	Rhode Island Historical Preservation & Heritage Commission
ROD	Record of Decision
RWF	Revolution Wind Farm
USCG	United States Coast Guard
WTG	Wind Turbine Generator

1.0 EXECUTIVE SUMMARY

This Historic Property Treatment Plan (HPTP) for the Bailey Farm, which is listed on the National Register of Historic Places (NRHP); the Clambake Club of Newport, which is listed on the NRHP; the Paradise Rocks Historic District, which is a Rhode Island Historical Preservation & Heritage Commission (RIHPHC) Historic Resource; the Sea View Villa, which is a RIHPHC Historic Resource; the St. George's School: Church of St. George, Little Chapel, and Memorial Schoolhouse, which is listed on the NRHP; the Indian Avenue Historic District which is listed on the NRHP; Whetstone, which is a RIHPHC Historic Resource; the Land Trust Cottages, which is a RIHPHC Historic Resource; and the Bluff/John Bancroft Estate, which is a RIHPHC Historic Resource, (the historic properties) provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects in the *Historic Resources Visual Effects Analysis – Revolution Wind Farm* (HRVEA; EDR, 2023) for the Revolution Wind Farm (RWF) and Revolution Wind Export Cable Project (collectively, the Undertaking). Revolution Wind LLC (Revolution Wind) has provided this HPTP in accordance with the Bureau of Ocean Energy Management's (BOEM) Findings of Adverse Effect (FoAE) for the Undertaking under the National Historic Preservation Act of 1966 (NHPA).

BOEM has used the National Environmental Policy Act (NEPA) substitution process to fulfill its Section 106 obligations as provided for in the NHPA implementing regulations (36 CFR § 800.8(c)), and BOEM has consulted with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, federally recognized Native American Tribes, and other NHPA Section 106 consulting parties in accordance with this process. Revolution Wind has provided this HPTP to BOEM for inclusion in the Final Environmental Impact Statement (FEIS).

This HPTP describes the mitigation measures to resolve potential adverse effects on historic properties, the implementation steps, and timeline for actions. The mitigation measures are based on the evaluations and outreach performed by Revolution Wind prior to the issuance of the DEIS as well as outreach to consulting parties performed by BOEM. This HPTP document has undergone revision and refinement in consultation with the Massachusetts State Historic Preservation Officer, the Rhode Island State Historic Preservation Officer, the ACHP, and other consulting parties throughout the NEPA substitution process. This HPTP is included in the Memorandum of Agreement (MOA) issued in accordance with 36 CFR §§ 800.8, 800.10.

This HPTP is organized into the following sections:

- **Section 1.0, Introduction**, outlines the content of this HPTP.
- **Section 2.0, Cultural Resources Regulatory Context**, briefly summarizes the Undertaking while focusing on cultural resources regulatory contexts (federal, tribal, state, and local, including preservation restrictions), identifies the historic properties discussed in this HPTP that will be adversely affected by the Undertaking, and summarizes the pertinent provisions and attachments of the HRVEA (EDR, 2023) and *Revolution Wind Farm Construction and Operations Plan* (COP; Revolution Wind, 2022) that guided the development of this document.

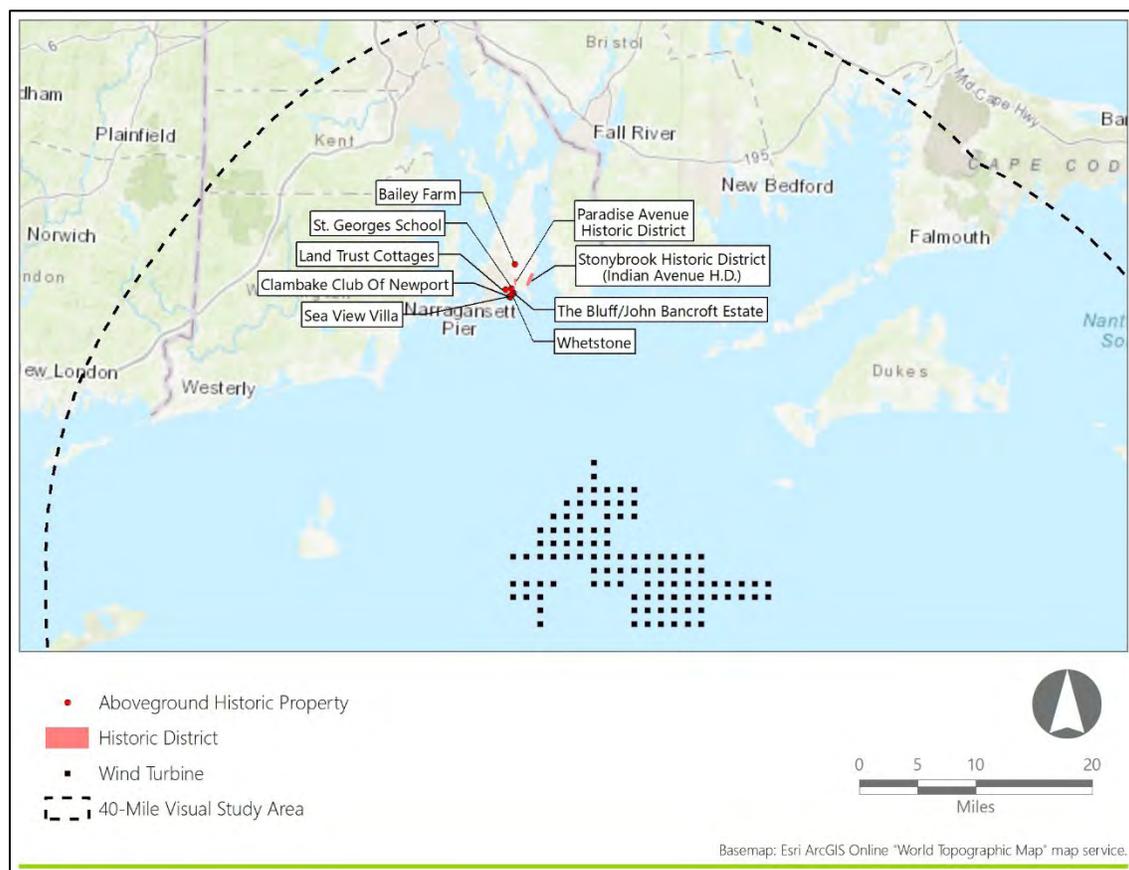
- **Section 3.0, Existing Conditions, Historic Significance, and Maritime Setting**, provides a physical description of the historic properties included in this HPTP. Set within its historic context, the applicable NRHP criteria for the historic properties are discussed with a focus on the contribution of a maritime visual setting to its significance and integrity.
- **Section 4.0, Mitigation Measures**, presents specific steps to carry out the mitigation actions. The mitigation action includes a detailed description, intended outcome, methods, standards, and requirements for documentation.
- **Section 5.0, Implementation**, establishes the process for executing mitigation actions at the historic properties, as identified in Section 4.0 of this HPTP. For each/the action, organizational responsibilities are outlined, a timeline is provided, and regulatory reviews are listed.
- **Section 6.0, References**, is a list of works cited in this HPTP.

2.0 BACKGROUND INFORMATION

2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable

The Undertaking is a wind-powered electric generating facility composed of up to 100 wind turbine generators (WTGs) and associated foundations, two offshore substations, and inter-array cables connecting the WTGs and the offshore substations (see Figure 2.1-1). The WTGs, offshore substations, array cables, and substation interconnector cables would be located on the Outer Continental Shelf approximately 15 nautical miles (18 statute miles) southeast of Point Judith, Rhode Island, approximately 13 nautical miles (15 statute miles) east of Block Island, Rhode Island, approximately 7.5 nautical miles (8.5 statute miles) south of Nomans Land Island National Wildlife Refuge (uninhabited island), and between approximately 10 to 12.5 nautical miles (12 to 14 statute miles) south/southwest of varying points of the Rhode Island and Massachusetts coastlines (62 FR 33708). In addition, two submarine export cables located in both federal waters and Rhode Island State territorial waters, will connect the offshore substation to the electrical grid. The proposed interconnection location for the Undertaking is the existing Davisville Substation, which is owned and operated by The Narragansett Electric Company d/b/a National Grid and located in North Kingstown, Rhode Island. The visible offshore components of the operational Undertaking will be located on Lease OCS-A 0486 in water depths ranging from approximately 108 to 125 feet.

Figure 2.1-1. Project Location



2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)

The regulations at 36 CFR § 800.8 provide for use of the NEPA process to fulfill a federal agency's NHPA Section 106 review obligations in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6. Under these provisions, issuance of an ROD and implementation of relevant conditions will resolve adverse effects to historic properties caused by the Undertaking, including to National Historic Landmarks for which BOEM must provide a higher standard of care, as required by Section 110(f) of the NHPA.

The measures to avoid and minimize adverse effects to identified historic properties are described in the COP (Section 4.4.1.3 and Appendix BB). This HPTP addresses the mitigation requirements identified by BOEM to resolve the remaining adverse effects after application of the above-referenced measures. The mitigation measures reflect consultations among consulting parties to refine a conceptual mitigation framework proposed by Revolution Wind.

All activities implemented under this HPTP will be conducted in accordance with any conditions imposed by BOEM in its ROD and with applicable local, state and federal regulations and permitting requirements. Responsibilities for specific compliance actions are described in further detail in Section 5.2, Organizational Responsibilities.

2.2.1 Municipal Regulations

Before implementation, any on-site mitigation measures will be coordinated with local municipalities and commissions to obtain approvals, as appropriate. These may include, but are not limited to building permits, zoning, land use, planning, historic commissions, and design review boards. Additional information regarding compliance with local requirements appears in Section 5.0, Implementation.

2.3 Participating Parties

BOEM initiated consultation under Section 106 with invitations to consulting parties on April 30, 2021. BOEM hosted the first Section 106-specific meeting with consulting parties on December 17, 2021 pursuant to Sections 106 and 110(f) of the NHPA and in accordance with 36 CFR 800.8.

Following BOEM initial Section 106 meeting with consulting parties, Revolution Wind held stakeholder outreach meetings (see Section 5.3) to review conceptual mitigation measures for the historic properties and invited the following parties:

- The Town of Middletown
- The Rhode Island Historical Preservation & Heritage Commission.

3.0 EXISTING CONDITIONS, HISTORIC SIGNIFICANCE, AND MARITIME SETTING

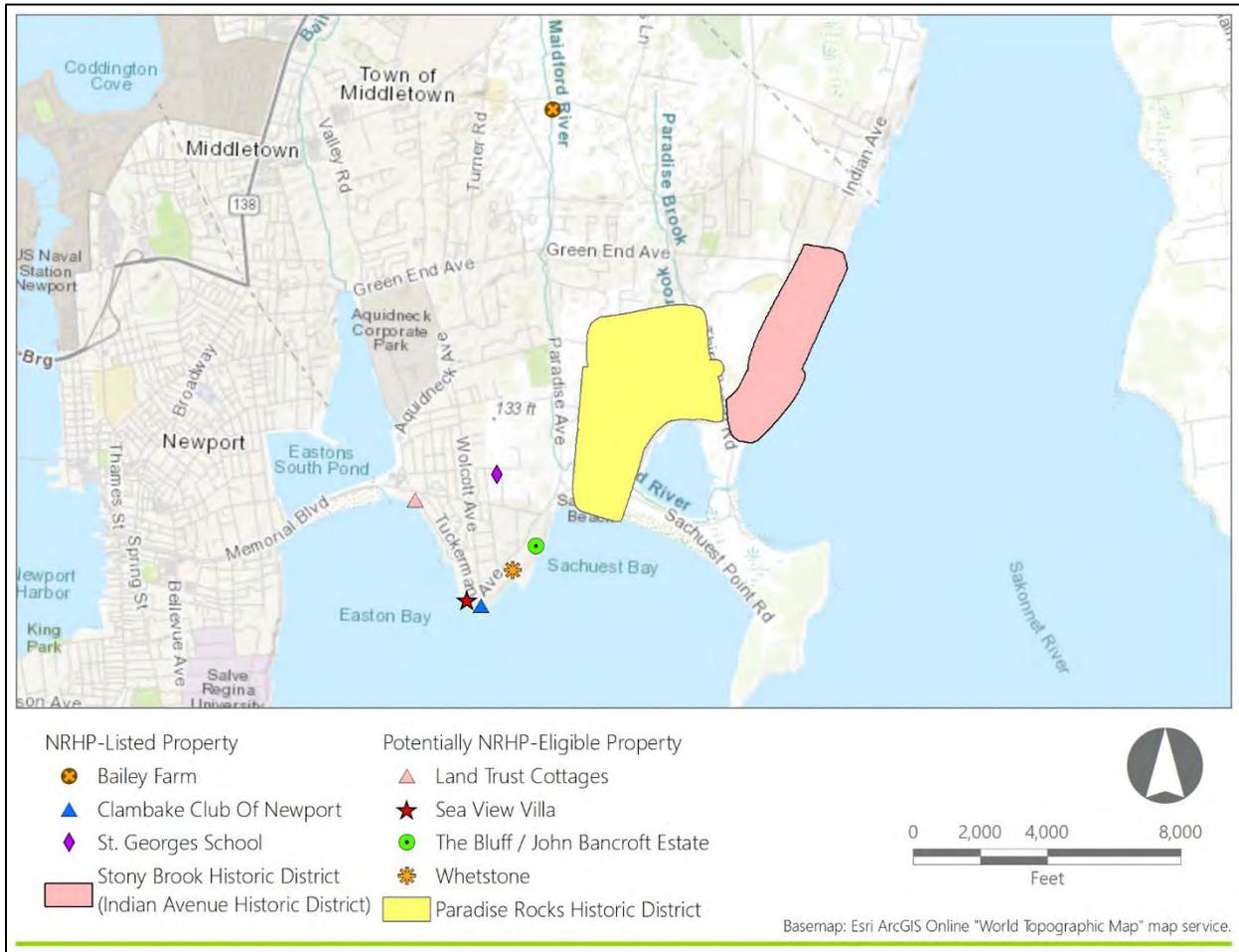
3.1 Historic Properties

This HPTP involves nine historic properties, as identified in Table 3.1-1 and located on Figure 3.1-1.

Table 3.1-1. Historic Properties included in the HPTP

Name	Property Designation	Municipality	State	Site No. (Agency)	Ownership	Historic Property Type
Bailey Farm	NRHP-Listed	Middletown	RI	84001887 (NPS Ref. #84001887)	Private	Agricultural Properties
Clambake Club of Newport	NRHP-Listed			95001267 (NPS Ref. #95001267)	Private	Recreational Properties
Paradise Rocks Historic District	RIHPHC Historic Resource			MT 4 (RI SHPO)	Private (Multiple)	Historic Buildings and Structures
Sea View Villa	RIHPHC Historic Resource			MT 75 (RI SHPO)	Private	Historic Buildings and Structures
St. George's School: Church of St. George, Little Chapel, and Memorial Schoolhouse	NRHP-Listed			4001235 (NPS Ref. #04001235)	Private	Historic Buildings and Structures
Indian Avenue Historic District	NRHP-Listed			9000708 (NPS Ref. #09000708)	Private (Multiple)	Historic Buildings and Structures
Whetstone	RIHPHC Historic Resource			MT 77 (RI SHPO)	Private	Historic Buildings and Structures
Land Trust Cottages	RIHPHC Historic Resource			903	Private	Historic Buildings and Structures
The Bluff/John Bancroft Estate	RIHPHC Historic Resource			MT 78 (RI SHPO)	Private	Estates and Estate Complexes

Figure 3.1-1. Historic Property Locations



In Sections 3.23 through 3.11, each historic property is individually considered, described both physically and within its historic context, with a focus on the contribution of a maritime visual setting to the property’s significance and integrity.

3.2 Maritime Setting

For the purposes of this analysis and assessment, views of marine waters are considered critical aspects of maritime settings. The influence of the marine environment and related human activities on historical development patterns is extensive and may be expressed in areas without direct lines of sight to the sea. Although these types of setting may contribute to the significance of historic properties, they would not be subject to alteration as a result of the proposed undertaking and are not considered further in this report.

The historic properties identified in this HPTP are included within the following property types as defined in the HRVEA: “Historic Buildings and Structures,” “Historic Cemeteries and Burial Grounds,” “Agricultural

Properties," "Recreational Properties," and "Estates and Estate Complexes." Each property type is defined below as well as the characteristics typical of their maritime setting.

"Historic Buildings and Structures" includes buildings and associated properties historically used as residences (in some instances their current use may be commercial, municipal, institutional, or otherwise non-residential) and is the largest grouping of above-ground historic properties within the PAPE. Historic Buildings and Structures within the PAPE consist mostly of vernacular residences, or groupings of residences, although this above-ground historic property type also includes historic parks and stone markers. The overall character of these individual above-ground historic properties and districts is residential or intended for public enjoyment, as opposed to the grand mansions and summer "cottages" built by wealthy industrialist families that typified the "Estates and Estate Complexes" property type (see below). These above-ground historic properties are typically listed due to each resource's unique significance or the combined significance of the resources forming an historic district, and usually qualify under National Register Criteria A and C. These factors are shared among the resource to a degree which justifies their grouping as an above-ground historic property type.

Historic Buildings and structures not fitting within the previously described types occur throughout the study area and in a variety of local contexts. Location and orientation of such properties is critical to understanding the nature of any associated maritime settings. Many historic structures were oriented to local roadways, with the front and rear elevations parallel to the nearby road's alignment. Local roadways along the region's shorelines often parallel the water's edge and Historic Buildings frequently shift in orientation along such coastal roads. This variation in orientation may strongly influence the associated views of marine waters that may form important elements of a property's historic setting.

"Historic Cemeteries and Burial Grounds" consists of cemeteries identified by federal, state, or local governmental agencies as having historic significance. These above-ground historic properties may be municipally owned cemeteries on public land, small family plots on private land, or abandoned burial grounds. Historic cemeteries are lasting memorials to the past, provide a guide to the changing values and composition of communities in the course of their historic development.

Historic cemeteries and burial ground vary throughout the study area. Small, private, non-denominational and family cemeteries were relatively common in New England, and many have survived to present-day. Many examples of small cemeteries were associated with specific farms or families and were frequently placed within the available agricultural lands surrounding a farmstead or near multiple associated family farms. Where such burial grounds are located near the water they may be associated with ocean or other maritime viewsheds, however, ocean vistas are less likely to have been a significant consideration in the siting of such cemeteries than their larger, more formal counterparts in the region. Where cemeteries are located within districts or other historic settlements strongly associated with maritime settings, such burial grounds may be sited to maintain a visual connection to the waters in order to maintain a sense of continuity linking the departed's final resting places with the environment in which they lived. Cemeteries in urban locations expressing such patterns may include formal design elements associated with the "rural cemetery movement" of the 19th century, which sought to create naturalistic, park-like settings to express "an

appreciation of nature and a sense of the continuity of life” (NPS National Register Bulletin 41: 6). Maritime views from hillside cemeteries that were intentionally incorporated or framed by landscape designs may be more sensitive to discordant modern elements than those associated with less formal burial grounds that may not have been specifically located to provide ocean views.

“Agricultural Properties” consist of historic farm buildings and landscapes which have retained a high degree of integrity and are generally no longer used for their original purpose. These above-ground historic properties feature barns, farmhouses, and large, open tracts of pastureland. Generally, these above-ground historic properties do not derive their significance in any direct way from the ocean or maritime activities.

Historic agricultural properties, including farms, farmhouses, barns and related buildings and structures are relatively common in the study area. Many of these properties were built between 1700 and 1850, after which agricultural economies in New England and New York declined sharply. The historic settings for such properties typically include open, agrarian landscapes which once may have afforded open views of the seas when sited along the shoreline or at higher elevations within the coastal interior. Few of the once expansive agrarian landscapes associated with the historic use of the region’s farms survive. Some have been altered by later residential and commercial development and many have been transformed by reforestation. Despite these changes, historic agricultural properties remain an important part of the region’s heritage and tangible expression of several centuries of intensive farming that transformed the landscapes throughout southern New England and eastern Long Island.

“Recreational Properties” is defined by the role these properties served in their original functions as places for the resort tourism economy of the late-nineteenth century to flourish. These above-ground historic properties feature beaches, casinos, restaurants, and other buildings and structures built to entertain seasonal vacationers. They are typically located near the shoreline or immediately adjacent to the sea, and in some cases, are the beaches themselves. The enjoyment of, and interaction with, the sea are integral features of the significance of these above-ground historic properties. In many cases, the beachfront, shoreline, and adjacent ocean waters are prominent features of the historic setting due to their close association with historic recreational activities.

The same macroeconomic trends that saw the decline of the quintessential New England farm in the mid-19th century are associated with a population shift to cities and rise in affluence for some segments of society. Summer resorts, supported by steamships, rail transportation, and eventually, automobiles were developed in numerous locations in the study area in the late 19th century. These resorts varied between properties intended to serve the rising group of “upper middle income” families living in the region’s cities to estate-like developments serving a more affluent set. Seaside resorts, like many other shoreline recreational, commercial, and residential properties, were often sited to take advantage of aesthetically pleasing ocean or maritime views. Depending on location and the the conformation of the local shoreline, such properties may be associated with specific bay or cove viewsheds that include limited areas of the open ocean waters. Recreational activities at resorts frequently included swimming and designated beaches where residents and visitors may have spent considerable time during the summer months. Where these features are still present and express a tangible association with the historic resort property, views from

beaches may be as important as views from more formal elements of the designed landscape. Likewise, historic hotels and inns became more common elements of the region's shoreline communities in the late 19th century. Such properties were often sited near harbors, ferry landings, rail stations, and public or private beaches and may be associated with similar historic maritime settings. Views to ocean waters or the more intimate bays and coves of the region may have been an integral part of the visitor's motivation for staying in such establishments. Such considerations can be expressed through the inclusion of building and landscape features clearly intended to afford views of ocean. Older taverns and inns in the study area may be found along the working harbors and ports and were intended to serve the fishing, whaling, and related participants in maritime commerce. The design and location of these properties may not show the same influence of aesthetic considerations but will likely also retain a strong association with the waterfront and maritime environment.

"Estates and Estate Complexes" consists of high-style residences, or groupings of residences, typically designed by prominent architects of the nineteenth and early twentieth centuries, such as Richard Morris Hunt and McKim, Mead and White. This property type consists mainly of the mansions and summer "cottages" built by wealthy industrialist families, drawn to the vicinity of Newport, Rhode Island as it became a prominent vacation and recreation area for the emerging American elite, and to Montauk Point as a naturalistic and remote enclave.

Estates built by or for wealthy families have been part of the region's landscapes for centuries and many such properties are located along the shorelines. High style, architect-designed mansions and associated landscapes are characteristic of several areas within the study area and many such properties were sited to take advantage of ocean views. The importance of maritime settings to these properties may be apparent in the design of building features such as veranda, porches, and large windows facing the water or through landscape elements and overall designs that were intended to frame specific views towards the seas. As with many other historic property types, the conformation of local shorelines and the specific orientation of each property may be important in assessing the association with specific aspects or elements of each associated viewshed.

3.3 The Bailey Farm

3.3.1 *Physical Description and Existing Conditions*

The Bailey Farm (NPS Ref. #84001887, originally inventoried as the Chapman House and Farm) is an approximately 47-acre farm located at 373 Wyatt Road in Middletown, Road Island, approximately 2.25 miles from the coastline in Sachuest Bay (Figure 3.1-1). The property consists of a central, main farm complex including the original farmhouse, a barn, associated outbuildings including sheds and garages, and a cistern. The fields surrounding the central farm complex are still in use (predominantly as a vineyard) and are bound and interlaced with dry-laid stone walls. The Bailey family burying ground is located in the northwestern corner of the parcel, partially enclosed by a stone wall and modern metal fence. The Maidford River (a small brook) runs north to south, bisecting the property immediately west of the central farm complex (Nebiker et al., 1984; RIHPC, 1979a:40).

A more modern house (constructed circa 1930) with associated outbuildings is located in the northwestern corner of the property north of the Bailey family burying ground but does not contribute to the historical significance of the Bailey Farm (Nebiker et al., 1984).

The frame of the Bailey farmhouse dates from the mid-eighteenth century but was renovated in the nineteenth century Greek Revival style, including a large brick center chimney and three-bay façade. The outbuildings date from the mid-nineteenth to early-twentieth century (likely replacements for earlier barns and sheds) and have gabled roofs, but have been updated with modern shingles, windows, and fixtures (such as solar panels). Though the outbuildings have been updated and/or replaced, they retain their original placement and orientation to the road and the surrounding landscape (Nebiker et al., 1984).

3.3.2 *Historic Context*

The Bailey Farm was once a farmstead occupying as much as 100 acres that was owned and occupied by the Bailey family, who were settlers of nearby Newport, throughout the eighteenth and into the nineteenth century. When the farmhouse underwent its Greek Revival renovations in 1838 the property was owned by Easton Bailey. The property was sold by the Bailey family in the 1850s and was bought and sold several times before being purchased by Peleg Sherman in 1878. His family owned the land until 1918, until it was sold to the Nunes family, whose descendants still owned the property at the time of the Bailey Farm's nomination for the NRHP in 1979. In the year 1850, under the operation of James Gardiner, the Bailey Farm produced \$200 worth of fruits and vegetables, and \$210 worth of meat, marking a relatively prosperous operation compared to other Rhode Island hill farms (RIHPC, 1979b; RIHPC, 1979a:40; Nebiker et al., 1984).

3.3.3 *NRHP Criteria and the Maritime Visual Setting*

The NRHP-listed Bailey Farm meets Criterion A for its associations with the nineteenth-century agriculture of island farms of Narragansett Bay and NRHP Criterion C for its importance as an example of architecture and engineering of the Greek Revival, with a period of significance from 1825-1849 (Nebiker et al., 1984). The Bailey Farm was listed on the NRHP in 1964 and enjoys views to Sachuest Bay.

3.4 The Clambake Club of Newport

3.4.1 *Physical Description and Existing Conditions*

The Clambake Club of Newport is a one-story building located on the bluff at Easton Point. It is a wood-framed, wood-shingled structure laid out in an L-shaped plan. Each wing is covered by a gabled roof, with cedar shingles, punctuated by large stone chimneys. Horizontal cedar-board siding covers the exterior. Several minor additions protrude from the sides of the original building. Areas of exposed foundation show a mix of irregularly cut stone and/or stucco. On the south side of the structure, which drops off to the water, the building is supported by masonry piers (Werenfels, 1995; RIHPC, 1979b:34).

The main entrance on the north side of the structure is cross-gabled, with an arched fan-light window above the wood-paneled entrance door. Stone piers support a flat roof outside the main entrance. The south side of the structure is characterized by a series of enclosed porches. The porches all have an arrangement of

large viewing windows that offer views of the Rhode Island Sound. The porch at the western end of the south side of the structure has a stone terrace outside (Werenfels,1995).

Two outbuildings are also located on the property, the Chef's Cottage and the Guest Cottage. The Chef's Cottage is a small, wood-framed, one-story building with a gabled roof on the north end of the property. The exterior of the Chef's Cottage is also covered in horizontal cedar-board siding. The roof is made of asphalt shingles. The Guest Cottage is a small, wood-framed, one-story building with a gabled roof located on the western end of the property. The Guest Cottage has a gabled entrance portico, and a large bay window facing the Rhode Island Sound to the south. The exterior to the Guest Cottage is covered in horizontal cedar-board siding, and has a cedar shingle roof (Werenfels,1995).

3.4.2 Historic Context

The Clambake Club of Newport has occupied the site at Easton's Point since the 1890s, officially organizing as a club to utilize the property in 1895. An existing dwelling and stable on the property were improved upon beginning in 1897 when they entered into a formal rental agreement with the owner of the property. In 1903 the Clambake Club of Newport property was purchased by founding member Center Hitchcock, who constructed the first clubhouse facility specifically built for the Clambake Club's activities sometime between 1903 and 1907. Club records indicate the facility was likely designed by Colonel Francis Hoppin. A photograph from 1910 shows a simple, one-story building with gabled roofs (Werenfels, 1995).

The original building (with some small additions) survived until September 21, 1938, at which time a hurricane destroyed portions of the building on its southern and eastern ends, though the main body of the building survived the storm. The club was rebuilt in 1939 by William L. Van Alen of Wilmington, Delaware, though it is unclear how much of the original structure was incorporated into the design of the new building. However, the simple, one-story gabled-roof character of the building remained the same (Werenfels, 1995; RIHPC, 1979b:34).

The two outbuildings are not depicted on the 1921 Sanborn Map Co. *Atlas of Newport, Jamestown, Middletown and Portsmouth, Rhode Island* (Sanborn, 1921) and it is unclear if they existed before the 1938 hurricane or if they were later additions to the property (Werenfels, 1995).

3.4.3 NRHP Criteria and the Maritime Visual Setting

The Clambake Club of Newport is significant under NRHP Criterion A for its associations with the late nineteenth-century and early twentieth century entertainment and recreation movements, specifically the seaside recreational facilities on Rhode Island and New England coastlines used for clambakes, social gatherings, and sporting activities such as fishing and shooting. The Clambake Club of Newport has a period of significance from 1875-1949 and is still in use as a private club today (Werenfels, 1995). The location of the main building, and both outbuildings speak to the property's historic association with views to and enjoyment of the seascape. Large bay windows and multiple porches extending towards the water show the importance of the ocean views and the immediate proximity of the waterfront to the historical character of the property. It was listed in the NRHP in 1995.

Historic Property Treatment Plan

Nine Historic Properties

Town of Middletown, Newport County, Rhode Island

3.5 The Paradise Rocks Historic District

3.5.1 *Physical Description and Existing Conditions*

The Paradise Rocks Historic District is located at the south end of Middletown, to the north of Gardiner Pond and Second Beach. According to the Rhode Island Historical Preservation & Heritage Commission (1979a:17), "On an island devoted largely to agricultural, residential, commercial, and industrial uses, the Paradise Rocks area is a superb and unique natural enclave." The Paradise Rocks Historic District is a largely undeveloped area, with portions of the district set aside as wildlife sanctuaries. The district encapsulates Nelson Pond and Paradise Brook, and is named for Paradise Rocks, a north-south trending outcropping of fine blue-hued conglomerate rock" (RIHPC, 1979a:2). The Paradise Rocks Historic District consists of several resources, both natural and man-made. These include Hanging Rock, the Smith-Gardiner-Norman Farm, Gray Craig Estate, the Allen-King-Norman Farm, and the Norman Bird Sanctuary and Museum. The history of each resource is described in the following section.

3.5.2 *Historic Context*

For most of its history, the area within Paradise Rocks Historic District was left in its natural state. Unlike the surrounding area (i.e., Stonybrook Historic District), the District did not become a location for numerous sprawling summer estates. During the nineteenth century, the area was utilized for agriculture and hunting. By the twentieth century more "passive recreation" was enjoyed in the bird sanctuary, with only several residences constructed (RIHPC, 1979a:17). A description and history of some of the resources within the District is listed below.

Hanging Rock

Hanging Rock is a conglomerate-rock mass near Second Beach that juts out into a marsh, with an abrupt cliff-like break at its south end. According to the Rhode Island Historical Preservation & Heritage Commission, (1979a:17-18), the rock was also known as "Berkeley's Seat" during the eighteenth century, as it was a favorite location of Bishop George Berkeley. Today, it is a popular tourist attraction.

Smith-Gardiner-Norman Farm (Paradise Farm)

The Smith-Gardiner-Norman Farm is an NRHP-listed historic district located on 129 acres. The property consists of a mid-eighteenth-century farmhouse with later additions, a mid-nineteenth century barn, two agricultural outbuildings, two burial sites, a stone-lined sheep pen, stone-lined pastures and fields, wooded areas, Hanging Rock, and an abandoned bluestone quarry. The farmhouse consisted of a two-and-a-half story structure rebuilt in the late nineteenth century in the Colonial Revival style. According to the Rhode Island Historical Preservation & Heritage Commission (1979a:18), the farmhouse had a gambrel roof, two interior brick chimneys, a central entry with sidelights in a veranda, gable dormers in front, and a flat roof addition.

The property was primarily farmed by tenant farmers from 1850 to 1900. However, it was best known as the summer residence of George H. and Abbie Kinsley Norman who bought the property in 1898. Mabel

Norman Cerio, the last private owner of the Smith-Gardiner-Norman Farm, adapted the farmhouse and immediate neighboring fields for use as a main residence in 1915. Cerio bequeathed much of the estate to the Norman Bird Sanctuary Trust for use as a bird sanctuary in 1949, which continues to be its use today. At the time of Cerio's death, a 16-acre parcel comprising the Paradise Farmhouse, outbuildings, and agricultural fields along Third Beach Road remained in the hands of the Norman heirs. Various fields were leased for commercial use until the 1990s. In the late 1990s, the Norman Bird Sanctuary purchased this parcel and reintegrated it into the sanctuary (Town of Middletown, 2015).

Gray Craig

Gray Craig, also known as the Michael M. Van Bueren House, was once the farm of one the earliest families in Middletown during the eighteenth century. The resource as it exists today consists of a large two-and-a-half story stone house with four chimneys and views of Sachuest Beach and the Atlantic Ocean. Updates were made to the estate by Mary and Michael Van Bueren during the early twentieth century to transform the estate into a chateau-like house. Additions included kennels, greenhouses, a walled and secret garden, a tea house, a gatehouse, a stable, and a barn (RIHPC, 1979a:18).

Allen-King-Norman Farm

The Allen-King-Norman Farm consists of a two-and-a-half story Federal-era structure with large brick and central chimneys. According to the Rhode Island Historical Preservation & Heritage Commission (1979a:18), the farmhouse had a central portico entry in a 5-bay, south-facing façade, and a large wing at a right angle at the rear. There was a complex of wood-shingle and stone outbuildings at the rear, and the grounds, with stone walls, were well landscaped. The farm was opened to the public as a bird sanctuary in 1950 and named for George H. Norman and George H. Norman, Jr.

Norman Bird Sanctuary and Museum

The Norman Bird Sanctuary, maintained by the Rhode Island Audubon Society, opened to the public in 1950 and consisted of a 450-acre tract of woodland, field, marshes, and rocky hills. Portions of the Sanctuary was formed from the Smith-Gardiner-Norman Farm and Allen-King-Norman Farm. A converted barn and several small outbuildings serve as the headquarters which comprise the bird sanctuary (RIHPC, 1979a:18).

3.5.3 NRHP Criteria and the Maritime Visual Setting

The Paradise Rocks Historic District is an NRHP-eligible resource, possibly under Criterion A and C. The district contains a typical landscape within coastal New England and Middletown that was utilized for agriculture by Europeans for over 200 years. In addition, the few houses within the district are typical examples of nineteenth century residences within Middletown, Rhode Island, embodying the distinctive characteristics of the type, period, or methods of construction. The homes are also in keeping with the vernacular building tradition of coastal New England.

One of the resources within the District, the Smith-Gardiner-Norman Farm (also known as Paradise Farm), was listed in the NRHP under Criterion A and C for its significance in the history of Middletown's settlement and agriculture. According to the NRHP Inventory Nomination Form (Connors, 2007), the Paradise Farm is "a well-preserved example of Rhode Island's eighteenth and nineteenth century island farms, typical of its

region in its form and in its history of use and ownership until the early twentieth century.” Contributing structures included a farmhouse, a two-car garage, carriage shed, barn, stone walls, agricultural fields, orchard, family garden, sheep pen, Gardiner Family Burial Plot (1786-1872), gravesite (date unknown), Hanging Rock, and quarry. The period of significance for the Farm spans from 1750 to 1949. While the early period’s significance included the history surrounding the historic farmstead, the later period’s significance included the pattern of development in the history of the island towns and the use of agricultural areas in island towns as country retreats for wealthy families. The Smith-Gardiner-Norman Farm may also be NRHP eligible under Criterion D, as it may yield evidence about the lifeways of coastal Native Americans as well as successive owners, tenants, and slaves (Connors, 2007).

3.6 The Sea View Villa

3.6.1 Physical Description and Existing Conditions

The Sea View Villa is a two-and-a-half story, multi-gabled chateau with a complex plan, several porches, and wood-carved details on the exterior (RIHPC, 1979a:34). The house is near the vicinity of Easton’s Point on Tuckerman Avenue. The house is less than 100 meters from the shoreline and approximately 40 feet above mean sea level, overlooking the Atlantic Ocean. Sea View Villa is currently a privately owned apartment complex (Sea View Villa, n.d.).

3.6.2 Historic Context

The Sea View Villa was built by General Zachariah Cantey Deas in the 1880s. The original lot, much like those in other sections of Middletown, were laid out by a syndicate of Boston businessmen. In 1945, the property was purchased by Tony and Mary Spiratos, whose family continues to own the property. During this time, Sea View Villa was host to President Eisenhower’s Cabinet and the White House’s staff. During the latter half of the twentieth century and to the present, the Spiratos family made major renovations to the estate, updating the various rooms (such as the old servant’s quarters) into apartments for rent (RIHPC, 1979a:6; Sea View Villa, n.d.).

3.6.3 NRHP Criteria and the Maritime Visual Setting

The Sea View Villa is an NRHP-eligible resource and appears to meet Criterion C. The house is a typical example of a late-nineteenth century residence within Middletown, Rhode Island, embodying the distinctive characteristics of the type, period, or methods of construction. In addition, the house is in keeping with the vernacular building tradition of coastal New England. The property’s natural landscape and maritime visual residence.

3.7 The St. George's School: Church of St. George, Little Chapel, and Memorial Schoolhouse

3.7.1 Physical Description and Existing Conditions

The St. George’s School (NPS Ref. #04001235) collectively refers to three buildings (attached to one another) together occupying less than one acre on a 125-acre school campus: the Church of Saint George, the

Memorial Schoolhouse, and the Little Chapel. Approximately 50 other structures, as well as lawns and athletic fields, cover the rest of the campus. Approximately half of the other structures were built between the 1880s and 1930s; some of those may also warrant NRHP nomination. The Memorial Schoolhouse, Church of Saint George, and the Little Chapel occupy the center of the campus between landscaped courtyards. The entire campus has been likened to an English manor estate, with buildings consistently between one and three stories, with gabled roofs, red brick exteriors, and Georgian Revival and Tudor Revival architecture (Cavanaugh, 2004: Section 7, pg. 1-2).

While the original campus was laid out in quadrangles, preserving ocean views to the east and south was later considered. The hilltop location of the school property offers “magnificent views of Second Beach, Sachuest Bay, Rhode Island Sound” and other landmarks (Cavanaugh, 2004: Section 7, pg. 1). Currently, the school serves as a private, Episcopal, coeducational boarding school (St. George’s School, n.d.).

The Little Chapel

The Little Chapel is a brick one-room building with one-story, and a gabled roof of green slate on a poured concrete foundation. Constructed between 1909 and 1911, the Tudor Revival style building was relocated in 1924 less than 100 feet away from its original site to make way for construction of the Church of Saint George. The Little Chapel is now attached to the larger Church of Saint George on the larger structure’s southeast corner in the position of a Gothic church’s “Lady Chapel.” The Little Chapel was modified between 1924 and 1928 to match the style of the Church of Saint George. The Little Chapel now exhibits a parapeted gable roof, Gothic pointed-arch doorway, diamond-paned leaded casement windows, and exposed roof beams and trusses. At the time of its inclusion on the NRHP, the slate roof and gutters of the Little Chapel were in disrepair (Cavanaugh, 2004: Section 7, pg. 3-5).

The Memorial Schoolhouse

The Memorial Schoolhouse is a two and one half-story red brick building built in the Tudor Revival style. It was constructed between 1921 and 1923 as a memorial to the alumni of the school who died in World War I. It has cast stone trim, a multi-gabled slate roof, and a wood-framed cupola. The main entranceway is semi-hexagonal with an arched doorway and Renaissance detailing. A miniature turret is adjacent to the north slype door. The schoolhouse is oriented on an east-west axis, and its primary façade faces the south. The schoolhouse is in very good condition, and retains full integrity of setting, feeling, and association (Cavanaugh, 2004: Section 7, pg. 6-11).

The Church of Saint George

The Church of Saint George was constructed between 1924 and 1927 by one of the major church architects of his generation, Ralph Adams Cram of the Boston firm of Cram & Ferguson. According to the St. George’s School NRHP registration form, “the Gothic Revival Style Church of St. George (commonly referred to as “the Chapel”) is not only the most visually prominent, but also the most historically and architecturally significant building on campus” (Cavanaugh, 2004; Section 7, pg. 12).

While notably smaller than medieval period counterparts, the Church of Saint George presents the Gothic feelings of height and weightlessness. Character defining features include: the stone materials; the

buttresses; the rib-vaulted roof; the pointed-arch window and door openings; the stained-glass windows outlined with stone tracery; the cloister with its fan-vaulting, pointed arches and stone tracery; the great tower; and the copious ornamentation inside and out (Cavanaugh, 2004: Section 7, pg. 12).

The Church of Saint George was constructed primarily of gray limestone, with areas of marble, granite and limestone interior. The roof is lead coated copper. The church is arranged in a T-shape, with a long nave running east-west and a short transept at the west end. The nave and the transept have end-gabled roofs. The church has four exterior towers, with the largest square tower rising 147 feet. A long, narrow, two-story stone structure called a slype connects the church with the Memorial Schoolhouse (Cavanaugh, 2004: Section 7, pg. 12).

3.7.2 *Historic Context*

The St. George's School was founded as an Episcopal school for boys in 1896 by Mr. John Byron Diman, a deacon in the Episcopal Church and alumnus of Brown, Cambridge, and Harvard. At the time, Rhode Island did not have a state-supported public high-school system, so the St. Georges School filled the need for private education. Originally the school rented a location in Newport, before relocating in 1901 to the present-day location due to Diman's love of the "rural, naturalistic qualities and extensive ocean views" (Cavanaugh, 2004; Section 8, pg. 45). By 1906 the school had 88 students, and construction of new campus buildings included classrooms, dormitories, residences, a dining hall and other supporting facilities. The Little Chapel was constructed between 1909 and 1911 to serve as a place for morning communion services, confirmation classes, Bible study, and community meetings. The Memorial Schoolhouse, constructed between 1921 and 1923, was built to memorialize those school alumni who had died in World War I. The Church of Saint George, constructed between 1924 and 1928, was built to provide religious services to the entire Episcopal community of St. George's School (Cavanaugh, 2004: RIHPC, 1979a:31).

3.7.3 *NRHP Criteria and the Maritime Visual Setting*

The St. Georges School is significant under NRHP Criterion A for reflecting the rise of faith-based private education in America, particularly of Episcopal boarding schools in New England, at the end of the 19th century and the beginning of the 20th century. Collectively and individually, the three buildings which comprise the NRHP listing are also significant Under Criterion C. The Little Chapel and the Memorial Schoolhouse both represent the Tudor Revival style. The Church of St. George is a masterpiece of English Gothic Revival ecclesiastical architecture, representing the work of one of the major church architects of his generation, Ralph Adams Cram of the Boston firm of Cram & Ferguson (Cavanaugh, 2004: Section 8, pg. 33).

The extensive and magnificent ocean views contribute to the St. George's School's integrity of setting, feeling, and association as they were a primary reason that founder John Diman chose the location. Layout and orientation of the campus buildings in relation to the east and south facing views was also considered during construction. The St. George's School was listed in the NRHP in 2004.

3.8 The Indian Avenue Historic District

3.8.1 *Physical Description and Existing Conditions*

The Indian Avenue Historic District, previously known as the Indian Avenue Historic District, is located in the eastern portion of Middletown, between Green End Avenue on the north and Third Beach Road on the south. The district encompasses a one-quarter mile section of Indian Avenue and contains approximately a dozen noteworthy Late Victorian and early twentieth century structures. An 1884 stone chapel, St. Columba's Chapel, is located nearby (RIHPC, 1979a:13). Most of the houses are located to the east of Indian Avenue, overlooking the Atlantic Ocean, with many consisting of one-and-a-half to two-story houses set back from the road and obscured by trees. The original homes were typically constructed from stone or vertical board-and-batten walls. Additional outbuildings, such as carriage houses, were and continue to be a common feature of these large estates (RIHPC, 1979a:14-15).

The land gently rises from sea level at the river's shore to just over 50 feet at the district's northwestern corner. Just south of Vancluse Avenue, which forms part of the district's western edge, a small creek crosses Indian Avenue and meanders into the Sakonnet River east of the intersection of Vancluse and Indian Avenues. The district's principal properties comprise a large, early twentieth century multiple resource estate with landscaped grounds, subdivided in the late twentieth century. It is comprised of four contributing buildings, five non-contributing buildings, and two discrete contributing sites. The contributing buildings include 75 Vancluse Avenue, 501 Indian Avenue, 502 Indian Avenue, 515 Indian Avenue, 521 Indian Avenue. The properties were largely divided from the Edward C. Knight, Jr. estate (Stonybrook) designed by Horace Trumbauer in 1928. In addition to the main house on a waterfront lot, the Knight estate extended across Indian Avenue, with formal gardens and outbuildings in the same style as Stonybrook (i.e., Late Gothic Revival) (Woodward, 2009).

3.8.2 *Historic Context*

From the time of European settlement in the eighteenth century until the mid-nineteenth century, the land within the Indian Avenue Historic District was primarily utilized for agriculture. A farmhouse stood at each end of the present-day district. In addition, a ferry landing near the end of Green End Avenue, originally known as Taggart's Ferry, carried farm produce between Little Compton and Newport until about 1870 (RIHPC, 1979a:13).

After the Civil War, the nearby town of Newport saw a marked increase in the purchase and construction of summer estates. Inspired by this growth, Eugene Sturtevant began his effort to make Middletown the "court end of the island" in 1871 (RIHPC, 1979a:6). Sturtevant and a partner purchased two and a half miles of farmland along the Sakonnet shore and money was invested into a 5-mile fenced road (Indian Avenue). The plat featured the road flanked by one hundred rectilinear lots, with an average frontage of 200 feet and depths of 400 feet or more (Woodward, 2009). The Indian Avenue neighborhood developed on a small scale, with the first purchases being made by Philadelphia and Hartford families. The advent of the automobile attracted more development within the district, as it was easier to drive the 3.5 miles from Newport (RIHPC, 1979a:13).

For the first three decades of the twentieth century, many new summer estates were constructed, though much of the original plat remained in agricultural use (Woodward, 2009). A pattern of summer estates with ample landscaped grounds interspersed with occasional farm fields defined the district in the decades after World War II. In the last quarter of the twentieth century another round of development added a new generation of large houses, filling in formerly undeveloped land or subdivided portions of the earlier estates (Woodward, 2009; RIHPC, 1979a:13).

3.8.3 *NRHP Criteria and the Maritime Visual Setting*

The Indian Avenue Historic District was added to the NRHP in 2009 under Criterion C. According to the NRHP Nomination Form (Woodward, 2009), the district is a "...notable example of the high-style residential development associated with the growth of an extensive summer-resort society that was centered in Newport, Rhode Island and spread into the neighboring towns of Middletown, Portsmouth, and Jamestown in the late nineteenth and early-twentieth centuries. The district... is the community's largest, most fully developed, and most intact representative of this phenomenon." In addition, it represents the work of a prominent architect of the time, Horace Trumbauer, and exemplified a style of life common to other sections of Middletown (RIHPC, 1979a:13). The district as a whole derives historic significance from its seaside location and maritime visual setting, as the location specifically relied on its coastal setting and maritime view in order to attract homeowners. According to the Rhode Island Historical Preservation & Heritage Commission (1979a:13), the maritime visual setting was an important aspect of the estates and District, as the "well sited lots afford[ed] good views of the river and ocean."

3.9 The Whetstone

3.9.1 *Physical Description and Existing Conditions*

The Whetstone is a two-story Early Victorian structure with two brick interior chimneys, round-head dormers, a front porch, and several additions. It is sited on the bluff overlooking Whetstone Point and Long Rock and Sachuest Bay at 455 Tuckerman Avenue (RIHPC, 1979a:34). The house is located approximately 100 meters from the shoreline and at approximately 40 feet above mean sea level, overlooking the Atlantic Ocean. The Whetstone is currently a privately owned home.

3.9.2 *Historic Context*

The Whetstone was built in 1860 by Lewis P. W. Balch, a doctor from New York, prior to the growth of Newport's summer colony after the Civil War (RIHPC, 1979a:6, 34). Prior to this, the Whetstone home was primarily located within a rural and agricultural environment. After the Civil War, increased construction in summer houses occurred on the south and east side of Tuckerman Avenue, as the lots offered views of the Atlantic Ocean. During the twentieth century, additional houses and roads were constructed to the north of the Whetstone. Currently, the Whetstone house is located within a moderately dense residential area.

3.9.3 *NRHP Criteria and the Maritime Visual Setting*

The Whetstone is an NRHP-eligible resource and appears to meet Criterion C. The house is a typical example of a mid-nineteenth century residence within Middletown, Rhode Island, embodying the distinctive characteristics of the type, period, or methods of construction. In addition, the house is in keeping with the vernacular building tradition of coastal New England. The property's natural landscape and maritime visual setting are a key component of its historic significance as a mid-nineteenth century vernacular seaside residence.

3.10 The Land Trust Cottages

3.10.1 *Physical Description and Existing Conditions*

The Land Trust Cottages are a group of five Shingle-style houses located off of Purgatory Road, at the east end of Easton Beach. The cottages are comprised primarily of two-and-a-half-story, gambrel-roof structures closely grouped together located between a tall hedgerow along Purgatory Road and Easton Bay.

3.10.2 *Historic Context*

The Land Trust Cottages were laid out for development in 1885-1887 under the guidance of Frederick Law Olmsted. The cottages were constructed as part of a wave of post-Civil War development in Middletown and Newport, primarily by businessmen and investors from Boston. In 1887-1888 E. B. Hall, a Boston builder, erected the cottages on a relatively small lot, positioned to take advantage of views of Easton Bay. The cottages have remained private residences since their construction, with relatively minimal alteration to materials or form (Nebiker and Kennedy, 1990; Jordy, 2012; Dunn, 2014).

3.10.3 *NRHP Criteria and the Maritime Visual Setting*

The Land Trust Cottages were included in the *Historic and Architectural Resources of Middletown RI* multi-property documentation form (Nebiker and Kennedy, 1990), but have not been formally listed on the NRHP. The RIHPHC have classified the property as potentially eligible for listing on the NRHP. The Land Trust Cottages appear to meet NRHP eligibility Criterion C as an intact, representative example of seaside Shingle-style residences, as well as for the associations with Frederick Law Olmsted. The coastal location and maritime visual setting of the cottages are a key component of their historic significance as late-nineteenth century summer cottages.

3.11 The Bluff/John Bancroft Estate

3.11.1 *Physical Description and Existing Conditions*

The Bluff/John Bancroft Estate is located at 575 Tuckerman Avenue. The property extends from the roadway to the bluffs overlooking Sachuest Bay. The building is an irregular-shaped, five-story Shingle-style residence originally constructed in 1895, converted into apartments in 1950, and renovated into ten luxury condominiums in 2006.

3.11.2 Historic Context

The Bluff/John Bancroft Estate was designed by architect William Ralph Emerson (regarded as one of the leading architects of the Shingle Style) for John Chandler Bancroft, a businessman and artist and collector of Japanese art from Boston, with a Japanese garden designed by Frederick Law Olmsted. The house was constructed on a bluff overlooking Sachuest Bay to take advantage of the sweeping views of the bay. The house was constructed as part of a wave of post-Civil War development in Middletown and Newport, primarily by businessmen and investors from Boston. Although Bancroft passed away in 1901, the building is still associated with his name due to his connections and contributions to the art world of Rhode Island in the late nineteenth century (RIHPC, 1979; Sieger, 2000; Historic New England, 2016; Dunn, 2017; WUC, 2020).

3.11.3 NRHP Criteria and the Maritime Visual Setting

The Bluff/John Bancroft Estate was included in the *Historic and Architectural Resources of Middletown RI* multi-property documentation form (Nebiker and Kennedy, 1990), but has not been formally listed on the NRHP. The RIHPC have classified the property as potentially eligible for listing on the NRHP. The Bluff/John Bancroft Estate appears to meet NRHP eligibility National Register Criterion A for its associations with John Chandler Bancroft, and Criterion C as an intact, representative example of the work of William Ralph Emerson, a prominent New England architect renowned for his Shingle-style designs, as well as the associations with Frederick Law Olmsted, who designed the Japanese garden on the property that is partially intact. The property's coastal location and uninterrupted maritime visual setting are a key component of its historic significance as a mid-nineteenth century seaside estate.

4.0 MITIGATION MEASURES

Mitigation measures at the historic properties are detailed in this section. These mitigation measures were developed in consultation with the Participating Parties by individuals who meet the Secretary of the Interior's *Professional Qualifications Standards* (36 CFR Part 61) and are appropriate to fully address the nature, scope, size, and magnitude of adverse effects including cumulative effects caused by the Project, NRHP-qualifying characteristics of each historic property that would be affected. These mitigation measures also include actions to respond to some reasonably foreseeable hazards unrelated to the Project that pose risks to the long-term preservation of affected historic properties, such as climate change.

4.1 Support Ongoing Maintenance and Aesthetic Improvements to the Third Beach Road and Hanging Rocks Road through Stone Wall Preservation and Observation Trails within the Paradise Rocks Historic District

4.1.1 Purpose and Intended Outcome

Per the request of the Norman Bird Sanctuary, Revolution Wind will provide funding to support the ongoing implementation of resiliency measures, ongoing maintenance, and/or aesthetic improvements to the historic stone walls along Third Beach Road and Hanging Rocks Road to ensure the long-term preservation of these historic and cultural resources. In addition, the funding may be used toward the ongoing improvement to the Norman Bird Sanctuary's Coastal Trail to provide support for viewing platforms and other trail improvements to enjoy and observe these historic and cultural resource.

4.1.2 Scope of Work

This scope of work will consist of the following:

- Review existing Town of Middletown Charter and Code of Ordinances;
- Review existing planning documents, guidance, and regulations;
- Review, photograph and document existing conditions;
- Solicit public engagement to discuss preservation priorities;
- Develop a draft plan, including drawings if necessary, to be distributed to the Participating Parties for review and comment;
- Develop a final plan, including drawings if necessary to be distributed to the Participating Parties;
- Complete project;
- Develop a draft report of work completed, including as-built documentation and photographs to be distributed to the Participating Parties for review and comment; and
- Develop the final report to be distributed the Participating Parties.

4.1.3 Methodology

Revolution Wind will release a request for proposals (RFP) for consultant services and select a consultant to perform the scope of work listed in Section 4.1.2.

4.1.4 Standards

The mitigation measure will comply with following standards:

- Town of Middletown Charter and Code of Ordinances; and
- The Secretary of the Interior's *Standards for the Treatment of Historic Properties* (36 CFR 68).

4.1.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Proposals by qualified consultants in response to the RFP;
- Photographs and documentation of existing conditions;
- Draft plan;
- Final plan;
- Draft report of work completed, including as-built documentation; and
- Final report.

4.1.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

4.2 Updated Town-Wide Historic Resources Survey

4.2.1 Purpose and Intended Outcome

Per the request of RIHPHC, Revolution Wind will provide funding to hire a Secretary of the Interior (SOI) qualified professional to complete an update of the existing Historic and Architectural Resources of Middletown, Rhode Island: A Preliminary Report, which was completed in 1979. The updated town-wide historic resources survey will identify and document historic and potentially historic properties located within the Town of Middletown.

4.2.2 Scope of Work

The scope of work will consist of the following:

- Review the existing Historic and Architectural Resources of Middletown, Rhode Island: A Preliminary Report;
- Review existing historic property documentation available at local repositories and the RIHPHC files;
- Develop a methodology for completion of the survey to be distributed to the Participating Parties for review and comment;
- Complete survey per the approved methodology;

- Develop a draft survey report to be distributed to the Participating Parties for review and comment; and
- Develop final report, addressing the comments received, to be distributed to the Participating Parties.

4.2.3 Methodology

Revolution Wind will release a request for proposals (RFP) for consultant services for the scope of work and select a consultant to perform the scope of work listed in Section 4.1.2. The consultant should be a SOI qualified professional and have demonstrated knowledge and experience in completing town-wide architectural surveys.

4.2.4 Standards

The exhibit will conform to the following standards:

- The Secretary of the Interior's *Professional Qualifications Standards* (36 CFR Part 61), as applicable; and
- RIHPHC guidance.

4.2.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- Request for Proposals (RFP);
- Proposals by qualified consultants in response to the RFP;
- Preliminary draft report; and
- Final report.

4.2.6 Funds and Accounting

Funding amounts were determined to be sufficient by BOEM in consultation with the consulting parties and are identified in an attachment to the MOA.

5.0 IMPLEMENTATION

5.1 Timeline

The timeline for implementation of the mitigation measures is identified in the MOA.

5.2 Organizational Responsibilities

5.2.1 *Bureau of Ocean Energy Management (BOEM)*

BOEM remains responsible for making all federal decisions and determining compliance with Section 106. BOEM has reviewed this HPTP to ensure, at minimum, it includes the content required.

- BOEM remains responsible for making all federal decisions and determining compliance with Section 106;
- BOEM, in consultation with the Participating Parties, will ensure that mitigation measures adequately resolve adverse effects, consistent with the NHPA;
- BOEM will be responsible for sharing the annual summary report with the Participating Parties; and
- BOEM is responsible for consultation related to dispute resolution.

5.2.2 *Revolution Wind, LLC*

Revolution Wind will be responsible for the following:

- Considering the comments provided by the Participating Parties in the development of this HPTP;
- Funding the mitigation measures specified in Section 4.0;
- Completion of the scope/s of work in Section 4.0;
- Ensuring all Standards in Section 4.0 are met;
- Providing the Documentation in Section 4.0 to the Participating Parties for review and comment;
- Annual Reporting to BOEM; and
- Revolution Wind will be responsible for ensuring that all work that requires consultation with Tribal Nations are performed by professionals who have demonstrated professional experience consulting with federally recognized Tribes.

5.2.3 *Other Parties, as Appropriate*

Revolution Wind does not anticipate additional consulting parties, should any be determined, this will be updated.

5.3 Participating Party Consultation

This HPTP was provided by Revolution Wind for review by Participating Parties to provide meaningful input on the resolution of adverse effects to and form(s) of implementing mitigation at the historic properties. Participating Parties were provided the opportunity for review and comment on the HPTP concurrent with BOEM's NEPA substitution schedule for the Project. This HPTP was further refined through informational

and consultation meetings, conference calls, HPTP draft reviews and document exchanges, or similar means of communication of information.

6.0 REFERENCES

Cavanaugh, K. 2004. St. Georges School. Prepared by Conservation Technology Group, Newport, RI for the United States Department of the Interior. Washington, D.C.

Code of Federal Regulations (CFR). 2021a. 36 CFR 800 – Protection of Historic Properties [incorporating amendments effective December 15, 2021]. Available at <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800>. Accessed December 21, 2021.

CFR. 2021b. 36 CFR 61.4(e)(1) – Procedures for State, Tribal, and Local Government Historic Preservation Programs [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4\(e\)\(1\)](https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4(e)(1)). Accessed December 21, 2021.

CFR. 2021c. 36 CFR 65.2(c)(2) – National Historic Landmarks Program – Effects of Designation [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2\(c\)\(2\)](https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2(c)(2)). Accessed December 21, 2021.

CFR. 2022. 40 CFR 1500 – National Environmental Policy Act Implementing Regulations. Available at <https://www.ecfr.gov/current/title-40/chapter-V/subchapter-A>. Accessed January 7, 2022.

Connors, Edward. 2007. "Smith-Gardiner-Norman Farm Historic District." National Register of Historic Places Inventory/Nomination Form. Middletown, Newport County, Rhode Island. May 2007.

Dunn, Christine. 2014. "Shingle-style Middletown Cottage Has Long, Colorful History." *The Providence Journal*. Real Estate section. November 7, 2014. Available at: <https://www.providencejournal.com/story/business/real-estate/2014/11/08/20141108-shingle-style-middletown-cottage-has-long-colorful-history-ece/35263620007/>. Accessed July 2022.

Dunn, Christine. 2017. "Middletown Condo Sells for \$1.9M." *The Providence Journal*. Real Estate section. September 22, 2017. Available at: <https://www.providencejournal.com/story/business/real-estate/2017/09/22/real-estate-notes-middletown-condo-sells-for-19m/18753782007/>. Accessed July 2022.

Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR). 2023. *Historic Resources Visual Effects Analysis, Revolution Wind Farm*. Syracuse, NY. July 2022.

Federal Register. 1997. 62 FR 33708 – The Secretary of the Interior’s Historic Preservation Professional Qualifications Standards. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/app/details/FR-1997-06-20/97-16168>. Accessed December 21, 2021.

Historic New England. 2016. "William Ralph Emerson: Father of the Shingle Style." Available at <https://www.historicnewengland.org/william-ralph-emerson-father-of-the-shingle-style/>. Accessed July 2022.

Jordy, William. 2012. "Land Trust Cottages", [Middletown, Rhode Island], SAH Archipedia, eds. Gabrielle Esperdy and Karen Kingsley, Charlottesville: UVaP, 2012. Available at: <http://sah-archipedia.org/buildings/RI-01-MI13>. Accessed July 2022.

Nebiker, Walter, and Pamela A. Kennedy. 1990. *Historical Architectural Resources of Middletown, R. I.: 1636-Present*. National Register of Historic Places Multiple Property Documentation Form. Prepared by the Rhode Island Historical Preservation & Heritage Commission, Providence, Rhode Island.

Nebiker, Walter, Ancelain V. Lynch, and Pamela A. Kennedy. 1984. *Bailey Farm*. National Register of Historic Places Inventory Nomination Form. Prepared by the Rhode Island Historical Preservation & Heritage Commission, Providence, Rhode Island.

Revolution Wind, LLC. 2022. *Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project*. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan>. Accessed January 12, 2022.

Rhode Island Historical Preservation & Heritage Commission (RIHPC). 1979a. *Historical Architectural Resources of Middletown, R. I.: A Preliminary Report*. June 1979. Available at https://preservation.ri.gov/sites/g/files/xkgbur406/files/pdfs_downloads/survey_pdfs/middletown.pdf. Accessed February 4, 2022.

RIHPC. 1979b. *Bailey Farm*. National Register of Historic Places Inventory Nomination Form. United States Department of the Interior. Washington, D.C.

Sanborn Map Co. (Sanborn). 1921. *Atlas of Newport, Jamestown, Middletown and Portsmouth, Rhode Island*. New York: 1921.

Sea View Villa. n.d. *History of Sea View Villa*. Available at <https://www.seaviewvillanewport.com/history>. Accessed February 9, 2022.

Sieger, William B. 2000. *John Chandler Bancroft and Art in Newport and New England in the 1860s*. Journal of the Newport Historical Society. Vol 71. Iss. 247. Available at <https://digitalcommons.salve.edu/newporthistory/vol71/iss247/2/>. Accessed June 2022.

St. George's School. n.d. *St. George's School*. Available at <https://www.stgeorges.edu/>. Accessed February 23, 2022.

Town of Middletown. 2015. *Middletown Rhode Island Comprehensive Community Plan*. Available at <https://www.middletownri.com/210/Comprehensive-Plan>, Accessed February 2022.

Town of Middletown. 2019. *Strategy for Reducing Risks from Hazards in Middletown, Rhode Island: A Multi-Hazard Mitigation Strategy, 2019 Update*. Available at <https://www.middletownri.com/DocumentCenter/View/347/2019-Update-Strategy-for-Reducing-Risks-From-Hazards-in-Middletown-Rhode-Island---A-Multi-Hazard-Mitigation-Strategy-PDF>. Accessed February 8, 2022.

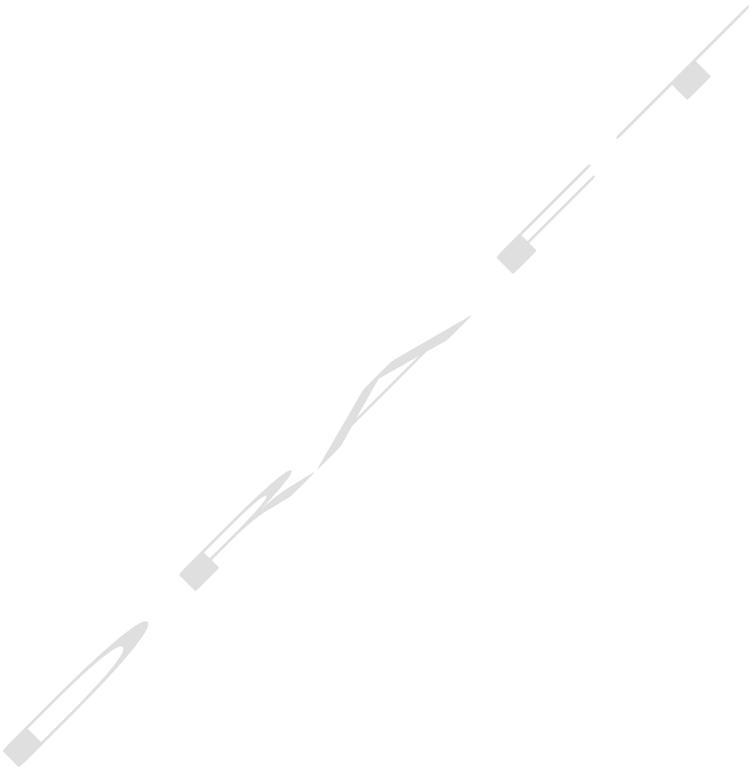
United States Code. 2016. Title 54 - National Historic Preservation Act [as amended through December 16, 2016]. Available at <https://www.achp.gov/sites/default/files/2018-06/nhpa.pdf>. Accessed December 21, 2021.

Werenfels, M. 1995. *Clambake Club of Newport*. National Register of Historic Places Inventory Nomination Form. Prepared by Conservation Technology Group, Newport, RI for the United States Department of the Interior. Washington, D.C.

What's Up Crew. 2020. *Bancroft on the Bluff's Penthouse sells for \$2.5 million*. What's Up Newp. <https://whatsupnewp.com/2020/12/bancroft-on-the-bluffs-penthouse-sells-for-2-5-million/>. Accessed June 2022.

Woodward, William Mackenzie. 2009. "Stonybrook Estate Historic District." National Register of Historic Places Inventory/Nomination Form. Middletown, Newport County, Rhode Island. June 30, 2009.

**ATTACHMENT 13 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE
REVOLUTION WIND FARM, NINE HISTORIC PROPERTIES SUBJECT TO ADVERSE
EFFECTS IN THE TOWN OF AQUINNAH, DUKES COUNTY, MASSACHUSETTS**



Historic Property Treatment Plan

for the

Revolution Wind Farm

Nine Historic Properties

Town of Aquinnah, Dukes County, Massachusetts

Submitted to:



Bureau of Ocean Energy Management
U.S. Department of the Interior

Prepared for:



Revolution Wind, LLC

<https://revolutionwind.com/>

Prepared by:



Environmental Design & Research, D.P.C.

217 Montgomery Street, Suite 1100

Syracuse, New York 13202

www.edrdpc.com

June 2023

ABSTRACT

Federal Undertaking: Revolution Wind Farm and Revolution Wind Export Cable Project

Location: Outer Continental Shelf and Rhode Island

Federal and
State Agencies: Bureau of Ocean Energy Management
National Park Service
U.S. Army Corps of Engineers
Massachusetts Historical Commission
Rhode Island Historical Preservation & Heritage Commission
New York Historic Preservation Office
Connecticut Historic Preservation Office
Advisory Council on Historic Preservation

Regulatory Process: National Environmental Policy Act
Section 106 of the National Historic Preservation Act
Section 110(f) of the National Historic Preservation Act

Purpose: This Historic Property Treatment Plan provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects from the Revolution Wind Project.

Adverse Visual
Effect Finding for: 71 Moshup Trail
The Leonard Vanderhoop House
The Edwin DeVries Vanderhoop Homestead
The Tom Cooper House
The Theodore Haskins House
3 Windy Hill Drive
The Gay Head-Aquinnah Town Center Historic District
The Gay Head-Aquinnah Shops
The Gay Head-Aquinnah Coast Guard Station Barracks

Submitted By: Revolution Wind, LLC

Date: June 2023

TABLE OF CONTENTS

1.0	Executive Summary	1
2.0	Background Information	3
2.1	Project Overview: Revolution Wind Farm and Revolution Wind Export Cable.....	3
2.2	Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)	4
2.2.1	Municipal Regulations.....	4
2.2.2	Preservation Easements and Restrictions.....	4
2.3	Participating Parties	4
3.0	Existing Conditions, Historic Significance, and Maritime Setting	6
3.1	Historic Properties	6
3.2	Maritime Setting.....	7
3.3	71 Moshup Trail.....	8
3.3.1	Physical Description and Existing Conditions.....	8
3.3.2	Historic Context.....	9
3.3.3	NRHP Criteria and the Maritime Visual Setting	9
3.4	The Leonard Vanderhoop House.....	9
3.4.1	Physical Description and Existing Conditions.....	9
3.4.2	Historic Context	10
3.4.3	NRHP Criteria and the Maritime Visual Setting	10
3.5	The Tom Cooper House	10
3.5.1	Physical Description and Existing Conditions.....	10
3.5.2	Historic Context.....	11
3.5.3	NRHP Criteria and the Maritime Visual Setting	11
3.6	The Theodore Haskins House	11
3.6.1	Physical Description and Existing Conditions.....	11
3.6.2	Historic Context.....	11
3.6.3	NRHP Criteria and the Maritime Visual Setting	11
3.7	3 Windy Hill Drive	12
3.7.1	Physical Description and Existing Conditions.....	12
3.7.2	Historic Context.....	12
3.7.3	NRHP Criteria and the Maritime Visual Setting	12
3.8	The Edwin DeVries Vanderhoop Homestead.....	12
3.8.1	Physical Description and Existing Conditions.....	12
3.8.2	Historic Context.....	13
3.8.3	NRHP Criteria and the Maritime Visual Setting	13

3.9	Gay Head – Aquinnah Town Center Historic District.....	13
3.9.1	Physical Description and Existing Conditions.....	13
3.9.2	Historic Context.....	16
3.9.3	NRHP/NHL Criteria and the Maritime Visual Setting	18
3.10	Gay Head – Aquinnah Shops.....	18
3.10.1	Physical Description and Existing Conditions.....	18
3.10.2	Historic Context.....	21
3.10.3	NRHP/NHL Criteria and the Maritime Visual Setting	21
3.11	Gay Head – Aquinnah Coast Guard Station Barracks.....	22
3.11.1	Physical Description and Existing Conditions.....	22
3.11.2	Historic Context.....	22
3.11.3	NRHP/NHL Criteria and the Maritime Visual Setting	22
4.0	Mitigation Measures.....	23
4.1	Americans with Disabilities Act-Compliant Access for The Aquinnah Shops	23
4.1.1	Purpose and Intended Outcome	23
4.1.2	Scope of Work.....	23
4.1.3	Methodology.....	23
4.1.4	Standards	24
4.1.5	Documentation.....	24
4.1.6	Funds and Accounting.....	24
4.2	Weatherization of the Edwin D. Vanderhoop Homestead	24
4.2.1	Purpose and Intended Outcome	24
4.2.2	Scope of Work.....	24
4.2.3	Methodology.....	25
4.2.4	Standards	25
4.2.5	Documentation.....	25
4.2.6	Funds and Accounting.....	25
5.0	Implementation	26
5.1	Timeline.....	26
5.2	Organizational Responsibilities	26
5.2.1	Bureau of Ocean Energy Management (BOEM)	26
5.2.2	Revolution Wind, LLC	26
5.2.3	Other Parties, as Appropriate.....	26
5.3	Participating Party Consultation	26
6.0	References.....	28

LIST OF FIGURES

Figure 2.1-1. Project Location.....3
Figure 3.1-1. Historic Property Location.....7
Figure 3.10-1. Aquinnah Shops Site Map 19

LIST OF TABLES

Table 3.1-1. Historic Properties included in the HPTP6
Table 3.9-1. Contributing buildings within the Gay Head – Aquinnah Town Center Historic District..... 14

LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
ADLS	Aircraft Detection Lighting System
APE	Area of Potential Effects
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
COP	Construction and Operations Plan
DEIS	Draft Environmental Impact Statement
EDR	Environmental Design and Research, D.P.C.
FEIS	Final Environmental Impact Statement
FR	Federal Regulation
HPTP	Historic Property Treatment Plan
MHC	Massachusetts Historical Commission
MOA	Memorandum of Agreement
NHL	National Historic Landmark
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
PAPE	Preliminary Area of Potential Effects
RFP	Request for Proposal
RIHPHC	Rhode Island Historical Preservation & Heritage Commission
ROD	Record of Decision
RWF	Revolution Wind Farm
TCP	Traditional Cultural Property
WTG	Wind turbine generator

1.0 EXECUTIVE SUMMARY

This Historic Property Treatment Plan (HPTP) for 71 Moshup Trail, which is a Massachusetts Historical Commission (MHC) Inventory Site; the Leonard Vanderhoop House, which is a MHC Inventory Site; the Edwin DeVries Vanderhoop Homestead, which is listed on the National Register of Historic Places (NRHP); the Tom Cooper House, which is an MHC Inventory Site; the Theodore Haskins House, which is an MHC Inventory Site; 3 Windy Hill Drive, which is an MHC Inventory Site; the Gay Head – Aquinnah Town Center Historic District, which is listed on the NRHP; the Gay Head – Aquinnah Shops, which is an MHC Inventory Site; and the Gay Head-Aquinnah Coast Guard Station Barracks, which is an MHC Inventory Site (hereinafter, the historic properties) provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects in the *Historic Resources Visual Effects Analysis – Revolution Wind Farm* (HRVEA; EDR, 2023) for the Revolution Wind Farm (RWF) and Revolution Wind Export Cable Project (collectively, the Undertaking). Revolution Wind LLC (Revolution Wind) has provided this HPTP in accordance with the Bureau of Ocean Energy Management’s (BOEM) Findings of Adverse Effect (FoAE) for the Undertaking under the National Historic Preservation Act of 1966 (NHPA).

BOEM has used the National Environmental Policy Act (NEPA) substitution process to fulfill its Section 106 obligations as provided for in the NHPA implementing regulations (36 CFR § 800.8(c)), and BOEM has consulted with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, federally recognized Native American Tribes, and other NHPA Section 106 consulting parties in accordance with this process. Revolution Wind has provided this HPTP to BOEM for inclusion in the Final Environmental Impact Statement (FEIS).

This HPTP describes the mitigation measures to resolve adverse effects on historic properties, the implementation steps, and timeline for actions. The mitigation measures are based on the evaluations and outreach performed by Revolution Wind prior to the issuance of the DEIS as well as outreach to consulting parties performed by BOEM. This HPTP document has undergone revision and refinement in consultation with the Massachusetts State Historic Preservation Officer, the Rhode Island State Historic Preservation Officer, the ACHP, and other consulting parties throughout the NEPA substitution process. This HPTP is included in the Memorandum of Agreement (MOA) issued in accordance with 36 CFR §§ 800.8, 800.10.

This draft HPTP is organized into the following sections:

- **Section 1.0, Introduction**, outlines the content of this HPTP.
- **Section 2.0, Cultural Resources Regulatory Context**, briefly summarizes the Undertaking while focusing on cultural resources regulatory contexts (federal, tribal, state, and local, including preservation restrictions), identifies the historic properties discussed in this HPTP that will be adversely affected by the Undertaking, and summarizes the pertinent provisions and attachments of the HRVEA (EDR, 2023) and *Revolution Wind Farm Construction and Operations Plan* (COP; Revolution Wind, 2022) that guided the development of this document.

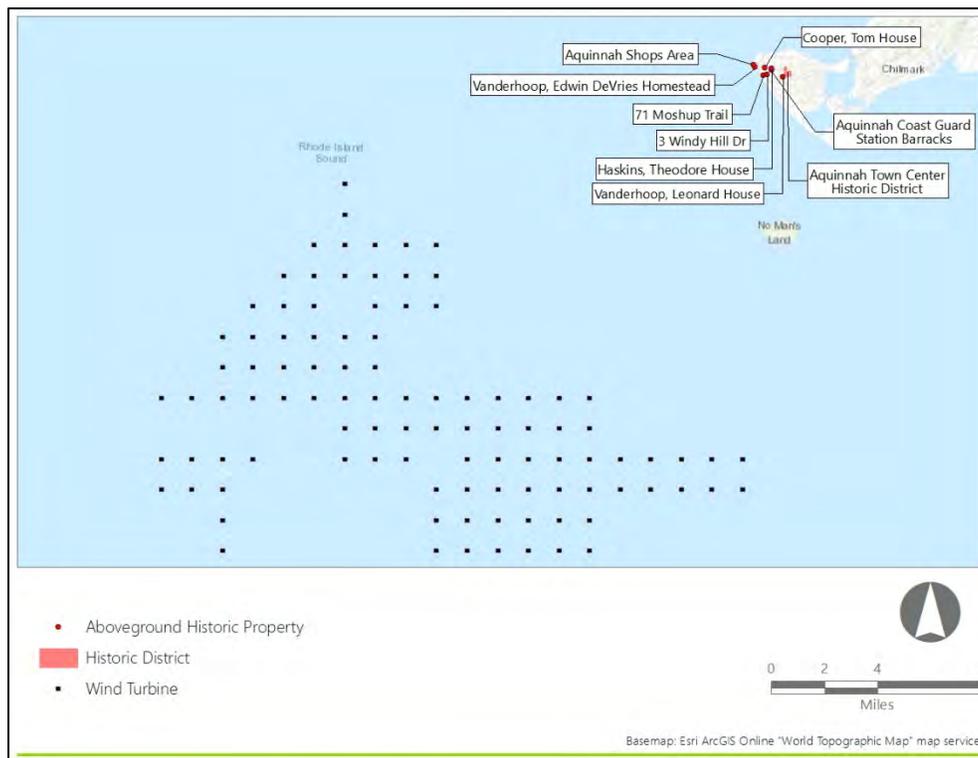
- **Section 3.0, Existing Conditions, Historic Significance, and Maritime Setting**, provides a physical description of the historic properties included in this HPTP. Set within its historic context, the applicable NRHP criteria for the historic properties are discussed with a focus on the contribution of a maritime visual setting to its significance and integrity.
- **Section 4.0, Mitigation Measures**, presents specific steps to carry out the mitigation actions. The mitigation action includes a detailed description, intended outcome, methods, standards, and requirements for documentation.
- **Section 5.0, Implementation**, establishes the process for executing mitigation actions at the historic properties, as identified in Section 4.0 of this HPTP. For each/the action, organizational responsibilities are outlined, a timeline is provided, and regulatory reviews are listed.
- **Section 6.0, References**, is a list of works cited in this HPTP.

2.0 BACKGROUND INFORMATION

2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable

The Undertaking is a wind-powered electric generating facility composed of up to 100 wind turbine generators (WTGs) and associated foundations, two offshore substations, and inter-array cables connecting the WTGs and the offshore substations (see Figure 2.1-1). The WTGs, offshore substations, array cables, and substation interconnector cables would be located on the Outer Continental Shelf approximately 15 nautical miles (18 statute miles) southeast of Point Judith, Rhode Island, approximately 13 nautical miles (15 statute miles) east of Block Island, Rhode Island, approximately 7.5 nautical miles (8.5 statute miles) south of Nomans Land Island National Wildlife Refuge (uninhabited island), and between approximately 10 to 12.5 nautical miles (12 to 14 statute miles) south/southwest of varying points of the Rhode Island and Massachusetts coastlines (62 FR 33708). In addition, two submarine export cables located in both federal waters and Rhode Island State territorial waters, will connect the offshore substation to the electrical grid. The proposed interconnection location for the Undertaking is the existing Davisville Substation, which is owned and operated by The Narragansett Electric Company d/b/a National Grid and located in North Kingstown, Rhode Island. The visible offshore components of the operational Undertaking will be located on Lease OCS-A 0486 in water depths ranging from approximately 108 to 125 feet.

Figure 2.1-1. Project Location



2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)

The regulations at 36 CFR § 800.8 provide for use of the NEPA process to fulfill a federal agency's NHPA Section 106 review obligations in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6. Under these provisions, issuance of a ROD and implementation of relevant conditions will resolve adverse effects to historic properties caused by the Undertaking, including to National Historic Landmarks (NHLs) for which BOEM must provide a higher standard of care, as required by Section 110(f) of the NHPA.

The measures to avoid and minimize adverse effects to identified historic properties are described in the COP (Section 4.4.1.3 and Appendix BB). This HPTP addresses the mitigation requirements identified by BOEM to resolve the remaining adverse effects after application of the above-referenced measures. The mitigation measures reflect consultations among consulting parties to refine a conceptual mitigation framework proposed by Revolution Wind.

All activities implemented under this HPTP will be conducted in accordance with any conditions imposed by BOEM in its ROD and with applicable local, state and federal regulations and permitting requirements. Responsibilities for specific compliance actions are described in further detail in Section 5.2 – Organizational Responsibilities.

2.2.1 Municipal Regulations

Before implementation, any on-site mitigation measures will be coordinated with local municipalities and commissions to obtain approvals, as appropriate. These may include, but are not limited to building permits, zoning, land use, planning, historic commissions, and design review boards. Additional information regarding compliance with local requirements appears in Section 5.0, Implementation.

2.2.2 Preservation Easements and Restrictions

Preservation easements and restrictions protect significant historic, archaeological, or cultural resources. The State of Massachusetts preservation restrictions are outlined in Massachusetts General Law Chapter 184, Sections 31-33. Any mitigation work associated with the historic properties will comply with the conditions of all extant historic preservation easements. Additional information regarding compliance with extant preservation restrictions appears in Section 5.0, Implementation. The MHC holds a preservation easement on the Aquinnah Public Library/Gay Head School (a contributing building to the Gay Head – Aquinnah Town Center Historic District) per Massachusetts General Law Chapter 184, Sections 31-33.

2.3 Participating Parties

BOEM initiated consultation under Section 106 with invitations to consulting parties on April 30, 2021. BOEM hosted the first Section 106-specific meeting with consulting parties on December 17, 2021 pursuant to Sections 106 and 110(f) of the NHPA and in accordance with 36 CFR 800.8.

Following BOEM initial Section 106 meeting with consulting parties, Revolution Wind held stakeholder outreach meetings (see Section 5.3) to review conceptual mitigation measures for the historic property and invited the following parties:

Historic Property Treatment Plan
Nine Historic Properties
Town of Aquinnah, Dukes County, Massachusetts

- The Wampanoag Tribe of Gay-Head (Aquinnah)
- The Martha's Vineyard Commission
- The Gay Head Lighthouse Advisory Committee
- The Town of Aquinnah
- The Massachusetts Historical Commission.¹

¹ MHC was invited to attend stakeholder outreach meetings regarding historic properties in Massachusetts; however, MHC has not participated in outreach meetings for Revolution Wind.

3.0 EXISTING CONDITIONS, HISTORIC SIGNIFICANCE, AND MARITIME SETTING

3.1 Historic Properties

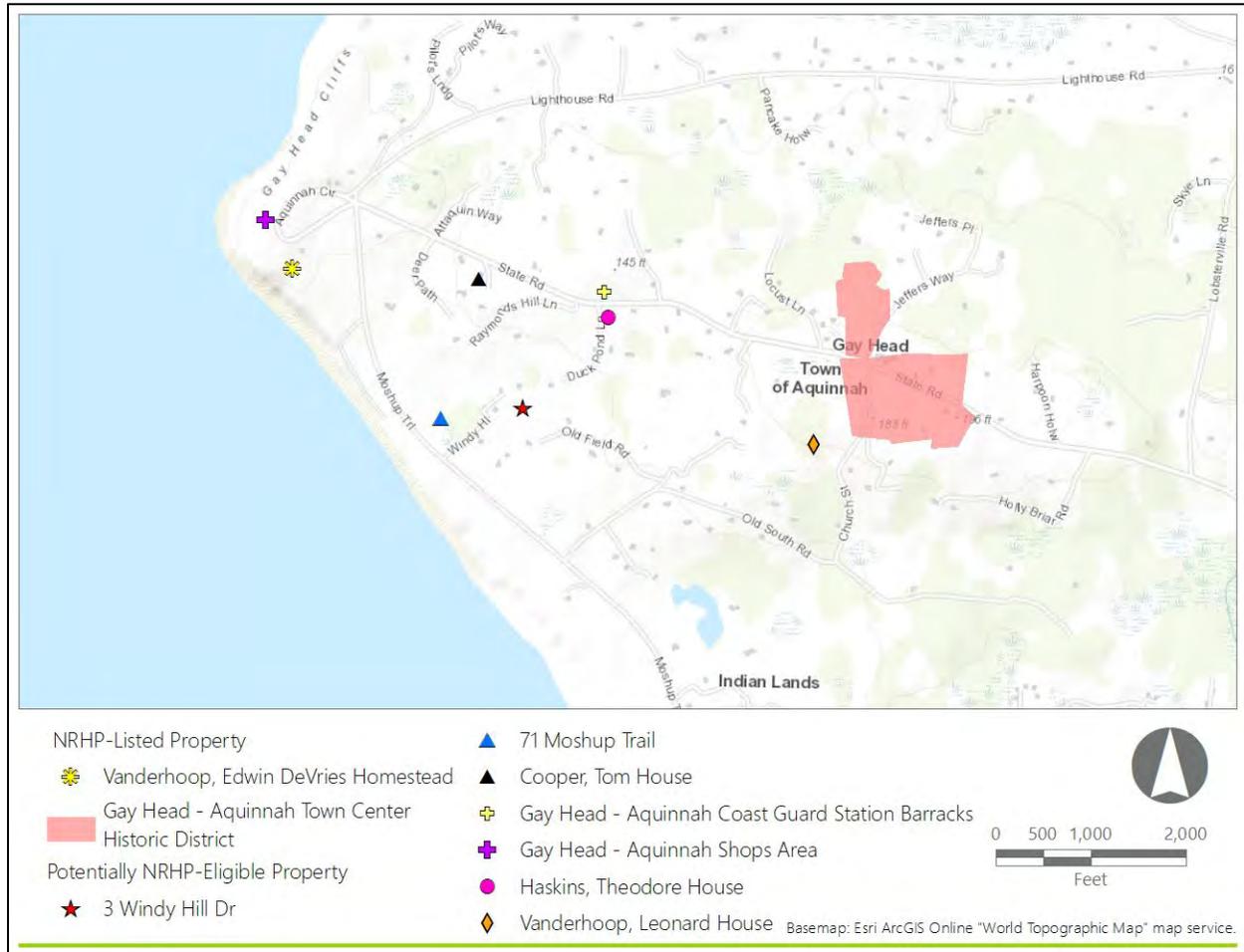
This HPTP addresses eight historic properties, as identified in Table 3.1-1 and located on Figure 3.1-1.

Table 3.1-1. Historic Properties included in the HPTP

Name	Property Designation	Municipality	State	Site No. (Agency)	Ownership	Historic Property Type
71 Moshup Trail	MHC Historic Inventory Site	Town of Aquinnah	MA	GAY.31 (MHC)	Private	Historic Buildings and Structures
Leonard Vanderhoop House	MHC Historic Inventory Site	Town of Aquinnah	MA	GAY.4 (MHC)	Private	Historic Buildings and Structures
Edwin DeVries Vanderhoop Homestead	NRHP-Listed	Town of Aquinnah	MA	GAY.40 (MHC); 06000784 (NPS)	Municipal	Historic Buildings and Structures
Tom Cooper House	MHC Historic Inventory Site	Town of Aquinnah	MA	GAY.53 (MHC)	Private	Historic Buildings and Structures
Theodore Haskins House	MHC Historic Inventory Site	Town of Aquinnah	MA	GAY.51 (MHC)	Private	Historic Buildings and Structures
3 Windy Hill Drive	MHC Historic Inventory Site	Town of Aquinnah	MA	GAY.55 (MHC)	Private	Historic Buildings and Structures
Gay Head – Aquinnah Town Center Historic District	NRHP-Listed	Town of Aquinnah	MA	GAY.A (MHC); 99000187 (NPS)	Municipal; Private	Historic Buildings and Structures
Gay Head – Aquinnah Shops	MHC Historic Inventory Site	Town of Aquinnah	MA	GAY.B (MHC)	Private; Tribal Nation	Historic Buildings and Structures

Gay Head- Aquinnah Coast Guard Station Barracks	MHC Historic Inventory Site	Town of Aquinnah	MA	GAY.52	Private	Historic Buildings and Structures
--	--------------------------------------	---------------------	----	--------	---------	--------------------------------------

Figure 3.1-1. Historic Property Location



In Sections 3.3. through 3.10, each property is described both physically and within its historic context, with a focus on the contribution of a maritime visual setting to the property’s significance and integrity.

3.2 Maritime Setting

For the purposes of this analysis and assessment, views of marine waters are considered critical aspects of maritime settings. The influence of the marine environment and related human activities on historical development patterns is extensive and may be expressed in areas without direct lines of sight to the sea. Although these types of setting may contribute to the significance of historic properties, they would not be subject to alteration as a result of the proposed undertaking and are not considered further in this document.

The historic properties included in this HPTP are all considered within the historic property type defined in the HRVEA as “Historic Buildings and Structures” which includes buildings and associated properties historically used as residences. Location and orientation of such properties is critical to understanding the nature of any associated maritime settings. Many historic houses were oriented to local roadways, with the front and rear elevations parallel to the nearby road’s alignment. Local roadways along the region’s shorelines often parallel the water’s edge and historic homes frequently shift in orientation along such coastal roads. This variation in orientation may strongly influence the associated views of marine waters that may form important elements of a property’s historic setting. Historic commercial fishing activities were focused along the eastern shores of Menemsha Pond, which afforded relatively sheltered harbor and access to Vineyard Sound to the north.

Topography and landcover also play critical roles in defining both the historic settings and existing visual settings for each historic property. Of these two factors, the latter has been generally subject to greater change since the period of original construction and/or period of significance for many historic properties located in the Town of Aquinnah. Mid- to late-twentieth century reforestation has transformed many of the formerly open, agrarian lands of Martha’s Vineyard and constrained local viewsheds from numerous buildings once set on or near agricultural or pasture lands (e.g. Seccombe, 2010). The extensive agricultural heritage in the area is now largely expressed by the stone walls constructed along former pastures, fields, and roads and the surviving farmhouses and barns. Post-1950 residential construction has affected the settings for a smaller number of historic properties but may have diminished the integrity of historic settings for specific properties. The extensive forest cover affords privacy in many residential areas, but limits direct ocean views.

The topography of Aquinnah is strongly influenced by the last glaciation. The elevated Gay Head (Aquinnah) Cliffs along the western shoreline and the highlands in the central section of the town were formed by deformation and upthrusting of ancient sediments as the ice advanced over the area approximately 24,000 years ago (Oldale and O’Hara, 1984). Where vegetation is absent or sparse, views towards the Project may be available from these higher elevations. The bordering areas along the Menemsha Pond to the east and along the southwestern shores have relatively low relief. Direct views of the ocean horizon are screened from Menemsha Pond by the Gay Head (Aquinnah) Cliffs. In the shoreline areas along the southwestern shores, even the commonly low tree and shrub canopies of the island may screen ground-level views of ocean due to the limited relief.

3.3 71 Moshup Trail

3.3.1 Physical Description and Existing Conditions

71 Moshup Trail is a one-and-one-half-story vernacular residence with a gable roof and wood shingle siding. Notable features include the semi-hexagonal tower and full-width porch on the primary (northeast elevation). Windows are generally two-over-two wood sash, and the primary entry door is offset on the northeast elevation. A single-story shed-roofed addition and a gabled dormer window are located on the

southwest elevation. The building has an asphalt shingle roof and rests on a stone foundation. A gable-roofed garage is also located on the roughly 9-acre lot.

3.3.2 *Historic Context*

Throughout the eighteenth century, most residential settlement was concentrated in the western and southern parts of the present-day Town of Aquinnah, which constituted the reservation lands of the Wampanoag Tribe of Gay Head (Aquinnah). Individual residences were linked by a network of paths, and by the mid-nineteenth century, several east-west roads connected the residential areas to the Gay Head Light and Clay Cliffs of Aquinnah to the west and the present-day Town of Chilmark to the east (Harrington, 1998a). In the 1860s, the “District of Gay Head” was established by the Massachusetts General Court. The district was incorporated as the Town of Gay Head in 1870, despite the objections of the Wampanoag residents, who viewed the town’s creation as the alienation of their lands in violation of the Federal Non-Intercourse Act of 1790 (WTGHA, 2022). At the time, tribal members accounted for all of the town’s 227 residents, and the survey and privatization of their land allowed non-tribal owners to acquire property in the town. By 1895, at least 18 non-tribal individuals owned land in the Town of Gay Head, and that number would increase in the following decades. The year-round (primarily Wampanoag) population declined during the twentieth century as communal economic systems dependent on fishing and agriculture waned. Meanwhile, visitation from off-island residents increased dramatically, and many new residences were constructed for use as summer rentals or vacation homes (Harrington, 1998a).

The residence at 71 Moshup Trail was built in approximately 1920. Its primary elevation faces northeast, towards a now-inaccessible extension of Old South Road which provided access to a small number of residences in the area during the early twentieth century. The current roadway, Moshup Trail, was built in 1956, extending east from Aquinnah Circle and providing access to home sites and points of interest along the town’s south shore (Harrington, 1998b).

3.3.3 *NRHP Criteria and the Maritime Visual Setting*

71 Moshup Trail appears to meet National Register Criterion C as a typical example of an early twentieth-century residence in keeping with the characteristic scale, form, and materials of the vernacular building tradition of coastal New England. The property’s natural landscape and maritime visual setting are a key component of its historic significance as an early-twentieth-century vernacular seaside residence.

3.4 The Leonard Vanderhoop House

3.4.1 *Physical Description and Existing Conditions*

The Leonard Vanderhoop House, located at 5 Church Street, is a one-and-one-half-story Greek Revival-derived vernacular residence with multiple additions sited on approximately 5.6 acres. The primary volume consists of a gable-and-ell modified (after 1998) with the addition of wall dormers. A small single-story addition to the west has a flat roof supporting an open deck. The exterior is clad in wood shingle and the roof is of asphalt shingle. The primary elevation faces northeast to an unpaved extension of Church Street.

3.4.2 *Historic Context*

The Leonard Vanderhoop House was built in approximately 1850 and was one of several residences, along with a school, church, and parsonage, which formed the nucleus of the Gay Head community along present-day Old South Road during the mid-nineteenth century. Leonard L. Vanderhoop (1855-1934), the earliest identified resident of the house, was a restaurant owner and Town Treasurer. The Vanderhoop family, descended from Leonard's parents William A. Vanderhoop and Beulah Salsbury, are a prominent Aquinnah family whose members own many properties and have held key positions in the town government as well as in the Wampanoag Tribe of Gay Head (Aquinnah) (Harrington, 1998c).

In 1870, the same year that the Town of Gay Head was incorporated, the improvement of present-day State Road by the State of Massachusetts dramatically altered the development patterns within the town. The new road was laid out north of Old South Road along the existing path that connected Chilmark to the east to the Gay Head Lighthouse. Nearly all of the existing buildings were subsequently moved from the older community around Old South Road to the new center of activity around the intersection of State Road and Church Street. By 1926 only a single unoccupied house remained at the old settlement (Harrington, 1998a). The Leonard Vanderhoop House was relocated during this period to its current site at 5 Church Street. It remains in the Vanderhoop family today.

3.4.3 *NRHP Criteria and the Maritime Visual Setting*

The Leonard Vanderhoop House has been significantly altered with the replacement of windows and doors and the introduction of wall dormers. However, it retains its overall massing and its historic setting. The house's relocation after 1870 in response to changing settlement patterns contributes to its historic significance. The Leonard Vanderhoop House appears to meet National Register Criterion A for its association with the mid-nineteenth century settlement along Old South Road. The Vanderhoop family is one of the most well-known families in the history of the Town of Aquinnah. The house is a Shingle-style building, typical of the buildings located on Martha's Vineyard, and has views to the water afforded by its relatively high elevation on the moraine. The remaining ocean views are associated with a once more expansive ocean viewshed that has been partially screened by reforestation.

3.5 The Tom Cooper House

3.5.1 *Physical Description and Existing Conditions*

The Tom Cooper House, located at 1 Sunset Lane, is a two-story residence consisting of a primary gable-roofed volume with multiple additions sited on approximately 0.5-acre. The exterior is clad in wood shingle and the roofs are clad in asphalt shingle. The residence appears to have been heavily remodeled in about 2005. All of the windows and doors appear to be modern replacements. Other alterations include the addition of a hipped-roof volume atop a walk-out basement, the enlargement of the original volume with wall dormers, and the addition of a visually prominent stone chimney.

3.5.2 *Historic Context*

Sunset Lane is a short road extending south from State Road. It was developed in the early twentieth century, following the improvement of State Road. The Tom Cooper House was built during the last quarter of the nineteenth century. Tom Cooper was the first known occupant of the house, during the early twentieth century. The Cooper family operated a restaurant out of the residence in the 1920s, later converted to an ice cream shop in the 1960s (Harrington, 1998d). The building was substantially remodeled in approximately 2005 (Town of Aquinnah, 2022).

3.5.3 *NRHP Criteria and the Maritime Visual Setting*

The Tom Cooper House appears to meet National Register Criteria A and/or C for its architecture and its role as a restaurant contributing to the development of the tourism industry in Gay Head. The natural landscape and maritime visual setting appear to be key components that contribute to the historic significance of the Tom Cooper House.

3.6 The Theodore Haskins House

3.6.1 *Physical Description and Existing Conditions*

The Theodore Haskins House, also known as the C. Adrian Vanderhoop House, located at 72 State Road/1150 State Road, is a one-and-one-half-story Colonial Revival-derived vernacular residence consisting of a gable-roofed main volume with multiple dormers and additions sited on approximately 1.0 acre. The exterior has wood shingle siding and an asphalt shingle roof, atop a concrete masonry unit foundation. A substantial brick chimney is located on the primary elevation. Windows are generally wood sash and appear original.

3.6.2 *Historic Context*

The Theodore Haskins House was built in the first quarter of the twentieth century for Theodore E. Haskins, who subsequently sold the property to C. Adrian Vanderhoop (1880-1956), a member of the prominent Vanderhoop family of Gay Head (see Section 3.3.2). In 1957, the property was acquired by the Gentry family, who still own it today (Harrington, 1998e; Town of Aquinnah, 2022).

3.6.3 *NRHP Criteria and the Maritime Visual Setting*

The Theodore Haskins House appears to meet National Register Criterion C as an intact and representative example of an early-twentieth-century residence in keeping with the characteristic scale, form, and materials of the vernacular building tradition of coastal New England with views to the ocean. The property is sited along the southwestern flank of an elevated glacial moraine with slopes oriented towards the Project. The remaining ocean views from the property are surviving elements of a once more expansive ocean viewshed that has been diminished by post-1950 reforestation.

3.7 3 Windy Hill Drive

3.7.1 *Physical Description and Existing Conditions*

The house at 3 Windy Hill Drive (current address, 5 Windy Hill Drive) is a two-story Colonial Revival-derived vernacular residence with hipped roofs, wood shingle siding, and a raised basement, sited on approximately 0.5 acre. The residence was significantly remodeled in the late-twentieth- or early-twenty-first century, with little or no historic exterior materials remaining.

3.7.2 *Historic Context*

The house at 3 Windy Hill Drive was built in the first quarter of the twentieth century. It was originally accessed via a network of trails and roads which extended south from Old South Road. Windy Hill Drive is now accessible from Moshup Trail, which was begun in 1956 to provide access to residential lots and points of interest on the town's south shore (Harrington, 1998f; Town of Aquinnah, 2022).

3.7.3 *NRHP Criteria and the Maritime Visual Setting*

The address 3 Windy Hill Drive appears to meet National Register Criterion C as an intact and representative example of a residence in keeping with the characteristic scale, form, and materials of the vernacular building tradition of coastal New England, and in particular Martha's Vineyard with views to the ocean. The natural landscape and maritime visual setting appear to be key components that contribute to the historic significance of 3 Windy Hill Drive.

3.8 The Edwin DeVries Vanderhoop Homestead

3.8.1 *Physical Description and Existing Conditions*

The Edwin DeVries Vanderhoop Homestead, located at 35 Aquinnah Circle, is a two-story wood-frame vernacular residence with complex massing consisting of multiple intersecting gable roofed volumes along with a single-story rear addition. The building has wood shingle siding, wood shingle roofing, and a granite foundation. Windows are generally two-over-two double hung wood sash with simple wood surrounds. The primary (north) elevation is arranged symmetrically, with two single-story entry porches flanking a two-story gable-roofed one-bay-wide projection. A 12-foot-by-29-foot open terrace (built in 2005) along the rear elevation of the house and provides expansive views of the ocean waters framed by the slightly elevated sections of the cliffs to the north. The existing terrace replaced a wooden deck. The residence is sited on an approximately 3.8-acre lot which extends southwest to the Clay Cliffs of Aquinnah and consists of grass lawn, mown fields, and low vegetation.

The house consists of two main side-gable volumes which are offset and are each roughly the size of a modest Cape Cod-style residence of the nineteenth century. The presence of a full basement beneath one of the volumes and the absence of a basement beneath the other suggests that one of the volumes may have been relocated from a previous site. Historic imagery shows that a barn and several additional outbuildings were once located on the property but are no longer extant (Parcon et. al., 2006). A public walking trail leads through the property to the shoreline. The property is owned by the Town of Aquinnah

and managed as part of the 49-acre Aquinnah Headlands Preserve, while the building serves as the Aquinnah Cultural Center and Aquinnah Wampanoag Indian Museum (MVLB, 2016; Aquinnah Cultural Center, 2021).

3.8.2 *Historic Context*

The Edwin DeVries Vanderhoop Homestead was built or assembled from one or more existing buildings between 1890 and 1897. Edwin DeVries Vanderhoop (1848-1923) was one of nine children born in Gay Head to William Adriaan Vanderhoop, a Dutch-Surinamese settler, and Beulah Salisbury, a member of the Wampanoag Tribe of Gay Head (Aquinnah). Edwin D. Vanderhoop worked as a whaling captain and served in the Massachusetts legislature. He purchased the lot upon which his homestead stands in 1890. His widow Mary A.C. Vanderhoop (1860-1935) inherited the homestead upon his death and the property remained in the Vanderhoop family until 2003. In that year, the property was sold to the Marsh Hawk Land Trust and subsequently transferred to the Town of Aquinnah, subject to conservation and preservation restrictions (Parcon et. al., 2006). The building has been rehabilitated since that time.

3.8.3 *NRHP Criteria and the Maritime Visual Setting*

The Edwin DeVries Vanderhoop Homestead meets National Register Criteria A and C in the areas of Architecture, Native American Ethnic Heritage, and Social History. It derives significance from its association with the prominent Vanderhoop family of the Wampanoag Tribe of Gay Head (Aquinnah), from its association with civic and social life in the community, and as a representative example of a late-nineteenth-century residence embodying the building traditions of coastal New England. The period of significance is circa 1890/1897 to 1956 (Parcon et. al., 2006). The rear of the residence and surrounding areas of the property retain views of the Atlantic Ocean to the south. The property's location atop the Gay Head Cliffs and the views to the sea are integral to its historic setting.

3.9 Gay Head – Aquinnah Town Center Historic District

3.9.1 *Physical Description and Existing Conditions*

The Gay Head – Aquinnah Town Center Historic District is a collection of 23 contributing buildings, two contributing objects, and five non-contributing buildings grouped near the intersection of State Road and Church Street, at the approximate geographic center of the Town of Aquinnah. The contributing buildings consist of historic public, semi-public, residential, and agricultural buildings related to the civic, religious, and economic development of the Town of Aquinnah in the nineteenth and early twentieth centuries. The 23 contributing buildings are enumerated in Table 3.9-1.

Table 3.9-1. Contributing buildings within the Gay Head – Aquinnah Town Center Historic District

Building Name and/or Description	Address	Construction Date
<p>The Aquinnah Town Hall/Community Center is a single-story end-gable building with a moderately pitched roof, wood shingle siding, and wood windows and doors. The primary (south) elevation consists of a projecting entry vestibule featuring a double leaf paneled door flanked by six-over-six windows. The east and west elevations include single-story ells and additions which are consistent with the form and materials of the main volume.</p>	<p>955 State Road</p>	<p>Circa 1929</p>
<p>The former post office and residence is a small single-story shed-roofed building with a roughly square plan and wood shingle and wood board siding. The building appears to have been unoccupied since at least the late 1990s and is overgrown with vegetation.</p>	<p>980 State Road</p>	<p>Circa 1920s</p>
<p>The Aquinnah Public Library/Gay Head School is a single-story Greek Revival-style end-gable building with wood shingle siding atop a granite foundation. The building has six-over-six windows and modest wood cornice returns, corner boards, and fascia boards. A wood deck and ramp added in the twenty-first century provide access to the library's main entrance on the south elevation. The primary historic entrance is on the north elevation and consists of a hipped-roof vestibule with doors on the east and west, which recall the building's use as a school from the time of its construction until 1968. The building was moved to its present location in 1878 (Harrington, 1998a).</p>	<p>1 Church Street</p>	<p>Circa 1844</p>
<p>The Gay Head Community Baptist Church is a one-and-one-half-story end-gable Greek Revival-style church with a square tower centrally located on the primary (south) elevation. The moderately-pitched roof is clad in asphalt shingle and the building has wood clapboard siding and Greek Revival-style wood cornice returns, corner boards, and fascia boards, atop a granite foundation. The outhouse located northeast of the church is also a contributing building to the historic district. It is not known whether the outhouse is still standing. The church was moved to its present location in 1907 (Harrington, 1998a).</p>	<p>2 Meetinghouse Way</p>	<p>Circa 1850</p>

Building Name and/or Description	Address	Construction Date
<p>The Minister’s House/Parsonage is a one-and-one-half-story end-gable residence with modest Greek Revival-style detailing. The building has wood shingle siding and simple cornice returns, corner boards, and fascia boards, atop a stone foundation. The primary (north) elevation is three bays wide, with an offset door and two six-over-six windows at the first floor, with two additional six-over-six windows in the gable end. A secondary entrance is located in a single-story rear addition. The parsonage was moved to its present location in 1907 along with the church (Harrington, 1998a).</p>	<p>3 Church Street</p>	<p>Circa 1856</p>
<p>The Linus S. Jeffers Residence is a one-and-one-half-story Cape Cod-derived vernacular residence with gable-and-ell massing, wood shingle siding, shed dormer windows, and an enclosed single-story porch.</p>	<p>4 Jeffers Way</p>	<p>Late-nineteenth century</p>
<p>The Isaac Rose/Charlie Vanderhoop House, Barn, Cottage, and Shed/cottage comprise a nineteenth-century farmstead sited on approximately 3.7 acres. The residence is a one-and-one-half-story cross-gabled Victorian Eclectic-derived vernacular building with wood shingle siding, ornate sawn vergeboards, an enclosed porch, and a circa-2005 addition.</p>	<p>38 South Road / 890 State Road</p>	<p>Mid-nineteenth century</p>
<p>The Adriaan Vanderhoop House, Barn, and Outhouse comprise a nineteenth-century farmstead sited on approximately 3.1 acres. The residence is a small single-story gable-roofed vernacular building with a central brick chimney, wood shingle siding, two-over-two windows, and a plank door.</p>	<p>46 South Road / 962 State Road</p>	<p>Late nineteenth century</p>
<p>The Lyman Madison House is a one-and-one-half-story vernacular residence with an end gable orientation, wood shingle siding, and a three-bay primary elevation with an offset door.</p>	<p>57 South Road / 903 State Road</p>	<p>Late nineteenth century</p>
<p>The house at 59 South Road/905 State Road is a one-and-one-half-story former boathouse clad in wood shingle atop a raised concrete block foundation. The building has a narrow gable-roofed wall dormer on the south elevation and a single-story wing on the east.</p>	<p>59 South Road / 905 State Road</p>	<p>Circa 1900</p>
<p>The Totem Pole Inn property consists of six buildings on an approximately 6.9-acre parcel, including an Innkeeper’s Residence, four cottages, and a shed. The Innkeeper’s Residence is a one-and-one-half-story Craftsman-style residence with wood shingle siding, a dormered gable roof, and an inset porch with cobblestone piers. The cottages are stylistically varied but are unified through their use of wood shingle siding and cobblestone foundations. The shed also has wood shingle siding.</p>	<p>1-9 Totem Pole Way</p>	<p>Circa 1920s</p>

The two contributing objects within the historic district are World War I monuments erected in 1918 and 1919 and currently located in front of the Aquinnah Town Hall. The monuments consist of bronze plaques affixed to boulders. According to the west monument's inscription, the Town of Gay Head (Aquinnah) contributed the "largest number of men in proportion to its population of any town in New England" to serve in the United States armed forces during the war.

Two of the five non-contributing buildings within the historic district are part of the complex of municipal buildings at 955 State Road. The Town Office Building (1989), east of the Town Hall, is a single-story gable-roofed building with wood shingle siding and six-over-six windows. East of the Town Office Building, the Fire Station (circa 1959) is a single-story gable-roofed building with wood shingle siding. Both buildings recall the scale, form, and materials of the 1929 Town Hall. The remaining three noncontributing buildings within the historic district are residences at 2 Jeffers Way, 44 South Road/920 State Road, and 61 South Road/ 917 State Road, all constructed in the 1960s or later.

3.9.2 *Historic Context*

Throughout the eighteenth century, most residential settlement was concentrated in the western and southern parts of the present-day Town of Aquinnah, which constituted the reservation lands of the Wampanoag Tribe of Gay Head (Aquinnah). Individual residences were linked by a network of paths, and by the mid-nineteenth century, several east-west roads connected the residential areas to the Gay Head Light and Clay Cliffs of Aquinnah to the west and the present-day Town of Chilmark to the east. Throughout the late eighteenth and nineteenth centuries, the community's population was roughly 200 (Harrington, 1998a).

The Gay Head community's civic and religious functions primarily took place within private residences until the mid-nineteenth century. The town's first and only purpose-built school building (now, the Aquinnah Public Library) was constructed prior 1844 north of present-day Old South Road. It was used for a variety of civic, social, and religious purposes in the years and decades before the community erected additional public buildings, and town records show that maintenance and upgrades to the building were frequent. The Baptist congregation of Gay Head met in the school before the Gay Head Community Baptist Church was constructed just north of the school in 1850. Within a few years, the Massachusetts Missionary Society supplied funding for a parsonage which was constructed in 1856 in order to attract a year-round minister to the church. The school, church, and parsonage, along with several additional residences, formed the nucleus of the Gay Head community along Old South Road in the mid-nineteenth century (Harrington, 1998a).

In the 1860s, the "District of Gay Head" was established by the Massachusetts General Court. The district was incorporated as the Town of Gay Head in 1870, despite the objections of the Wampanoag residents, who viewed the town's creation as the alienation of their lands in violation of the Federal Non-Intercourse Act of 1790 (WTGHA, 2022). At the time, tribal members accounted for all of the town's 227 residents, and the survey and privatization of their land allowed non-tribal owners to acquire property in the town. By 1895, at least 18 non-tribal individuals owned land in the Town of Gay Head, and that number would increase in the following decades (Harrington, 1998a).

In the same year that the Town of Gay Head was incorporated, the improvement of South Road (now, State Road) by the State of Massachusetts dramatically altered the development patterns within the town. The new road was laid out north of Old South Road along the existing path that connected Chilmark to the east to the Gay Head Lighthouse. Several buildings were subsequently moved from the older community around Old South Road to the new center of activity around the intersection of South Road and Church Street. The school was relocated in 1878, while the church and parsonage were relocated in 1907. Several additional residences were also moved during this period, and by 1926 only a single unoccupied house remained at the old settlement (Harrington, 1998a).

A post office serving the new Town of Gay Head was established in 1873 and operated out of a succession of private residences, including the Linus S. Jeffers Residence, throughout its roughly 70-year existence. The Post Office/Residence at 980 State Road was likely constructed in the 1920s as a seasonal gift shop and served as the post office and postmistress' residence from the 1930s until the post office was closed during the Second World War. The building presumably continued to serve as a residence following the post office's closure; however, by the late 1990s, the building had been vacant for some time (Harrington, 1998a).

There were no purpose-built town offices in Gay Head until 1929 when the current Town Hall was constructed. Previously, town meetings had been held in the school and town officials rented space in the nearby Linus S. Jeffers residence, which also served as a grocery store and town post office. Linus Jeffers served on the Board of Directors of the Gay Head Improvement Association, which raised funds for the construction of the new Town Hall. The building was designed by Vineyard Haven architect Herbert C. Hancock. Since its construction, the building has housed many of the town's social gatherings since it has the largest capacity of any buildings within the town (Harrington, 1998a).

The year-round (primarily Wampanoag) population declined during the twentieth century as communal economic systems dependent on fishing and agriculture waned. Meanwhile, visitation from off-island increased dramatically, and many new residences were constructed for use as summer rentals or vacation homes. A group of cottages known as the Totem Pole Inn was built during this period just east of the intersection of State Road and Church Street. Gay Head's town center continued to grow in order to meet the changing community's needs. The town was without a dedicated fire department until the fire station was constructed to the east of the Town Hall in about 1959 or 1960; it is still in use today. The town's library was shuffled back and forth between the school and the Town Hall multiple times over several decades before the school closed in 1968 and the town's children began attending larger schools in Chilmark and Vineyard Haven. In 1975, the school was used as additional town office space while a substantial addition was made to the Town Hall. In the same year, the school was permanently converted into the town library and it continues to serve that function today. In the late 1980s, the town once again was in need of additional office space, and a new town office building was built east of the existing Town Hall. Additional alterations were made to the 1975 addition in 1992-1993 to house the town police barracks. The town's name was changed from Gay Head to its Wampanoag name, Aquinnah, in 1998 (Harrington, 1998a).

In general, the buildings comprising the Gay Head – Aquinnah Town Center Historic District continue to be utilized by the community for their original purposes. While the Aquinnah Public Library no longer functions

as a school, it continues to be a center of activity and is well cared for by the community. A large deck and accessible ramp were recently added to the building. The Town Hall has likewise undergone maintenance and repairs in recent years. The Gay Head Community Baptist Church is the only extant church building in the Town of Aquinnah. The Post Office/Residence remains vacant. The Gay Head – Aquinnah Town Center Historic District was listed in the NRHP in 1999 (nomination completed in 1998) and in 2001, the boundary was increased to include an additional 17 contributing buildings and three noncontributing buildings (Harrington and Friedberg, 2001).

3.9.3 NRHP/NHL Criteria and the Maritime Visual Setting

The Gay Head – Aquinnah community's historic relationship with and dependence upon maritime resources is integral to understanding the history and development of the historic district. The Gay Head – Aquinnah Town Center Historic District meets National Register Criteria A and C in the areas of architecture, community planning, and Native American ethnic heritage as an intact group of civic, residential, and religious buildings representing nineteenth- and twentieth-century settlement in the Town of Gay Head. The district's period of significance is circa 1850 (the construction date of the earliest building in the district, the Aquinnah Public Library) to 1951 (50 years prior to the NRHP boundary expansion in 2001; Harrington and Friedberg, 2001). The fire station was not included in the 1998 NRHP nomination because it had not yet reached 50 years of age; however, it retains a high degree of integrity and could be considered a contributing resource to the historic district. Although the library, church, and parsonage have been relocated from their original sites, they meet Criteria Consideration B because their relocation took place during the period of significance and was directly related to the growth of the town center and shifts in development patterns in the late nineteenth and early twentieth centuries. The district is sited on the elevated highlands of a prominent moraine. The surviving ocean views are important surviving elements of a once-more expansive pastoral maritime setting for the district.

3.10 Gay Head – Aquinnah Shops

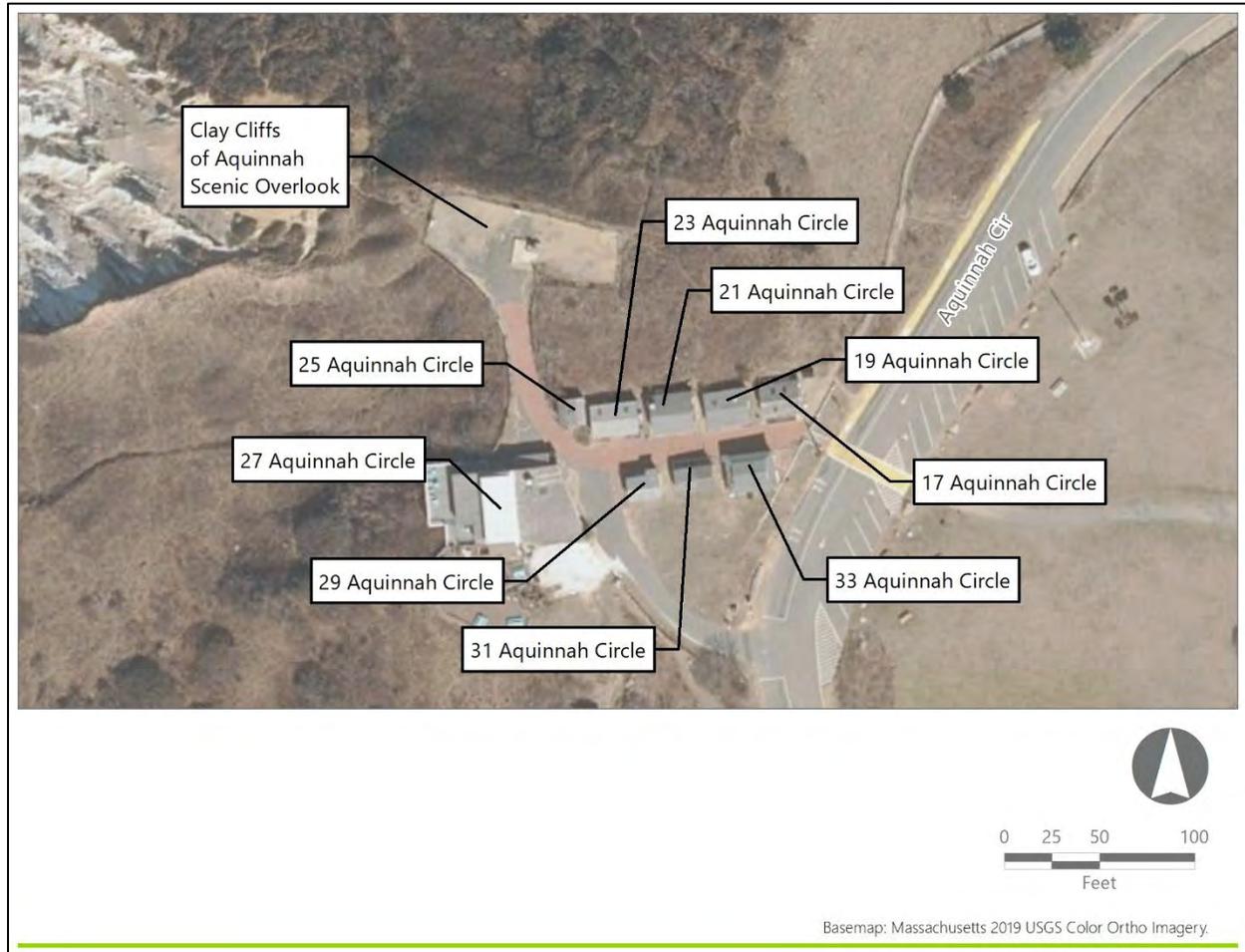
3.10.1 Physical Description and Existing Conditions

The Gay Head – Aquinnah Shops are a group of nine vernacular commercial buildings clustered around a paved walkway leading from a parking area along Aquinnah Circle to the Clay Cliffs of Aquinnah Scenic Overlook (see Figure 3.1-1). All buildings are of similar scale, form, and materials, generally consisting of simple rectangular volumes with gable or hipped roofs and wood-shingle siding. The buildings are sited on two tax parcels comprising approximately 4.8 acres, which comprise the entirety of the Property. The buildings occupy limited portions of the parcels, leaving large areas of open space consisting of low-growing vegetation.

The brick paved walkway which forms the central spine of the Property is accessed from Aquinnah Circle via a short flight of concrete stairs with painted wood handrails. From east to west, the buildings north of the walkway are numbered 17, 19, 21, 23 and 25 Aquinnah Circle. The buildings south of the walkway, from east to west, are numbered 33, 31, 29, and 27 Aquinnah Circle. The westernmost building, 27 Aquinnah

Circle, is separated from the other buildings by an asphalt vehicle access drive which functions as an alternative, stair-free path to the overlook.

Figure 3.10-1. Aquinnah Shops Site Map



Existing conditions and alterations since the Gay Head – Aquinnah Shops were documented in 1998 (Harrington, 1998) are described for each building:

- The building at 17 Aquinnah Circle (circa 2005) is a single-story building with a rectangular footprint, a moderately pitched gable roof clad in wood shingles, and exterior wood shingle wall cladding. The primary (south) elevation features a centered two-leaf entry door flanked by small windows. This entry is accessed by a wood ramp. The east elevation has a secondary entrance. The building does not appear in aerial imagery dated to 2001 and appears to have been completely rebuilt in approximately 2005 (Harrington, 1998b; MassGIS, 2001, 2005).
- The building at 19 Aquinnah Circle (early- to mid-twentieth century) is a single-story building with a rectangular footprint, a low gable roof clad in asphalt shingles, and exterior wood shingle wall cladding. The primary (south) elevation has a deep eave overhand and features a centered two-leaf

entry door flanked by paired one-over-one windows. The entry is raised three steps from the paved walkway. The doors and windows have been replaced since 1998 but retain their approximate size and position (Harrington, 1998b).

- The building at 21 Aquinnah Circle (circa 2005) is a single-story building with a rectangular footprint, a low gable roof clad in asphalt shingles, and exterior wood shingle wall cladding. The primary (south) elevation has three pairs of sliding service windows sheltered by an open porch. The building appears to have been completely rebuilt in approximately 2005 and does not appear in aerial imagery dated to 2001 (Harrington, 1998b; MassGIS, 2001, 2005).
- The building at 23 Aquinnah Circle (circa 1950s) is a single-story building with a rectangular footprint, a low gable roof clad in asphalt shingles, and exterior wood shingle wall cladding. The primary (south) elevation features a centered two-leaf entry door flanked by large windows. The entry is raised two steps from the paved walkway. The south elevation windows were replaced after 1998, when they consisted of paired three-light casement windows (Harrington, 1998b).
- The building at 25 Aquinnah Circle (circa 2013) is the smallest of the Gay Head – Aquinnah Shops buildings and is set back farther from the walkway than 17-23 and 29-33 Aquinnah Circle. It is a single-story building with an approximately square footprint, a low gable roof clad in wood shingle, and exterior wood shingle or bark wall cladding. It has been completely rebuilt since 1998 and does not appear in aerial imagery dated to 2011-2012 (Harrington, 1998b; MassGIS, 2011-2012, 2013-2014).
- The building at 27 Aquinnah Circle (mid-twentieth century) is the largest of the Gay Head – Aquinnah Shops buildings and occupies a separate tax parcel from the rest of the shops. It is a one-and-one-half-story building with a roughly rectangular footprint, a low gable roof clad in asphalt shingle, and exterior wood shingle wall cladding. It has two small shed additions and a shed dormer. The primary (east) elevation has an entrance within an inset porch and a pair of sliding service windows. The building houses a restaurant with indoor and outdoor seating areas, including a large wood deck and concrete patio. It does not appear to have been altered significantly since 1998 (Harrington, 1998b).
- The building at 29 Aquinnah Circle (circa 2015) is a single-story building with a rectangular footprint, a low gable roof clad in asphalt shingle, and exterior wood shingle wall cladding. It has been completely rebuilt since 1998 and does not appear in aerial imagery dated to 2015 (Harrington, 1998b; Town of Aquinnah, 2022).
- The building at 31 Aquinnah Circle (mid-twentieth century; rebuilt or enlarged circa 2008) is a single-story building with a rectangular footprint, a low gable roof clad in asphalt shingles, and exterior wood shingle wall cladding. The primary (north) elevation has double leaf, nine-light wood entry doors and a large fixed-sash window. The entry is raised two steps from the paved walkway. The building has been enlarged (or rebuilt) and the north elevation has been altered since 1998, when the entry doors were centered and flanked by two small windows (Harrington, 1998b; MassGIS, 2005, 2008).
- The building at 33 Aquinnah Circle (circa 1950s; possibly rebuilt circa 2000) is a single-story building with a rectangular footprint, a gable-on-hip roof clad in asphalt shingles, and exterior wood shingle wall cladding. The primary (north) elevation has four service windows. A single-light door and a

large window are located on the east elevation. The building has been substantially altered or possibly rebuilt since 1998, when it had a hipped roof and an inset porch with a door on the north elevation (Harrington, 1998b; MassGIS, 1990s, 2001).

The buildings were observed to be in fair to good condition when they were documented in 1998 (Harrington, 1998b). The apparent rebuilding or substantial remodeling of six of the buildings since that date, as well as the replacement of many of the remaining buildings' windows and doors, is likely due to the buildings' ongoing exposure to harsh seaside conditions.

3.10.2 Historic Context

The Aquinnah Cliffs and Gay Head Light have been a tourist attraction since the nineteenth century. Several small shops and "tepees" catering to tourists were present along the cliffs by the early twentieth century but were relocated to the present site by the Town of Gay Head (now, the Town of Aquinnah) in order to preserve the setting of the overlook. The earliest extant building on the site was built in the early-to-mid-twentieth century, while the remaining buildings are believed to have been constructed from the mid-twentieth century to the early twenty-first century. The form, scale, and materials of the buildings have been consistent with the vernacular building traditions of coastal New England: modest in size, with low-to-moderate gable roofs, shallow roof eaves, simple doors and windows, and shingle cladding. Historically, the shops sold souvenir items including Wampanoag crafts and objects made from the local clay (Harrington, 1998b).

The Gay Head Cliffs, comprising 24 acres under municipal and Wampanoag trust ownership, were designated as a National Natural Landmark by the National Park Service in 1965 (NPS, 2021). Gay Head Cliffs, including the Gay Head – Aquinnah Shops, was designated as a District of Critical Planning Concern by the Martha's Vineyard Commission (Dukes County). Construction within the district is subject to limitations in order to preserve the natural, ecological, cultural, and historic resources of the district (Town of Aquinnah, 2022). The Gay Head – Aquinnah Shops were surveyed by the Massachusetts Historical Commission in 1998. The same year, the name of the town and its namesake cliffs were changed from Gay Head to Aquinnah, their original Wampanoag name.

Today, the buildings are used primarily as seasonal restaurants and gift shops catering to the tourists who visit the Clay Cliffs of Aquinnah Scenic Overlook. Many of the businesses are multigenerational family enterprises owned by members of the Wampanoag Tribe of Gay Head (Aquinnah). As of 2015, tribal members had the right of first refusal to lease the building lots from the Town of Aquinnah (Elvin, 2015). The buildings now appear to be under a mix of individual and tribal ownership (Town of Aquinnah, 2022).

3.10.3 NRHP/NHL Criteria and the Maritime Visual Setting

As a historic district, the Gay Head – Aquinnah Shops meet National Register Criterion A for their association with the development of Aquinnah Cliffs as a tourist attraction during the late nineteenth and early twentieth centuries. The district also meets Criterion C as a group of intact twentieth-century commercial buildings in keeping with the characteristic scale, form, and materials of the vernacular building tradition of

coastal New England. The natural landscape and maritime visual setting of the Aquinnah Cliffs, including expansive views of the Atlantic Ocean, are key to understanding the Gay Head-Aquinnah Shops' historic significance as a commercial development directly tied to seaside tourism.

3.11 Gay Head – Aquinnah Coast Guard Station Barracks

3.11.1 Physical Description and Existing Conditions

The Gay Head – Aquinnah Coast Guard Station Barracks is currently located at 1147 State Road. The building is a one-and-a-half-story residential building set on a high stone foundation with stone support piers. The building is clad in wood shingles and two shed dormers are located on the north and south rooflines. A small, one-story addition is located to the east.

3.11.2 Historic Context

The building's exact construction date is unknown; however, it was originally a barracks located at the Coast Guard Station near the Gay Head Light. In 1870, South Road was constructed, and multiple buildings were relocated to the new roadway. According to the MHC Form, the Gay Head – Aquinnah Coast Guard Station Barracks was moved to its present location after World War II and was converted to a residence (Harrington, 1998g).

3.11.3 NRHP/NHL Criteria and the Maritime Visual Setting

As stated above, the Gay Head – Aquinnah Coast Guard Station Barracks was relocated from its original location, thus affecting its integrity of setting; however, the building retains its integrity of materials, workmanship, association, and design. The building is eligible for listing under Criterion A for its association with the United States Coast Guard Station in Aquinnah.

Although the Gay Head - Aquinnah Coast Guard Station Barracks was relocated from its original maritime setting, the building is currently sited on an elevated parcel of land with ocean views.

4.0 MITIGATION MEASURES

Mitigation measures at these historic properties are detailed in this section. These mitigation measures were developed in consultation with the Participating Parties by individuals who meet the Secretary of the Interior's *Professional Qualifications Standards* (36 CFR Part 61) and are appropriate to fully address the nature, scope, size, and magnitude of adverse effects including cumulative effects caused by the Project, NRHP-qualifying characteristics of each historic property that would be affected. These mitigation measures also include actions to respond to some reasonably foreseeable hazards unrelated to the Project that pose risks to the long-term preservation of affected historic properties, such as climate change.

4.1 Americans with Disabilities Act-Compliant Access for The Aquinnah Shops

4.1.1 *Purpose and Intended Outcome*

The Town of Aquinnah, in consultation with Revolution Wind, has identified a need to improve ADA-compliant access to the Aquinnah Shops and adjacent Aquinnah Overlook properties. The Town will be replacing the existing wood steps linking the Aquinnah Shops with the Aquinnah Circle parking areas, but wheelchair accessible access will require additional planning and construction to ensure the physical and historic integrity of the Aquinnah Shops is maintained. Once completed, the access project will enhance public appreciation of the historic property by encouraging visitation from a broader spectrum of the resident community and tourists.

4.1.2 *Scope of Work*

The scope of work will consist of the following:

- Review existing town and county planning documents and regulations;
- Photograph and document (e.g. map) existing conditions;
- Draft ADA-compliant access plans that are consistent with the Secretary of the Interior's (SOI) *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*;
- Develop a final plan to include comments from the Participating Parties;
- Distribute the final plan to the Participating Parties;
- Photograph and document as-built conditions upon completion of construction.

4.1.3 *Methodology*

Revolution Wind will release a request for proposals (RFP) for consultant services for the scope of work and select a consultant to perform the Scope of Work listed in Section 4.1.2. The chosen consultant should have a demonstrated knowledge of climate change and the treatment of historic properties. Public engagement sessions will be held to solicit comments, questions, and concerns from the residents of the Town of Aquinnah. The sessions will inform the preparation of the draft plan which will be distributed to the Participating Parties for review and comment. Additional sessions should be held as necessary to allow for public engagement. The comments shall be addressed and incorporated in the final document which will be distributed to the Participating Parties.

4.1.4 Standards

The project will comply with the following standards:

- The Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (36 CFR 67.7);
- Martha's Vineyard Commission's planning and climate change guidance, as applicable;
- Town of Aquinnah Community Preservation Committee guidance, as applicable;
- Town of Aquinnah Planning Board Review Committee guidance, as applicable; and

4.1.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFP;
- Proposals by qualified consultants in response to the RFP;
- Existing conditions photography and documentation (e.g., mapping);
- Draft construction plans;
- Final construction plans;
- Final plans;
- As-Built photography and documentation.

4.1.6 Funds and Accounting

Funding amounts are being determined in consultation with the consulting parties.

4.2 Weatherization of the Edwin D. Vanderhoop Homestead

4.2.1 Purpose and Intended Outcome

The purpose of this mitigation measure is to fund weatherization improvements to the Edwin D. Vanderhoop Homestead property. The property houses the Aquinnah Cultural Center, a local museum operated by a local not-for-profit organization and staff by members of the Wampanoag Tribe of Gay Head (Aquinnah). The weatherization improvements are intended to maintain the physical and historic integrity of the property while reducing the costs of maintaining the building and collections.

4.2.2 Scope of Work

The scope of work will consist of the following:

- Review existing town and county planning documents and regulations;
- Review existing energy efficiency guidance, including resources from the National Park Service's Technical Preservation Services and the National Trust for Historic Preservation;
- Photograph and document (e.g., map) existing conditions;
- Develop draft plans and specifications;

- Consult with Participating Parties;
- Develop draft plans and specifications to be distributed to the Participating Parties for review and comment;
- Develop a final plans and specifications to include comments from the Participating Parties;
- Distribute the final plans and specifications to the Participating Parties;
- Implement the improvements; and
- Develop as-built documentation to be distributed to the Participating Parties.

4.2.3 Methodology

Revolution Wind will release an RFP for consultant and contracting services for the scope of work and select a consultant to perform the Scope of Work listed in Section 4.2.2. The preferred consultants and contractors will have experience in developing energy efficiency plans for historic buildings. The draft and final plans and specifications will be developed in consultation with the Participating Parties.

4.2.4 Standards

The project will comply with following standards:

- The Town of Aquinnah Building Code, as applicable;
- The Town of Aquinnah Energy and Climate Committee guidance, as applicable;
- The Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (36 CFR 67.7); and
- National Park Service's *Improving Energy Efficiency in Historic Buildings* Preservation Brief 3.

4.2.5 Documentation

The following documentation is to be provided for review by Participating Parties:

- RFPs;
- Proposals by qualified consultants in response to the RFP.
- Preliminary draft plans and specifications;
- Final plans and specifications; and
- As-built documentation including photographs.

4.2.6 Funds and Accounting

Funding amounts are being determined in consultation with the consulting parties.

5.0 IMPLEMENTATION

5.1 Timeline

The timeline for implementation of the mitigation measures is identified in the MOA.

5.2 Organizational Responsibilities

5.2.1 *Bureau of Ocean Energy Management (BOEM)*

BOEM remains responsible for making all federal decisions and determining compliance with Section 106. BOEM has reviewed this HPTP to ensure, at minimum, it includes the content required:

- BOEM remains responsible for making all federal decisions and determining compliance with Section 106;
- BOEM, in consultation with the Participating Parties, will ensure that mitigation measures adequately resolve adverse effects, consistent with the NHPA;
- BOEM will be responsible for sharing the annual summary report with Participating Parties; and
- BOEM is responsible for consultation related to dispute resolution.

5.2.2 *Revolution Wind, LLC*

Revolution Wind will be responsible for the following:

- Considering the comments provided by the Participating Parties in the development of this HPTP;
- Funding the mitigation measures specified in Section 4.0;
- Completion of the scope/s of work in Section 4.0;
- Ensuring all Standards in Section 4.0 are met;
- Providing the Documentation in Section 4.0 to the Participating Parties for review and comment;
- Annual Reporting to BOEM; and
- Revolution Wind will be responsible for ensuring that all work that requires consultation with Tribal Nations are performed by professionals who have demonstrated professional experience consulting with federally recognized Tribes.

5.2.3 *Other Parties, as Appropriate*

Revolution Wind does not anticipate additional consulting parties, should any be determined, this will be updated.

5.3 Participating Party Consultation

This HPTP was provided by Revolution Wind for review by Participating Parties to provide meaningful input on the resolution of adverse effects to and form(s) of implementing mitigation at the historic properties. Participating Parties were provided the opportunity for review and comment on the HPTP concurrent with BOEM's NEPA substitution schedule for the Project. This HPTP was further refined through informational

and consultation meetings, conference calls, HPTP draft reviews and document exchanges, or similar means of communication of information.

6.0 REFERENCES

Aquinnah Cultural Center. 2021. The Museum at the Edwin D. Vanderhoop Homestead. Available at <https://www.aquinnah.org/>. Accessed February 22, 2022.

Code of Federal Regulations (CFR). 2021a. 36 CFR 800 – Protection of Historic Properties [incorporating amendments effective December 15, 2021]. Available at <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800>. Accessed December 21, 2021.

CFR. 2021b. 36 CFR 61.4(e)(1) – Procedures for State, Tribal, and Local Government Historic Preservation Programs [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4\(e\)\(1\)](https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4(e)(1)). Accessed December 21, 2021.

CFR. 2021c. 36 CFR 65.2(c)(2) – National Historic Landmarks Program – Effects of Designation [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2\(c\)\(2\)](https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2(c)(2)). Accessed December 21, 2021.

CFR. 2022. 40 CFR 1500 – National Environmental Policy Act Implementing Regulations. Available at <https://www.ecfr.gov/current/title-40/chapter-V/subchapter-A>. Accessed January 7, 2022.

Elvin, A. 2015. "Town, Tribe Ponder Future for Unused Lots at Aquinnah Circle." Vineyard Gazette, September 14, 2015. Available at <https://vineyardgazette.com/news/2015/09/14/town-tribe-ponder-future-unused-lots-aquinnah-circle>. Accessed December 21, 2021.

Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR). 2023. *Historic Resources Visual Effects Analysis, Revolution Wind Farm*. Syracuse, NY. July 2022.

Federal Register. 1997. 62 FR 33708 – The Secretary of the Interior’s Historic Preservation Professional Qualifications Standards. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/app/details/FR-1997-06-20/97-16168>. Accessed December 21, 2021.

Harrington, M.K. et. al. 1998a. *Gay Head/Aquinnah Town Center Historic District*. National Register of Historic Places Registration Form. United States Department of the Interior, National Park Service.

Harrington, M.K. et. al. 1998b. 71 Moshup Trail. Massachusetts Historical Commission Inventory Form. Office of the Secretary. Boston, MA.

Harrington, M.K. et. al. 1998c. Leonard Vanderhoop House. Massachusetts Historical Commission Inventory Form. Office of the Secretary. Boston, MA.

Harrington, M.K. et. al. 1998d. Tom Cooper House. Massachusetts Historical Commission Inventory Form. Office of the Secretary. Boston, MA.

Harrington, M.K. et. al. 1998e. Theodore Haskins House. Massachusetts Historical Commission Inventory Form. Office of the Secretary. Boston, MA.

Harrington, M.K, et. al. 1998f. 3 Windy Hill Drive. Massachusetts Historical Commission Inventory Form. Office of the Secretary. Boston, MA.

Harrington, M.K, et. al. 1998g. Gay Head – Aquinnah Coast Guard Station Barracks. Massachusetts Historical Commission Inventory Form. Office of the Secretary. Boston, MA.

Harrington, M.K. and Betsy Friedberg. 2001. *Gay Head/Aquinnah Town Center HD – 2001 Boundary Increase*. National Register of Historic Places Registration Form. United States Department of the Interior, National Park Service.

MVC. 2021. Dukes County Multi-Jurisdiction Hazard Mitigation Plan Update. Available at https://www.mvcommission.org/sites/default/files/docs/DukesCountyMultiJurisdictionalHazardMitigationPlanUpdate_Oct15_2021.pdf. Accessed February 22, 2022.

Martha’s Vineyard Land Bank (MVLB). 2016. Aquinnah Headlands Preserve Map. Available at http://www.mvlandbank.com/documents/websitemap06---AquinnahHeadlands_000.pdf. Accessed February 22, 2022.

Massachusetts General Law (MGL). 2020. Chapter 184, Section 31: Restrictions, Defined [incorporating amendments passed before December 31, 2020]. Available at <https://malegislature.gov/Laws/GeneralLaws/PartII/TitleI/Chapter184/Section31>. Accessed December 21, 2021.

MGL. 2020. Chapter 184, Section 32: Effect, enforcement, acquisition, and release of restrictions [incorporating amendments passed before December 31, 2020]. Available at <https://malegislature.gov/Laws/GeneralLaws/PartII/TitleI/Chapter184/Section32>. Accessed December 21, 2021.

MGL. 2020. Chapter 184, Section 33: Restrictions, Defined. Public restriction tract index [incorporating amendments passed before December 31, 2020]. Available at <https://malegislature.gov/Laws/GeneralLaws/PartII/TitleI/Chapter184/Section33>. Accessed December 21, 2021.

MassGIS. 1990s. Statewide Aerial Imagery. Available at <https://www.axisgis.com/AquinnahMA/>. Accessed January 2022.

MassGIS. 2001. Statewide Aerial Imagery. Available at <https://www.axisgis.com/AquinnahMA/>. Accessed January 2022.

MassGIS. 2005. Statewide Aerial Imagery. Available at <https://www.axisgis.com/AquinnahMA/>. Accessed January 2022.

MassGIS. 2008. Statewide Aerial Imagery. Available at <https://www.axisgis.com/AquinnahMA/>. Accessed January 2022.

MassGIS. 2011-2012. Statewide Aerial Imagery. Available at <https://www.axisgis.com/AquinnahMA/>. Accessed January 2022.

MassGIS. 2013-2014. Statewide Aerial Imagery. Available at <https://www.axisgis.com/AquinnahMA/>. Accessed January 2022.

National Park Service (NPS). 2021. "Gay Head Cliffs." National Park Service, U.S. Department of the Interior. Available at <https://www.nps.gov/subjects/nlandmarks/site.htm?Site=GAHE-MA>. Accessed December 2021.

Oldale, R.N., and O'Hara, C.J. 1984. Glaciotectonic origin of the Massachusetts coastal end moraines and a fluctuating late Wisconsinan ice margin. *Geological Society of America Bulletin*, v. 95, p. 61–74.

Parcon, Diana C., Mark Rayburn, Virginia H. Adams, and Betsy Friedberg. 2006. *Edwin DeVries Vanderhoop Homestead*. National Register of Historic Places Registration Form. United States Department of the Interior, National Park Service.

Revolution Wind, LLC. 2022. *Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project*. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan>. Accessed January 12, 2022.

Seccombe, Michael. 2010. "New Threat is Loving Vineyard Forests to Death". *Vineyard Gazette*, June 3, 2010. Available at <https://vineyardgazette.com/news/2010/06/03/new-threat-loving-vineyard-forests-death>. Accessed June 2022.

Town of Aquinnah, MA. 2019. *Community Preservation Committee Plan*. Available at https://www.aquinnah-ma.gov/sites/g/files/vyhliif261/f/uploads/2019_cpc_plan_pdf.pdf. Accessed February 22, 2022.

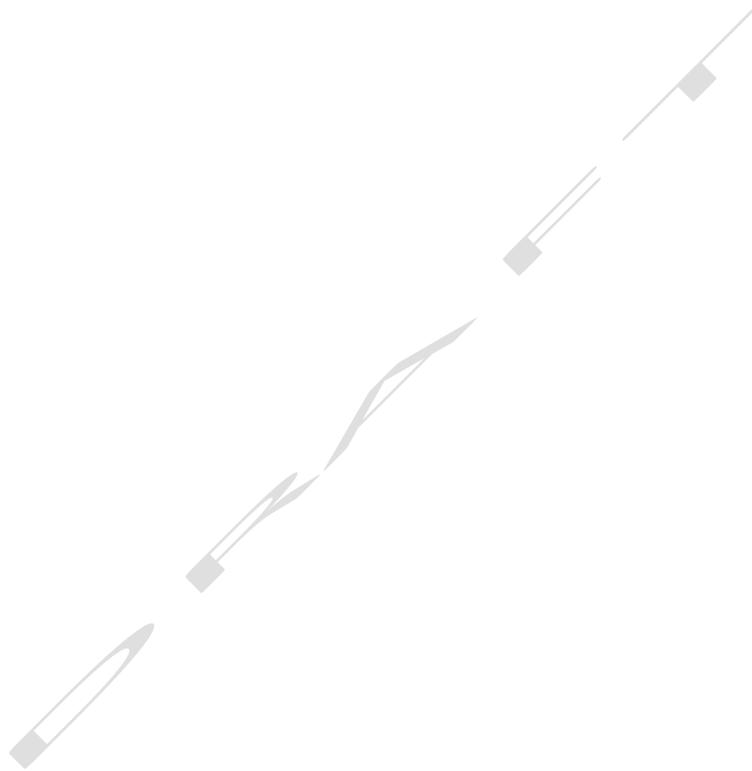
Town of Aquinnah, MA. 2022. Parcel Data. Available at <https://www.axisgis.com/AquinnahMA/>. Accessed January 2022.

Town of Aquinnah, MA. Available at <https://www.aquinnah-ma.gov/>. Accessed January 2022.

United States Code. 2016. Title 54 - National Historic Preservation Act [as amended through December 16, 2016]. Available at <https://www.achp.gov/sites/default/files/2018-06/nhpa.pdf>. Accessed December 21, 2021.

Wampanoag Tribe of Gay Head (Aquinnah) (WTGHA). 2022. "Wampanoag History." Available at <https://wampanoagtribe-nsn.gov/wampanoag-history>. Accessed January 2022.

**ATTACHMENT 14 – HISTORIC PROPERTIES TREATMENT PLAN FOR THE
REVOLUTION WIND FARM: THE GAY HEAD LIGHTHOUSE, TOWN OF AQUINNAH,
DUKES COUNTY, MASSACHUSETTS**



Historic Property Treatment Plan

for the

Revolution Wind Farm

The Gay Head Lighthouse

Town of Aquinnah, Dukes County, Massachusetts

Submitted to:



Bureau of Ocean Energy Management
U.S. Department of the Interior

Prepared for:



Revolution Wind, LLC
<https://revolutionwind.com/>

Prepared by:



Environmental Design & Research, D.P.C.
217 Montgomery Street, Suite 1100
Syracuse, New York 13202
www.edrdpc.com

June 2023

ABSTRACT

Federal Undertaking: Revolution Wind Farm and Revolution Wind Export Cable Project

Location: Outer Continental Shelf and Rhode Island

Federal and
State Agencies: Bureau of Ocean Energy Management
National Park Service
U.S. Army Corps of Engineers
Massachusetts Historical Commission
Rhode Island Historical Preservation & Heritage Commission
New York Historic Preservation Office
Connecticut Historic Preservation Office
Advisory Council on Historic Preservation

Regulatory Process: National Environmental Policy Act
Section 106 of the National Historic Preservation Act
Section 110(f) of the National Historic Preservation Act

Purpose: This Historic Property Treatment Plan provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve adverse effects from the Revolution Wind Project.

Adverse Visual
Effect Finding for: The Gay Head Lighthouse

Submitted By: Revolution Wind, LLC

Date: June 2023

TABLE OF CONTENTS

1.0 Executive Summary 1

2.0 Background Information 3

 2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable..... 3

 2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA) 4

 2.2.1 Municipal Regulations..... 4

 2.2.2 Preservation Easements and Restrictions..... 4

 2.3 Participating Parties 5

3.0 Existing Conditions, Historic Significance, and Maritime Setting 6

 3.1 Historic Properties 6

 3.2 Maritime Setting..... 7

 3.3 The Gay Head Lighthouse 7

 3.3.1 Physical Description and Existing Conditions..... 7

 3.3.2 Historic Context..... 8

 3.3.3 NRHP Criteria and the Maritime Visual Setting 9

4.0 Mitigation Measures 10

 4.1 Historic Rehabilitation of the Gay Head Lighthouse..... 10

 4.1.1 Purpose and Intended Outcome 10

 4.1.2 Scope of Work..... 10

 4.1.3 Methodology 11

 4.1.4 Standards 11

 4.1.5 Documentation 11

 4.1.6 Funds and Accounting 12

5.0 Implementation 13

 5.1 Timeline..... 13

 5.2 Organizational Responsibilities 13

 5.2.1 Bureau of Ocean Energy Management (BOEM) 13

 5.2.2 Revolution Wind, LLC 13

 5.2.3 Massachusetts Historical Commission (MHC) 13

 5.2.4 Massachusetts State Historic Preservation Officer 13

 5.2.5 United States Coast Guard (USCG) 14

 5.2.6 Wampanoag Tribe of Gay Head (Aquinnah)..... 14

 5.2.7 Other Parties, as Appropriate..... 14

 5.3 Participating Party Consultation 14

6.0 References..... 15

LIST OF FIGURES

Figure 2.1-1. Project Location.....3
Figure 3.1-1. Historic Property Location.....6

LIST OF TABLES

Table 3.1-1. Historic Properties included in the HPTP6

LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
ADLS	Aircraft Detection Lighting System
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
COP	Construction and Operations Plan
DEIS	Draft Environmental Impact Statement
EDR	Environmental Design and Research, D.P.C.
FEIS	Final Environmental Impact Statement
FR	Federal Regulation
HPTP	Historic Property Treatment Plan
MHC	Massachusetts Historical Commission
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
RIHPHC	Rhode Island Historical Preservation & Heritage Commission
ROD	Record of Decision
RWF	Revolution Wind Farm
SOI	Secretary of the Interior
USCG	United States Coast Guard
VERI	Vineyard Environmental Research Institute
WTG	Wind Turbine Generator

1.0 EXECUTIVE SUMMARY

This Historic Property Treatment Plan (HPTP) for the Gay Head Lighthouse, which is listed on the National Register of Historic Places (NRHP) (the Historic Property) provides background data, historic property information, and detailed steps that will be implemented to carry out mitigation actions to resolve potential adverse effects preliminarily identified by the applicant in the *Historic Resources Visual Effects Analysis – Revolution Wind Farm*, dated July 2022 (HRVEA; EDR, 2023) for the Revolution Wind Farm (RWF) and Revolution Wind Export Cable Project (collectively, the Undertaking). Revolution Wind LLC (Revolution Wind) has provided in accordance with the Bureau of Ocean Energy Management’s (BOEM) Findings of Adverse Effect (FoAE) for the Undertaking under the National Historic Preservation Act (NHPA).

BOEM has used the National Environmental Policy Act (NEPA) substitution process to fulfill its Section 106 obligations as provided for in the NHPA implementing regulations (36 CFR § 800.8(c)), and BOEM has consulted with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, federally recognized Native American Tribes, and other NHPA Section 106 consulting parties in accordance with this process. Revolution Wind has provided this HPTP to BOEM for inclusion in the Final Environmental Impact Statement (FEIS).

This HPTP describes the mitigation measures to resolve adverse effects on historic properties, the implementation steps and timeline for actions. The mitigation measures are based on the evaluations and outreach performed by Revolution Wind prior to the issuance of the DEIS as well as outreach to consulting parties performed by BOEM. This HPTP document has undergone revision and refinement in consultation with the Massachusetts State Historic Preservation Officer, the Rhode Island State Historic Preservation Officer, the ACHP, and other consulting parties throughout the NEPA substitution process. This HPTP is included in the Memorandum of Agreement (MOA) issued in accordance with 36 CFR §§ 800.8, 800.10.

This HPTP is organized into the following sections:

- **Section 1.0, Introduction**, outlines the content of this HPTP.
- **Section 2.0, Cultural Resources Regulatory Context**, briefly summarizes the Undertaking while focusing on cultural resources regulatory contexts (federal, tribal, state, and local, including preservation restrictions), identifies the historic property discussed in this HPTP that will be adversely affected by the Undertaking, and summarizes the pertinent provisions and attachments of the HRVEA (EDR, 2023) and *Revolution Wind Farm Construction and Operations Plan (COP; Revolution Wind, 2022)* that guided the development of this document.
- **Section 3.0, Existing Conditions, Historic Significance, and Maritime Setting**, provides a physical description of the historic property included in this HPTP. Set within its historic context, the applicable NRHP criteria for the historic property are discussed with a focus on the contribution of a maritime visual setting to its significance and integrity.
- **Section 4.0, Mitigation Measures**, presents specific steps to carry out the applicant-proposed mitigation actions identified in the COP or alternative measures developed through stakeholder

engagement meetings to date. The mitigation action includes a detailed description, intended outcome, methods, standards, and requirements for documentation. The mitigation action details may be revised, based on feedback gathered during the process.

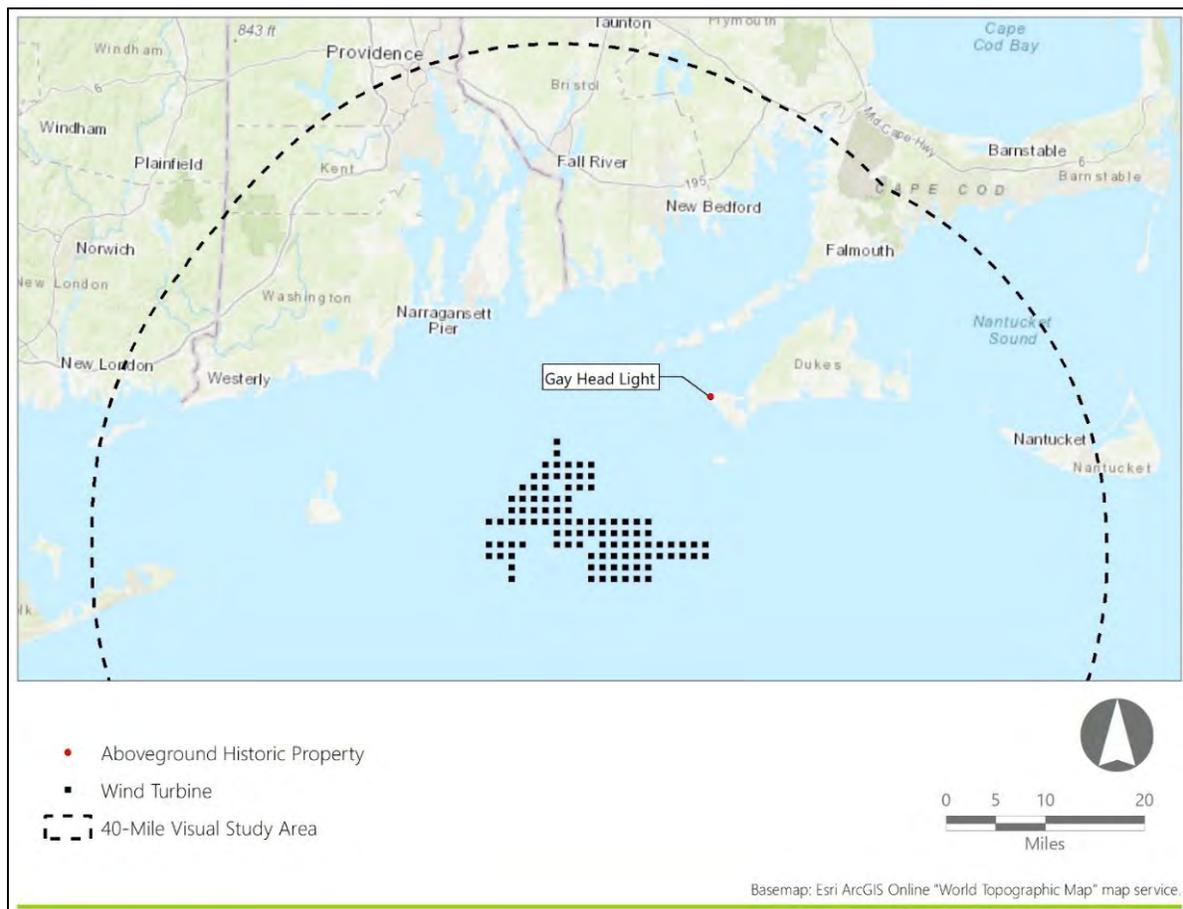
- **Section 5.0, Implementation**, establishes the process for executing mitigation actions at the historic property, as identified in Section 4.0 of this HPTP. For each/the action, organizational responsibilities are outlined, a timeline is provided, and regulatory reviews are listed.
- **Section 6.0, References**, is a list of works cited in this HPTP.

2.0 BACKGROUND INFORMATION

2.1 Project Overview: Revolution Wind Farm and Revolution Wind Export Cable

The Undertaking is a wind-powered electric generating facility composed of up to 100 wind turbine generators (WTGs) and associated foundations, two offshore substations, and inter-array cables connecting the WTGs and the offshore substations (see Figure 2.1-1). The WTGs, offshore substations, array cables, and substation interconnector cables would be located on the Outer Continental Shelf approximately 15 nautical miles (18 statute miles) southeast of Point Judith, Rhode Island, approximately 13 nautical miles (15 statute miles) east of Block Island, Rhode Island, approximately 7.5 nautical miles (8.5 statute miles) south of Nomans Land Island National Wildlife Refuge (uninhabited island), and between approximately 10 to 12.5 nautical miles (12 to 14 statute miles) south/southwest of varying points of the Rhode Island and Massachusetts coastlines (62 FR 33708). In addition, two submarine export cables located in both federal waters and Rhode Island State territorial waters, will connect the offshore substation to the electrical grid. The proposed interconnection location for the Undertaking is the existing Davisville Substation, which is owned and operated by The Narragansett Electric Company d/b/a National Grid and located in North Kingstown, Rhode Island. The visible offshore components of the operational Undertaking will be located on Lease OCS-A 0486 in water depths ranging from approximately 108 to 125 feet.

Figure 2.1-1. Project Location



2.2 Section 106 and Section 110(f) of the National Historic Preservation Act (NHPA)

This HPTP was developed in accordance with the HRVEA and COP and reflects consultations conducted by BOEM with multiple consulting parties, including the Massachusetts State Historic Preservation Officer (MA SHPO), the Town of Aquinnah, and the Gay Head Lighthouse Advisory Board. The regulations at 36 CFR § 800.8 provide for use of the NEPA process to fulfill a federal agency's NHPA Section 106 review obligations in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6. Under these provisions, issuance of an ROD and implementation of relevant conditions will resolve adverse effects to historic properties caused by the Undertaking, including to National Historic Landmarks for which BOEM must provide a higher standard of care, as required by Section 110(f) of the NHPA.

The measures to avoid and minimize adverse effects to identified historic properties are described in the COP (Section 4.4.1.3 and Appendix BB).

This HPTP addresses the mitigation requirements identified by BOEM to resolve the remaining adverse effects after application of the above-referenced measures. The mitigation measures reflect consultations among consulting parties to refine a conceptual mitigation framework proposed by Revolution Wind.

All activities implemented under this HPTP will be conducted in accordance with any conditions imposed by BOEM in its ROD and with applicable local, state and federal regulations and permitting requirements. Responsibilities for specific compliance actions are described in further detail in Section 5.2 – Organizational Responsibilities.

2.2.1 Municipal Regulations

Before implementation, any on-site mitigation measures will be coordinated with local municipalities and commissions to obtain approvals, as appropriate. These may include, but are not limited to building permits, zoning, land use, planning, historical commissions, and design review boards. Additional information regarding compliance with local requirements appears in Section 5.0, Implementation.

2.2.2 Preservation Easements and Restrictions

Preservation easements and restrictions protect significant historic, archaeological, or cultural resources. The State of Massachusetts preservation restrictions are outlined in Massachusetts General Law Chapter 184, Sections 31-33. The Massachusetts Historical Commission (MHC) holds a Historic Preservation Restriction, and the United States Coast Guard (USCG) holds an Aid to Navigation Easement on the historic property per 10 USC 2668 Easements for Rights of Way. Any mitigation work associated with the historic property will comply with the conditions of all extant historic preservation easements. Additional information regarding compliance with extant preservation restrictions appears in Section 5.0, Implementation.

2.3 Participating Parties

BOEM initiated consultation under Section 106 with invitations to consulting parties on April 30, 2021. BOEM hosted the first Section 106-specific meeting with consulting parties on December 17, 2021, pursuant to Sections 106 and 110(f) of the NHPA and in accordance with 36 CFR 800.8.

Following BOEM initial Section 106 meeting with consulting parties, Revolution Wind held stakeholder outreach meetings (see Section 5.3) to review conceptual mitigation measures for the historic property and invited the following parties:

- The Wampanoag Tribe of Gay-Head Aquinnah
- The Martha's Vineyard Commission
- The Gay Head Lighthouse Advisory Committee
- The Town of Aquinnah
- The Massachusetts Historical Commission.¹

¹ MHC was invited to attend stakeholder outreach meetings regarding historic properties in Massachusetts; however, MHC has not participated in outreach meetings for Revolution Wind.

3.0 EXISTING CONDITIONS, HISTORIC SIGNIFICANCE, AND MARITIME SETTING

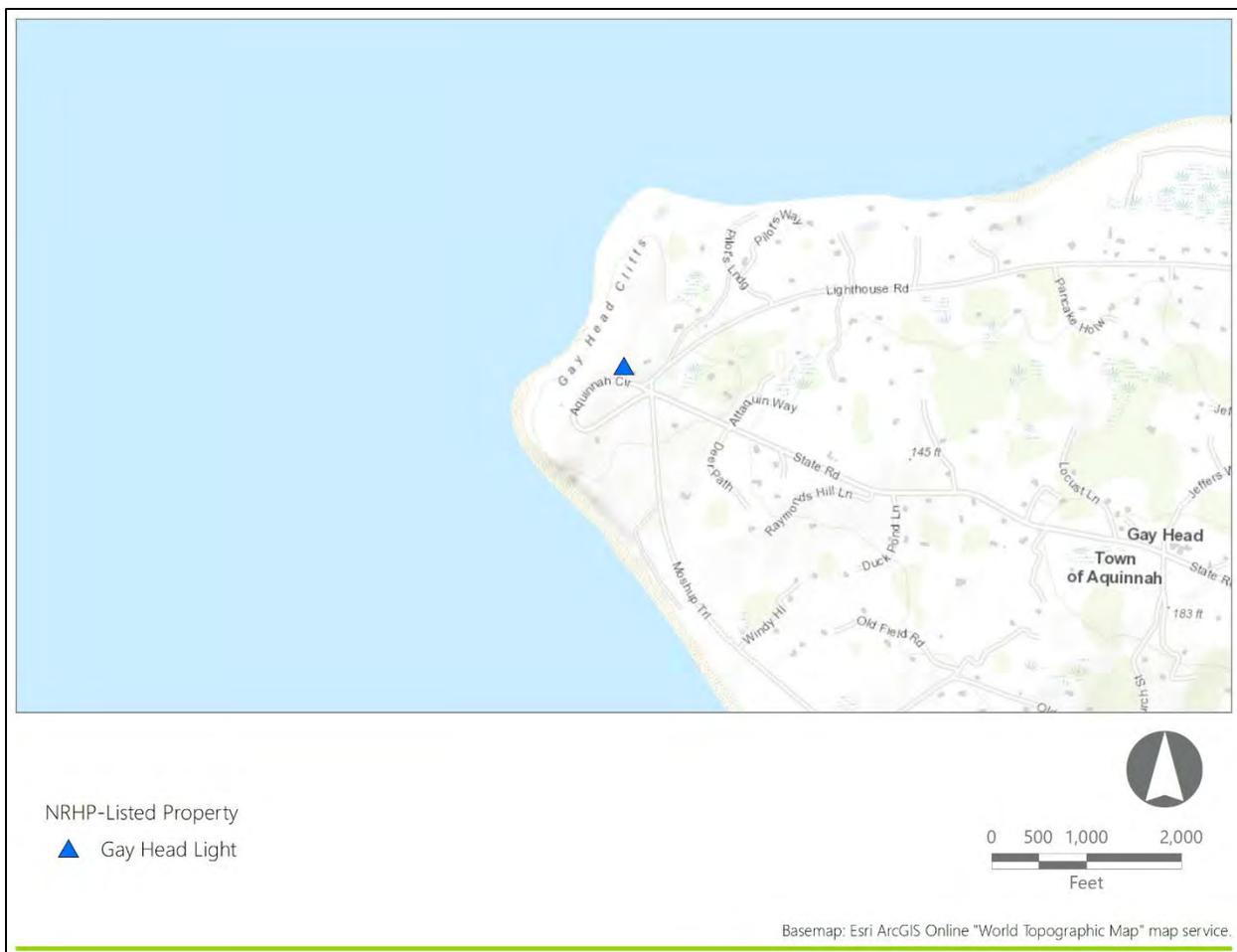
3.1 Historic Properties

This HPTP involves one historic property, as identified in Table 3.1-1 and located on Figure 3.1-1.

Table 3.1-1. Historic Properties included in the HPTP

Name	Property Designation	Municipality	State	Site No. (Agency)	Ownership	Historic Property Type
The Gay Head Lighthouse	NRHP-Listed	Town of Aquinnah	MA	MHC #GAY.900 (MHC); GSA 1-X-MA-0877 (USCG); 87001464 (NPS)	Public	Lighthouses and Navigational Aids

Figure 3.1-1. Historic Property Location



In Section 3.3, the historic property is described both physically and within its historic context, with a focus on the contribution of a maritime visual setting to the property's significance and integrity.

3.2 Maritime Setting

For the purposes of this analysis and assessment, views of marine waters are considered critical aspects of maritime settings. The influence of the marine environment and related human activities on historical development patterns is extensive and may be expressed in areas without direct lines of sight to the sea. Although these types of setting may contribute to the significance of historic properties, they would not be subject to alteration as a result of the proposed undertaking and are not considered further in this report.

The Gay Head Lighthouse is considered within the HRVEA as historic property type "Lighthouses and Navigational Aids" which is defined by the historic associations with water-related transportation and defense, prominent views of the sea and dominance of the surrounding landscape, and common architectural forms. These structures present themselves as prominent and iconic features on the coastal landscape, possess elevated views of the ocean horizon, and are sited specifically for those elevated views.

Lighthouses and other historic navigation aids in the study area include properties that were intended to serve mariners plying large areas of open water and other properties that served specific navigation routes through the complex and treacherous waters of the region's bays. All of these properties have an obvious association with maritime settings, but the scale of those settings will vary due to the conformation of the local landscape and seas and the design and purpose of each navigation aid.

3.3 The Gay Head Lighthouse

3.3.1 Physical Description and Existing Conditions

Sited on 1.35 acres off Aquinnah Circle at the southwestern point of the Town of Aquinnah, the conical 1856 brick lighthouse sits just east of clay cliffs which overlook Devil's Bridge rocks. The lighthouse marks the entrance to Vineyard Sound from the south. In 2015, the structure was relocated 134 feet from its original location, away from the cliffs due to erosion concerns (Gay Head Lighthouse, 2018). The structure was placed on a new granite sub-foundation, at the same elevation as its original location (Unnamed, 2015).

The red brick tower shaft houses interior stairs and measures 17.5 feet in diameter and 45.7 feet in height (DiStefano, 1981). A mid-level balcony, corresponding to the interior lamp room, rests on a sandstone entablature and has iron railings. The glazed lens room with black iron structure contains the optic and sits atop the masonry with its own iron balcony (Tait, 1987). The lens room is enclosed by an iron roof with ventilator and lightning rod. A series of square four-pane windows perforate the building envelope at various heights around the circumference of the lighthouse. Recent improvements include replacement iron railings that match the original set, and repair to masonry damage where the lens room and balcony meet the brick (Gay Head Lighthouse, 2018).

Following the relocation of the Gay Head Lighthouse in 2015, cliff erosion was no longer the biggest threat to the structure. Due to age and maritime siting, the poor condition of the Gay Head Lighthouse building

materials is currently posing the largest risk to its long-term survival. The curtain wall of the lens room, as well as brick, sandstone, and mortar all display signs of deterioration (Gay Head Lighthouse, 2018).

3.3.2 Historic Context

The extant circa 1856 Gay Head Lighthouse is the second lighthouse on this site, a replacement for the original wood structure authorized in 1799 by President John Adams (DiStefano, 1981). By 1854, the original structure was being confused with the Sankay Light on Nantucket, resulting in a shipwreck. As a response to the tragedy, Congress allocated \$30,000 for a new brick lighthouse, a first-order Fresnel lens from France, and a keeper's residence (demolished circa 1961). Caleb King of Boston constructed the new Gay Head Lighthouse and keeper's house using brick from the nearby Chilmark Brick Works. The lighthouse's reopening in 1856 was well publicized and tours opened to the public shortly thereafter (Gay Head Lighthouse, 2018).

Between 1856 and 1952 the Fresnel lens served as the lighthouse beacon, under the care of 18 principal keepers and 10 assistant keepers. The first Wampanoag Tribe of Gay Head (Aquinnah) member to serve as the Gay Head Lighthouse Keeper was Charles W. Vanderhoop, Sr. who served in that position from 1930-1933 (Gay Head Lighthouse, 2018). Following the introduction of electricity and an upgraded optic at the lighthouse, the USCG donated the Fresnel lens to the Martha's Vineyard Museum, and the keeper's house was demolished. With a fully automated beacon, the USCG began its operation of the Gay Head Lighthouse in 1956.

Under USCG stewardship, and with insufficient funds for maintenance, the condition of the Gay Head Lighthouse began its slow decline in the 1960s, continuing into the early 1980s. In 1984, Congressional hearings to save the Gay Head Lighthouse from demolition resulted in the licensure of a 35-year lease to the Vineyard Environmental Research Institute (VERI) who were given control of the management and maintenance of the property (Gay Head Lighthouse, 2018). The USCG continued to operate the navigational aid beacon through an access easement (see Section 2.2.2). VERI commenced fundraising activities to make repairs and re-open the lighthouse to the public, which was done in 1986, 30 years after its closure. Once again keepers and assistant keepers were appointed, including Charles Vanderhoop, Jr. who was born in the keeper's house. In 1994, VERI transferred its license to the Martha's Vineyard Museum, and in 2009 the Museum provided President Barack Obama a private tour of the property with his family (Gay Head Lighthouse, 2018).

Though cliff erosion was a decades-old problem at the Gay Head Lighthouse, it became an increased threat in 2010 when a portion of the perimeter fence tumbled down the cliff face. By 2012, the Save the Lighthouse Committee was formed to research options for the continued safety of the structure, including a potential relocation which was determined to be the solution. In 2013, the Gay Head Lighthouse was featured on the National Trust of Historic Preservation's list of 11 Most Endangered Places. Its inclusion on the list put in motion a years-long fundraising campaign for its relocation by International Chimney Corporation who recommended it occur no later than 2015. With funding in place, the move began on May 28, 2015, and finished on May 30, 2015, with the Gay Head Lighthouse's safety assured for another century (Gay Head Lighthouse, 2018).

The Town of Aquinnah filed for ownership of the property in 2015, as it was determined to be excess to the needs of the UCSG (General Services Administration, 2013). The deed to the town included a preservation easement and access restrictions, described in Section 2.2.2. The Gay Head Lighthouse Advisory Committee is a municipal department board which manages the property.

3.3.3 NRHP Criteria and the Maritime Visual Setting

In 1987, the Gay Head Lighthouse was listed on the NRHP as part of the Lighthouses of Massachusetts Thematic Resources Area (DiStefano, 1981). At the time of construction, it was considered one of the ten most important lights on the Atlantic Coast and contained one of the country's first Fresnel lenses. The Gay Head Lighthouse is significant under Criterion A as a historic maritime structure and aid to navigation. It is also significant under Criterion C as an outstanding example of nineteenth-century maritime architecture (Tait, 2017).

The site chosen for the lighthouse's 2015 relocation was consistent with the setting of the original, thereby allowing for the continued integrity of "association, setting, feeling and relationship to the Gay Head cliffs and to the ocean as an aid to navigation" (Unnamed, 2015). Therefore, the Gay Head Lighthouse continued to be NRHP-listed during and following its relocation. Since that time, physical improvements have been consistent with the Secretary of the Interior's (SOI) Standards (36 CFR 68) which have allowed the structure to retain integrity of materials, workmanship, and design.

As stated above, the Gay Head Light is located on the Gay Head Cliffs and "marks the Devil's Bridge rocks, the shoals of the south shore of the island and the entrance to Vineyard Sound from Buzzard's Bay" (Tait, 2017). Devil's Bridge extends over a mile from the cliffs and has been the site of numerous accidents. In 1838 the lighthouse was replaced, and the new light could be seen for more than 20 miles (D'Entremont, 2021). The need for a lighthouse at this location is evident, and despite the powerful and long-distance light, due to Devil's Bridge and the strong currents, shipwrecks continued to occur. The setting of the Gay Head Light is intrinsically linked to the water with its location high on the Gay Head Cliffs, marking Vineyard Sound and the Atlantic Ocean.

4.0 MITIGATION MEASURES

Mitigation measures at the historic property are detailed in this section. The mitigation measures for the Gay Head Lighthouse (detailed below) reflect consultations among consulting parties to refine a conceptual mitigation framework proposed by Revolution Wind. BOEM and Revolution Wind have identified steps to implement these measures in consultation with Participating Parties, led by individuals who meet the qualifications specified in the Secretary of the Interior's Qualifications Standards for History and Architectural History (36 CFR 61).

4.1 Historic Rehabilitation of the Gay Head Lighthouse

4.1.1 *Purpose and Intended Outcome*

In consultation with the Town of Aquinnah and the Gay Head Lighthouse Advisory Board, this mitigation measure will contribute funds to the next phase of rehabilitation at the Gay Head Lighthouse, as discussed at the Revolution Wind stakeholder meetings on February 1, 15 and 18, 2022. The Gay Head Lighthouse Advisory Board, a municipal board in the Town of Aquinnah, has commissioned a report identifying preservation and restoration needs for the lighthouse, the ICC Commonwealth Corporation *Report of December 2021 Inspection Gay Head Lighthouse Aquinnah, MA* dated April 13, 2022. The intended outcome is to ensure the long-term preservation of the lighthouse by contributing funds for physical repairs and/or restoration of the historic building materials according to the priorities identified by the report. During consultation, the Town requested contracting support for the restoration effort at the Gay Head Lighthouse. Should sufficient funds be available for the next phase of restoration the Gay Head Lighthouse in the timeframe set forth in Section 4.1.3 below, Revolution Wind would provide contracting support for restoration of the curtain wall.

4.1.2 *Scope of Work*

The scope of work includes the following:

- Revolution Wind will provide the funding amount identified in Attachment 7 of the MOA; and
- If sufficient funds are available to complete the full restoration project as defined in the previously referenced report, then Revolution Wind will provide additional support outlined below and in Sections 4.1.3 and 4.1.5 in consultation with the Participating Parties.
 - Contracting support for restoration of the curtain wall per the ICC Commonwealth Corporation *Report of December 2021 Inspection Gay Head Lighthouse Aquinnah, MA* dated April 13, 2022. Contracted work would include:
 - Prior to any work commencing, photographic and written documentation of the existing conditions will be recorded;
 - Development of draft specifications and construction drawings to be distributed to the Participating Parties for review and comment;
 - Final Specifications and construction drawings to be distributed to the Participating Parties for review and comment;
 - Progress reports as requested by the Participating Parties to be distributed to the Participating Parties for review and comment; and

- A Summary Report of the work completed including photographs and as-built documentation to be distributed to the Participating Parties.

4.1.3 Methodology

Revolution Wind will deposit the funding stipulated in Attachment 7 in an escrow account. If notified by the Town of Aquinnah that sufficient funds are available for the defined scope of work within five years of the execution of the MOA, Revolution Wind will hire a qualified contractor to complete the next phase of restoration at the Gay Head Lighthouse. Prior to any work commencing, photographic and written documentation of the existing conditions will be recorded. Drawings and specifications supporting the scope of work (see Section 4.1.2 and 4.1.5) will be developed in compliance with applicable standards (see Section 4.1.4). The project will require the mobilization of a qualified contractor that is experienced in the repair and restoration of historic lighthouses.

4.1.4 Standards

The scope of work will comply with following standards:

- Town of Aquinnah, MA Building Code;
- Martha’s Vineyard Commission planning guidance, as applicable;
- Preservation Restriction (MGL Chapter 184, Section 31-33);
- United States Coast Guard Aid to Navigation (ATON) Access Easement (U. S. Department of Homeland Security and U. S. Coast Guard, 2005);
- The Town of New Shoreham Building, Zoning, Land Use & Planning guidance and regulations;
- The Town of New Shoreham Historic District Commission;
- United States Coast Guard Aid to Navigation (ATON) Access Easement (U. S. Department of Homeland Security and U. S. Coast Guard, 2005);
- *Preservation Brief 17: Architectural Character – Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving their Character* (Nelson, 1988);
- *Preservation Brief 47: Maintaining the Exterior of Small and Medium Size Historic Buildings*;
- *National Register Bulletin 34: Guidelines for Evaluating and Documenting Historic Aids to Navigation*;
- *Historic Lighthouse Preservation Handbook*;
- *IALA-AISM Lighthouse Conservation Manual*;
- Preservation Restriction (RIGL Title 42, Section 42-45-9); and
- The Secretary of the Interior’s *Standards for Treatment of Historic Properties* (36 CFR 68);
- The Secretary of the Interior’s *Professional Qualifications Standards* (36 CFR Part 61), as applicable;
- The Secretary of the Interior’s *Standards for Treatment of Historic Properties* (36 CFR 68); and
- The Secretary of the Interior’s *Professional Qualifications Standards* (36 CFR Part 61), as applicable.

4.1.5 Documentation

The following documentation would be provided for review by the Participating Parties should the Town of Aquinnah notify Revolution Wind that sufficient funds are available for the defined scope of restoration:

- Proposed scopes of work including draft text, project plans, and design specifications;
- Photographic and written documentation of existing conditions;
- Draft specifications and construction drawings to be distributed to the Participating Parties for review and comment;
- Final Specifications and construction drawings to be distributed to the Participating Parties for review and comment;
- Progress reports as requested by the Participating Parties to be distributed to the Participating Parties for review and comment; and
- A Summary Report of the work completed including photographs and as-built documentation to be distributed to the Participating Parties.

4.1.6 Funds and Accounting

Funding amounts are being determined in consultation with the consulting parties. Revolution Wind will deposit the stipulated funding in an escrow account in accordance with the timeline for implementation of mitigation measures identified in the MOA. If insufficient funds are available to complete the restoration project (as defined in the Town's report) within five years of the execution of the Memorandum of Agreement, the escrowed funds shall be released to the Town of Aquinnah for sole use in the planning and implementation of repair and restoration work on the Gay Head Lighthouse property, provided such repair and restoration efforts comply with the standards listed in Section 4.1.4 and are reviewed and approved by the Massachusetts Historical Commission prior to implementation. Release of the escrowed funds to the Town of Aquinnah in this manner shall satisfy Revolution Wind's obligations as they relate to mitigation for the adverse visual effect to the Gay Head Lighthouse.

5.0 IMPLEMENTATION

5.1 Timeline

The timeline for implementation of the mitigation measures is identified in the MOA.

5.2 Organizational Responsibilities

5.2.1 *Bureau of Ocean Energy Management (BOEM)*

BOEM remains responsible for making all federal decisions and determining compliance with Section 106. BOEM has reviewed this HPTP to ensure, at minimum, it includes the content required.

- BOEM remains responsible for making all federal decisions and determining compliance with Section 106;
- BOEM, in consultation with the Participating Parties, will ensure that mitigation measures adequately resolve adverse effects, consistent with the NHPA;
- BOEM will be responsible for sharing the annual summary report with Participating Parties; and
- BOEM is responsible for consultation related to dispute resolution.

5.2.2 *Revolution Wind, LLC*

Revolution Wind will be responsible for the following:

- Considering the comments provided by the Participating Parties in the development of this HPTP;
- Contributing funding for mitigation measures, as specified in Section 4;
- Providing the Documentation in Section 4.0 to the Participating Parties for review and comment;
- Annual Reporting to BOEM; and
- Revolution Wind will be responsible for ensuring that all work that requires consultation with Tribal Nations are performed by professionals who have demonstrated professional experience consulting with federally recognized Tribes.

5.2.3 *Massachusetts Historical Commission (MHC)*

Should the Town of Aquinnah notify Revolution Wind that sufficient funding is available to complete the scope of restoration identified in the Town's report, the scope of work would be submitted to the MHC under the terms of the Preservation Restriction.

5.2.4 *Massachusetts State Historic Preservation Officer*

Should the Town of Aquinnah notify Revolution Wind that sufficient funding is available to complete the scope of restoration identified in the Town's report, the scope of work would be submitted to the Massachusetts State Historic Preservation Officer for compliance with the SOI Standards for Rehabilitation (36 CFR 68).

5.2.5 *United States Coast Guard (USCG)*

Should the Town of Aquinnah notify Revolution Wind that sufficient funding is available to complete the scope of restoration identified in the Town's report, the scope of work will be submitted to the USCG for review to confirm that it complies with the terms of the ATON Access Easement.

5.2.6 *Wampanoag Tribe of Gay Head (Aquinnah)*

The Wampanoag Tribe of Gay Head (Aquinnah) may, at their sole discretion, participate in consultations for the finalization of the HPTP in recognition of the traditional cultural and religious significance of the historic property to the Tribe.

5.2.7 *Other Parties, as Appropriate*

Revolution Wind does not anticipate additional consulting parties, should any be determined, this will be updated.

5.3 Participating Party Consultation

This HPTP was provided by Revolution Wind for review by Participating Parties to provide meaningful input on the resolution of adverse effects to and form(s) of implementing mitigation at the historic properties. Participating Parties were provided the opportunity for review and comment on the HPTP concurrent with BOEM's NEPA substitution schedule for the Project. This HPTP was further refined through informational and consultation meetings, conference calls, HPTP draft reviews and document exchanges, or similar means of communication of information.

6.0 REFERENCES

Code of Federal Regulations (CFR). 2021a. 36 CFR 800 – Protection of Historic Properties [incorporating amendments effective December 15, 2021]. Available at <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800>. Accessed December 21, 2021.

CFR. 2021b. 36 CFR 61.4(l)(1) – Procedures for State, Tribal, and Local Government Historic Preservation Programs [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4\(e\)\(1\)](https://www.ecfr.gov/current/title-36/chapter-I/part-61#p-61.4(e)(1)). Accessed December 21, 2021.

CFR. 2021c. 36 CFR 65.2(c)(2) – National Historic Landmarks Program – Effects of Designation [incorporating amendments effective December 15, 2021]. Available at [https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2\(c\)\(2\)](https://www.ecfr.gov/current/title-36/chapter-I/part-65#p-65.2(c)(2)). Accessed December 21, 2021.

CFR. 2021d. 36 CFR 68 – Secretary of the Interior’s Standards for the Treatment of Historic Buildings. National Archives and Records Administration. Washington, D.C. Available at <https://www.ecfr.gov/current/title-36/chapter-I/part-68>. Accessed December 16, 2021.

CFR. 2022. 40 CFR 1500 – National Environmental Policy Act Implementing Regulations. Available at <https://www.ecfr.gov/current/title-40/chapter-V/subchapter-A>. Accessed January 7, 2022.

D’Entremont, Jeremy. 2021. *History of Gay Head Light, Martha’s Vineyard, Massachusetts*. New England Lighthouses: A Virtual Guide. Available <http://www.newenglandlighthouses.net/gay-head-light-history.html>. Accessed January 2022.

DiStefano, Victoria. 1981. Gay Head Light. Massachusetts Lighthouse Information Form. Massachusetts Historical Commission. Boston, MA.

Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR). 2023. *Historic Resources Visual Effects Analysis, Revolution Wind Farm*. Syracuse, NY. July 2022.

Federal Register. 1997. 62 FR 33708 – The Secretary of the Interior’s Historic Preservation Professional Qualifications Standards. Office of the Federal Register, National Archives and Records Administration. Washington, D.C. Available at <https://www.govinfo.gov/app/details/FR-1997-06-20/97-16168>. Accessed December 21, 2021.

Gay Head Lighthouse. 2018. *About the Lighthouse*. Available at <http://www.gayheadlight.org/about-the-lighthouse/>. Accessed December 21, 2021.

General Services Administration. 2013. *Notice of Availability*. Department of Homeland Security. Washington D.C. Available at <https://www.nps.gov/maritime/nhlpa/noa/2013/GayHeadNOAFactSheet.pdf>. Accessed December 21, 2021.

Martha’s Vineyard Commission. 2022. *DCPCs*. Available at <https://www.mvcommission.org/dcpcs>. Accessed January 21, 2021.

Revolution Wind, LLC. 2022. Construction and Operations Plan for the Revolution Wind Farm and Revolution Wind Export Cable Project. Available at <https://www.boem.gov/renewable-energy/state-activities/revolution-wind-farm-construction-and-operations-plan>. Accessed January 12, 2022.

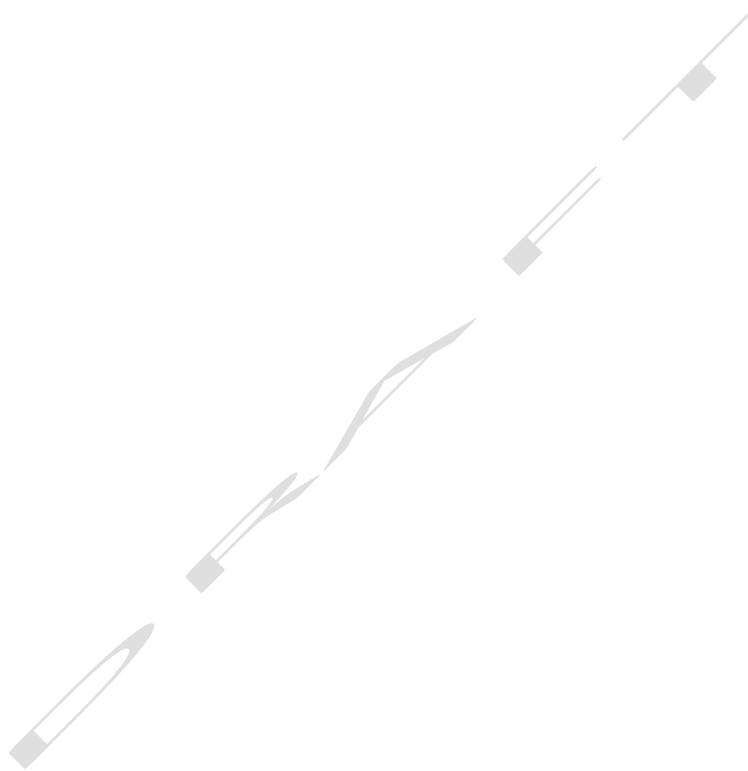
Tait, Anne. 1987. *Gay Head Light: Lighthouses of Massachusetts Thematic Group Nomination*. Massachusetts Historical Commission. Boston, MA.

United States Code. 2016. Title 54 - National Historic Preservation Act [as amended through December 16, 2016]. Available at <https://www.achp.gov/sites/default/files/2018-06/nhpa.pdf>. Accessed December 21, 2021.

United States (U. S.) Department of Homeland Security and United States (U.S.) Coast Guard. 2005. *Aids to Navigation Manual Administration*. Available at https://media.defense.gov/2017/Mar/29/2001724016/-1/-1/0/CIM_16500_7A.PDF. Accessed February 22, 2022.

Unnamed. 2015. *Technical Amendment to the Gay Head Light National Register of Historic Places Nomination Form*. United States Department of the Interior. Washington, D.C.

ATTACHMENT 15 – REVOLUTION WIND EXPORT CABLE ONSHORE SUBSTATION AND INTERCONNECTION FACILITY, NORTH KINGSTOWN, RHODE ISLAND: PROCEDURES GUIDING THE DISCOVERY OF UNANTICIPATED CULTURAL RESOURCES AND HUMAN REMAINS





Revolution Wind Export Cable Onshore Substation and Interconnection Facility North Kingstown, Rhode Island

Procedures Guiding the Discovery of Unanticipated Cultural Resources and Human Remains

March 2023

Revolution Wind, LLC (Revolution Wind), a 50/50 joint venture between Orsted North America Inc. (Orsted NA) and Eversource Investment LLC (Eversource), proposes to construct and operate the Revolution Wind Farm Project (Project). The wind farm portion of the Project will be located in federal waters on the Outer Continental Shelf (OCS) in the designated Bureau of Ocean Energy Management (BOEM) Renewable Energy Lease Area OCS-A 0486. The Project also includes up to two submarine export cables (RWECS), generally co-located within a single corridor through both federal waters and state waters of Rhode Island. The RWECS will make landfall at Quonset Point in North Kingstown, Rhode Island and will interconnect to an existing electric transmission system via the Davisville Substation, which is owned and operated by The Narragansett Electric Company (TNEC), located in North Kingstown, Rhode Island.

Revolution Wind is committed to the protection and preservation of cultural resources, in accordance with federal and state legislation, and is continuing that commitment as part of the onshore components of the Project. Revolution Wind recognizes that despite intensive cultural resource field investigations that were performed in the spring and summer of 2021 (Forrest and Waller 2021), it is nonetheless possible that potentially significant archaeological resources could be discovered during onshore Project construction, particularly during excavation. Revolution Wind also recognizes the requirement for compliance with federal, state, and municipal laws and regulations regarding the treatment of human remains, if any are discovered.

The procedures guiding the unanticipated discovery of cultural resources and human remains detailed herein (“Procedures”) were developed on behalf of Revolution Wind and in consultation with the Rhode Island Historical Preservation and Heritage Commission (RIHPHC)/office of the State Historic Preservation Officer (SHPO), and federally recognized Native American tribes. These Procedures summarize the approach that Revolution Wind will use to address any unanticipated discoveries of archaeological resources or human remains during construction activities within the onshore portion of the Project’s area of potential effect (APE).

The purpose of archaeological investigations is to determine the presence or absence of historic properties, including archaeological sites, within a project APE. These archaeological investigations are conducted in accordance with standards set forth in Section 106 of the National Historic Preservation Act of 1966, as amended, (54 USC 36018) and its implementing regulations (36 CFR 800), specifically, those procedures regarding “post-review discoveries” as outlined in 36 CFR 800.13. All work is undertaken pursuant to the Secretary of the Interior *Standards for Archaeology and Historic Preservation* (48 FR 44716-44742); the *Performance Standards and Guidelines for Archaeology in Rhode Island* (RIHPHC 2021); and the applicable laws and regulations pertaining to



the cultural resources and human remains including the Rhode Island Historical Cemeteries Act (Rhode Island General Law [R.I.G.L.] 23-18-11 *et seq.*) and the Antiquities Act of Rhode Island (R.I.G.L. 42-45.1).

Cultural Sensitivity Training

Revolution Wind acknowledges the sensitivity of the Project and surrounding area to potentially contain significant archaeological sites including Native American burials. The Public Archaeology Laboratory Inc. (PAL) Principal Investigator will give Revolution Wind and its contractor construction supervisors cultural and archaeological sensitivity training before the start of construction. The purpose of this training will be to review Revolution Wind's commitments to cultural resource compliance, review the general results of the archaeological investigations conducted within the onshore portions of the Project APE, and to provide an overview of the general cultural history of the area so that Revolution Wind and their contractors are aware of the types of archaeological resources that may be encountered during construction. The training program will outline the procedures that will be followed if a significant cultural resource or archaeological deposit is discovered during construction.

Notification Procedures

The identification of archaeological resources requires experience in recognizing and identifying potentially and significant archaeological sites and deposits. Revolution Wind is committed to having qualified archaeological monitors onsite during any ground disturbing construction activities. Revolution Wind will provide the Narragansett Indian Tribe, the Wampanoag Tribe of Gay Head/Aquinnah, Mashpee Wampanoag Tribe, the Mohegan Tribe, the Shinnecock Indian Nation, the Delaware Tribe of Indians, the Delaware Nation, and the Mashantucket Pequot Tribal Nation Tribal Historic Preservation Offices (THPOs) the opportunity to have their tribal monitors and cultural resource specialists onsite during archaeological or construction activities.

The following details the plan that Revolution Wind and their contractors will follow if archaeological resources or human remains are identified during construction.

During Construction

Archaeological Discoveries

1. Possible archaeological remains may be discovered by archaeological and tribal monitors during construction. If anyone including construction personnel identify suspected cultural or archaeological resources, the archaeologist on site should immediately be notified such that the qualified archaeological monitor can issue a stop-work order. If suspected artifacts or archaeological features are uncovered during a construction activity, qualified archaeological monitors will have the authority to stop work in the vicinity of the discovery until it can be determined if the materials are cultural and whether they represent a potentially significant site or archaeological deposit.
2. Archaeological monitors will immediately notify Revolution Wind's Environmental Compliance Manager. Notification will include the activity, specific work area including location/address and construction site (onshore substation, interconnection facility, export cable route, etc.), and provide digital photographs of the find.

3. Revolution Wind will issue a Stop Work order and direct the contractor to secure the area by flagging or fencing off the area of the archaeological discovery. Any discovery made on a weekend or overnight hours will be protected until all necessary parties have been notified of the discovery. The contractor will not resume work in the vicinity of the find until Revolution Wind's Environmental Compliance Manager has granted clearance.
4. PAL, in consultation with the onsite tribal monitors, will determine if the site is potentially significant and notify the RIHPHC and BOEM. Revolution Wind, their contractors, and PAL will work with the RIHPHC and the THPOs to develop and implement a site treatment plan.
5. Since the area of any potential discovery will have been partially disturbed by construction, the objective of cultural resource investigations will be to evaluate data quickly so that notifications are made and consultation can proceed. If archaeological investigations are required, Revolution Wind will inform the construction supervisor that no construction work in the immediate vicinity of the discovery can proceed until archaeological fieldwork is complete. The area will be flagged as being off-limits for work but will not be identified as an archaeological site *per se* to protect the resource(s).
6. The duration of any work stoppages will be contingent upon the significance of the identified cultural resource(s) and consultation among Revolution Wind, BOEM, RIHPHC, THPOs, and other parties to determine treatment to avoid, minimize, or mitigate any adverse effects to the identified site.
7. Once all treatment measures are complete, Revolution Wind will notify the contractor that construction work may proceed.

Human Remains Discoveries

If human remains are encountered during Project construction, they will be handled in accordance with the Rhode Island Historic Cemeteries Act (Appendix A) and North Kingstown Code of Ordinances, Part III, Chapter 12, Section 12–15 (Appendix B) and guided by the policy statement adopted by the Advisory Council on Historic Preservation ([Advisory Council]; see *Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects*, (Appendix C)). Human remains, if present, are likely to be found in deeply buried or areas unimpacted by previous construction.

Human remains will be treated with the utmost dignity and respect at all times. Skeletal remains and/or associated artifacts will be left in place and not disturbed. No remains or associated materials will be collected or removed until all notifications have been made, appropriate consultation has taken place, and a plan of action has been determined. The procedures that will be followed in the event that human remains are discovered during Project construction are:

1. If PAL and/or tribal monitors identify human remains or possible human remains, all construction work in the vicinity of the find that could affect the integrity of the remains will cease. The remains will not be touched, moved, or further disturbed. PAL will notify Revolution Wind and with the assistance of onsite contractors take measures to ensure site security.
2. PAL/Revolution Wind will record the exact location of the find, its time of discovery, and will immediately notify the RI State Police and the Town of North Kingstown's Building Inspector in accordance with Rhode Island Historic Cemeteries Act and the North Kingstown Code of Ordinances. BOEM will also be notified as soon as practicable.



3. The Town will notify the Office of the State Medical Examiner (OSME). If the OSME determines the remains are less than 100 years old, then their treatment becomes the responsibility of the State Police and the Town. If the OSME determines the remains are more than 100 years old, the OCME will notify the RIHPHC State Archaeologist. The State Archaeologist, PAL and tribal monitors will determine if the remains are Native American.
4. The Town of North Kingstown, State Archaeologist, and if the remains are Native American, the THPOs will discuss whether there are prudent and feasible alternatives to protect the remains. The results of this consultation will be made in writing. If it is not possible to protect the remains, they may be excavated only under a permit issued by the RIHPHC after the review of a recovery plan that specifies a qualified research team, research design, and plan for the disposition of the remains consistent with the results of consultation and permission from the North Kingstown Town Council.
5. In all cases, due care will be taken in the excavation, transport, and storage of any remains to ensure their security and respectful treatment.

Applicable Laws

Federal

- Section 106 of the National Historic Preservation Act of 1966, as amended (54 USC 306108) and its implementing regulations “Protection of Historic Properties” (36 CFR part 800).

Rhode Island

- Rhode Island Historic Cemeteries Act: Rhode Island General Law 23-18-11 *et seq.* (Appendix A)

North Kingstown

- North Kingstown Code of Ordinances, Part III, Chapter 12, Section 12–15 (Appendix B)

LIST OF CONTACTS

Revolution Wind, LLC

56 Exchange Terrace, Suite 300
Providence, Rhode Island 02903

Contact : James Neveu, Environmental Compliance Manager

Tel: (857) 210-9152

Email: JANEV@orsted.com

REDACTED



Bureau of Ocean Energy Management

*Office of Renewable Energy Programs
45600 Woodland Road
VAM-OREP*

Sterling, Virginia 20166

Contact: Laura Schnitzer, Archaeologist

Email: laura.schnitzer@boem.gov

Rhode Island Historical Preservation and Heritage Commission

*150 Benefit Street
Providence, RI 02903-1209*

Contact: Charlotte Taylor, Principal Archaeologist

Tel: (401) 222-4140

Email: Charlotte.Taylor@preservation.ri.gov

Jeffrey Emidy, Interim Executive Director, Deputy State Historic Preservation Officer

Tel: 401) 222-4134

Email: Jeffrey.Emidy@preservation.ri.gov

Rhode Island Department of Health/Office of the State Medical Examiners

*48 Orms Street
Providence, RI 02904*

Contact: Tel: 401-222-5500

Rhode Island State Police, Wickford Barracks

*7875 Post Road
North Kingstown, RI 02852*

Contact: Tel: (401) 444-1064

North Kingstown Police Department

*8166 Post Road
North Kingstown, RI 02852*

Contact: Tel: (401) 294-3316

The Public Archaeology Laboratory, Inc.

*26 Main Street
Pawtucket, RI 02860
Contact: Deborah Cox*

TRIBAL HISTORIC PRESERVATION OFFICES

Narragansett Indian Tribe Tribal Historic Preservation Office

[REDACTED]

Mashantucket Pequot Tribal Nation Tribal Historic Preservation Office

[REDACTED]

Mashpee Wampanoag Tribe Tribal Historic Preservation Office

[REDACTED]

Mohegan Tribe Tribal Historic Preservation Office

[REDACTED]

[Shinnecock Indian Nation Tribal Historic Preservation Office](#)

[REDACTED]

Wampanoag Tribe of Gay Head/Aquinnah Tribal Historic Preservation Office

[REDACTED]

Delaware Tribe of Indians Tribal Historic Preservation Office (PA)

[REDACTED]

Delaware Nation Tribal Historic Preservation Office

[REDACTED]

APPENDIX A: RHODE ISLAND GENERAL LAWS TITLE 23 - HEALTH AND SAFETY - CHAPTER 23-18 CEMETERIES

SECTION 23-18-11

§ 23-18-11 Regulation of excavation around cemeteries. – (a) The city or town council of any municipality may by ordinance prescribe standards regulating any construction or excavation in the city or town, when those standards are reasonably necessary to prevent deterioration of or damage to any cemetery or burial ground, or to any structures or gravesites located in any cemetery or burial ground. The rules and regulations shall not apply to the ordinary installation of gravesites or of monuments, markers, or mausoleums.

(b) No city or town shall permit construction, excavation or other ground disturbing activity within twenty-five feet (25') of a recorded historic cemetery except in compliance with the following provisions:

(1) The boundaries of the cemetery are adequately documented and there is no reason to believe additional graves exist outside the recorded cemetery and the proposed construction or excavation activity will not damage or destructively alter the historic cemetery through erosion, flooding, filling, or encroachment; or

(2) The proposed construction or excavation activity has been reviewed and approved by the city or town in accordance with § 23-18-11.1.

(c) Whenever an unmarked cemetery or human skeletal material is inadvertently located during any construction, excavation, or other ground disturbing activity, including archaeological excavation, the building official of the city or town where the unmarked cemetery or human skeletal material is located shall be immediately notified. The building official shall, in turn, notify the state medical examiner and the Rhode Island historical preservation and heritage commission if the grave, cemetery, or skeletal material appears to be historic. Prior to the continuation of any further construction, excavation, or other ground disturbing activity, and unless the provisions of § 23-18-7 shall apply, the property owner shall undertake an archaeological investigation to determine the boundaries of the unmarked cemetery and shall so inform the building official. In the event that the cemetery meets the criteria for a historic cemetery, the building official shall so advise the recorder of deeds of the city or town who shall record and register the cemetery in accordance with the provisions of § 23-18-10.1.

SECTION 23-18-11.1

§ 23-18-11.1 Permit required to alter or remove historic cemetery – Powers of city or town council – Appeal. – (a) Before an agency or a property owner may authorize or commence alteration or removal of any historic cemetery, the agency or owner must apply to the city or town council where the historic cemetery is located for a permit to alter or remove. The city or town council shall prescribe by ordinance standards to regulate the alteration or removal of any historic cemetery within its municipal limits, but shall at a minimum provide that:

(1) The applicant will examine all alternatives, and demonstrate that no prudent or feasible alternative to the proposed alteration is possible;

(2) The city or town provide for notification and participation in the permitting process of parties which may be interested in the proposed alteration or removal by virtue of their status as a governmental health or historic preservation authority, or as a private or nonprofit historical, genealogical or civic

organization, or, in the case of American Indian cemeteries and burial grounds, the appropriate tribal organization; and

(3) The city or town provide for due consideration of the rights of descendants in any application to substantially alter or remove a historic cemetery.

(b) When an application for alteration or removal of a historic cemetery has been made and the boundary is unknown or in doubt, the city or town may require that the applicant, at its own expense, conduct an archaeological investigation to determine the actual size of the cemetery prior to final consideration by the city or town of the application to alter or remove.

(c) After due consideration, the city or town council may grant the application to alter or remove the historic cemetery in whole or in part, under the supervision of an archaeologist and with any restrictions and stipulations that it deems necessary to effectuate the purposes of this section, or deny the application in its entirety. Any person or persons aggrieved by a decision of the city or town council shall have the right of appeal concerning the decision to the superior court and from the superior court to the supreme court by writ of certiorari.

(d) Nothing in this section shall be deemed to contravene the authority of municipal bodies under § 45-5-12 to hold, manage, repair, or maintain any neglected burial ground.

SECTION 23-18-11.2

§ 23-18-11.2 Regulation of excavation – Removal and transfer of graves and cemeteries – Penalties. – (a) The city or town council of any municipality may by ordinance prescribe standards, in addition to those required by § 23-18-10, regulating the excavation, removal, and transfer of any graves, grave sites, and cemeteries in the municipality so as to provide an accurate record of any activity and to ensure that any remains removed are properly re-interred and the location of the new interment is recorded. In the absence of a local ordinance establishing standards, regulations adopted by the historical preservation and heritage commission shall govern. A report of any grave removal and relocation from one cemetery or burial ground to another shall be filed in the clerk's office for each municipality and shall, to the extent permitted by law, be available for public inspection. In instances where there is a headstone or other burial marker identifying the original grave, the headstone or burial marker shall be erected on the site to which any remains are transferred.

(b) To the extent not promulgated pursuant to § 23-3-5.1, the state registrar of vital records shall promulgate regulations to establish a system of record-keeping to allow descendants to locate their ancestors' graves in Rhode Island.

(c) Any person convicted of violating this section shall be subject to a fine of not more than one thousand dollars (\$1,000) and such fine shall be deemed civil in nature and not a criminal penalty.

(d) The provisions of this section shall be considered to be in addition to any other penalties provided for desecration or vandalism to cemeteries.

SECTION 23-18-13

§ 23-18-13 Notification of historical preservation and heritage commission. – The historical preservation and heritage commission shall be notified whenever an ancient burial place contains or is suspected to contain the remains of one or more persons.

APPENDIX B: NORTH KINGSTOWN CODE OF ORDINANCES, PART III, CHAPTER 12, SECTION 12-15 – HISTORICAL AND ARCHAEOLOGICAL BURIAL SITES

- a) *Authority.* In compliance with RIGL 1956, § 23-18-1 et seq., the town adopts this section to govern the preservation of historic and archaeological burial sites in the town.
- b) *Purpose.* The town council recognizes that historic and archeological gravesites possess archaeological and scientific value and are often of great artistic, cultural and religious significance and represent for all cultures a respect for the sanctity of human life. It is, therefore, the policy of the town that marked or unmarked historic cemeteries are to be preserved and are not to be altered or removed except as provided for in this section.
- c) *Definitions.* The following words, terms and phrases, when used in this section, shall have the meanings ascribed to them in this subsection, except where the context clearly indicates a different meaning:

Applicant means the owner of the land on which an archeological burial site or family cemetery is located for which a permit must be sought for alteration or removal.

Archaeological burial site means an area of land which has been designated and/or used for the interment of human remains in the prehistoric or distant past. Archaeological burial sites may include American Indian or other ethnic groupings.

Family cemetery means a historic cemetery which is not associated with a specific religious organization but which is the site of burial for persons related by blood, marriage or household.

Historic cemetery means any tract of land which has been used for a period in excess of 100 years as a burial place, whether or not marked with a historic marker or gravestone, including but not limited to ancient burial places known to contain the remains of one or more American Indians. For the purposes of this section, the term "historic cemetery" also includes an area 25 feet in width around the perimeter of the cemetery.

Human remains means any parts or remains of deceased persons including skeletal remains or cremated ashes.

Grave means any site where human remains have been purposefully interred. The term also includes gravemarkers, funerary objects and associated cultural remains and artifacts. A grave includes mausoleums, crypts or other structures designed to house human remains.

Least disruptive means means a means of construction, excavation, removal or other activity which, in the opinion of the state historic preservation commission, has the least overall destructive impact on the grave, human remains or cemetery.

Owner means the owner of a parcel of land.

Religious cemetery means any cemetery owned or maintained by a religious organization.

Religious organization means the organization representing the adherents of any religious society.

Site alteration plan means a document showing in written text and by illustration the proposed alteration of a historic cemetery, an archaeological burial site or a family cemetery, including detailed specifications for alteration, removal and reinterment of human remains.

Town means the town, its agents or its officers.

- d) Procedures. Procedures regarding disturbance of historic cemeteries or archaeological burial sites shall be as follows:
- 1) It shall be unlawful for any person to disturb, disrupt, excavate, deposit, fill in or on, remove or destroy gravemarkers, burial objects or buried human remains or conduct any other activities that would damage or diminish the integrity of any historic cemetery or archaeological burial site or family cemetery without first obtaining a permit to alter or remove such historic cemetery, archaeological burial site or family cemetery from the town council.
 - 2) Once a discovery of a previously unknown burial site is made, the owner or contractor shall immediately notify the building inspector who in turn shall contact the state medical examiner and state historical preservation commission pursuant to RIGL 1956, § 23-18-1 et seq.
 - 3) The town shall require the cessation of construction activities pending preliminary verification of the property as a human burial site by the state medical examiner or historic preservation commission. If the site is verified as a human burial site, work within 25 feet of the site shall be halted unless or until a permit to alter or remove is issued by the town pursuant to this section.
 - 4) The owner shall be required, at the owner's expense, to conduct an archaeological investigation of the area to establish the boundaries of the cemetery/burial site using the least disruptive means feasible. The least disruptive means shall be determined by the town through the town's consultation with the state historic preservation commission (RIHPC). A survey report shall be produced incorporating the findings of the investigation in text and graphic form.
 - 5) The applicant shall then submit the report and a detailed engineering plan, as required and identified in subsection (d)(8)a of this section of the proposed construction project and all other proposed activities on the property that in any manner might lead to or necessitate any disruption of the cemetery/burial site.
 - 6) The applicant shall also submit a detailed site alteration plan proposal of the extent and method of removal of human remains and a reburial plan in text and drawing of the new gravesite.
 - 7) The town council may issue a permit to allow the alteration or removal of historic cemeteries, archaeological cemeteries or family cemeteries only after concluding, based on evidence submitted to the council at a public hearing, that all alternatives to the proposed activity have been examined and that no prudent and feasible alternative to the proposed activity exists or that the alteration serves the interests, health, welfare and safety of the public and is not solely for commercial expediency.
 - 8) The applicant shall submit the following to the town council prior to the consideration of any application for a permit to remove and/or alter a historic cemetery or an archaeological burial site:
 - a. Detailed site plans drawn to scale by a licensed professional registered land surveyor or professional engineer, as applicable, at a minimum scale of 1"=50', showing the boundaries of the property in question, topographical contour intervals of no more than one foot, a surveyed boundary of the cemetery and a setback area of no less than 25 feet, and a proposed plan of all improvements proposed on the site that would necessitate disturbance of the cemetery.

- b. If known, a written description of the cemetery, its age and condition, and historical importance; whether the cemetery is religious, family, organization, publicly owned or other kind of cemetery; a listing of names and vital dates of those interred as may be determined from gravemarkers on site; and a cemetery plan indicating position of graves and to the extent possible the identities of those interred.
 - c. A detailed site alteration plan indicating the extent of disruption of the cemetery, methods of construction or removal of human remains, reburial plan, including in text and illustration the relocation of graves.
 - d. If a family cemetery, a genealogical study to identify whether decedents of the families of the interred still reside in the state.
 - e. If a religious cemetery, a listing of the religious organization that owns or maintains the cemetery.
 - f. Any further information and study the town council deems necessary to complete its consideration of the request to alter a cemetery in compliance with RIGL 1956, § 23-18-1 et seq.
- e) *Hearing.* A hearing shall be conducted in accordance with the following:
- 1) *Public notice.* Once the required documents are submitted by an applicant and published, the town council shall set the date for a public hearing. Notice of the date, time and location of the public hearing shall be at the applicant's expense, in a local newspaper, for a period of not less than two weeks prior to the hearing. The state historic preservation commission shall be notified not less than two weeks prior to the scheduled hearing, and an advisory opinion shall be requested by pertinent town staff.
 - 2) *Notice to interested parties.* Notice to interested parties shall be given as follows:
 - a. For archaeological burials and historic Native American graves, the town shall cause the tribal council of the Narragansett Tribe to be notified by regular mail of the subject, date and time of the scheduled hearing.
 - b. If an application involves the cemetery of an extant religious society, such society shall be so notified by regular mail of the scheduled hearing.
 - c. If the application involves a family cemetery, the interred of which have living lineal descendants, the applicant, at the applicant's expense, shall make all reasonable efforts to notify the lineal descendants as to the scheduled hearing, which efforts may include sending notice to the descendants via first class mail or publication of the notice in a newspaper of statewide circulation at least once per week for two successive weeks prior to the scheduled hearing.
 - 3) *Burden of proof.* At the hearing, the applicant shall prove to the satisfaction of the town council that:
 - a. The applicant has examined all possible alternatives and conclusively demonstrated that no prudent and feasible alternative to the proposed alteration is possible; or
 - b. The proposed alteration serves the interests of health, welfare and safety of the public and is not solely for commercial expediency.



-
- f) *Final action.* The town council shall conduct a public hearing on the proposed project and shall render a decision approving, denying or approving with reasonable conditions the proposed site alteration plan and may set other conditions and/or requirements necessary to carry out the purposes of RIGL 1956, § 23-18-1 et seq.
 - g) *Legal status.* Nothing in this section shall be construed to prohibit the routine maintenance and repair of historical gravesites or the use of historic cemeteries as places of interment, nor shall it be construed to preclude the town boards or commissions or agents from otherwise acting within their authority to regulate and protect historical and archaeological cemeteries.
 - h) *Severability.* If any subsection, clause, provision or portion of this section shall be held invalid or unconstitutional by a court of competent jurisdiction, such decision shall not affect the validity or constitutionality of any other subsection, clause, provision or portion of this section.
 - i) *Appeal.* Any person aggrieved by the decision of the town council shall have a right to appeal the decision to the superior court pursuant to RIGL 1956, § 23-18-11.1.

(Ord. No. 94-25, § 1, 11-14-1994)

Cross reference— Historical zoning, [§ 21-331](#) et seq.

State Law reference— Historical and archaeological burial sites, RIGL 1956, § 23-18-1 et seq.; historic burial sites, RIGL 1956, § 23-18-10.1; historic preservation, RIGL 1956, § 42-45-1 et seq.



**APPENDIX B: ADVISORY COUNCIL ON HISTORIC PRESERVATION POLICY
STATEMENT REGARDING TREATMENT OF BURIAL SITES, HUMAN REMAINS AND
FUNERARY OBJECTS**



Preserving America's Heritage

ADVISORY COUNCIL ON HISTORIC PRESERVATION

POLICY STATEMENT REGARDING

TREATMENT OF BURIAL SITES, HUMAN REMAINS AND FUNERARY OBJECTS

Preamble: This policy offers leadership in resolving how to treat burial sites, human remains, and funerary objects in a respectful and sensitive manner while acknowledging public interest in the past. As such, this policy is designed to guide federal agencies in making decisions about the identification and treatment of burial sites, human remains, and funerary objects encountered in the Section 106 process, in those instances where federal or state law **does not prescribe a course of action**.

This policy applies to all federal agencies with undertakings that are subject to review under Section 106 of the National Historic Preservation Act (NHPA; 16 U.S.C. § 470f), and its implementing regulations (36 CFR Part 800). To be considered under Section 106, the burial site must be or be a part of a historic property, meaning that it is listed, or eligible for listing, in the National Register of Historic Places.

The Advisory Council on Historic Preservation (ACHP) encourages federal agencies to apply this policy throughout the Section 106 process, including during the identification of those historic properties. In order to identify historic properties, federal agencies must assess the historic significance of burial sites and apply the National Register criteria to determine whether a property is eligible. Burial sites may have several possible areas of significance, such as those that relate to religious and cultural significance, as well as those that relate to scientific significance that can provide important information about the past. This policy does not proscribe any area of significance for burial sites and recognizes that the assessment must be completed on a case-by-case basis through consultation.

The policy is not bound by geography, ethnicity, nationality, or religious belief, but applies to the treatment of all burial sites, human remains, and funerary objects encountered in the Section 106 process, as the treatment and disposition of these sites, remains, and objects are a human rights concern shared by all.

This policy also recognizes the unique legal relationship between the federal government and tribal governments as set forth in the Constitution of the United States, treaties, statutes and court decisions, and acknowledges that, frequently, the remains encountered in Section 106 review are of significance to Indian tribes.

Section 106 requires agencies to seek agreement with consulting parties on measures to avoid, minimize, or mitigate adverse effects to historic properties. Accordingly, and consistent with Section 106, this policy does not recommend a specific outcome from the consultation process. Rather, it focuses on issues and perspectives that federal agencies ought to consider when making their Section 106 decisions. In many cases, federal agencies will be bound by other applicable federal, tribal, state, or local laws that do

prescribe a specific outcome, such as the Native American Graves Protection and Repatriation Act (NAGPRA). The federal agency must identify and follow applicable laws and implement any prescribed outcomes.

For undertakings on federal and tribal land that encounter Native American or Native Hawaiian human remains and funerary objects, NAGPRA applies. NHPA and NAGPRA are separate and distinct laws, with separate and distinct implementing regulations and categories of parties that must be consulted.¹ Compliance with one of these laws does not mean or equal compliance with the other. Implementation of this policy and its principles does not, in any way, change, modify, detract or add to NAGPRA or other applicable laws.

Principles: When burial sites, human remains, or funerary objects will be or are likely to be encountered in the course of Section 106 review, a federal agency should adhere to the following principles:

Principle 1: Participants in the Section 106 process should treat all burial sites, human remains and funerary objects with dignity and respect.

Principle 2: Only through consultation, which is the early and meaningful exchange of information, can a federal agency make an informed and defensible decision about the treatment of burial sites, human remains, and funerary objects.

Principle 3: Native Americans are descendants of original occupants of this country. Accordingly, in making decisions, federal agencies should be informed by and utilize the special expertise of Indian tribes and Native Hawaiian organizations in the documentation and treatment of their ancestors.

Principle 4: Burial sites, human remains and funerary objects should not be knowingly disturbed unless absolutely necessary, and only after the federal agency has consulted and fully considered avoidance of impact and whether it is feasible to preserve them in place.

Principle 5: When human remains or funerary objects must be disinterred, they should be removed carefully, respectfully, and in a manner developed in consultation.

Principle 6: The federal agency is ultimately responsible for making decisions regarding avoidance of impact to or treatment of burial sites, human remains, and funerary objects. In reaching its decisions, the federal agency must comply with applicable federal, tribal, state, or local laws.

Principle 7: Through consultation, federal agencies should develop and implement plans for the treatment of burial sites, human remains, and funerary objects that may be inadvertently discovered.

Principle 8: In cases where the disposition of human remains and funerary objects is not legally prescribed, federal agencies should proceed following a hierarchy that begins with the rights of lineal descendants, and if none, then the descendant community, which may include Indian tribes and Native Hawaiian organizations.

¹ The ACHP's publication *Consulting with Indian Tribes in the Section 106 Process* and the National Association of Tribal Historic Preservation Officers' publication *Tribal Consultation: Best Practices in Historic Preservation* provide additional guidance on this matter.

DISCUSSION:

Principle 1: Participants in the Section 106 process should treat all burial sites, human remains and funerary objects with dignity and respect.

Because the presence of human remains and funerary objects gives a historic property special importance as a burial site or cemetery, federal agencies need to consider fully the values associated with such sites. When working with human remains, the federal agency should maintain an appropriate deference for the dead and the funerary objects associated with them, and demonstrate respect for the customs and beliefs of those who may be descended from them.

Through consultation with descendants, culturally affiliated groups, descendant communities, and other parties, federal agencies should discuss and reach agreement on what constitutes respectful treatment.

Principle 2: Only through consultation, which is the early and meaningful exchange of information, can a federal agency make an informed and defensible decision about the treatment of burial sites, human remains, and funerary objects.

Consultation is the hallmark of the Section 106 process. Federal agencies must make a “reasonable and good faith” effort to identify consulting parties and begin consultation early in project planning, after the federal agency determines it has an undertaking and prior to making decisions about project design, location, or scope.

The NHPA, the ACHP’s regulations, and Presidential Executive Orders set out basic steps, standards, and criteria in the consultation process, including:

- Federal agencies have an obligation to seek out all consulting parties [36 CFR § 800.2(a)(4)], including the State Historic Preservation Officer (SHPO)/Tribal Historic Preservation Officer (THPO) [36 CFR § 800.3(c)].
- Federal agencies must acknowledge the sovereign status of Indian tribes [36 CFR § 800.2(c)(2)(ii)]. Federal agencies are required to consult with Indian tribes on a government-to-government basis in recognition of the unique legal relationship between federal and tribal governments, as set forth in the Constitution of the United States, treaties, statutes, court decisions, and executive orders and memoranda.
- Consultation on a government-to-government level with Indian tribes cannot be delegated to non-federal entities, such as applicants and contractors.
- Federal agencies should solicit tribal views in a manner that is sensitive to the governmental structures of the tribes, recognizing their desire to keep certain kinds of information confidential, and that tribal lines of communication may argue for federal agencies to provide extra time for the exchange of information.

- Properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization may be determined eligible for inclusion on the National Register [16 U.S.C. § 470a(d)(6)(A)], and federal agencies must consult with any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to such historic properties [16 U.S.C. § 470a(d)(6)(B) and 36 CFR § 800.2(c)(2)(ii)(D)].

Principle 3: Native Americans are descendants of original occupants of this country. Accordingly, in making decisions, federal agencies should be informed by and utilize the special expertise of Indian tribes and Native Hawaiian organizations in the documentation and treatment of their ancestors.

This principle reiterates existing legal requirements found in federal law, regulation and executive orders, and is consistent with positions that the ACHP has taken over the years to facilitate enfranchisement and promote broad participation in the Section 106 process. Federal agencies must consult with Indian tribes on a government-to-government basis because they are sovereign nations.

Indian tribes and Native Hawaiian organizations bring a special perspective on how a property possesses religious and cultural significance to them. Accordingly, federal agencies should utilize their expertise about, and religious and cultural connection to, burial sites, human remains, and associated funerary objects to inform decision-making in the Section 106 process.

Principle 4: Burial sites, human remains and funerary objects should not be knowingly disturbed unless absolutely necessary, and only after the federal agency has consulted and fully considered avoidance of impact and whether it is feasible to preserve them in place.

As a matter of practice, federal agencies should avoid impacting burial sites, human remains, and funerary objects as they carry out their undertakings. If impact to the burial site can be avoided, this policy does not compel federal agencies to remove human remains or funerary objects just so they can be documented.

As this policy advocates, federal agencies should always plan to avoid burial sites, human remains, and funerary objects altogether. When a federal agency determines, based on consultation with Section 106 participants, that avoidance of impact is not appropriate, the agency should minimize disturbance to such sites, remains, and objects. Accordingly, removal of human remains or funerary objects should occur only when other alternatives have been considered and rejected.

When a federal agency determines, based on consultation with Section 106 participants, that avoidance of impact is not appropriate, the agency should then consider any active steps it may take to preserve the burial site in place, perhaps through the intentional covering of the affected area, placement of markers, or granting of restrictive or other legal protections. In many cases, preservation in place may mean that, to the extent allowed by law, the locations of burial sites, human remains, and funerary objects should not be disclosed publicly. Alternatively and consistent with the Section 106 regulations [36 CFR § 800.5(a)(2)(vi)], natural deterioration of the remains may be the acceptable or preferred outcome of the consultation process.

Principle 5: When human remains or funerary objects must be disinterred, they should be removed carefully, respectfully, and in a manner developed in consultation.

When the federal agency decides that human remains or funerary objects must be disturbed, they should be removed respectfully and dealt with according to the plan developed by the federal agency in consultation. “Careful” disinterment means that those doing the work should have, or be supervised by people having, appropriate expertise in techniques for recognizing and disinterring human remains.

This policy does not endorse any specific treatment. However, federal agencies must make a reasonable and good faith effort to seek agreement through consultation before making its decision about how human remains and/or funerary objects shall be treated.

The plan for the disinterment and treatment of human remains and/or funerary objects should be negotiated by the federal agency during consultation on a case-by-case basis. However, the plan should provide for an accurate accounting of federal implementation. Depending on agreements reached through the Section 106 consultation process, disinterment may or may not include field recordation. In some instances, such recordation may be so abhorrent to consulting parties that the federal agency may decide it is inappropriate to carry it out. When dealing with Indian tribes, the federal agency must comply with its legal responsibilities regarding tribal consultation, including government-to-government and trust responsibilities, before concluding that human remains or funerary objects must be disinterred.

Principle 6: The federal agency is ultimately responsible for making decisions regarding avoidance of impact to or treatment of burial sites, human remains, and funerary objects. In reaching its decisions, the federal agency must comply with applicable federal, tribal, state, or local laws.

Federal agencies are responsible for making final decisions in the Section 106 process [36 CFR § 800.2(a)]. The consultation and documentation that are appropriate and necessary to inform and support federal agency decisions in the Section 106 process are set forth in the ACHP’s regulations [36 CFR Part 800].

Other laws, however, may affect federal decision-making regarding the treatment of burial sites human remains, and funerary objects. Undertakings located on federal or tribal lands, for example, are subject to the provisions of NAGPRA and the Archaeological Resources Protection Act (ARPA). When burial sites, human remains, or funerary objects are encountered on state and private lands, federal agencies must identify and follow state law when it applies. Section 106 agreement documents should take into account the requirements of any of these applicable laws.

Principle 7: Through consultation, federal agencies should develop and implement plans for the treatment of burial sites, human remains, and funerary objects that may be inadvertently discovered.

Encountering burial sites, human remains, or funerary objects during the initial efforts to identify historic properties is not unheard of. Accordingly, the federal agency must determine the scope of the identification effort in consultation with the SHPO/THPO, Indian tribes and Native Hawaiian

organizations, and others before any archaeological testing has begun [36 CFR § 800.4(a)] to ensure the full consideration of avoidance of impact to burial sites, human remains, and funerary objects.

The ACHP’s regulations provide federal agencies with the preferred option of reaching an agreement ahead of time to govern the actions to be taken when historic properties are discovered during the implementation of an undertaking. In the absence of prior planning, when the undertaking has been approved and construction has begun, the ACHP’s post-review discovery provision [36 CFR § 800.13] requires the federal agency to carry out several actions:

- (1) make reasonable efforts to avoid, minimize, or mitigate adverse effects to such discovered historic properties;
- (2) notify consulting parties (including Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to the affected property) and the ACHP within 48 hours of the agency’s proposed course of action;
- (3) take into account the recommendations received; and then
- (4) carry out appropriate actions.

NAGPRA prescribes a specific course of action when Native American and Native Hawaiian human remains and funerary objects are discovered on federal or tribal lands in the absence of a plan—cessation of the activity, protection of the material, notification of various parties, consultation on a course of action and its implementation, and then continuation of the activity. However, adherence to the plan under Principle 5 would cause new discoveries to be considered “intentional excavations” under NAGPRA because a plan has already been developed, and can be immediately implemented. Agencies then could avoid the otherwise mandated 30 day cessation of work for “inadvertent discoveries.”

Principle 8: In cases where the disposition of human remains and funerary objects is not legally prescribed, federal agencies should proceed following a hierarchy that begins with the rights of lineal descendants, and if none, then the descendant community, which may include Indian tribes and Native Hawaiian organizations.

Under the ACHP’s regulations, “descendants” are not identified as consulting parties by right. However, federal agencies shall consult with Indian tribes and Native Hawaiian organizations that attach religious and cultural significance to burial sites, human remains and associated funerary objects, and be cognizant of their expertise in, and religious and cultural connection to, them. In addition, federal agencies should recognize a biological or cultural relationship and invite that individual or community to be a consulting party [36 CFR § 800.3(f)(3)].

When federal or state law does not direct disposition of human remains or funerary objects, or when there is disagreement among claimants, the process set out in NAGPRA may be instructive. In NAGPRA, the “ownership or control” of human remains and associated funerary objects lies with the following in descending order: specific lineal descendants; then tribe on whose tribal lands the items were discovered; then tribe with the closest cultural affiliation; and then tribe aboriginally occupying the land, or with the closest “cultural relationship” to the material.

Definitions Used for the Principles

- **Burial Site:** Any natural or prepared physical location, whether originally below, on, or above the surface of the earth, into which as a part of the death rite or ceremony of a culture, individual human remains are deposited [25 U.S.C. 3001.2(1)].
- **Consultation:** The process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the Section 106 review process [36 CFR § 800.16(f)].
- **Consulting parties:** Persons or groups the federal agency consults with during the Section 106 process. They may include the State Historic Preservation Officer; the Tribal Historic Preservation Officer; Indian tribes and Native Hawaiian organizations; representatives of local governments; applicants for federal assistance, permits, licenses, and other approvals; and/or any additional consulting parties [based on 36 CFR § 800.2(c)]. Additional consulting parties may include individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties [36 CFR § 800.2(c)(6)].
- **Disturbance:** Disturbance of burial sites that are listed in or eligible for listing in the National Register of Historic Places will constitute an adverse effect under Section 106. An adverse effect occurs when “an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, setting, materials, workmanship, feeling, or association” [36 CFR § 800.5(a)(1)].
- **Federal land:** Lands under a federal agency’s control. Mere federal funding or permitting of a project does not turn an otherwise non-federal land into federal land (see *Abenaki Nation of Mississquoi v. Hughes*, 805 F. Supp. 234 (D. Vt. 1992), aff’d, 990 F. 2d 729 (2d Cir. 1993) (where the court found that a Clean Water Act permit issued by the US Army Corps of Engineers did not place the relevant land under federal “control” for NAGPRA purposes).
- **Funerary objects:** “items that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed intentionally at the time of death or later with or near individual human remains” [25 U.S.C. 3001(3)(B)].
- **Historic property:** “Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. It includes artifacts, records, and remains that are related to and located within such properties, and it includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register of Historic Places criteria” [36 CFR § 800.16(1)].
- **Human remains:** The physical remains of a human body. The term does not include remains or portions of remains that may reasonably be determined to have been freely given or naturally shed by the individual from whose body they were obtained, such as hair made into ropes or nets [see 43 CFR § 10.2(d)(1)].
- **Indian Tribe:** “An Indian tribe, band, nation, or other organized group or community, including a Native village, Regional Corporation or Village Corporation, as those terms are defined in Section 3 of the Alaska Native Claims Settlement Act [43 U.S.C. 1602], which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians” [36 CFR § 800.16(m)].
- **Native American:** Of, or relating to, a tribe, people, or culture that is indigenous to the United States [25 U.S.C. 3001 (9)]. Of, or relating to, a tribe, people, or culture indigenous to the United States, including Alaska and Hawaii [43 CFR 10.2(d)].

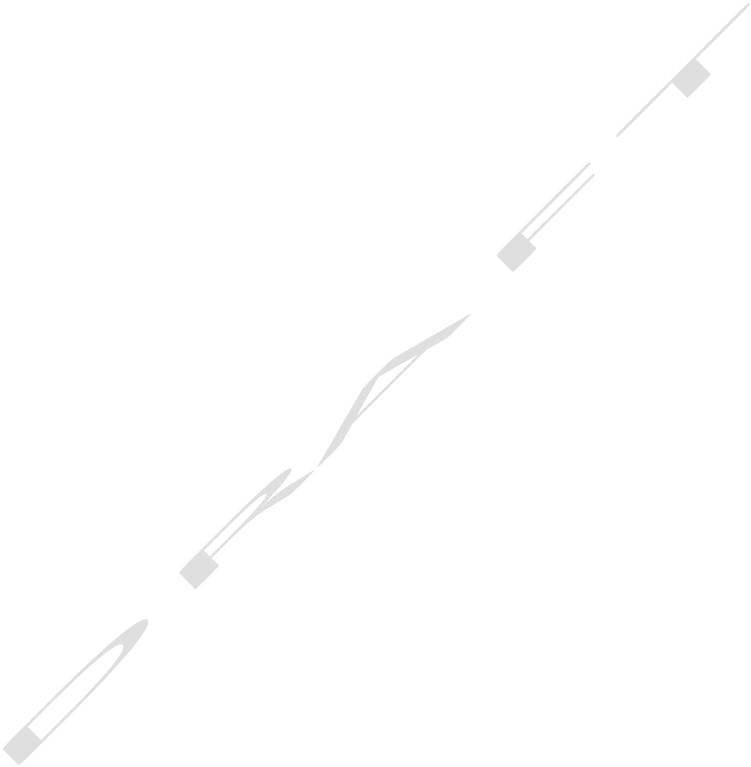
- **Native Hawaiian:** Any individual who is a descendant of the aboriginal people who, prior to 1778, occupied and exercised sovereignty in the area that now constitutes the state of Hawaii [36 CFR § 800.16(s)(2)].
- **Native Hawaiian Organization:** Any organization which serves and represents the interests of Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of historic preservation that are significant to Native Hawaiians [36 CFR § 800.16(s)].
- **Policy statement:** A formal statement, endorsed by the full ACHP membership, representing the membership's collective thinking about what to consider in reaching decisions about select issues, in this case, human remains and funerary objects encountered in undertakings on federal, tribal, state, or private lands. Such statements do not have the binding force of law.
- **Preservation in place:** Taking active steps to ensure the preservation of a property.
- **Protection of Historic Properties:** Regulations [36 CFR Part 800] implementing Section 106 of the National Historic Preservation Act.
- **Section 106:** That part of the National Historic Preservation Act which establishes a federal responsibility to take into account the effects of undertakings on historic properties and to provide the Advisory Council on Historic Preservation a reasonable opportunity to comment with regard to such action.
- **State Historic Preservation Officer:** The official appointed or designated pursuant to Section 101(b)(1) of NHPA to administer the state historic preservation program.
- **Tribal Historic Preservation Officer:** The official appointed by the tribe's chief governing authority or designated by a tribal ordinance or preservation program who has assumed the responsibilities of the SHPO for purposes of Section 106 compliance on tribal lands in accordance with Section 101(d)(2) of NHPA.
- **Treatment:** Under Section 106, "treatments" are measures developed and implemented through Section 106 agreement documents to avoid, minimize, or mitigate adverse effects to historic properties.

Acronyms Used for the Policy Statement

- **ACHP:** Advisory Council on Historic Preservation.
- **ARPA:** Archaeological Resources Protection Act [16 U.S.C. 470aa-mm].
- **NHPA:** National Historic Preservation Act [16 U.S.C. § 470f].
- **NAGPRA:** The Native American Graves Protection and Repatriation Act [25 U.S.C. 3001 et seq].
- **SHPO:** State Historic Preservation Officer
- **THPO:** Tribal Historic Preservation Officer

[The members of the Advisory Council on Historic Preservation unanimously adopted this policy on February 23, 2007]

**ATTACHMENT 16 – UNANTICIPATED DISCOVERIES PLAN FOR SUBMERGED
ARCHAEOLOGICAL SITES, HISTORIC PROPERTIES, AND CULTURAL RESOURCES
INCLUDING HUMAN REMAINS: REVOLUTION WIND FARM FOR LEASE AREA OCS A-
0486 CONSTRUCTION AND OPERATIONS PLAN**



**UNANTICIPATED DISCOVERIES PLAN FOR SUBMERGED ARCHAEOLOGICAL
SITES, HISTORIC PROPERTIES, AND CULTURAL RESOURCES INCLUDING
HUMAN REMAINS, REVOLUTION WIND FARM FOR LEASE AREA OCS A-
0486 CONSTRUCTION AND OPERATIONS PLAN**

PREPARED FOR

**REVOLUTION WIND LLC
56 EXCHANGE TERRACE
SUITE 300
PROVIDENCE, RI 02903**

AND

**VHB ENGINEERING
99 HIGH ST # 10
BOSTON, MA 02110**

AUTHORED BY

BENJAMIN C. WELLS, MA, RPA, JOSEPH GRINNAN, MA, RPA, AND JEFFREY M. ENRIGHT, MA, RPA

SEARCH

WWW.SEARCHINC.COM

MARCH 2023

INTRODUCTION

Revolution Wind LLC (Revolution Wind) proposes to construct and operate the Revolution Wind Farm Project (Project) within the Bureau of Ocean Energy Management (BOEM) Renewable Energy Lease Area OCS A-0486 (Lease Area). The Project consists of the Revolution Wind Farm (RWF) and the Revolution Wind Farm Export Cable (RWEC) route, which traverses federal and state waters. The RWEC has a proposed landfall near Quonset Point in North Kingstown, Rhode Island. Revolution Wind has submitted a Construction and Operations Plan (COP) for the Project to BOEM to support the development, operation, and eventual decommissioning of Project infrastructure, including offshore wind turbines, offshore substations, array cables, substation interconnector cables, and offshore export cables. SEARCH provided technical expertise to Revolution Wind's environmental consultant, VHB Engineering (VHB), by providing a Qualified Marine Archaeologist (QMA) in accordance with Lease Agreement Stipulation Addendum C Section 2.1.1.2.

SEARCH developed this Unanticipated Discoveries Plan (UDP) to assist Revolution Wind and its contractors to preserve and protect potential cultural resources from adverse impacts caused by Project construction, operation and maintenance, and decommissioning activities. The UDP sets forth guidelines and procedures to be used in the event potential submerged cultural resource are encountered during bottom disturbing activities and assists Revolution Wind in its compliance with Section 106 of the National Historic Preservation Act (NHPA) (Title 54 U.S.C. § 306108), Native American Graves Protection and Repatriation Act (Title 25 U.S.C. § 3001 et seq.), Lease OCS A-0486 Lease Stipulations, and other relevant state and local laws as applicable. This UDP is subject to revisions based on consultations with interested parties pursuant to Section 106 of the National Historic Preservation Act or the Act's implementing regulations at 36 CFR Part 800.

ROLES AND RESPONSIBILITIES

Implementation of the provisions and procedures in the UDP will require the coordinated efforts of Revolution Wind and their contractors during all construction, operations and maintenance, and decommissioning activities with the potential to impact the seafloor. The following sections identify key participants in the UDP and outlines their roles and responsibilities.

REVOLUTION WIND

Implementation of the provisions and procedures outlined in this plan is ultimately the responsibility of Revolution Wind or its designee, who will be responsible for the following:

- Ensuring procedures and policies outlined in the UDP and UDP training materials are implemented;
- Identifying a responsible party within Revolution Wind tasked with overseeing implementation of the UDP during all project and contractor activities;
- Developing cultural resource and UDP awareness training programs for all project staff and contractors;
- Requiring all project and contractor staff complete cultural resource and UDP awareness training;
- Coordinating and facilitating communication between the QMA, project staff, and contractors if a potential cultural resource is encountered during project activities; and
- Participating in and/or facilitating consultations with state and federal agencies (BOEM, Naval History and Heritage Command [NHHC], Rhode Island Historical Preservation & Heritage Commission [RIHPHC], etc...), federally recognized Tribes'/Tribal Nations' Tribal Historic Preservation Offices (THPOs), and other consulting parties, as appropriate.

QUALIFIED MARINE ARCHAEOLOGIST

Revolution Wind will retain the services of a QMA to provide cultural resource advisory services during implementation of the UDP. The QMA will be responsible for the following:

- Assist Revolution Wind with the development and implementation of the procedures outlined in the UDP;
- Assist Revolution Wind in developing a cultural resource and UDP awareness training program and informational graphic;
- Review and document potential submerged cultural resources identified by the project and/or contractor staff;

- Assist Revolution Wind with the Section 106 consultation process that may arise as a result of an unanticipated submerged cultural resource; and
- Conduct archaeological investigation of unanticipated submerged cultural resources following coordination with appropriate consulting parties.

TRAINING AND ORIENTATION

As described in the previous section, Revolution Wind will be responsible for ensuring Project and contractor staff complete a cultural resources and UDP awareness training program prior to the start of bottom disturbing activities. The training will be sufficient to allow Project and contractor staff to identify common types of marine cultural resources and implement the UDP procedures. The training will be delivered as a standalone training and/or combined with the Project's or contractors' general health and safety (H&S) or environment, health, and safety (EHS) induction training.

The training program will include, but not be limited to, the following elements:

- A review of applicable state and federal cultural resource laws and regulations;
- Characteristics of common types of submerged cultural resources found on the Atlantic Outer Continental Shelf (e.g. wooden shipwrecks, metal shipwrecks, downed aircraft, post-Contact artifacts, pre-Contact artifacts, bone and faunal remains, etc.);
- How to identify potential submerged cultural resources during bottom disturbing activities; and
- Procedures to follow and parties to notify if potential submerged cultural resources/materials are encountered during project activities.

The SEARCH QMA will develop draft cultural resources and UDP awareness training in coordination with Revolution Wind. The training program will be provided to BOEM and the RIHPhC for review and comment before the training program is finalized.

In addition to the training program, the SEARCH QMA will generate an informational graphic summarizing the UDP and the materials discussed in the cultural resources and UDP awareness training program. The informational graphic will include:

- Images of common types of submerged cultural resources and materials;
- A flow chart depicting the UDP reporting process;
- A notice to all employees of their stop work authority if potential cultural resources are encountered; and
- Contact information for the Revolution Wind staff responsible for overseeing implementation of the UDP and the QMA.

The informational graphic will be placed in a conspicuous location on each project and contractor vessel where workers can see it and copies will be made available to project and/or contractor staff upon request.

PROCEDURES WHEN CULTURAL MATERIAL ARE OBSERVED

As part of its COP submission, Revolution Wind conducted an extensive marine archaeological resources assessment (MARA) of the Project's preliminary area of potential effects (PAPE). The MARA identified 19 potential submerged cultural resources (Targets 01-11 and Targets 13-20) and 13 geomorphic features of archaeological interest (Targets 21-33) within the PAPE. Revolution Wind anticipates avoidance of Targets 01-11 and Targets 13-20 and their associated recommended avoidance buffers. Additionally, Revolution Wind has committed to avoidance of Target 27 and Targets 31-33. Revolution Wind has developed a Mitigation Framework and Historic Properties Treatment Plan to aid in avoiding, minimizing, and/or mitigating adverse effects upon the remaining historic properties (Targets 21-26 and Targets 28-30).

Even with the extensive preconstruction marine archaeological surveys, it is impossible to ensure that all cultural resources have been identified within the PAPE. Even at sites that have been previously identified and assessed, there is a potential for the discovery of previously unidentified archaeological components, features, or human remains that may require investigation and assessment. Furthermore, identified historic properties may sustain effects that were not originally anticipated. Therefore, a procedure has been developed for the treatment of unanticipated discoveries that may occur during site development.

The procedure also will be implemented should an unanticipated archaeological find occur during investigations to ground-truth potential unexploded ordnance (pUXO). In addition, Revolution Wind will involve the QMA during pUXO investigations to consult and monitor. Revolution Wind has agreed to a protocol for inspections that includes a decision tree for contacting the QMA; providing the QMA with inspection reports, including video footage, still photographs, multibeam echosounder imagery, and pUXO specialist observations; and real-time video monitoring for inspections that occur atop shallowly buried geomorphic features of archaeological interest.

The implementation of the final UDP will be overseen by Revolution Wind and a QMA who meets or exceeds the Secretary of the Interior's *Professional Qualifications Standards for Archaeology* [48 FR 44738-44739] and has experience in conducting HRG surveys and processing and interpreting data for archaeological potential [BOEM 2020]. See **Figure 1** for a flow chart of the communications and notification plan for unanticipated discoveries.

If unanticipated submerged cultural resources are discovered, the following steps should be taken:

- (1) Per Lease Stipulation 4.2.7.1, all bottom-disturbing activities in the immediate area of the discovery shall cease and every effort will be made to avoid or minimize impacts to the potential submerged cultural resource(s).
- (2) The project or contractor staff will immediately notify Revolution Wind of the discovery.
- (3) Revolution Wind will notify the QMA and provide them with sufficient information/documentation on the potential find to allow the QMA to evaluate the discovery and determine if the find is a cultural resource. If necessary, the QMA may request to visit the find site or the vessel that recovered the cultural material to inspect

the find. If the find is a cultural resource, the QMA will provide a preliminary assessment as to its potential to be a historic property as defined in 36 CFR Part 800.

- (4) Per Lease Stipulation 4.2.7.1, BOEM shall be notified of the potential submerged cultural resource within 24 hours of the discovery. Revolution Wind shall also notify the State Historic Preservation Officer (SHPO) of Rhode Island and/or Massachusetts, the State Archaeologist(s), and the Tribal Historic Preservation Officers (THPOs) or other designated representatives of the consulting tribal governments. If the potential submerged cultural resource could be a sunken military craft under the jurisdiction of the Department of the Navy, then Revolution Wind additionally will notify the NHHHC.
- (5) Within 72 hours of being notified of the discovery, Revolution Wind shall issue a report in writing to BOEM providing available information concerning the nature and condition of the potential submerged cultural resource and observed attributes relevant to the resource's potential eligibility for listing in the National Register of Historic Places (NRHP).
- (6) Revolution Wind shall consult with BOEM, as feasible, to obtain technical advice and guidance for the evaluation of the discovered cultural resource.
- (7) If the impacted resource is determined by BOEM, in consultation with the NHHHC if applicable to a sunken military craft, to be NRHP eligible, a mitigation plan shall be prepared by Revolution Wind for the discovered cultural resource. This plan must be reviewed by BOEM prior to submission to the RI/MA SHPO and representatives from consulting federally recognized Tribes/Tribal Nations for their review and comment, as well as provided to the NHHHC for review and approval if the potential cultural resource falls under the jurisdiction of the Department of the Navy. The RI/MA SHPO and Tribes/Tribal Nations will review the plan and provide comments and recommendations within one week, with final comments to follow as quickly as possible.
- (8) Per Lease Stipulation 4.2.6, Revolution Wind may not impact a known archaeological resource in federal waters without prior approval from BOEM. If the potential resource falls under the jurisdiction of the Department of the Navy, then similar approval will be provided from the NHHHC. No development activities in the vicinity of the cultural resource will resume until either a mitigation plan is executed or, if BOEM, or the NHHHC if applicable, determines a mitigation plan is not warranted, BOEM provides written approval to Revolution Wind to resume bottom disturbing activities. For discoveries in state waters, Revolution Wind will not impact a known archaeological resource with prior approval from BOEM and the RI/MA SHPO.

If suspected human remains are encountered, the below procedures, which comply with the Advisory Council on Historic Preservation's (ACHP) *Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects*, should be followed.

- (1) All work in the near vicinity of the human remains shall cease and reasonable efforts should be made to avoid and protect the remains from additional impact. Encountered potential material shall be protected, which may include keeping the remains submerged in an onboard tank of sea water or other appropriate material.
- (2) The Onboard Representative shall immediately notify the County Medical Examiner, State Archaeologist, the Forensic Anthropology Unit of the Rhode Island State Police, and Revolution Wind as to the findings.

- (3) Revolution Wind will notify the QMA and provide them with sufficient information/documentation on the potential find to allow the QMA to evaluate the discovery and determine if the find is a cultural resource. If necessary, the QMA may request to visit the vessel to inspect the potential human remains. If the find is a cultural resource, the QMA will provide a preliminary assessment. The QMA will document and inventory the remains and any associated artifacts, and assist in coordinating with federal, state, and local officials.
- (4) A plan for the avoidance of any further impact to the human remains and/or mitigative excavation, reinternment, or a combination of these treatments will be developed in consultation with the State Archaeologist; the RI/MA SHPO; BOEM; the NHHHC, if the potential human remains could be associated with a sunken military craft under the jurisdiction of the Department of the Navy; and appropriate Tribes or closest lineal descendants. All parties will be expected to respond with advice and guidance in an efficient time frame. Once the plan is agreed to by all parties, the plan will be implemented.
- (5) If suspected human remains are encountered in RI State Waters, Revolution Wind will additionally adhere to the requirements of the Rhode Island Historic Cemeteries Act (Attachment A).

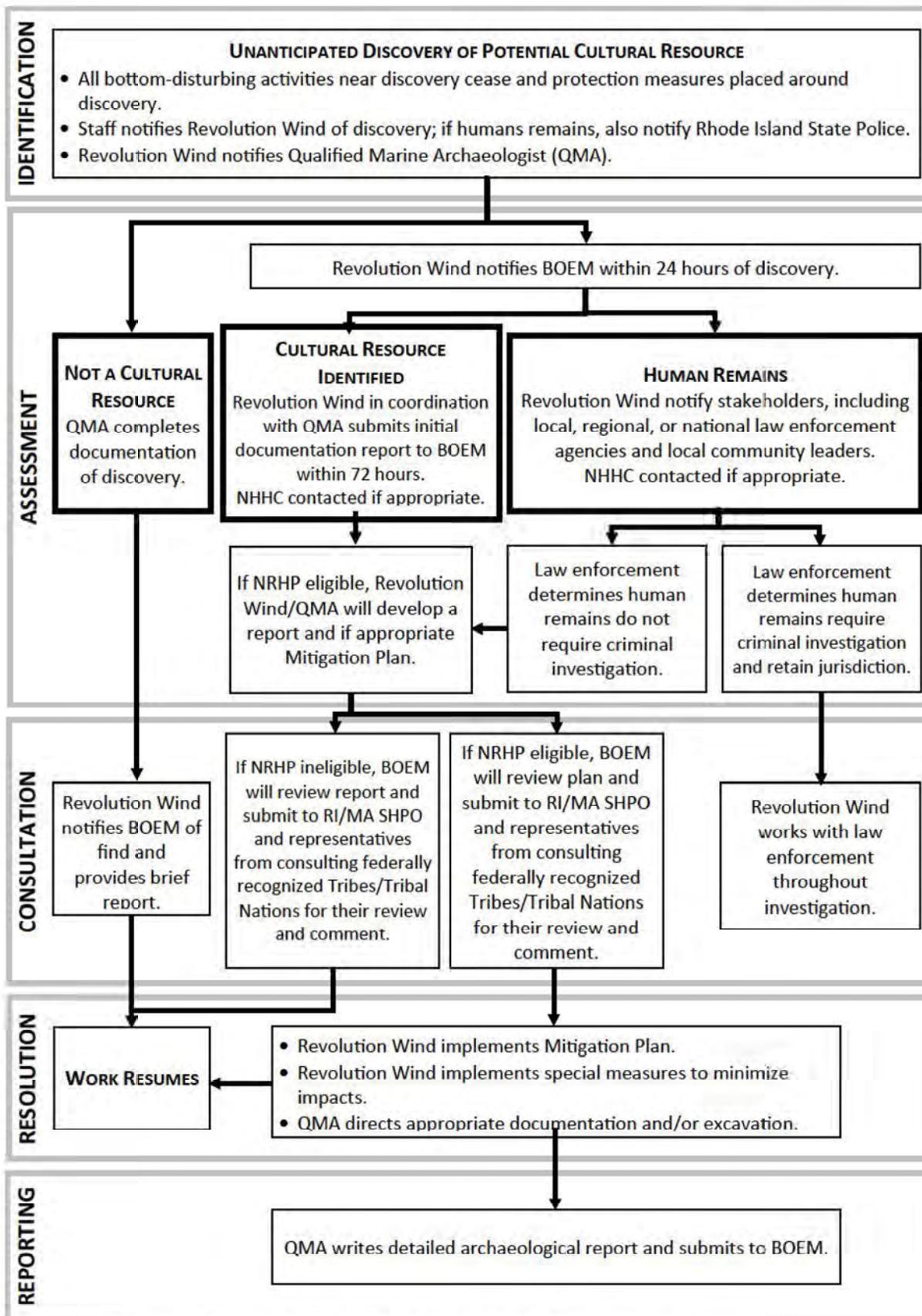


Figure 1. Communications and notification plan for unanticipated discoveries.

ARCHAEOLOGICAL INVESTIGATION OF A SUBMERGED UNANTICIPATED DISCOVERY

Archaeological investigation of a submerged unanticipated discovery may be necessary in order to evaluate the find, determine its eligibility for listing in the NRHP, and/or assess any construction impacts that may have occurred. The following is a recommended procedure for complying with the UDP and providing BOEM; NHHHC, if applicable; and RI/MA SHPO with the necessary information to make informed decisions to approve continuation of bottom disturbing activities. After each step, consultation among the appropriate parties will occur.

- (1) Initial assessment of unanticipated discovery via a refined HRG survey and/or ROV investigation (Phase Ia reconnaissance survey).
 - a. May result in no further recommended action (i.e., target is not a historic property) or additional investigation.
- (2) Develop an avoidance zone based upon Step 1.
 - a. Minimally, construction activity will remain outside of the avoidance zone for a period of time necessary to allow archaeological investigation, if required.
 - b. Determine whether construction activity can remain outside of the avoidance zone permanently.
- (3) Identify the source, delineate the site boundary, and assess potential impacts that led to the unanticipated discovery (Phase Ib identification).
 - a. Accomplished utilizing archaeological/scientific diving and/or ROV investigation.
 - b. May result in no further recommended action (i.e., target is not a historic property) or additional investigation.
- (4) Determine eligibility for listing in the NRHP (Phase II NRHP evaluation).
 - a. Accomplished utilizing archaeological/scientific diving.
 - b. May require extensive excavation.
 - c. May require archival research.
- (5) Develop a strategy to resolve adverse effects to the historic property that occurred as a result of the unanticipated discovery and to minimize or mitigate potential future adverse effects as construction proceeds.
- (6) On-site monitoring of bottom disturbing activities at the location.

Not all of these steps may be necessary, and the appropriate course of action will be determined at the time of discovery and in consultation with BOEM and if applicable, RI/MA SHPO.

NOTIFICATION LIST

Bureau of Ocean Energy

Sarah Stokely
Lead Historian and Section 106 Team Lead
Bureau of Ocean Energy Management
Office of Renewable Energy Programs
45600 Woodland Road, VAM-OREP
Sterling, Virginia 20166
Sarah.Stokely@boem.gov

Massachusetts Board of Underwater Archaeological Resources

Mr. David Robinson
Director
251 Causeway St.
Ste. 800
Boston, MA 02114-2136
Phone: (617) 626-1014

Revolution Wind Responsible Party

TBD

Rhode Island State Police

Center for Forensic Sciences
State Health Laboratory
50 Orms St.
Providence, RI 02904-2222
Phone: (401) 222-5600

Naval History and Heritage Command

Alexis Catsambis, PhD
Underwater Archaeology Branch
805 Kidder Breese St, SE
Washington, DC 20374
Phone: (202) 685-1073

Washington County Medical Examiner & Coroner Office

County Medical Examiner
48 Orms St.
Providence, RI 02904
Phone: (401) 222-5500

Rhode Island Historic Preservation and Heritage Commission

Mr. Jeffrey Emidy
Interim Executive Director
Deputy State Historic Preservation Officer
Old State House
150 Benefit St.
Providence, RI 02903
Phone: (401) 222-2678

Mashpee Wampanoag Tribe

[REDACTED]

Massachusetts Historical Commission

Ms. Brona Simon
State Historic Preservation Officer and
Executive Director
220 Morrissey Blvd.
Boston, MA 02125-3314
Phone: (617) 7278470

Wampanoag Tribe of Gay Head (Aquinnah)

[REDACTED]

Mashantucket Pequot Tribal Nation

[REDACTED]

The Narragansett Indian Tribe

[REDACTED]

Mohegan Tribe of Indians in Connecticut

[REDACTED]

The Shinnecock Indian Nation

[REDACTED]

REFERENCES CITED

Advisory Council on Historic Preservation's (ACHP)

2007 *Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects*. <https://www.achp.gov/sites/default/files/policies/2018-06/ACHPPolicyStatementRegardingTreatmentofBurialSitesHumanRemainsandFuneraryObjects0207.pdf>, Digital article accessed December 9, 2021.

Bureau of Ocean Energy Management (BOEM)

2020 *Guidelines for Providing Archaeological and Historical Property Information Pursuant to 30 CFR Part 585*. United States Department of the Interior, Office of Renewable Energy Programs.