



STATE OF RHODE ISLAND

HISTORICAL PRESERVATION & HERITAGE COMMISSION

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20 August 2021

Via email: emma.rodvien@puc.ri.gov

Emma Rodvien, Coordinator
Rhode Island Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Revolution Wind
RIEFSB Docket No. SB-2021-01

Dear Ms. Rodvien:

By order of the Energy Facility Siting Board (EFSB), the Rhode Island Historical Preservation and Heritage Commission (RIHPHC) has been designated as an agency of state government that shall render an advisory opinion on certain issues to be considered in the EFSB evaluation of Revolution Wind LLC's application to construct the facilities associated with the Revolution Wind project. Docket No. SB-2021-01 specifically instructs the RIHPHC "to render an advisory opinion as to (i) whether the Facility would be subject to its jurisdiction and, if so, whether the Facility would conform with requirements relevant thereto, and (ii) whether any required approval or exception should be granted" (page 12).

The portion of the project that is subject to EFSB jurisdiction is "the Facilities necessary to connect the wind farm to the onshore electric transmission system" (page 1). These "Facilities" include the construction of: two, 23-mile submarine export cables; two new underground 1-mile onshore transmission cables; an onshore substation; and two new 519-foot long high-voltage transmission lines. Also included in EFSB jurisdiction are the expansion of the existing Davisville substation and reconfiguration of 1,340 feet of overhead transmission lines.

To the EFSB's first question: Yes, the project is subject to RIHPHC jurisdiction. The RIHPHC will review the entire Revolution Wind project under the regulations of Section 106 of the National Historic Preservation Act. The RIHPHC review of the portion of the project subject to the EFSB's jurisdiction has two elements: archaeological (terrestrial and underwater) and above-ground. That review is not yet complete. However, regarding the Facilities' conformity with relevant requirements, the status of our review is as follows:

- The RIHPHC has reviewed the draft Marine Archeological Resources Assessment for the Revolution Wind Farm project. There are several potentially significant cultural resources within the proposed cable route through Rhode Island waters, and we have recommended that the final cable path be designed to avoid these. If this is not possible, additional archaeological investigation would be required. Our review of the terrestrial archaeological component is still ongoing.

- The Quonset Point Naval Air Station, in which part(s) of the project will be located, has been determined eligible for listing in the National Register of Historic Places. However, due to the nature of the work proposed at the Station, we conclude that the project will have no adverse effects on above-ground resources at the station. No other above-ground historic resources will be affected by the construction of the “Facilities”. Therefore, the portion of the project under EFSB jurisdiction does conform with relevant requirements regarding above-ground historic resources.

To the second question: as the project is undergoing a thorough review by the RIHPHC under the regulations of Section 106 of the National Historic Preservation Act, we have no objection to the ESRB granting any required approval or exception.

These comments are provided in accordance Rhode Island General Laws. If you have any questions, please contact me at jeffrey.emidy@preservation.ri.gov or 222-4134.

Sincerely,



Jeffrey D. Emidy
Interim Executive Director
Interim State Historic Preservation Officer