

VIRGINIA
DEPARTMENT
OF HISTORIC
RESOURCES

February 23, 2006

Mr. Ernst F. Aschenbach
DEQ Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, Virginia 23219

Re: Application for Approval to Construct, Own and Operate an Electrical Generation Facility
Highland New Wind Development, L.L.C.
DHR File No. 2003-1027; State Project # **06-011S**

Dear Mr. Aschenbach:

Our office has received for comment the application submitted to the State Corporation Commission (SCC) for the project referenced above (SCC Case No. PUE-2005-00101). We find that the information provided in Section 11(h) of the application is insufficient for the Department of Historic Resources (DHR) to provide full and final comment on the potential impacts of this project on historic properties. At the scoping meeting on September 12, 2005, we expressed concern over the potential direct impacts to archaeological resources and indirect impacts to Camp Allegheny and other potentially historic structures and districts. At that time, we recommended to the applicant that the following items be provided for our review:

- A viewshed analysis to determine from where the turbines would be seen;
- The results of an architectural survey within the viewshed to determine if individual historic structures or potential rural historic districts are present; and
- A comprehensive site plan, including detailed grading and construction plans, to determine the location and extent of all ground-disturbing activities so recommendation on the need for archaeological survey within the project area can be offered.

None of these items were provided with the application packet submitted for our review. In addition, the claim that the turbines would not be visible from the parking lot at the Camp Allegheny is unsubstantiated with photo-simulation and the potential impacts to the extensive earthworks and other well-preserved components of this camp are not addressed.

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We request that these and our earlier comments be addressed and the necessary additional information provided for our consideration. Once we have this information, we will be able to provide guidance on the need for additional studies and evaluations. Thank you for providing an opportunity for DHR to comment on this important project. If you have any questions concerning these comments, please do not hesitate to contact me at (804) 367-2323 x153 or email roger.kirchen@dhr.virginia.gov.

Sincerely,

Roger W. Kirchen, Archeologist
Office of Review and Compliance