



# R. CHRISTOPHER GOODWIN & ASSOCIATES, INC.

cultural resource management and preservation planning

March 31, 2011

Mr. David R. De Caro, PWS  
Senior Permit Manager  
Iberdrola Renewables  
201 King of Prussia Road, Suite 500  
Radnor, PA 19087

**RE: Blue Creek Amendment Turbines and Associated Facilities – Cultural Resources Studies**

Dear Mr. DeCaro:

For the Blue Creek Amendment, eight turbines are proposed to be added within the context of the previously approved turbines layout (Figure 1). Associated with these turbines are 2.98 mi of access road, 3.38 mi of underground collector line, and 2.31 mi of crane path. Previous archeological survey for the approved layout have already covered portions of the Amendment, including 1.64 ac of turbine area, 0.65 mi of access road, 0.58 mi of underground collector line, and 0.32 mi of crane path. Because the Amendment is within the context of the approved layout, no additional architectural survey was undertaken, as the area entirely was surveyed as part of the survey for the approved layout, and the approved mitigation measures for the approved layout also apply to the Amendment area.

The revised archeological predictive model approved by the OHPO for the original Blue Creek layout was applied to the Amendment. This model divided the project area into zones of high and moderate probability. No low probability areas exist within the proposed Amendment area. High probability areas included locations of floodplains, terraces, levees, and other settings of less than 15 per-cent slope and within 898.4 ft (273.9 m) of water; areas mapped on soils classified as well drained or moderately well drained, or somewhat poorly drained, locations within 598.4 ft (182.4 m) of historic roads or structures; and, locations within 598.4 ft (182.4 m) of previously recorded archeological sites. Moderate probability areas were defined as areas with less than 15 per-cent slope that are not within 898.4 ft (273.9 m) of water sources, and that are not within 598.4 ft (182.4 m) of historic roads or structures or previously recorded archeological sites.

The Amendment contained approximately 8.81 ac of high potential turbine survey (400 ft diameter), 1.04 mi of high potential access road survey (200 ft width), 1.26 mi of high potential underground collector line survey (50 ft width), and 0.59 mi of high potential crane path survey (200 ft width). The remaining portions of the Amendment were located in areas of moderate archeological probability – 12.64 ac of turbine survey, 1.29 mi of access road survey, 1.44 mi of underground collector line survey, and 1.40 mi of crane path survey.

The current archeological field methods, as approved by the OHPO for the original Blue Creek layout in March 2010, were applied to the Amendment. In high probability areas, in those areas that did not possess surface visibility exceeding 50 per cent, there was systematic shovel testing spaced at 15 m (49.2 ft)

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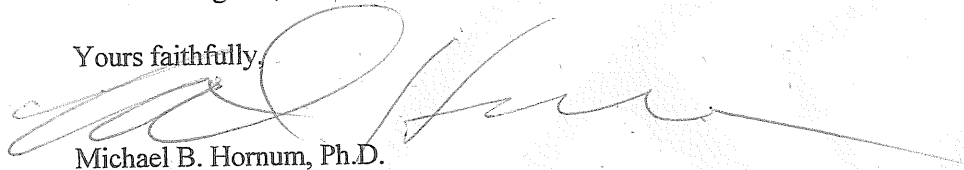
intervals, whereas in areas where surface visibility exceeded 50 per-cent, systematic surface collection was being employed using lanes spaced at 6 m (19.7 ft) intervals. For areas of moderate probability, unsystematic pedestrian reconnaissance was employed except as the field staff saw something that warranted more systematic survey in those areas. The field survey for the Amendment was completed on March 24, 2011. No archeological artifacts were recovered during the survey. Therefore, no historic properties, as defined in 36 CFR 800.16(I), will be impacted by the proposed project in the Amendment areas.

The results of archeological survey for the Amendment will be submitted for review and concurrence to the OHPO, and to the OPSB and U.S. Army Corps of Engineers, Buffalo District. It is anticipated that a draft technical report will be submitted by April 30, 2011.

Please call if you have any questions. We are at your service.

With best regards, I remain

Yours faithfully,

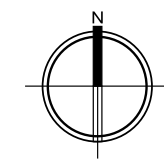
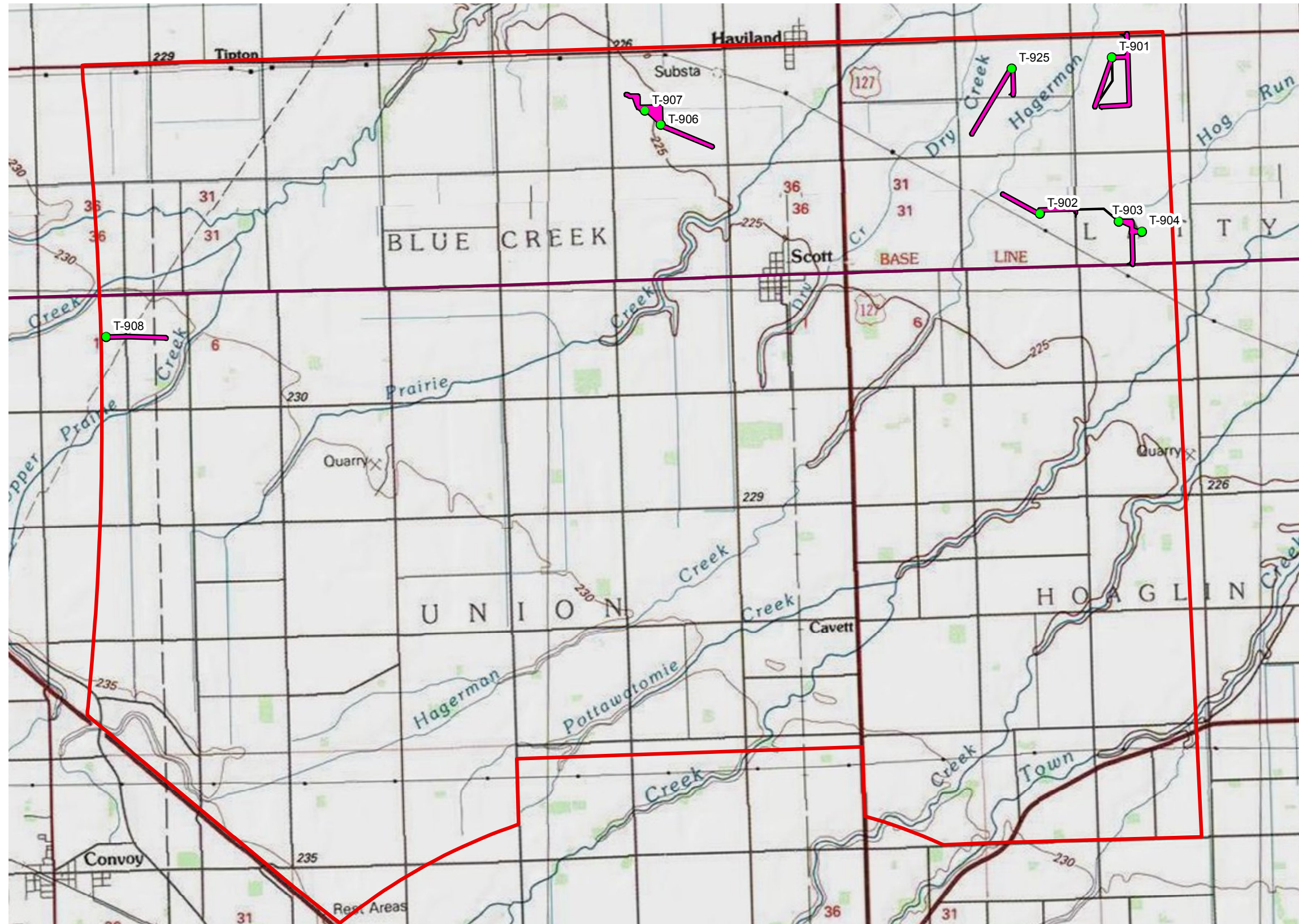


Michael B. Hornum, Ph.D.  
Senior Project Manager

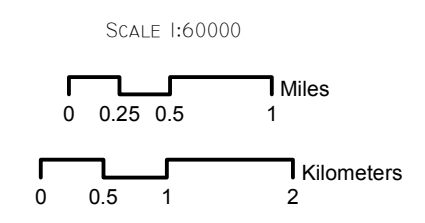
Enclosure



Blue Creek Wind Farm  
 Eight Amendment Turbines  
 Cultural Survey Areas - 2011



- Amendment Turbine Centerpoint
- Amendment Turbine Workspaces
- Project Area Boundary



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 241 East Fourth Street, Suite 100 Frederick, MD 21701  
 DATE: 31 MARCH 2011 PREPARED BY: NSW

Figure 1