



March 1, 2017

**VIA CERTIFIED MAIL**

Chief Roger Longtoe Sheehan  
Elnu Tribe of the Abenaki  
Tribal Headquarters  
5243 VT Route 30  
Jamaica, VT 05343

Re: Traditional Cultural Properties Study, Northfield Mountain Pumped Storage Project, FERC Project No. 2485 Turners Falls Hydroelectric Project, FERC Project No. 1889

Dear Chief Sheehan:

FirstLight Hydro Generating Company (FirstLight) is in receipt of your letter to FirstLight and TransCanada dated January 17, 2017 in which the Elnu Abenaki Tribe (Elnu) in collaboration with and as proxy for the Nulhegan Band of the Coosuk-Abenaki Nation (Nulhegan) and the Koasek Traditional Band of the Koas Abenaki Nation (Koasek) set forth a draft plan of action to address “historic properties of religious and cultural significance to an Indian tribe.” FirstLight is also in receipt of your letter to the Federal Energy Regulatory Commission (FERC) of the same date.

On September 13, 2013, FERC approved the study plan for the FirstLight’s proposed Traditional Cultural Properties (TCP) study. Tasks 1, 2, and 4 of the TCP study plan set forth the requirements for consultation to be conducted in connection with the TCP study. While the TCP study report documents the steps that FirstLight took to engage in consultation in accordance with the TCP study plan, FirstLight’s consultation efforts with respect to its TCP study are also set forth in our letter to the Narragansett Indian Tribe (NIT) dated February 28, 2017, of which we have sent you a copy and which is attached here for convenience. For the sake of efficiency, we will not repeat that chronology here. On January 15, 2016, FERC indicated that the TCP study was finalized.

You note that evaluating and documenting TCPs should be done in accordance with the guidelines of National Register Bulletin (NRB) 38. FirstLight agrees. In fact, FirstLight’s TCP report cites those guidelines when it states that a TCP investigation is conducted through consultation with the people who identify and associate historic properties of religious and cultural significance in an on-going fashion to maintain their cultural identity.

As noted in our February 28<sup>th</sup> letter to the NIT, Section 5.6 of the Draft HPMP discusses proposed management measures for TCPs, which includes the following: “In the event that the NIT and the Nolumbeka agree to meet with the Licensee’s ethnographer and participate in tribal interviews and field reconnaissance for TCPs, the Licensee will conduct those portions of the TCP study, which it has been unable to conduct. In the event that eligible TCPs are ultimately identified with the APE, management measures will be developed at that time.” A copy of the Draft HPMP was sent to the Elnu, Nulhegan, and Koasek by certified mail on April 29, 2016. To the extent that the Elnu, Nulhegan, and Koasek Tribes

**Gus Bakas**

Director – Massachusetts Hydro

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identify and associate historic properties of religious and cultural significance in an on-going fashion to maintain their cultural identity within the Project's APE, FirstLight is willing to meet with you to discuss those potential TCPs in the Project's APE.

Please feel free to contact me if you would like to discuss the TCP study. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gus Bakas', written in a cursive style.

Gus Bakas

Encl.

Cc: Bonney Hartley, Stockbridge-Munsee Community (certified mail)  
Ramona Peters, Mashpee Wampanoag Tribe (certified mail)  
Bettina Washington, Wampanoag Tribe of Gay Head (certified mail)  
Doug Harris, Narragansett Indian Tribe (certified mail)  
Joe Graveline, The Nolumbeka Project (certified mail)  
Chief Donald Stevens, Nulhegan Band of the Coosuk Abenaki Nation (certified mail)  
Co-Chiefs Shirly Hook, Amy-Hook Therrien, and Carrie Gendreau, Koasek Traditional Band of  
the Koas Abenaki Nation (certified mail)  
Peggy Fullerton, Koasek Traditional Abenaki Band (certified mail)  
Chief Lawrence Moose Lampman, the Abenaki Nation of Missiquoi (certified mail)  
Rich Holschuh, Elnu Tribe of the Abenaki  
Jim Taylor, Councilman, Elnu Tribe of the Abenaki  
Frank Winchell, Federal Energy Regulatory Commission  
Kimberly Bose, Federal Energy Regulatory Commission (filed electronically)