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Northfield Mountain/Turners Falls Projects

PRIVILEGED

Via Electronic Filing

December 14, 2018

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C 20426

Re: FirstLight Hydro Generating Company, Turners Falls Hydroelectric Project (FERC No. 1889)
and Northfield Mountain Pumped Storage Project (FERC No. 2485).

Dear Secretary Bose:

FirstLight Hydro Generating Company (FirstLight) owns and operates the Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project. FirstLight is in the process of relicensing the facilities with the Federal Energy Regulatory Commission (FERC), including conducting Phase IB and Phase II archaeological investigations in Vermont, New Hampshire, and Massachusetts.

In its Order of Rehearing dated March 15, 2018, FERC established a deadline of September 15, 2018 to file reports for required Phase IB and Phase II archaeological investigations. On July 16, 2018, FirstLight requested an extension of time to complete Phase IB archaeological investigations in New Hampshire and Massachusetts. FirstLight also noted that depending on the results of the Phase IB investigations, it was possible that FirstLight would request an extension of time to complete Phase II investigations in New Hampshire and Massachusetts. In its request for extension of time, FirstLight also noted that it had completed archaeological investigations in Vermont and had submitted its report to the Vermont State Historic Preservation Office (SHPO) on July 3, 2018. By letter dated August 8, 2018, FERC provided an extension of time until December 15, 2018 for FirstLight to file the New Hampshire and Massachusetts Phase IB reports, and an extension of time until March 15, 2019 to file the New Hampshire and Massachusetts Phase II reports.

Because this filing identifies the location of lands that may contain cultural resources, FirstLight is filing the Phase IB and II archaeological reports attached hereto as “privileged.”¹

I. Summary of Phase IB and II Surveys Conducted in 2018

A. Vermont

On behalf of FirstLight, TRC Environmental Corporation (TRC) conducted a Phase IB archaeological survey in May 2018 on approximately 4,950 m of shoreline in the Town of Vernon, Vermont. The Phase IB survey encompassed four survey segments identified in the 2014 Phase IA reconnaissance survey that were considered archaeologically sensitive and undergoing erosion within the Project Area of Potential Effect (APE). As a result of the survey, no archaeological sites were found and no further survey work was recommended. As noted above, the report for the Vermont Phase IB archaeological survey was transmitted

¹ Entities receiving copies of the reports, such as Tribes, are listed on the attached distribution list.

to the Vermont SHPO by email dated July 3, 2018. No response has been received from the Vermont SHPO. In accordance with Vermont's Guidelines for Conducting Archaeology (Vermont Division of Historic Preservation, 2017:32-34), if no response has been received within 30 days, then that is considered Vermont's concurrence with the recommendations in the report. Accordingly, archaeological investigations in the Vermont portion of the Project APE are considered complete.

A copy of the Vermont Phase IB report is enclosed herein as [Attachment A](#).

B. New Hampshire

TRC conducted a Phase IB archaeological survey in May 2018 on 5,700 meters of shoreline in the Town of Hinsdale, New Hampshire. The Phase IB survey encompassed five survey segments identified in the 2014 Phase IA reconnaissance survey that were considered archaeologically sensitive and eroding within the Project APE. As a result of the Phase IB survey, two new archaeological sites were identified and were recommended for Phase II evaluation. Following the Phase IB survey work and artifact analysis and after consultation with the New Hampshire State Historic Preservation Office (SHPO), Phase II evaluations were conducted on the two sites in June 2018 in order to evaluate their eligibility for listing on the National Register of Historic Places. As a result of the Phase II evaluations, the sites were recommended ineligible for NRHP-listing and no further work was recommended. The report for the Phase IB and Phase II archaeological work was submitted to the New Hampshire SHPO by letter dated July 30, 2018. By letter dated August 16, 2018, the New Hampshire SHPO concurred with the report's recommendations, although it stated that because one of the sites likely extends beyond the Project Area of Potential Effect, the determination of "not eligible" applies only to the portion of the site within the Project APE.

TRC also conducted Phase IB archaeological survey in October 2018 on the three remaining survey segments identified in the 2014 Phase IA reconnaissance survey that were considered archaeologically sensitive and eroding within the Project APE. These three survey segments are located on lands owned by Great River Hydro, the FERC licensee of the upstream Vernon Hydroelectric Project. As a result of the Phase IB survey, no archaeological resources were identified and no further work was recommended. The report for the Phase IB archaeological work on the lands owned by Great River Hydro was submitted to the New Hampshire SHPO by letter dated November 9, 2018. By letter dated November 13, 2018, the New Hampshire SHPO concurred with results of the survey and the recommendations for no further survey.

In light of the New Hampshire SHPO's concurrence with the recommendations contained in the two reports, archaeological investigations in the New Hampshire portion of the Project APE are considered complete.

A copy of the New Hampshire Phase IB and II report (July 2018) and the New Hampshire SHPO's concurrence are enclosed herein as [Attachment B.1](#). A copy of the New Hampshire Phase IB Addendum report (November 2018) and the New Hampshire SHPO's concurrence are enclosed herein as [Attachment B.2](#).

C. Massachusetts

TRC conducted an intensive (locational) survey (Phase IB archaeological survey) from August 2018 through October 2018 located along an approximately 17-mile stretch of the Connecticut River in Franklin County, in the Towns of Greenfield, Gill, and Northfield. The purpose of the study was to identify archaeological sites within 13 survey segments identified in the 2014 Phase IA reconnaissance survey that were considered archaeologically sensitive and undergoing erosion within the Project APE. As a result of the survey, 27 newly recorded and five previously recorded archaeological sites were identified. Fourteen sites are recommended for site examination (Phase II evaluation).

The report for the Massachusetts Phase IB archaeological survey was submitted to the Massachusetts Historical Commission (MHC) by letter dated November 30, 2018 and is enclosed herein as [Attachment C](#).

II. Request for Extension of Time to Complete Phase II Evaluations in Massachusetts

In accordance with MHC's regulations, MHC has 30 days to provide its comments on the Massachusetts Phase IB report, which was submitted to MHC by letter dated November 30, 2018. Thus, FirstLight may not receive MHC's review comments and concurrences until the end of December. In the event that MHC concurs with the recommendations in the Phase IB report or requires other Phase II evaluations, in accordance with MHC regulations and other state and local regulations, FirstLight must apply for and

receive a number of permits, including a permit from MHC to conduct the Phase II evaluations. In addition, ground conditions (snow cover and frozen ground) in the Project area generally are not conducive for conducting archaeological investigations until April at the earliest. Moreover, the MHC discourages conducting archaeological investigations during winter months given these conditions. Thus, FirstLight does not expect that Phase II field work will commence until April 2019, conditions permitting. Therefore, FirstLight requests an extension of time until September 15, 2019 to complete Phase II evaluations in Massachusetts. FirstLight may also request an additional extension of time depending on the number of Phase II evaluations required and the month in which FirstLight can begin Phase II field work.

If you have any questions, or need additional information, please feel free to contact me.

Sincerely,



Douglas Bennett
Director MA Hydro Operations
Northfield Mountain/ Turners Falls Projects

Attachments:

- A. Phase IB Archaeological Survey - End of Fieldwork Report, Windham County, Vermont (July 2018)
- B. 1. Phase IB Archaeological Survey and Phase II Evaluation of Sites 27CH244 and 27CH245 – Cheshire County, New Hampshire (July 2018) and SHPO Concurrence dated August 16, 2018
- B. 2. Addendum 1 – Phase IB Archaeological Survey, Cheshire County, New Hampshire (November 2018) and SHPO Concurrence dated November 13, 2018
- C. Intensive (Locational) Survey (Phase IB Archaeological Survey), Franklin County, Massachusetts (November 2018)

Distribution List For Copies of “Privileged” Vermont, New Hampshire, and Massachusetts Phase IB and II Archaeological Survey Reports

Ms. Ramona Peters
Director
Tribal Historic Preservation Department
Mashpee Wampanoag Tribe
483 Great Neck Road South
Mashpee, MA 02649

Doug Harris
Narragansett Indian Tribal Historic Preservation Office
Narragansett Indian Tribe
Narragansett Indian Longhouse
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Greenfield Conservation Commission (Massachusetts report only)
Ms. Sara Brodeur, Conservation Agent
14 Court Square
Greenfield, MA 01301

Greenfield Historical Commission (Massachusetts report only)
Mr. John Passiglia, Chair
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Gill Historical Commission (Massachusetts report only)
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Northfield Historical Commission (Massachusetts report only)
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Koasek Traditional Band of the Sover
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Cowasuck Band of the Pennacook/Abenaki People
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Donna Roberts Moody and John Moody
Abenaki Nation Repatriation & Site Protection Coordinator
3089 Quechee/W. Hartford Road
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Vermont Commission on Native American Affairs
Lucy Cannon-Neel, Chair
1031 Whittier Rd.
Derby Line, VT 05830

New Hampshire Commission on Native American Affairs
Julianne Morse, NHCNAA
NH Department of Cultural Resources
20 Park Street
Concord, NH 03301

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Attachment A

Phase IB Archaeological Survey - End of Fieldwork Report, Windham County, Vermont (July 2018)

Note: This Attachment was filed with FERC as Privileged document

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Attachment B.1

Phase IB Archaeological Survey and Phase II Evaluation of Sites 27CH244 and 27CH245 – Cheshire County, New Hampshire (July 2018) and SHPO Concurrence dated August 16, 2018

Note: This Attachment was filed with FERC as Privileged document

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Attachment B.2

Addendum 1 – Phase IB Archaeological Survey, Cheshire County, New Hampshire (November 2018) and SHPO Concurrence dated November 13, 2018

Note: This Attachment was filed with FERC as Privileged document

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Attachment C

Intensive (Locational) Survey (Phase IB Archaeological Survey), Franklin County, Massachusetts
(November 2018)

Note: This Attachment was filed with FERC as Privileged document