

The Nolumbeka Project, Inc.

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February 28, 2013

Ken Hogan, Project Supervisor  
Federal Energy Regulatory Commission  
Office of Energy Projects  
Division of Hydropower Licensing  
Washington, DC 20426

RE: Wilder Dam Project No. 1892-026  
Bellows Falls Project No. 1855-045  
Vernon Project No. 1904-073  
Turners Falls Project No. 1889-081  
Northfield Mountain Pump Storage Project No. 2485-063

Dear Mr. Hogan,

The Nolumbeka Project Inc., wishes to establish a line of communication between your office and our organization as you move forward in re-licensing the five hydroelectric projects along the middle Connecticut River in the states of Vermont, New Hampshire, and Massachusetts.

The Nolumbeka Project is a Massachusetts based 501 (c) (3) non-profit corporation whose preservation mission includes the promotion of a deeper, broader, and more accurate depiction of the history and culture of the Native Americans of New England. Our organization holds the deed in preservation of a forty-one (41) acre ancient Indian village and sacred site called Wissatinnewag on the Connecticut River just down stream of the Turners Falls Dam. This twelve thousand year old village is part of a much larger complex that make up what archaeological studies have revealed to be one of the most significant and culturally diversified Native American gathering places on the banks of the Connecticut River. We are currently partners with U.S. Fish and Wildlife Service with their twenty-two (22) acres in our preservation efforts for a combined sixty-three (63) acre historically important piece of property that abuts the Connecticut River on the west bank, running north to south from the confluence of the Falls River, just below the Great Falls (Turners Falls) and down stream a distance. The village itself was a larger complex that runs further south down stream to what is now referred to as Rock Dam. The Wissatinnewag Village site is located on the border of Gill and Greenfield Massachusetts, across the river from the village of Turners Falls, in the Town of Montague.

The history of this area and our site is much too complex to go into detail in this letter, but if given the opportunity to provide information to your office and the public, I am certain that it will become clear just how important this stretch of river was in the history of the indigenous people going back over twelve thousand years. Our website does offer more detailed information. Go to [www.nolumbekaproject.org](http://www.nolumbekaproject.org)

The story that lies here in this land and on this river has never been fully and accurately told for many reasons, mostly political and cultural. The last time the hydro projects were up for licensing and re-licensing there existed all across the country, and most especially here in the Northeast, an indifferent attitude toward old Indian sites and burial places. That attitude proved to be devastating to the Native American cultural resources here on the river and elsewhere. However in 2011, members of our organization had the opportunity to monitor the work on an electrical power grid infrastructure upgrade in the town of Leverett, Massachusetts. The challenge on that project was to bring heavy equipment on to the site without damaging the ceremonial stone structures identified there. The level of cooperation and respect we experienced on that project to preserve the ceremonial stone landscape in the project area proved to us there has been a change of attitude from the utilities about historic cultural preservation, and we look forward to this new level of dialogue and respect.

In relation to conducting field studies, it should be known that archaeological training processes used by most universities and public organizations are woefully lacking on the subtle cultural understanding of the lifestyles and social practices of the indigenous peoples of the Northeast. Our organization feels it is of paramount importance that this work be done and supervised by people with the proper training and understanding of how to read the land and to recognize the lifestyle and sacred practices and spaces of the indigenous peoples that existed on this stretch of river. The data from this study needs to be digitized into a format that will make it accessible for use by the appropriate researchers and Tribal Historic Preservation Offices (THPO's). The Nolumbeka Project, as the first indigenous people's cultural preservation organization in the region has taken on this challenge and seeks a role as a lead organization for future researchers, historians and government agencies.

The impact the past and current hydro projects have had on the very ancient relationship that played out with the water's edge, the land, fish, animal and human interactions on the Wissatinnewag site as well as other places on the river, has been forever changed, and with it a chance to see and better understand what was here, when, and why the indigenous people from many different tribal cultures journeyed here by the thousands each spring, and stayed throughout the summer to fish and grow crops.

A cultural gathering place that was a melting pot of intertribal activities encompassing social, spiritual and technological exchanges, and a connecting point, "the hub of the wheel", that brought together tribes from a radius of a thousand miles was established here. There is much we can learn about what that looked like on a seasonal and more importantly on a daily basis, but most of the archaeological studies and dig information for the Riverside Archaeological District and other places on the river and elsewhere in

our area, have been inaccessible for decades, and in most cases have been classified as highly restricted. Our organization has been repeatedly denied access to that information. That old system of restricting access to classified research data to protect archaeological resources, has had the opposite effect, and has failed to communicate to the public and the resource managers, the story of the Indian People and the land in a way that could have protected many of the unique and irreplaceable cultural assets we witnessed destroyed on the Wissatinnewag property that is now in our stewardship. This has also been true for many other sites on the river and elsewhere.

It is our sincere hope that the time has arrived for organizations like ours to experience a more balanced, and equity driven working relationship with the FERC, the utilities, the public, the Massachusetts Historic Commission and other governmental agencies.

We are seeking to bring into balance the historical and cultural gaps and losses of natural habitat and cultural resources that were experienced on this stretch of river during the time of past re-licensing issuances. To do this, we will lay out our request for five project studies for consideration at this time that we feel will contribute to the usefulness of the yet untapped historical project resources under consideration.

### **Study request 1**

We are requesting a comprehensive investigation and mapping of the many ancient traversing trail systems and fishing stations as well as village locus and other special places that still exist all along the river's edge and up on the land of the Wissatinnewag village, as well as south down river to and beyond the area now known as Rock Dam. The northern section of this area is currently listed in the National Register of Historic Places as part of The Riverside Archaeological District. Our goal is to identify and recognize the hidden historical and cultural value in this land that will foster a stronger awareness and level of protection from the many poor development choices we experienced in the past and see on the horizon.

### **Part two of request 1**

We are requesting to do additional comprehensive investigations, documents searches and other research and field studies and inventory and formal archaeological digs, to address the project areas north up to and around the Wilder and Vernon Falls (dam) on the New Hampshire, Vermont, and Massachusetts sides of the river. Any time there are obstructions on the river, like a falls, we understand that a fishing site and a village would have been a part of the landscape. This is where fish are held and create fishing opportunities. These areas hold a wealth of archaeological information that needs to be taken into account when projects are undertaken on the river's edge, or on infrastructure upgrades that are made inland of the project area and might cause the loss of those cultural assets. The Nolumbeka Project, Inc. sees the access to background literature reviews of previous cultural resources and archaeological study reports, and the development of archaeological sensitivity models and focused field reconnaissance

studies, which include access to the existing archaeological study data in the files of the Vermont, New Hampshire, and the Massachusetts, State, corporate and other NGO archives, as an important component for use in our historical archive research library. This would add a centralized and accessible body of knowledge for use in determining the cultural assets at risk in the project scope area.

Because of the current disconnect to the past cultural data, and lax attitude of past project's responsibility to that data, we see a need to organize that data in a central location and make it digitally available. At this point in the conversation, without knowing all the parties who would need or want to be involved, it would be nearly impossible to do a cost projection for this request.

### **Study request 2**

We request that a comprehensive field survey of wildlife and botanical species/habitat to identify, catalogue, digitize, and show the association and use of the many indigenous plant species, both protected, and unprotected, that played a part in the cultural lifestyles of the people who used them. This information would prove to be useful for endangered species protection and life ways studies of the ancient river tribes. The cost of this process would be determined by the number of sites that give indication of Native land use in the projects areas, and that has yet to be fully determined.

### **Study request 3**

We request a project be undertaken to stabilize the exposed sand bank and protect from erosion damages other disturbed areas on the Wissatinnewag property damaged during mining and contracting work or the result of storm damage experienced prior to the acquisition of the land by The Nolumbeka Project. The goal would be to return the site to a green-fields condition for use as a cultural educational resource. This should include planting of indigenous grasses and plants known to have existed here prior to the land being disturbed. In addition, this would allow an experienced team of botanists, historians and archaeologists to do the basic research to develop a more complete cultural profile on the Wissatinnewag site and other important sites on the river in the resource areas under the license obligations from the utilities. The cost for this process would be impacted by the results of the second study request, which we do not have at this time.

### **Study request 4**

We request a project be undertaken to identify and implement the formation of a National Historic Park around the Great Falls fight site in the Gill and Turners Falls area. A Historic Educational Park and self guided hiking trails, would allow the story of the May 19, 1676 attack on the refugee camp at the Wissatinnewag and the Peskeompskut village sites to be told from the indigenous point of view, and would help to educate and celebrate the importance of the relationship The Great Falls played in the lives of the indigenous people, who for over 200 generations, considered it to be a village of peace

and place of cultural and technical exchange and celebration. This educational experience fits right into the Town of Montague's efforts to establish the River Culture and history of the Great Falls as a destination for historical tourism. The Town of Northfield is also talking about historic tourism as part of their new Master Plan. As part of this process we would like to also request a central housing facility in the Gill or Turners Falls area for our historic archives and study programs. Researchers, educators, and THPO's across the northeast and beyond could use this office. It could also be a central location for preservation efforts here in Western Massachusetts. A study needs to be done first to arrive at the cost of this project. An office location for the Nolumbeka Project might be incorporated into a River Culture complex with the Town of Montague and other NGO's, to offset the expense of the project.

### **Study request 5**

In the early sixties a construction company mined the northern portion of the Wissatinnewag Village area we are responsible for preserving. During that time period sand and gravel from the Wissatinnewag Village site was taken for the building of Route 2 in Greenfield across the street and Route 10 in the Northfield area. During this phase of history on the site, part of the village was destroyed and untold numbers of unmarked burials were displaced. Sadly, human remains mixed in the sand and gravel often became part of the road base for the Route 2 and Route 10 road construction projects at that time. The construction company used the mined out portion of the village to deposit and bury construction debris. Old tires, discarded construction materials and steel barrels were buried there. That portion of the village leaches into Falls Brook, which goes into the Falls River and within a few hundred feet into the Connecticut River. We would like to clean up the pollution going into Falls Brook and restore the area to a clean and healthy ecosystem. Addressing this challenge would make the area safer and more useful in our educational and preservation programs on the site. The cost of this effort could only be determined by testing for the extent of the contamination on the site impacted, and that has yet to be done

From the Board of The Nolumbeka Project and myself, we would like to thank you for the opportunity to be a part of this process, and we look forward to a rewarding and productive exchange and working relationship on this re-licensing project.

Sincerely,

Joseph Graveline, President  
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Document Content(s)

Federal Energy Regulatory Commission.DOC.....1-6