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FEDERAL ENERGY
REGULATORY COMMISSION**The Commonwealth of Massachusetts**William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

April 24, 2013

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First St NE Room 1A
Washington, DC 20426

Attn: Ken Hogan

RE: Federal Energy Regulatory Commission Relicensing of the Turners Falls Hydroelectric Project
And Northfield Mountain Pumped Storage Project, Franklin County, MA. MHC # RC.1099.
FERC No. 1889-081 and No. 2485-063.

Dear Secretary Bose:

Staff of the Massachusetts Historical Commission (MHC), the Office of the Massachusetts State Historic Preservation Officer, have reviewed the Proposed Study Plan (PSP) submitted by Gomez and Sullivan Engineers on behalf of Firstlight, received April 16, 2013, for the proposed project referenced above. The proposed projects consist of the FERC relicensing of the Turners Falls Hydroelectric Project and the Northfield Mountain Pumped Storage Project in Franklin County. The MHC has previously commented on the Notice of Intent to File License Application, Filing of Pre-Application Document on January 16, 2013 (copy enclosed).

Section 3.7 (pg.3-209) of the PSP indicates that Firstlight will conduct an archaeological reconnaissance survey for the project area of potential effect. The project boundaries in Massachusetts are shown on Figures 2.2.4-1 through 13 and generally describe the geographic project area of potential effect. However, the MHC is unable to determine where new construction, demolition or rehabilitation at the existing facilities, if any, is proposed that may cause effects to significant historic and archaeological resources. Scaled existing and proposed conditions project plans for the project should be submitted to the MHC for review and comment as they are developed.

Archaeological investigations, including reconnaissance and intensive (locational) survey proposed to be conducted in Massachusetts, must be conducted under a State Archaeologist's Permit (950 CMR 70). A State Archaeologist's permit application should be submitted to the MHC by a qualified professional archaeological consulting firm retained by Firstlight. The cultural resources consultant should evaluate the potential effects on historic and archaeological resources of operations, and any new construction, demolition or rehabilitation which may be required for the facilities.

The MHC also requests the opportunity to review the proposed scope for the historic properties identification effort prior to implementing any cultural resources survey for historic architectural resources. The research design and methodology, and CVs of the qualified professional historic preservation consultants on the research team, should be submitted to the MHC for review and comment.

The results of the cultural resources surveys should include archaeological sensitivity assessments of the proposed impact areas and recommendations for intensive (locational) archaeological survey, if warranted, in order to locate and identify any significant historic or archaeological resources that may be affected by the project. The results of the surveys will provide information to assist in consultation to avoid, minimize or mitigate any adverse effects to significant historic and archaeological resources.

The MHC strongly recommends that a qualified professional archaeologist be included on the research team for the proposed 2013 Full River Reconnaissance Study described in Section 3.0 (pg.3-1). The MHC has previously reviewed multiple Connecticut River bank stabilization projects within portions of the geographic project area of potential effect in Northfield, Montague, and Gill. Archaeological investigations have been conducted for these projects. These projects have had adverse effects to significant archaeological resources located within bank stabilization project impacts areas, including bank access routes and equipment storage and materials staging areas along the Connecticut River floodplains and banks, and. If a qualified professional archaeologist is unable to participate on the study research team, then the results of the study should be provided to the professional archaeological consulting firm for their review and assessment, and management recommendations provided to the MHC and FERC.

Data containing highly sensitive archaeological site locational information is not a public record (36 CFR 800.6(a)(5); 800.11(c); Massachusetts General Laws Chapter 9, sections 26A(1) & 27(C)). All sensitive archaeological site locational information should be removed from any project documents intended for public review. Any documentation prepared with this information should be prominently labeled "Confidential. Not for Public Release", and the distribution strictly controlled. Consultation with the MHC should be conducted prior to the dissemination of this information.

The MHC's Inventory of Historic and Archaeological Assets of the Commonwealth (which includes current State and National Register listings) is available for research at our office, without an appointment, during normal business hours. The Inventory is regularly updated, so project planners should continue to consult the Inventory for identified historic and archaeological properties as the project proceeds. Researchers should be aware, however, that consultation of the Inventory is not sufficient to identify all significant historic and archaeological resources that may be affected by a project (36 CFR 800.4).

The MHC looks forward to reviewing the information requested above, and to consultation to avoid, minimize or mitigate adverse effects to significant historic and archaeological resources.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (36 CFR 800). Please contact Jonathan K. Patton at this office if you have any questions at this time.

Sincerely,



Brona Simon
State Historic Preservation Officer
Executive Director
State Archaeologist
Massachusetts Historical Commission

Encl: MHC to FERC 1/16/2013

xc w/ encl: see next page

xc w/ encl: John Howard, Director, FirstLight GDF Suez Hydro Generating Company
Charles Momney, Firstlight GDF Suez
Lana Khitrik, Gomez and Sullivan Engineers, P.C.
Mickey Marcus, New England Environmental, Inc.
Karen Kirk Adams, USACOE-NED, Regulatory
Kate Atwood, USACOE-NED
Marc Paiva, USACO-NED
Cheryl White, Stockbridge-Munsee Tribal Historic Preservation Officer
Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)
Ramona Peters, Mashpee Wampanoag Tribe
John Eddins, ACHP
Giovanna Peebles, VT SHPO
Elizabeth Muzzey, NH SHPO
Bill Lellis, Acting Chief, Conte Anadromous Fish Laboratory
John Wilson, USFW
Local Historical Commissions: Towns of Northfield, Gill, Greenfield, Montague, and Erving



The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

January 16, 2013

Kimberly D. Bose
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RE: Federal Energy Regulatory Commission Relicensing of the Turners Falls Hydroelectric Project
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FERC No. 1889-081 and No. 2485-063.

Dear Secretary Bose:

Staff of the Massachusetts Historical Commission (MHC), the Office of the Massachusetts State Historic Preservation Officer, have reviewed the Notice of Intent to File License Application, Filing of Pre-Application Document, received December 31, 2012, submitted by for the proposed project referenced above. The proposed projects consist of the FERC relicensing of the Turners Falls Hydroelectric Project and the Northfield Mountain Pumped Storage Project in Franklin County.

An Environmental Impact Statement (EIS) is proposed to be prepared for the project. A copy of the draft EIS, including scaled existing and proposed conditions project plans for new construction, demolition or rehabilitation at the existing facilities, should be submitted to the MHC for review and comment when it is developed.

Cultural resources surveys (pg. 31), including archaeological reconnaissance survey(s) are proposed to be conducted for the project to identify historic and archaeological resources with the project area of potential effect. The MHC has previously recommended in 2011 that Firstlight have a qualified cultural resource consultant research and compile the information required by the FERC relicensing application for identified historic and archaeological resources and archaeologically sensitive areas. The cultural resources consultant should evaluate the potential effects on historic and archaeological resources of operations, and any new construction, demolition or rehabilitation which may be required for the facilities. The results of the survey will provide information to assist in consultation to avoid, minimize or mitigate any adverse effects to significant historic and archaeological resources.

Archaeological surveys are conducted under a State Archaeologist's Permit (950 CMR 70) and an application should be submitted to the MHC by a professional archaeological consulting firm retained by the project proponent. The results of the survey should include archaeological sensitivity assessments of the proposed impact areas and recommendations for intensive (locational) archaeological survey, if warranted, in order to locate and identify any significant historic or archaeological resources that may be affected by the project.

The EIS should include a summary of consultation with the MHC and results of the cultural resource survey(s) in a way that does not disclose sensitive archaeological site locational information. Data containing highly sensitive archaeological site locational information is not a public record (36 CFR 800.6(a)(5); 800.11(c); Massachusetts General Laws Chapter 9, sections 26A(1) & 27(C)). All sensitive archaeological site locational information should be removed from any project documents intended for public review. Any documentation prepared with this information should be prominently labeled "Confidential. Not for Public Release", and the distribution strictly controlled. Consultation with the MHC should be conducted prior to the dissemination of this information.

MHC's Inventory of Historic and Archaeological Assets of the Commonwealth (which includes current State and National Register listings) is available for research at our office, without an appointment, during normal business hours. Project planners should consult the Inventory of Historic and Archaeological Assets of the Commonwealth for identified historic and archaeological properties. Researchers should be aware, however, that consultation of the Inventory is not sufficient to identify all significant historic and archaeological resources that may be affected by a project (36 CFR 800.4).

The MHC looks forward to reviewing the information requested above, and to consultation to avoid, minimize or mitigate adverse effects to significant historic and archaeological resources.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (36 CFR 800). Please contact Jonathan K. Patton at this office if you have any questions at this time.

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