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FEDERAL ENERGY
REGULATORY COMMISSION

The Commonwealth of Massachusetts

June 21, 2013

William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

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

Attn: Frank Winchell, Hydro Power

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 Ms. Bose:

Staff of the Massachusetts Historical Commission (MHC), office of the Massachusetts State Historic Preservation Officer have reviewed the Project Notification Form (PNF), received by the MHC on June 3, 2013, and the MHC's files, for the project referenced above.

The MHC, as the office of the Massachusetts State Historic Preservation Officer, is reviewing and commenting on the project pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), to assist and advise the Federal Energy Regulatory Commission (FERC) in fulfilling its responsibilities.

The USGS maps provided in the PNF outline a proposed project area of potential effect. As project planning is refined, the MHC looks forward to reviewing additional information, including scaled existing and proposed conditions project plans, for any proposed new construction, demolition, rehabilitation or other activities, at the existing facilities, if any, that may cause effects to significant historic and archaeological resources. Please provide the MHC with the FERC's determination of the area of potential effect (36 CFR 800.4(a)(1)).

The PNF indicates that Firstlight has retained the TRC Companies as its cultural resources consultant. Project information should be provided to TRC to assist in its evaluation efforts for proposed impacts to significant historic and archaeological resources during the proposed cultural resource survey. TRC will apply for a State Archaeologist's Field Investigation Permit (950 CMR 70) to conduct the previously requested archaeological reconnaissance survey. The archaeological survey Research Team should include individuals with previous relevant experience in ancient and historical period archaeology of the glaciated Northeast and in the Connecticut River Valley region of New England (see 950 CMR 70.10). The MHC's review and comment on the proposed research design and methodology will assist FERC in developing the scope of the identification efforts (36 CFR 800.4(a)).

The MHC looks forward to reviewing the scope of the proposed identification and evaluation efforts proposed as part of the Firstlight Study Plans, including the State Archaeologist's permit application and archaeological research design and methodology, and the proposed scope for the historic properties identification effort, the research design and methodology, and CVs of the qualified professional historic

preservation consultants on the research team. The archaeological research design and methodology should include a description of TRC's facilities, equipment, staffing, and other resources necessary to undertake archaeological research, fieldwork, laboratory processing, analysis, and reporting to carry projects to completion in accordance with the Standards for Field Investigation (950 CMR 70.13). An adequate curatorial facility for the archaeological materials and records of the investigation should be located prior to submitting the permit application, with preference for curation within Massachusetts for the Massachusetts survey area.

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

xc: John Howard, Director FERC Hydro Compliance, Firstlight Power Resources GDF Suez
Charles Momney, Firstlight GDF Suez
Lana Khitrik, Gomez and Sullivan Engineers, P.C.
Mickey Marcus, New England Environmental, Inc.
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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

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