

The Nolumbeka Project, Inc.

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July 14, 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. 1855-026
Bellows Falls Project No. 1855-045
Vernon Project No. 1904-073
Turners Falls Project No. 1889-081
Northfield Pump Storage Project No. 2485-063

Dear Mr. Hogan,

The Nolumbeka Project Inc. would like to request a Traditional Cultural Properties Study for the above listed projects.

Study Request. Traditional Cultural Properties Study

During the June 12, 2013 study plan meeting discussing proposed study plan (PSP) studies 3.7.1 Phase 1A Archaeological Survey and 3.7.2 Reconnaissance-Level Historic Structures Survey, our group raised the question about whether a sacred ceremonial landscape would be considered a “structure” in the Historical Structures Survey. The answer was that these are typically covered in a Traditional Cultural Properties (TCPs) Study Plan, which is not currently in the PSP. We are therefore submitting a request for one.

TCPs are locations associated with cultural practices or beliefs of a living community that are: 1) rooted in that community’s history; or 2) important in maintaining the continuing cultural identity of a community. (National Register Bulletin 38, 1998:1). Parker and King (1998) defines a TCP as:

- Locations associated with traditional beliefs of an aboriginal/indigenous group about its origins, its cultural history, or the nature of the world and cultural landscapes.
- A rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents.
- An urban neighborhood that is the traditional home for a particular cultural group, and that reflects its beliefs and practices.
- Locations where Native American religious practitioners have historically gone and are known or thought to go today, to perform ceremonial cultural rules of practice.
- Locations where a community has traditionally carried out economic, artistic or other cultural practices important in maintaining its historic identity.

Goals and Objectives

The goal of the study is to assist the Federal Energy Regulatory Commission (FERC) in meeting its compliance requirements under Section 106 of the National Historic Preservation Act (NHPA), as amended, by determining if licensing the Project will have an adverse effect on National Register of Historic Places (NRHP)-eligible TCPs, ethnographic resources, or other cultural resources of tribal significance.

The objective of this study is to identify TCPs and other cultural resources of tribal importance that may potentially be affected by Project operations, evaluate their eligibility to the NRHP, and identify Project-related activities that may affect TCPs, other tribal interests, or traditional interests of other groups within the Area of Potential Effect (APE).

Relevant Resource Management Goals

The Nolumbeka Project in cooperation with the Narragansett Indian Tribal Historic Office (NITHIPO), the Town of Montague, the Town of Gill and other interested tribes and organizations, and as a conservator of one of the largest and oldest village and cultural gathering places on the whole of the Connecticut River, would like to elevate the awareness of the cultural, and ceremonial history of the Great Falls and Ceremonial Hill locus and beyond, including the historical events surrounding the Great Falls Massacre of May 19, 1676, to reflect the importance of the Native American cultural life ways that are so uniquely concentrated in this area for the purpose of preservation and education. Nolumbeka seeks to stimulate one of the newest recreational activities catching on all over the world, Recreational Historical Tourism. Our goal is to bring awareness to Native culture and history and with the success of that, tourist dollars into the area to help ensure the continued protection and preservation of ancient sacred sites, the 12,000 year old trail systems and fishing stations, the expanded ceremonial stone landscapes, burial grounds and battle grounds sites and other cultural resources in this area and further up north on the Connecticut River including Vermont's petroglyph's and ceremonial stone calendar sites. One of the first steps is to identify and acknowledge as many of the cultural assets eligible for listing on the National Register of Historic Places as possible.

An important statistic to take into consideration on this subject is that Massachusetts, Vermont and New Hampshire seem to be lagging behind many other states in the country on their preservation efforts around Native American Cultural Resources. The chance of a Native American site being listed on the National Register of Historic Places in Massachusetts is 1 out of 300, in Vermont, it is 1 out of 147.2, In New Hampshire it is 1 out of 105 while in places like Maine it is 1 out of 12.7.

If this is going to be a 50- year license issue, it will reflect a 50 year lock in on the States and Licensee's attitude around the their responsibility to preservation efforts of our Native American cultural assets and resources here in the Connecticut River Valley. Nolumbeka Feels it is time for Massachusetts, Vermont and New Hampshire to elevate our collective Native American cultural preservation responsibilities to that of other states like Maine. Nolumbeka feels that a comprehensive TCP is an important first step.

Public Interest Consideration If Requester Is Not A Resource Agency

Section 106 of the National Historic Preservation Act (1966) requires that federal agencies, licensees, and those receiving federal assistance take into account the effects of proposed undertakings on any resource that is listed on or is eligible for the NRHP. The Nolumbeka Project considers our organization a limited resource agency. The Nolumbeka Project represents the following public interests: historic cultural tourism, preservation of sacred sites and ceremonial stone landscapes, a wider public interest in educational and artistic Native American events such as an annual Narragansett and Town of Montague proposed tribal canoe race on the Connecticut River to coincide with a popular Peoples Harvest Native American art music and history event, and the desire for the Town of Gill and Montague to create a Native American cultural educational park.

Existing Information and Need for Additional Information

Sections 4.10.2.3 and 4.10.2.4 of the Pre-application Document (PAD) described the Woodland Period (1000BC-AD1600) and the Contact Period (AD1500-AD1620) generally. This should include Paleo-Indian (12,000-BC-AD1676) Contact Period.

The Gill Riverside Historic District is listed as eligible for The National Register of Historic Places as well as the Turners Falls Ceremonial Hill, which is listed as a district with a 20-mile radius around the Turners Falls Airport.

There is the historic May 19,1676 Great Falls, Peskemoskut massacre site to take into consideration, including an intact parcel of that site at the top of the hill in Gill known as the Conway Site. That property had a ground penetrating radar (GPR) survey done several years ago, that produced the indication of nearly 300 unmarked burials including a very rare Spokes Burial commonly associated with the Andean culture, as well as the recent discovery of an additional Spokes Burial located not far from the one discovered in the late 1890's on the Conway site.

There is the 12,000-year-old Wissatinnewag Village site that Nolumbeka holds the deed to, located at the foot of the Great Falls, which includes a built earthworks traversing trail system going down to fishing and canoe launching stations on what was the shore line of ancient Lake Hitchcock and later in time on down to the rivers edge that accesses what is now known as the By-Pass Reach section of the river. That access point proved to be a

highly productive fishing area. The Wissatinnewag trail system also supports a number of ceremonial stone structures that directly relate to the line of sight and ceremonial connection to the Ceremonial Stone Hill at the Turners Falls Airport, as well as a large number of burials up higher on the village site. All the sections of the village site are still used today by the tribes for ceremony and other traditional practices associated with their past cultural life ways. Wissatinnewag today is a live and vibrant historical piece of property made fully accessible to the tribes and is used for the growing of Native heritage crops and seed preservation as well as education.

There is the rare 12,000-year-old Hannaman Paleo-Indian Hunting and Kill site located at the foot of the Ceremonial Stone Hill.

There are islands below the falls that were used for seasonal fishing and village sites where there are ancient shell middens on the islands north ends that could reveal a great deal about the aquatic resources that were used by the inhabitants for thousands of years. By investigating these shell middens researchers could discover what was being harvested from the river for food and utility and what the environmental health of the river was during the time of these middens. This investigation might reveal new information about the shellfish population as well as the sturgeon populations that existed at that time. There are shell middens in the Rock Dam area that should be investigated as well. Also in the Rock Dam area there were burials eroding out of the rivers edge that are well documented.

Under the waters of Barton's Cove there is an extension of the Great Falls village that was for years kept in preservation as pastureland but was later flooded by the raising of waters associated with the rising level of the dams to produce hydropower. This village was part of the 1676 Turner attack on the village of Peskeomskut. Somewhere under the waters of Barton Cove is the mouth of Heal All Brook where forges, muskets and pigs of lead were thrown into the fast flowing waters on the morning of May 19, 1676 during that predawn attack.

In the project area is the Kells Farm Site just south of the By-Pass Reach that has proven to be a very important Paleo-Indian to Contact Period village site. Some of the artifacts in known collections from that site have revealed a high concentration of ceremonial burial items. On the Kells Site there are also a large number of ceremonial stone markers that indicate part of the site was used for sacred practices and ceremony. Some of the stones have very interesting markings on them that might prove to be useful to expand the level of knowledge surrounding ceremonial stone sites.

There is an extension of the Wissatinnewag Village that connects with that part of the Wissatinnewag Village that The Nolumbeka Project owns. That site is has had less impact than some parts of our section of the village and should be taken into consideration in a TCP study.

To date, there has been no comprehensive professional cultural properties inventory of the Project APE to identify such resources. The Nolumbeka project feels this is a necessary part of the re-licensing regulatory process. Also Nolumbeka feels that recognition of historical structures should be applied to ceremonial built stone structures and the built earthworks of the engineered steep slop Indigenous trail systems and fishing stations.

Nexus to Project Operations and Effects.

First Light's continued operation and maintenance of the Turners Falls Dam and Northfield Mountain Pumped Storage Projects has a potential to affect TCPs especially due to erosion and under monitoring of cultural properties from looting and limited knowledge of ceremonial practices and recognition of sacred cultural resources.

Under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, federal agencies must take into account the effects of their undertakings on historic properties and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on such undertakings. As defined under 36 CFR 800.16(l), historic properties are prehistoric or historic sites, buildings, structures, objects, districts, or locations of traditional use or beliefs (i.e., TCPs) that are included in, or eligible for inclusion in, the National Register of Historic Places (NRHP). Historic properties are identified through a process of evaluation against specific criteria. For most cultural resources evaluated for listing on the NRHP, these criteria are found at 36 CFR 60.4. However, to be considered a historic property, a TCP must meet other significance criteria identified in amendments made to the NHPA in 1992. These criteria are found at §101(d)(6)(A)

Proposed Methodology

Task 1: Establish study area

The study area should be the same APE determined by the State Historic Preservation Offices (SHPOs) and Narragansett Indian Tribal Historic Preservation Office (NITHPO), after consultation with knowledgeable local contacts and organizations including The Nolumbeka Project.

Task 2: Research archives

The Nolumbeka Project archives are available for use in this process, also the University of Massachusetts (U-Mass) Archaeological Services Archives can be tapped, but with the caveat that they often list research locations and studies under a number of different names for the same locus. This has in the past, allowed for a disconnect of access to the full body of knowledge on a given site if it was listed at one time or another under a different name. There are local highly knowledgeable researchers at The Nolumbeka Project, and the Narragansett (NITHPO) have access to cultural practices and information that could expand on the body on knowledge of this area, as well as other local researchers. The research library at the Pocumtuck Valley Memorial Association Library (PVMA), (the Memorial libraries) in Historic Deerfield library up stairs collection, U-Mass library, is an expanded body of knowledge. The Historic Commissions in the surrounding towns and the Historical Society in Northfield and Gill, Carnegie Public Library in Turners falls has land improvement maps that show what was done in the Gill Riverside and Turners area. The records of the Massachusetts, Vermont and New

Hampshire SHPO'S should be reviewed. . Look for private and public manuscript collections, pictorial resources and maps, including local newspaper archives, articles and the Kells Farm Family Private Artifacts Collection.

Task 3: Tribal Consultation and Identification of Resources

Following the ethnographic literature review suggested in step 2, the next step in identifying potential TCPs will involve extensive tribal and local researchers consultation. Consultation and the necessary fieldwork and potential TCPs documentation shall be in accordance with Section 106 of the NHPA, as amended, and shall be consistent with the National Register Bulletin No. 38, Guidelines for Evaluating and Documenting Identification of Traditional Cultural Properties (Parker and King 1998).

In order to facilitate tribal consultations, the Licensee's are requested to retain a qualified, professional ethnographer who meets the standards for ethnography as defined in Appendix II of National Register Bulletin No. 38. The Licensee's will coordinate its selection of the ethnographer with the assistance of affected tribes and other interested cultural/tribal stakeholders including the Nolumbeka Project anthropologist

The ethnographer, in consultation with tribal representatives including the NITHPO and other tribes and stakeholders will determine the scope and breath of interviews. It will be the responsibility of the ethnographer to contact the appropriate tribe(s) and interested tribal and cultural stakeholders to arrange for interviews at a time and location acceptable to those tribal Interviewees. The ethnographer and tribal interviewees may need to visit the APE together to accurately define potential TCPs or other ethnographic and non-TCP cultural resources of importance to the tribes. It may be necessary for the Licensee's to arrange for an initial introductory meeting bringing together the Licensee's, tribal representatives, and the ethnographer.

Interviews will often need to be conducted on a one on one basis with the ethnographer. The oral traditions and information collected during interviews will be used to help define the potential TCPs, or other cultural resources of tribal significance in the APE, and assist in making sound judgments and resource management and other decisions in the Projects planning. If during tribal interviews the ethnographer and interviewees determine it appropriate, the Licensee's ethnographer will coordinate with tribal interviewees to obtain Traditional Ecological Knowledge. The sole purpose of addressing Traditional Ecological Knowledge (TEK) will be to identify important tribal locations and cultural resources within the APE.

If participating tribes do not wish to disclose the locations of any potential TCPs or other cultural resources, the Licensee's will instead work with the tribes to identify the general issues and concerns that the tribes(s) may have regarding potential impacts of the Project upon resources known to the tribe(s) and further work with the tribes and appropriate land management agencies to develop agreeable measures to address these concerns.

Step 4-Site Visits

Capable tribal representatives, and stakeholders including The Nolumbeka Project researchers and the Licensee's ethnographer may wish to visit archaeological sites including (Wissatinnewag and the Kells Farm as well as the islands and shell middens and the petroglyphs locos containing artifacts, features, scared artwork or other physical remains from past human activities) identified during the study or during the Licensee's Historic Properties Study. The purpose of the visit would be to provide tribal representatives the opportunity to exam any archaeological sites of interest to the tribes that were encountered during the Historic Properties Study fieldwork, and to enable the ethnographer to obtain additional information on the potential TCPs that may be associated with the sites. The licensee's or their enthrpgrapher will make a reasonable effort to reach out to the participating tribes to invite participation in archaeological site visits by calling, sending letters or through electronic mail.

Step5-National Register of Historic Places Evaluation

Following the completion of step 4, the Licensee's ethnographer will evaluate the eligibility of identified TCPs and other cultural resources of tribal importance for listing on the NRHP using the data collected from the field studies described above. This will be done in consultation with participating tribes. The amendments in 36CFR 60.4 to the NHPA in 1992 (ss101(d)(6)9A0) specify that properties of traditional religious and cultural importance to a tribe may be determined eligible for inclusion in the NRHP because of their "association with cultural practices or beliefs of a living community that are: 1) rooted in that community's history; and 2) are important in maintaining the continuing cultural identity for the community." Nolumbeka believes that both criteria exist in the Great Falls area for a number of tribes.

All TCP that are evaluated at this phase will be done with the affected tribes, the appropriate federal agencies and the SHIPs. Those evaluations will be submitted to the appropriate agencies and tribes for review and comment prior to final submission to the SHIPs for concurrence. The Licensee's will work with the tribes regarding resources of tribal importance that may not qualify for the NRHP, or resources the tribes may have regarding potential impacts of the project upon resources known to the tribes. The Licensees will work with the tribes and land management agencies to develop agreeable measures to address these concerns.

Step 6-Identify and assess Potential Project Effects on National Register Eligible Properties

As required under 36 CFR ss 800.5 the Licensees will identify and assess any adverse affects on TCPs resulting from Project O&M. Adverse effects are defined as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the properties location,

design setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be further removed in distance or be cumulative (36 CFR ss 800.5 (a) (1)).

Step 7-Reporting

The Licensees will prepare a report at the conclusion of the study that includes the following sections; 1) Study Goals and Objectives; 2) Methods; 3) Results; 4) Discussion, and; 5) Description of Variances from the FERC-approved study proposal, if any.

Copies of this report will be provided to the affected Indian tribes including but not limited to the Narragansett NITHPO, interested stake holders including but not limited to the Nolumbeka Project research staff, and other interested parties. Interested parties will be provided the opportunity to review the TCP report before it is sent to the SHIPOs for concurrence.

Step 8-Consistency of Methodology with Generally Accepted Scientific Practices

The proposed study methods listed above should be consistent with ACHP's guidelines for compliance with the requirement of Section 106 of the NHPA found at 36 CFR 800 and with the related guidance set forth in National Register Bulletin 38.

Level of Effort and Cost

We estimate that this study will cost \$50,000 - \$100,000

References

Parker, Patricia L., and Thomas F King, 1998. Guidelines for Evaluating and Documenting Traditional Cultural Properties. National Register Bulletin 38. U.S. Department of the Interior, National Parks Service, Washington, D.C.

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July 10, 2013

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RE: Wilder Dam Project No. 1855-026
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Dear Mr. Hogan,

The Nolumbeka Project wishes at this time to respond to the proposed study plans as offered by Trans Canada and First Light.

We will start with First Light's response to our study request 1. We asked for a comprehensive investigation and mapping of the of the ancient trail systems and fishing stations and other special places that exist on the river's edge and up on the Wissatinnewag village site proper.

First Light's response suggests that archaeological surveys will result in reports that will discuss cultural landscape as a result of the surveys, but they indicate they will not be looking at steep grades and wetlands, they also indicated they will not do TCP study. The Nolumbeka project will be requesting a TCP study. That request will be filed with this letter.

Our request was clearly asking for studies of the built earthworks and trail systems that were created many thousands of years ago on the Wissatinnewag Village Site out of the need to access some of the most productive fishing in the river on what is now called the Bypass Reach. The Bypass Reach area abuts the Wissatinnewag Village site. This terrain is a steep rock ledge that goes right down to the ancient waters edge. These built trail systems were not simply ruts worn in the earth by thousands of years of use, but were engineered roadways that required the builders to cut into the upper ledge materials and redeposit that material down grade to create a safe traversing trail system to access fishing earthworks ledges on the ancient Lake Hitchcock shoreline and later down to the river. They included fishing, ceremonial sighting, and canoe-launching stations.

First light indicated that Nolumbeka offered no nexus or direct link to the project area in our study requests. Nolumbeka feels strongly about the fact that the Wissatinnewag Village site existed 12,000 years before colonial boundaries and lines were ever drawn on a map. First light offered up on their project boundaries map a lined off area showing the Wissatinnewag Village property. The village is a congruent and fully connected cultural resource that goes right to the water's edge, and in this area has not been degraded or impacted by modern progress with the exception of the damming of the river in the last hundred years, and the loss of the natural water flow rates. This cultural resource is a rare jewel. We would also like to point out that we created the conservation easement that abuts First Light's land on the rivers edge. Nolumbeka has a legal agreement with U.S. Fish and Wildlife in our conservation easement partnership that articulates our shared stewardship for the protection of the Wissatinnewag property. In this contract we share responsibility for the safeguarding of the cultural resources that connect with First Light's property, and we use that section of the Wissatinnewag village for educational programs that promote the protection of Native American cultural resources and a Native viewpoint of the history of the region. We feel we have a stronger than average connection or nexus to the river resource area and First Lights operations impact nexus.

First light and trans Canada would like to eliminate steep slopes and or swamps or wetlands from study consideration. This request by the Licensee's is exactly why we recommended the need for more culturally sensitive and better-trained researchers. To address wetlands, Nolumbeka feels there needs to be an educational component that might help First Light, Trans Canada and FERC understand how important to Native cultural values wetlands have always been. Wetlands have been for thousands of years one of the most powerful gathering places for healing resources and ceremony, as well as foraging and are very often associated with ceremonial stone landscapes. To disregard the need to look more closely at wetlands is to marginalize a culture's ceremonial connection to the land, their history and values. Many important archaeological discoveries have been located in what were considered wetland areas. Nolumbeka would like to request that steep slopes and wetlands be included in the cultural studies, inventory and project boundaries discussions. If the Licensee's choose not to look at steep slopes and wetlands they will not have a complete inventory of the cultural resources in their project areas.

Nolumbeka also requests to be a part of the on the ground field studies and data analysis component of this project licensing process. Since 1997 we have been doing research, data analysis and field monitoring of archaeological sites and have worked closely with the Narragansett (NITHPO). We have created a digitized historic cultural database and have worked with a number of tribes including the Narragansett (NITHIPO) to assist in their cultural and historical research when the tribes have been working to protect their cultural resources on project impacted lands. The Nolumbeka Project has been one of the early organizations involved with the discoveries of a number ceremonial stone landscapes. We have offered to continue our work with the Narragansett Tribe to create a centralized database in the Gill Turners Falls area to streamline and make study reports and oral histories more accessible to the tribes when projects impacts might need to be taken into consideration in the river boundaries area.

We are aware that a number of archaeological 1A studies have been done without tribal partnership. Trans Canada has requested the right to recycle an archaeological 1A study created five years ago under an old licensing issue without tribal participation or monitoring. We feel that is not the way to build trust with the tribes or the public and seem to not be congruent with the spirit of the 106 processes. Nolumbeka pointed out in our first letter to FERC that we felt it was important to bring on board professionals trained by the tribes to recognize the life ways and sacred practices and spaces of the indigenous peoples of this river valley culture. The Nolumbeka Project sees the recycling of Trans Canada's 5-year-old archaeological 1A study as a short cut that undermines the 106 processes.

In 2.1.6 Cultural Resources FERC def # 6 FERC requested First light to provide available information of Indian Traditional Cultural and Religious Properties as specified in 5.6 (d) (3) (x) (B), and 5.6 (d) (3) (x) (C).

First Light replied, "There are no known Indian traditional cultural properties (TCPs) or religious properties within the Turners Falls Project and Northfield Mountain Project boundaries". First light acknowledged The Turners Falls Sacred Ceremonial Hill Site, but claimed that it was not located in either of the projects boundaries.

Nolumbeka would like to respond that the Turners Falls Sacred Ceremonial Hill Site is not just a hill at the Turners Falls Airport, but is as a district that covers a 20-mile radius. This district covers a great deal of First Light's Project boundaries. Also some of the stone structures located on the Wissatinnewag Village property are a component of the Ceremonial Hill and have a direct line of vision and contextual connection to that location.

There is an Indian village currently underwater in Barton Cove, and in First Light's APE. Prior to the raising of the water level for the hydro production, that piece of land was pastureland and well before it was a pasture it was a part of the Great Falls village that was attacked by William Turner in the early dawn raid at the Great Falls on May 19, 1676. This site is by its very nature a traditional cultural property and also a religious property. Under water in that area are some of the cultural artifacts of that village and the attack, which includes a number of muskets that were being repaired at the village at that time as well as the forge and at least 2 pigs of lead. It can be expected that the personal artifacts of some of the victims could well be under water in that locus as well.

Just south of the By-Pass Reach area there are shell middens on the north end of the islands that were deposited over thousands of years during the warmer months when the prevailing winds are out of the south. Nolumbeka would like to see studies of these middens. We feel they could reveal significant new information on the sturgeon and shellfish habitat in the By-Pass Reach area and the river in general. It is also common for cultural discarded artifacts to be located in the disposal sites such as midden areas. These are well within First Light's APE. Nolumbeka feels First light's operations have had an impact on the cultural resources within their APE with erosion most especially but not limited to the area in and around the islands and on the shell midden sites as well as

directly across from the Northfield Mountain Project and at many points down river including the Kells Farm Paleo Indian Site.

Nolumbeka would like to respond to 2.2.2 Cultural Resources (FERC AIR #2)

FERC requested First Light to include in your study proposal that you would also consult with the Vermont, Massachusetts, and New Hampshire SHIPO'S and any involved Indian Tribe or other interested parties in formulating each of the tasks.

First light has not consulted with any Indian tribe that we know of, nor have they consulted with The Nolumbeka Project in formulating what the projects APE will look like. We have yet to see any research data for review on the known cultural resources in the project boundaries. It appears to us that First Light will create the APE with only SHIPO review and has not brought in the Tribes and other interested parties including Nolumbeka. We would like to have the chance, in a timely manner, to review and respond to the data that will be used to set the projects APE.

Nolumbeka feels First light misunderstood the study request from a number of other interested parties including Nolumbeka and the Town of Montague regarding the Great Falls Native Cultural Park. The study requests for the Great Falls Native Cultural Park was a request to study what it would look like for the Licensee's to help create the Great Falls Native Cultural Park as a way to give back to the Native American community and the general public something of cultural value that would help create historic tourism as a form of recreation and education in this area. This would go a long way to make up for the cultural resources that have been compromised on the river over the years during the development of Hydro Power. These Native American cultural resources were not addressed during the last licensing process many years ago. Nolumbeka has documented a number of cultural resources that have been damaged, destroyed and or lost and have on a number of occasions slipped by First Light's accountability to those resources over the years. The Great Falls Native Cultural Park would also allow for a more balanced Native historical viewpoint on the Great Falls massacre of May 19,1676. This story is a powerful piece of history that needs to be told from a Native perspective. Nolumbeka feels that the story told from that perspective would contribute to the Recreational Historic Tourism in our area. A number of years ago a study was done to get a sense of what percentage of sites listed on the National Register of Historic Places are Native American sites compared to other cultural groups. In Massachusetts out of the 3,602 sites listed only 1 out of 300 sites were Native American. That is 0.33% of the sites listed. In Maine out of 1,295 sites listed there were 102 Native sites. That is 1 out of 12.7 sites listed as Native American. The Great Falls Native Cultural Park is a chance to shift the trend that has led to such low numbers of Indian sites listed on the National Register of Historic Places that has prevailed here in Massachusetts for over 40 years. The Great Falls Native Cultural Park would expand a form of recreation that is catching on all over the world, Recreational Historic Tourism. Right here in the Great Falls area, the State Massachusetts has the history of a fascinating 12,000-year-old Indigenous culture that could be taped into as part of Recreational Historic Tourism. This is a form of recreation that has been overlooked for too many years. Nolumbeka strongly supports a study by the Licensee's to create a Native Cultural Park in the Montague Gill area.

2.3.3 Cultural Resources (FERC AIR 37)

In addition to the FERC, Massachusetts, Vermont and New Hampshire recommendation to do a Phase 1A Archaeological Survey and Historic Structure Survey, Nolumbeka requests that FERC consider requiring that survey to include Native American built stone structures, earthworks and ceremonial stone built landscapes in the APE as is the case in other states like Ohio, and if physically connected to go beyond the APE. Nolumbeka finds the APE maps we currently have to view, offer very little insight on what exactly is out there for cultural resources. Without the ability to review any studies that have been done, we find there is no way for us or the tribes to participate on the assessment of the applicability of the suggested APE Boundaries. Nolumbeka would like to review the research and compare it with what we know to exist in our archives before we would feel we have been allowed to be a contributor in this process. We have been doing this type of research work for the tribes since 1997, and we understand the process well enough to lend additional viewpoints and conversation to the decision making process in formulating each of the tasks.

3.4 Terrestrial Wildlife and Botanical Resources

3.4.1 Baseline Study of Terrestrial Wildlife and Botanical Resources at the Turners Falls Impoundment, the Bypass Reach and below Cabot Station within the Project Boundary

The Nolumbeka Project feels that our first request to do terrestrial wildlife and botanical resources studies on the Wissatinnewag property are congruent with 3.4.1 and would add to the body of knowledge that the Recreational Historic Tourism public would appreciate in their forays to the Turners Falls Gill- Greenfield historic site visits. Nolumbeka would like to take part in this process and would be happy to assist researchers on and around the Wissatinnewag Village Site.

3.6

3.6.1 Recreation Use/User Contact Survey

The Nolumbeka Project considers ourselves to be a unique stakeholder group do to the fact that we own a 41 acre 12,000 year old village site conservation easement in partnership with US Fish and Wildlife's 21 acre portion of the combined 63 acre Wissatinnewag Historical Village Site proposed to be a part of a Recreational Historic Tourism Plan for the Towns of Gill, Turners Falls and Greenfield. Our knowledge of the Bypass Reach is augmented by our access to that part of the river through our land and our mission as a cultural preservation nonprofit. We feel we could be of use to help assess possible access points in the Bypass Reach part of the river and possible canoe portage trails that might be feasible.

3.6.5

The Nolumbeka Project considers our use of the land in the project area in harmony with the cultural history and attraction to the Great Falls area, and we request to be identified as such in the goals and objectives in consideration in 3.6.5

The Nolumbeka Project Study Request 4

As part of our study request 4, Nolumbeka and the Narragansett (THPO) asked for a study to create a centralized housing facility in the Gill Turners Falls area for our archives and study programs, as well as a centralized housing facility to digitized and disseminate to appropriate tribes and researchers, the total of documents that have been amassed over the years on cultural studies done up and down the Connecticut River and in the surrounding area. The public perception at this time is that if just such a facility were in place now the current licensing process would be much streamlined as there would be no disconnect with what is out there and where it is and how it might impact any of the Licensee's projects on the river and beyond. There will be a need for just such a facility many times over the next 30 to 40 years of this license issue, and the Nolumbeka Project would be happy to team up with any of the tribes, the SHIPOs and the Licensees to create the protocols and institute such a program. Right now the cultural data that is out there is still in the early twentieth century mindset and access. This condition makes it difficult for a transparent exchange of data and research needed by the tribes and other interested parties to facilitate a balanced decision making process on the proposed Licenses for First Light and Trans Canada or any future projects that might need cultural impact consideration. The Nolumbeka Project feels our request could play an important part of creating a new attitude around Native American cultural preservation efforts here in the Connecticut River Valley and beyond and we strongly encourage FERC to support just such an endeavor.

Thank you,

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