



State of Vermont
Division for Historic Preservation
One National Life Drive, Floor 6
Montpelier, VT 05620-0501
www.HistoricVermont.org

[phone] 802-828-3211
[division fax] 802-828-3206

*Agency of Commerce and
Community Development*

July 15, 2013

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

Re: VT SHPO Comments on the June 28, 2013 Updated Proposed Study Plan for the Turners Falls (FERC No. 1889) and Northfield Mountain Pumped Storage (FERC No. 2485) Projects, First Light Power Resources.

Dear Secretary Bose:

Thank you for the opportunity to comment on the above referenced project.

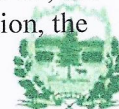
The Vermont Division for Historic Preservation (Division) is providing the Federal Energy Regulatory Commission (FERC) with the following comments pursuant to 36 CFR 800.4, regulations established by the Advisory Council on Historic Preservation to implement Section 106 of the National Historic Preservation Act. Project review consists of assisting FERC in identifying the project's potential impacts to historic buildings, structures, historic districts, historic landscapes and settings, and known or potential archeological resources that are listed in or may be eligible for inclusion in the National Register of Historic Places (National Register).

As currently defined, the Cultural Resources Study Plan (Section 3.7) presented by First Light is limited to a Phase IA Archaeological Survey and a Reconnaissance Level Historic Resources Survey. While these study plan components represent necessary first steps in the cultural resource review process, they are first steps only and will by no means provide all the data necessary to identify and evaluate the full suite of cultural resources present in the Project area.

By definition, the Phase IA study will only provide background information on known archeological resources and a preliminary assessment of the potential location of additional archeological resources within the project area. Similarly, the Reconnaissance Level Historic Resource Survey will identify and compile information on known historic structures but not evaluate the structures to determine their eligibility to the National Register or assess the project's effect on National Register eligible or listed structures.

The Division would also like to clarify that our statements during the June 14, 2013 Study Plan conference call concerning an APE determination of 10 meters (33 feet) from the top of bank along the Project boundary were made in reference to a discussion of Phase IB site identification and Phase II site evaluation study efforts. In general terms, a Phase IA study usually includes a larger zone of review in order to identify the broadest spectrum of cultural resources that may be affected by any project.

The current Phase IA study plan includes provisions for further consultation with the relevant SHPOs, the Narrangansett THPO, and any other interested Native American tribes with regard to APE definition, the



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development of a archeological sensitivity model, and an archeological field reconnaissance methodology. The Division looks forward to this consultation and recommends that a specific consultation schedule be provided in the Revised Study Plan. In addition, the Revised Study Plan should also provide specific reference to the development and implementation of the following Cultural Resource Study Plan components that will be necessary subsequent to the completion of the Phase IA:

- A Phase IB site identification survey within all archeologically sensitive areas and potential site locations within the APE that are actively eroding. This study should include strategies to implement deep testing methods for identification of deeply buried cultural components.
- Phase II site evaluation of any archeological site identified in the Project APE as a result of the Phase IB survey or any known site that is located within a portion of the APE that is actively eroding to determine their boundaries and eligibility for inclusion on the National Register of Historic Places.
- A phased plan to complete Phase II site evaluation of any remaining currently recorded archeological sites in the Project APE to determine their boundaries and eligibility for inclusion on the National Register of Historic Places.
- Identification of Traditional Cultural Properties.
- Historic Structures Assessment and Evaluation Report

The above studies will provide the basis for the development of a project specific Historic Properties Management as well inform on the development of Mitigation Plans and Programmatic Agreements to address any adverse effects to historic properties. Completion of these actions will ensure that this Projects relicensing fully considers potential impacts to historic properties in compliance with the National Historic Preservation Act.

Sincerely:
VERMONT DIVISION FOR HISTORIC PRESERVATION



 Noelle MacKay
Acting State Historic Preservation Officer

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