

ORIGINAL



July 16, 2013

Kimberly D. Bose
Secretary

The Commonwealth of Massachusetts

Federal Energy Regulatory Commission
888 First St NE Room 1A
Washington, DC 20426
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

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SECRETARY OF THE
COMMISSION
2013 JUL 24 A 9:08
FEDERAL ENERGY
REGULATOR COMMISSION

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 updated Proposed Study Plan dated June 28, 2013, received by the MHC on July 3, 2013, for the project referenced above.

Section 3.7 of the updated plan incorporates the MHC's April 24 and June 21, 2013 comments, including a refinement of the project area of potential effect for historic and archaeological resources, shown in figures 3.7.1-1 through 3.7.1-5. Figure 3.7.1-6 includes information on the Fuller Farm property in the vicinity of the Northfield Mountain portion of the project area. The Fuller Farm is included in the MHC's Inventory of Historic and Archaeological Assets of the Commonwealth as the Fredrick Morgan, Sr. House/ Morgan-Fuller Residence (MHC # NFL.178). The MHC has previously provided comments to Firstlight in 2011 regarding this property (see enclosed).

The MHC looks forward to reviewing the scope of the proposed identification and evaluation efforts proposed as part of the updated Proposed Study Plan, 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.

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,

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

Encl: MHC to FirstLight 12/20/2011

xc w/ encl: see attached

xc w/ encl: **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.
 Representative Stephen Kulik, Attn: Paul Dunphy
 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

December 20, 2011

John Howard
Plant Manager
Firstlight Power Resources GDF Suez
Northfield Mountain Station
99 Millers Falls Road
Northfield, MA 01360

RE: Federal Energy Regulatory Commission Request for 8.12 Acre Parcel Removal, Northfield Mountain Pumped Storage, Northfield, MA. MHC #RC.1099.

And

Federal Energy Regulatory Commission Authorization of Non-Project Use and Occupancy of Project Lands, Northfield Mountain Pumped Storage, Northfield, and Turners Falls Hydroelectric Project, Gill, Erving and Montague, MA. MHC #RC.1099.

FERC No. 1889 and No. 2485.

Dear Mr. Howard:

Staff of the Massachusetts Historical Commission, office of the Massachusetts State Historic Preservation Officer, have reviewed your submittals, received December 9, 2011, for the projects referenced above. The proposed projects consist of the FERC approval of the release of an 8.12 acre parcel, known as the Fuller Farm off Millers Falls Road, from the Northfield Mountain Pumped Storage Project, and the authorization of continued non-project uses of the Northfield Mountain Pumped Storage Project and Turners Falls Hydroelectric Project property by others at the Franklin County Boat Club in Gill, a fire pond in Erving, and a car parking area and truck turn-in in Turners Falls.

The Fuller Farm, including the house, barn, outbuildings and associated pasture land off Miller's Falls Road in Northfield proposed to be released for sale by Firstlight is included in the MHC's Inventory of Historic and Archaeological Assets of the Commonwealth as the *Fredrick Morgan, Sr. House/ Morgan-Fuller Residence* (MHC # NFL.178). The MHC does not have sufficient information to offer an opinion of National Register eligibility but the property reportedly dates to ca. 1801. An updated MHC Inventory Form B continuation sheet, including current photographs of the buildings, should be submitted to the MHC.


Undisturbed portions of the parcel are also considered by MHC to be archaeologically sensitive. This sensitivity is due to the favorable environmental characteristics of the parcel, with wetlands and water resources of Fourmile Brook and the Connecticut River in the immediate vicinity, and with areas of level, well-drained soils, favorable for ancient and historic period land use and occupation. In New England, archaeological resources are typically buried and require systematic professional archaeological survey to be identified. Archaeological sites included in the Inventory have also been identified in the general area.

To assist to preserve the property's significant historic and archaeological characteristics, the MHC recommends that Firstlight consult with local and regional land trusts and/or conservation organizations to place the parcel under a conservation easement. If a conservation restriction (M.G.L. C.184, ss.31-33) is proposed for the parcel, then the MHC would request the opportunity to review and comment on suitable stipulation language.

For the requested authorization of the non-project uses of the Northfield Mountain Pumped Storage Project and Turners Falls Hydroelectric Project property by others--at the Franklin County Boat Club in Gill, a fire pond in Erving, and a car parking area and truck turn-in in Turners Falls (Montague)-- "no historic properties would be affected" (36 CFR 800.4(d)(1)) by the continued uses, as no new construction is proposed.

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 me if you have any questions.

Sincerely,



Jonathan K. Patton
Archaeologist/Preservation Planner
Massachusetts Historical Commission

xc: Secretary Kimberly D. Bose, FERC
Northfield Historical Commission

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