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

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FEDERAL ENERGY
REGULATORY COMMISSION

August 26, 2013

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 revised Proposed Study Plan dated August 14, 2013, received by the MHC on August 19, 2013, for the project referenced above.

Section 3.7 of the revised plan incorporates information included in the MHC's April 24 and June 21, 2013 comments. The results of the 2013 Full River Reconnaissance survey (Study No. 3.1.1; pp. 3-402 and 3-403) and an archaeological sensitivity assessment for the Fuller Farm property within the Northfield Mountain portion of the project area will be incorporated into the proposed archaeological reconnaissance technical report.

Scopes for the proposed identification and evaluation efforts proposed as part of the revised 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, should be submitted to the MHC for review and comment as they are developed.

The project area of potential effect for archaeological and historic resources is shown in figures 3.7.1-1 through 3.7.1-6 and 3.7.2-1 through 3.7.2-5. The project area of potential effect shown in these figures is adequate for preliminary identification efforts, although 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. The MHC notes that Firstlight proposes to conduct a teleconference in October 2013 to discuss further refinements to the project area of potential effect. The MHC looks forward to further consultation with FERC on FERC's determination of the area of potential effect (36 CFR 800.4(a)(1)).

The paper copy of the document received by the MHC includes only Appendices A and B. Copies of MHC comments on previous submittals for the project are not included in these appendices, although they may be included in Appendix H, Stakeholder Comments on Updated PSP. Appendix H was not included in the submittal to the MHC. To assist in future review of the project and consultation with FERC, the MHC would appreciate the incorporation of a separate cultural resources comments matrix into future project filings. The cultural resources comments matrix should include a list and summaries of all comment letters received to date from State Historic Preservation offices (MA, NH, VT), Tribal Historic Preservation Offices, local historical commissions and interested groups/individuals for potential project effects to cultural 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

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.
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
Doug Harris, NITHPO
John Eddins, ACHP
Giovanna Peebles, VT SHPO
Elizabeth Muzzey, NH SHPO
Victor Mastone, MBUAR
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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William Francis Galvin, Secretary of the Commonwealth
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August 26, 2013

Lana Khitrik
Gomez and Sullivan Engineers, P.C.
1961 Wehrle Drive
Williamsville, NY 14221-5776

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. Khitrik:

Staff of the Massachusetts Historical Commission (MHC), office of the Massachusetts State Historic Preservation Officer, have reviewed the revised Proposed Study Plan dated August 14, 2013, received by the MHC on August 19, 2013, for the project referenced above.

Three paper copies of the updated study plan, including only Appendices A and B, were received by the MHC. The MHC requires only one paper copy of complete project documents for review and comment.

For future project submittals, please submit one (1) paper copy of project documents, including all appendices, to this office. The submittal cover letter should reference MHC # RC.1099.

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,

A handwritten signature in cursive script that reads "Brona Simon".

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

xc: Kimberly D. Bose, Federal Energy Regulatory Commission, Attn: Frank Winchell, Hydro Power
John Howard, Director FERC Hydro Compliance, Firstlight Power Resources GDF Suez
Charles Momney, Firstlight GDF Suez
Mickey Marcus, New England Environmental, Inc

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