

Relicensing Study 3.7.1

PHASE IA, IB, AND PHASE II ARCHAEOLOGICAL SURVEYS

Initial Study Report Summary

**Northfield Mountain Pumped Storage Project (No. 2485)
and Turners Falls Hydroelectric Project (No. 1889)**

Prepared for:



Prepared by:



GOMEZ AND SULLIVAN
ENGINEERS



SEPTEMBER 2014

1.1 Study Summary and Consultation Record to Date

The goal of Study No. 3.7.1 is to assist the Federal Energy Regulatory Commission (FERC) in meeting its compliance obligation under Section 106 of the National Historic Preservation Act of 1966 (NHPA) by determining whether relicensing the Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485) will have any effect on historic properties.

In its September 13, 2013 Study Plan Determination Letter (SPDL), FERC concluded that FirstLight should conduct a full archaeological inventory of the Area of Potential Effect (APE) during the 2014 field season that includes Phase IA, Phase IB and Phase II investigations, and not only the Phase IA study as proposed by FirstLight in its Modified Revised Study Plan (RSP).

In 2014 TRC, on behalf of FirstLight, initiated the Phase IA Archaeological Survey (Reconnaissance Survey) (Study No. 3.7.1) in the towns of Northfield, Erving, Montague, Greenfield, and Gill, Franklin County, Massachusetts, and in Windham County, Vermont, and Cheshire County, New Hampshire. The survey also included field reconnaissance of the Fuller Farm Parcel, which FirstLight is considering removing from the Project boundary as part of its relicensing proposal. The reconnaissance survey was conducted on behalf of FirstLight pursuant to Section 106 of the NHPA, as amended (36 CFR 800), the Secretary of the Interior's *Standards and Guidelines for Archaeology and Historic Preservation* (48 Fed. Reg. 190) (1983), and the Massachusetts General Laws, Chapter 9, Sections 26A and 27C (950 CMR 70).

Background research was conducted at the Massachusetts, Vermont, and New Hampshire State Historic Preservation Offices (SHPOs) in February and March, 2014. Local interviews, research, and field survey were conducted in July 2014 under the overall direction of Timothy Sara, M.A. (Principal Investigator). The research team included Edward Moore, M.S., Patrick Walters, B.A., Jessica Mundt, M.A., and Kathrina Aben, M.A.; the research leads all meet the Professional Qualification Standards as part of the larger *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation*.

The reconnaissance survey was conducted in Massachusetts under a State Archaeologist's Permit issued by the Massachusetts Historical Commission (MHC) on June 9, 2014. No permits were required to survey in Vermont and New Hampshire. The reconnaissance survey included research and consultation conducted at State and local institutions to develop appropriate contexts and obtain local information on the project areas. Field survey was conducted to assess areas that may have been favorable for Native American (Precontact) and/or Euro-American (Postcontact) period land use. The information collected is being used to identify areas that are either sensitive or not sensitive for archaeological resources within the Projects' APE and will be utilized to form recommendations regarding future archaeological studies.

1.2 Study Progress Summary

Task 1. Consultation with the Massachusetts, Vermont, and New Hampshire SHPOs and THPOs¹

In its letter of June, 28, 2013, FirstLight solicited comments from the Massachusetts, Vermont, and New Hampshire SHPOs on the Updated Proposed Cultural Resources Study Plan for a Phase IA Archaeological Survey.

In its July 15, 2013 review letter, the Vermont SHPO indicated the Cultural Resources Study Plan should also include Phase IB site identification survey and Phase II site evaluation components.

¹ See [Appendix A](#) for correspondence described herein.

In its July 16, 2013 review letter, the Massachusetts SHPO requested the FERC's determination of the APE, and indicated the need for the consultant to apply for a State Archaeologist's Field Investigation Permit to conduct the archaeological reconnaissance (Phase IA) survey.

In its August 26, 2013 review letter, the Massachusetts SHPO indicated the FERC's determination of the APE was adequate for preliminary identification efforts and requested the consultant submit for review and comment 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.

In accordance with the FERC-approved Study Plan, on October 31, 2013, a telephone conference was held among FirstLight, FERC, the Vermont and New Hampshire SHPOs, the Nolumbeka Project, and the Connecticut River Watershed Council (CRWC) to discuss finalization of the APE for the archaeological study.² On November 27, 2013, FERC sent a letter confirming that consultation had taken place with respect to the APE and seeking formal concurrence from the Massachusetts, Vermont, and New Hampshire SHPOs on the definition of the APE.

In its December 19, 2013 review letter, the Massachusetts SHPO concurred with the FERC's determination of the Projects' APE. By letter dated January 9, 2013, the Vermont SHPO also concurred with this determination.

In its February 12, 2014 State Archaeologist's Permit application to the Massachusetts SHPO, TRC included a research design for Phase IA, Phase IB, and Phase II archaeological investigations.

In its February 24, 2014 review letter of TRC's State Archaeologist's Permit application, the Massachusetts SHPO indicated that a research design for Phase IA, Phase IB, and Phase II archaeological investigations was not justified at this time in the project review and requested a revised application that addressed only a Phase IA survey (archaeological reconnaissance survey).

In its April 25, 2014 letter, TRC submitted a revised State Archaeologists' Permit Application to the Massachusetts SHPO to conduct a Phase IA survey (archaeological reconnaissance survey).

In its May 7, 2014 review letter, the Massachusetts SHPO requested that TRC submit a Curation Agreement, which was submitted on June 4, 2014.

In its June 9, 2014 review letter, the Massachusetts SHPO issued a State Archaeologists' Permit to TRC to conduct a Phase IA survey (archaeological reconnaissance survey).

As part of the study, by letters dated March 31, 2014 and April 15, 2014, Tribal Historic Preservation Officers (THPOs) were also contacted to determine their level of interest in the study. This consultation was conducted with the Mashpee Wampanoag Tribe, the Stockbridge-Munsee Band of Mohican Indians, and the Wampanoag Tribe of Gay Head (Aquinnah) of Massachusetts, and the Narragansett Indian Tribe. TRC has also consulted with the Nolumbeka Project as an interested party.

² The Massachusetts SHPO and the Narragansett Indian Tribe were also invited to participate in the telephone conference but did not attend.

Task 2. Background Research

The objective of the background research is to identify known archaeological site locations and develop historical contexts that will assist in identifying patterns of land use through the Precontact and Postcontact periods. This will inform the predictability of the location of previously unrecorded archaeological resources potentially in the Projects' APE and the types of sites that might be expected. The study team has reviewed site inventory forms at the SHPOs to identify known archaeological resources within the Projects' APE. As a result, 73 previously recorded archaeological sites were identified: 71 in Massachusetts, two in Vermont, and none in New Hampshire. The study team has also examined previous research and cultural resource management reports relevant to understanding the cultural and historical contexts of the Connecticut River Valley. MHC Reconnaissance Survey Town Reports have also been reviewed for the towns of Erving, Gill, Greenfield, Montague, and Northfield to further refine historical contexts and landscape use in the Projects' APE. This research provides a baseline for predicting the locations and types of archaeological resources in the Projects' APE.

The study team has also consulted with local historical commissions, historical societies, and libraries in the towns of Erving, Gill, Greenfield, Montague, and Northfield in Massachusetts to obtain information on the history and resources of the Projects' APE. The team has also consulted with the Massachusetts Archaeological Society (MAS), Pocumtuck Valley Memorial Association, and the Springfield Museums to make contact with groups or individuals knowledgeable of the archaeological resources of the Connecticut River Valley. For each of these contacts a *Record of Consultation Form* was completed that included information identifying the organization or individual, contact information, the purpose and results of the consultation, resources consulted and general notes. Each completed *Record of Consultation Form* will be included in the full report. Consultation with the repositories is ongoing and should be concluded by the 3rd quarter of 2014.

Based on the results of the research and consultation, the study team is developing both Precontact and Postcontact period contexts. The Precontact context will include settlement and land use patterns of the Middle Connecticut River Valley organized by cultural periods, and an assessment of known and expected archaeological resources. The Postcontact (Historic) context will be organized by township and will include a general discussion of each historical period, assessment of known and expected resources, and a presentation of historical mapping illustrating changes in the Projects' APE over time.

Task 3. Development of a Sensitivity Model

The purpose of the fieldwork was to inspect landforms within the Projects' APE to provide preliminary assessments of sensitivity or non-sensitivity for archaeological resources. Data gathered from the fieldwork will be used in conjunction with the background research to develop a sensitivity model for predicting where archaeological resources might occur and identify areas as either sensitive or not sensitive for archaeological resources within the Projects' APE. The sensitivity model will be used during agency consultation to help determine the need for Phase IB (site identification) field surveys.

To assess the sensitivity of the Projects' APE for Precontact period archaeological resources, the study team is reviewing information on known archaeological resources within a 1-mile buffer of the Projects' APE in order to provide an understanding of the locations and types of archaeological resources in the project vicinities. Past research in the Connecticut River Valley indicates that the locations of archaeological sites dating to the Precontact period can be predicted on the basis of natural and cultural historical models that incorporate a variety of types of information from several disciplines including anthropology, biology, natural history, and geology. Because Native peoples utilizing the Middle Connecticut River Valley were dependent on natural resources, information that seeks to characterize the type and distribution of those natural resources within a given project area is important to an understanding of site location. For these reasons, the study team is examining environmental conditions,

both as they exist today and as they are thought to have existed in the past, to develop the sensitivity model.

To provide an understanding of past and current environmental conditions, the study team is reviewing palynological, geological, and soil maps of the region, as well as research related to the glacial and post-glacial development of the Connecticut River Valley. This information is being used to re-construct the geomorphological history of the Projects' APE and serve as a basis for determining if known archaeological resources can be associated with particular environmental settings. Environmental attributes that will be used to identify Precontact period land use patterns include landform type and relative age (if known); distance to a water source and the type of water source; soil type; elevation; slope; and distance from known or suspected resource procurement areas, such as lithic outcrops with desirable stone material or falls for procuring fish. After identifying patterns of landscape use, landforms possessing similar attributes within the Projects' APE will be ranked as sensitive or not sensitive for Precontact period archaeological resources.

In order to determine Postcontact (Historic) period archaeological sensitivity of the Projects' APE, the study team has examined SHPO, historical society, and library records, cartographic and other relevant documentation, as well as landscape and environmental features. Examination of landscape features are also being used as an indicator of the sensitivity for Postcontact period site types. For example, proximity to a fresh water supply and transportation routes (riverine or terrestrial) may augment sensitivity for a variety of site types, such as domestic, agricultural, commercial, industrial, transportation-related, or institutional. Domestic and agriculture-related sites may also be expected on or near fertile, well-drained land. Commercial sites such as taverns and stores would likely be situated near population centers and/or major transportation routes. Institutional sites, such as a schools, churches, libraries or civic buildings, would likely be located in settled areas for accessibility to surrounding communities. Industrial sites and associated buildings or structures - such as warehouses, train depots, and worker housing – may be expected adjacent to rivers or major streams in order to exploit water resources. Also under examination are historic maps, the location of former buildings and structures, transportation-related features, and general areas of occupation or development.

Task 4. Field Reconnaissance

Prior to field investigations, the Projects' APEs were divided into 65 segments defined by topographic and development features as depicted on USGS 7.5-minute topographic maps. Each segment was examined and evaluated by the survey team and accessed by either foot or motorboat. Both shoreline and interior landforms were visually inspected within each survey segment and information on their cultural and environmental settings was recorded on a standardized forms. Recorded attributes included landform characteristics, depositional environment, known archaeological sites, bank vegetation, soil types, and presence or absence of erosion. Completed forms for each survey segment will be included in the full report. Documentation of the segments was also made with digital camera. Where the soil profiles could not be readily observed along the river bank, nine (9) locations were also cored using a hand auger to assess the nature of deposition and subsurface soils on certain landforms.

Although the purpose of fieldwork was to provide preliminary assessments of sensitivity or non-sensitivity for archaeological resources, three previously recorded Precontact period sites were identified in the field based on the observation of surface artifacts, and six previously unrecorded archaeological sites were also identified. These newly identified archaeological sites include a Precontact-period lithic scatter near Ashuela Brook, remnants of historic Munns Ferry near Kidds Island, the remnants of two small summer cottages on upland ridges overlooking the Connecticut River, a historic surface scatter near Cabot Camp, and a partial stacked-stone foundation and spring-related feature near the Route 2 Bridge (French King Bridge).

Task 5. Report Development

Data analysis and preparation of the report documenting the findings of the investigation are ongoing. The Phase 1A report will be completed by the end of 4th quarter of 2014.

1.3 Variances from Study Plan and Schedule

FirstLight has not conducted Phase IB and Phase II archaeological surveys during the 2014 survey season because the Massachusetts SHPO would only grant TRC a State Archaeologists Permit for a Phase IA reconnaissance survey. Any necessary Phase IB site identification or Phase II site evaluation surveys will be conducted in 2015 after state permits for those activities are obtained.

1.4 Remaining Activities

The remaining study activities include a) data analysis and b) completion of the Phase IA Report.

Appendix A

Correspondence Record



Northfield Mountain Station
99 Millers Falls Road
Northfield, MA 01360
Ph: (413) 659-4489
Fax: (413) 659-4459
Internet: john.howard@gdfsuezna.com

John S. Howard
Director- FERC Hydro Compliance

Via Electronic Filing

June 28, 2013

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Northfield Mountain Pumped Storage Project, FERC Project No. 2485-063
Turners Falls Hydroelectric Project, FERC Project No. 1889-081
Filing of ***Updated Proposed Study Plan***

Dear Secretary Bose:

On April 15, 2013, pursuant to the regulations of the Federal Energy Regulatory Commission (Commission or FERC), 18 C.F.R. § 5.11, FirstLight Hydro Generating Company (FirstLight), a subsidiary of IPR-GDF SUEZ North America, Inc., Licensee of the Turners Falls Hydroelectric Project (FERC No. 1889) and the Northfield Mountain Pumped Storage Project (FERC No. 2485), filed its Proposed Study Plan (PSP) for the relicensing of the Turners Falls Project and Northfield Mountain Project.

In addition to other components of the PSP, the filing included 36 proposed studies and 11 studies not being proposed. Pursuant to 18 C.F.R. § 5.11, FirstLight was required to hold a study plan meeting or meetings for the purpose of clarifying the PSP and any initial information gathering or study requests, and to resolve any outstanding issues with the respect to the PSP. FirstLight held a Study Plan Meeting on May 14, 2013 in which all of the proposed studies and studies not being proposed were briefly discussed. Thereafter, FirstLight held nine resource-specific study plan meetings to allow for more detailed discussions on each proposed study plan and on studies not being proposed. With respect to study plans, FirstLight and the stakeholders focused on working out details on study methodology. The nine meetings were held on May 14, 15, 21, and 22, and June 4, 5, 11, 12, and 14. In addition, FirstLight met with the Narragansett Tribe on June 6 to discuss proposed studies. All meeting dates and notices as well as PowerPoint materials for these meetings were published on FirstLight's website <http://www.northfieldrelicensing.com>. FERC attended these meetings in person and/or via teleconferencing as did numerous stakeholders.

FirstLight agreed at these meetings to update the PSP and file a single **Updated PSP** with FERC prior to the July 15, 2013¹ deadline for stakeholders to provide comment on the PSP. Given the size of the **Updated PSP** and short turnaround period for stakeholder review, modifications from the original PSP are shown in track-change to allow for easier review. A few studies required significant changes and thus are not shown as track-change; they include the following:

- 3.1.1- 2013 Full River Reconnaissance Study
- 3.1.2- Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability
- 3.3.11- Fish Assemblage Assessment
- 3.3.18- Impacts of the Turners Falls Canal Drawdown on Fish Migration and Aquatic Organisms

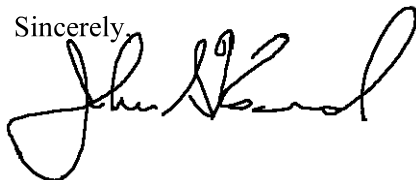
Note that Volume 2 of the original PSP, which included Appendices A-G, has not changed and thus is not being re-filed as part of the **Updated PSP**. **FirstLight respectfully requests stakeholders to denote in any comment letters what version their comments are based on—the April 15, 2013 PSP filing or the June 28, 2013 Updated PSP filing.**

FirstLight is filing the **Updated PSP** with the Commission electronically. FirstLight is making the **Updated PSP** available for download on its website. To access the **Updated PSP** here, navigate to <http://www.northfieldrelicensing.com>, and click on the “documents” tab on the left side of the screen.

In addition, FirstLight is making available to the public the **Updated PSP** at the Northfield Mountain Visitor Center at 99 Millers Falls Road, Northfield, MA 01360 during regular business hours.

If you have any questions regarding this filing, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "John Howard", with a stylized flourish at the end.

John Howard
FERC- Director Hydro Compliance

¹ In Scoping Document 1 and 2, FERC provided a schedule whereby stakeholder comments on the PSP were due on July 14, 2013 which falls on a Sunday. Per FERC regulations, deadlines falling on a weekend or holiday default to the next business day—in this case July 15, 2013.



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 Narragansett THPO, and any other interested Native American tribes with regard to APE definition, the



K. Bose
Page 2 of 2
July 15, 2013

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



July 16, 2013

Kimberly D. Bose
Secretary

Federal Energy Regulatory Commission
888 First St NE Room 1A
Washington, DC 20426

The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical 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.

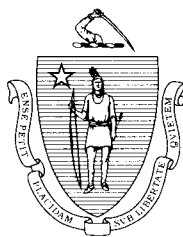
Sincerely,

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



ORIGINAL

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

August 26, 2013

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

FILED
SECRETARY OF THE
COMMISSION
2013 SEP -3
AM 10:33 X 934
FEDERAL ENERGY
REGULATORY 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 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,

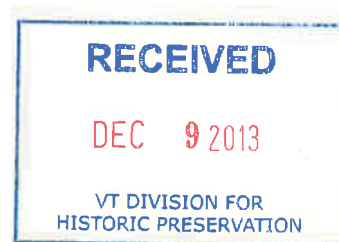


Brona Simon
State Historic Preservation Officer
Executive Director
State Archaeologist
Massachusetts Historical Commission

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.
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Cheryl White, Stockbridge-Munsee Tribal Historic Preservation Officer
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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

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426
November 27, 2013

OFFICE OF ENERGY PROJECTS



Project No. 2485-063--Massachusetts
Project No. 1889-081--Massachusetts
FirstLight Hydro Generating Company

Reference: Concurrence on the Area of Potential Effects for the Turner Falls and Northfield Mountain Projects.

To the parties addressed:

We consulted with the Massachusetts, Vermont, New Hampshire State Historic Preservation Officers (SHPOs), along with the Narragansett Indian Tribe, Nolumbeka Project, FirstLight, and others with regard to the areas of potential effects (APEs) involving the relicensings for the Turner Falls Hydroelectric Project and the Northfield Mountain Pumped Storage Project (projects). Based on those consultations, we determine that the APEs should include all lands within the current project boundaries of the two projects, in addition to any other lands outside the project boundaries where historic properties could be affected by project-related adverse effects.

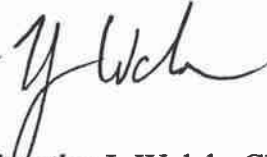
The projects' APEs include lands within Franklin County, Massachusetts, Windham County, Vermont, and Cheshire County, New Hampshire. On lands adjacent to the project boundaries, the APEs would also include an additional 10 meters (33 feet) of lands inland from the top of banks of the Connecticut River and associated tributaries. The enclosed maps demarcate the general geographic and topographic coverage of the APEs for these projects. (See enclosure maps).

At this time, we seek formal concurrence from the Massachusetts, Vermont, and New Hampshire SHPO on our defined APEs for the Turner Falls and Northfield Mountain projects.



If you have any questions, please contact Dr. Frank Winchell at 202-502-6104.

Sincerely,



Timothy J. Welch, Chief
West Branch
Division of Hydropower Licensing

Addressees:

Brona Simon, SHPO
Executive Director and State Archeologist
Massachusetts Historical Commission
220 Morrissey Boulevard
Boston, MA 02125

Laura Trieschmann, SHPO
State of Vermont
Division for Historic Preservation
One National Life Drive, Floor 6
Montpelier, VT 05620-0501

Elizabeth Muzzey, SHPO
Director
New Hampshire Division of Historical Resources
State of Department of Cultural Resources
19 Pillsbury Street
Concord, NH 03301-3570

Enclosures: APE maps

cc: Mailing List
Public Files



ORIGINAL

December 19, 2013

Kimberly D. Bose
Secretary

The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth
Federal Energy Regulatory Commission
Massachusetts Historical 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 your determination of the area of potential effect, received by the MHC on December 12, 2013, for the project referenced above.

The MHC concurs with FERC's determination of the project area of potential effect, to include all lands within the current project boundaries as shown on attached figures 3.7.2.1-4, including within 10 meters of the top of the Connecticut River and tributaries, and any other lands outside the project boundaries where potential effects to historic properties may occur.

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 looks forward to reviewing 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.

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: see attached

FILED
SECRETARY OF THE
COMMISSION
2013 DEC 27 A 11:22
FEDERAL ENERGY
REGULATORY COMMISSION

220 Morrissey Boulevard, Boston, Massachusetts 02125
(617) 727-8470 • Fax: (617) 727-5128
www.sec.state.ma.us/mhc

**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**



4425 Forbes Boulevard
Lanham, Maryland 20706

Main 301-306-6981
Fax 301-306-6986

February 12, 2014

Ms. Brona Simon
State Historic Preservation Officer
Executive Director
State Archaeologist
Massachusetts Historical Commission
220 Morrissey Boulevard
Boston, MA 02125

***RE: State Archaeologist's Permit Application for Turners Falls Hydroelectric (FERC No. 1889) and
Northfield Mountain Pumped Storage (FERC No. 2485) Project in Franklin County, Massachusetts***

Dear Ms. Simon,

As requested in prior correspondence between the Massachusetts Historical Commission (MHC) and the Federal Energy Regulatory Commission (FERC), TRC Environmental Corporation (TRC) is pleased to submit the enclosed State Archaeologist's Permit Application and supporting Research Design and Professional Qualifications for the FirstLight Hydro Generating Company (FirstLight) Turners Falls and Northfield Mountain Hydroelectric Relicensing Project.

The proposed Research Team includes key individuals with prior relevant experience in the ancient archaeology of the glaciated Northeast and Connecticut River Valley region, as well as in historical archaeology. As Principal Investigator and Project Manager for the archaeological studies, I will serve as key liaison between your agency, FirstLight, and FERC for the duration of the permit. Key members of the Research Team include Edward Moore, M.S., who received his graduate training in glacial landscape archaeology from the Institute for Quaternary Studies, University of Maine, Orono, Jessica Mundt, M.A., whose graduate research focused on historical archaeology, and Richard Will, Ph.D., RPA, who has extensive experience in the archaeology of the Northeast. Dr. Will will provide overall QA/QC oversight of project research, findings, and resource management recommendations.

FirstLight has entered into a Memorandum of Understanding (MOU) with the Springfield Science Museum, which has agreed to serve as the curation facility for all artifact collections, catalogs, and field records generated from this study. The enclosed application provides detailed information on proposed research methodologies, expected results, qualifications of the Research Team, and the fully executed curation MOU between FirstLight and the Museum.

As part of the background research in advance of intensive field surveys, TRC plans to conduct field reconnaissance of the project area in late March, or as ground conditions permit, and visit local repositories, including the Pocumtuck Valley Memorial Association in Deerfield, and the Springfield Science Museum to view their collections. TRC will also be consulting with the Narragansett Tribe over the course of these studies.

Please do not hesitate to contact me at (301) 276-8040, or tsara@trcsolutions.com should you have any questions or comments during your review of this application.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'T. Sara' with a stylized flourish at the end.

Timothy R. Sara, RPA
Program Manager, Archaeology

cc: John Howard, FirstLight
Mark Wamser, GSE
Frank Winchell, FERC
Sarah Verville, TRC
Richard Will, TRC

TRC File: 184005.2014.0649



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

February 24, 2014

Timothy R. Sara
Principal Investigator
TRC Environmental Corporation
4425 Forbes Boulevard
Lanham, MD 20706

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 Mr. Sara:

Staff of the Massachusetts Historical Commission (MHC), the office of the State Historic Preservation Officer and the State Archaeologist, have reviewed the State Archaeologist's permit application for reconnaissance, intensive, and site examination archaeological surveys, received February 14, 2014, for the project referenced above.

On December 19, 2013, the MHC and FERC agreed that the project area should be subjected to an archaeological reconnaissance.

The permit application does not propose an adequate methodology for the reconnaissance. Please submit a revised research design and methodology that addresses the following comments.

Scope

The multiple-scoped proposal for reconnaissance, intensive, and site examination archaeological surveys, is not justified at this time in the project review. An adequate research design and methodology for a reconnaissance is not presented in your application. It is premature to request a State Archaeologist's permit for an intensive (locational) survey or site examination. Research designs for an intensive (locational) survey and site examination cannot be developed until the detailed results of the reconnaissance investigation are available for consideration. The specific information required for an adequate research design and methodology to conduct an intensive (locational) survey or archaeological site examination, if warranted, including specific descriptions of the artifact deposits and features and research questions proposed to evaluate the site-specific data, do not exist at this time. Please revise the proposed scope to be for a reconnaissance survey, which is the scope that is proposed in your cover letter dated February 12, 2014. The results of the reconnaissance survey will then allow you to develop an adequate methodology for intensive (locational) archaeological survey, if recommended by FERC and MHC, in specific archaeologically sensitive areas that are proposed for project activities that could adversely affect significant archaeological resources in those specific locations.

Research Design & Methodology

A. Description of the Survey Area in Relation to the Proposed Project

The area of potential effect and the specific proposed project-related impacts that have the potential to adversely affect National Register-eligible historic properties are not described. Please include the specific information in the revised research design and methodology to justify the proposed investigation.

Regarding research proposed to be conducted at local and regional repositories, please further describe the range and quantity of information available that is proposed to be reviewed. What is the level of effort, schedule, and expected results of that aspect of the background research? How will the information obtained be applied to the investigation?

B. Consultation

During background research, please propose to consult with local historical commissions, local historical societies, and knowledgeable groups and individuals, including the Massachusetts Commission on Indian Affairs and the Massachusetts Archaeological Society, in addition to those suggested on page 2. In addition to the Narragansett Tribal Historic Preservation Officer, the Tribal Historic Preservation Officers of the Wampanoag Tribe of Gay Head (Aquinnah), Mashpee Wampanoag Tribe, and Stockbridge Munsee Tribe, have at times expressed their wishes to be consulted in advance of proposed archaeological investigations in the Connecticut Valley region of Massachusetts. The MHC advises that you contact these other tribes to determine their interest.

C. Predictive Modeling, Expected Resources, Field Methods, & Expected Results

The proposal tripartite sensitivity model is undefined and arbitrary. It is not clear what relation the tripartite model has for understanding ancient and historical period site selection and land use choices, if there is any real and purposeful difference in the three categories, or how the three categories would assist to locate and identify resources. Instead, explicit criteria for determining areas that are "sensitive" or "not sensitive" need to be developed and evaluated based on existing, reliable data, and that considers issues of accuracy, precision, representativeness, and scale. A reliable binary model will demonstrate areas that are and are not expected to have any material evidence of ancient and historical period land use with both integrity and potential significance. The previous and existing environmental settings and the cultural geography of the project area need to be determined and related to known and expected patterns of ancient and historical period land use and settlement patterns. Please review and apply previous, relevant research findings for the Connecticut River Valley to develop and evaluate a suitable predictive site location model. Suitable predictive models for that region are described in archaeological reports on file at the MHC. Please review and consider results of previous relevant research, and the present the information in the revised research design and methodology.

Based on the background research that provides expectations of site locations in relationship to environmental settings and cultural geographic features (e.g., proximity of a historical period road to predict the location of an historical period occupation), please describe an adequate field methodology that includes shoreline inspection from a boat and a walkover survey of adjacent parcels in order to locate and record archaeologically sensitive areas and any evidence of archaeological sites on the surface or in eroding riverbanks in the survey area. If artifacts visible on the surface are proposed to be collected, then a suitable laboratory and curation research design and methodology needs to be described. Please describe how the results of the visual reconnaissance inspections will be presented in narrative and graphic formats. The MHC expects that scaled archaeological base maps will clearly indicate areas interpreted to be "archaeologically sensitive" and narrative description will clearly explain existing conditions; why the area is considered sensitive according to the predictive model; expected archaeological resources specifying expected site periods, types, sizes, and contents derived from known or comparative data; project-related impacts that could adversely affect the resources; and, specific recommendations for locating and identifying the resources by field testing in those locations. The MHC recommends that you review the report entitled "Holyoke Project Cultural Resource Reconnaissance Survey, Franklin, Hampshire and Hampden Counties, Massachusetts", prepared by Adams et al., 1997 (MHC # 25-2374), on file at the MHC, as an example of a complete reconnaissance report for a similar project along the Connecticut River.

The research design and methodology does not include procedures in the event that human skeletal remains are identified during the proposed investigation. If human skeletal remains are identified on non-federal, non-

tribal property, the Massachusetts Unmarked Burial Law procedures are followed (Massachusetts General Laws c. 7, s. 38A, c. 38, s.6, c.9, ss. 26A & 27C and c. 114, s. 17, all as amended). No State Archaeologist's permittee is authorized to excavate human skeletal remains without obtaining a Special Permit (950 CMR 70.20). Please review the state law and regulations and propose a consistent procedure as a contingency in the event that human skeletal remains are encountered during the investigation.

The research design and methodology does not include a list of references cited in the text. Please always include a complete list of sources cited.

D. Artifact Analysis

South's etic artifact "pattern" categories developed in 1970s-era "historic sites archeology" do provided useful information in relationship to actual social behavioral contexts that occurred in a place, at and over time. The arbitrary categories have been applied without regard to depositional contexts or site formation processes, and so they prevent understandings of particular cultural activities and meanings in specific temporal and geographic contexts. Because the categories were developed without regard to specific cultural, historical, and geographic contexts, they are reductive and ahistorical. Please become familiar with current approaches to artifact identification and analysis as practiced by contemporary historical archaeologists. Please describe an adequate methodology for description, analysis, and interpretation of historical period artifacts that considers current, relevant, research programs in modern historical archaeology.

TRC facilities in Maryland and Maine are proposed to be used for artifact processing. TRC's proposal to remove artifacts from Massachusetts to their facilities in Maryland and/or Maine is not acceptable. The proposal to remove artifacts and samples from Massachusetts, to split the specimens among different states, and for an indefinite period, poses dangers of loss and mixing of provenience data, samples and specimens, and insurmountable difficulties for my office to obtain the specimens, samples and records should that be required. Please locate a suitable artifact processing laboratory facility in Massachusetts that the MHC can evaluate for adequacy.

E. Reporting

TRC proposes to submit a management summary memorandum summarizing the results of the reconnaissance archaeological survey. Please propose to instead submit a complete, bound draft report to the MHC for MHC's review and comment for the investigation. The final products to be submitted to MHC are two (2) copies of the final report that addresses MHC's comments on the draft reports; a CD-ROM containing a word processing file with the report author(s), date, title, page count, and an archaeological abstract prepared in accordance with the State Archaeologist's report abstracting guidelines; and, new or updated MHC inventory forms, attached to which are USGS locus maps with the archaeological site clearly bounded, and smaller scale site maps showing the boundaries of the site in relation to archaeological testing.

F. Curation

The permit application Appendix B should specify that the location of the proposed curatorial institution (item #4) is the Springfield Science Museum, which is a part of the Springfield Museums organization. The Memorandum of Understanding (MOU) for proposed curation of artifacts and records at the Springfield Science Museum does not provide assurances that the complete archaeological collection and records will be accessioned. The MOU poses significant uncertainties whether the curation would occur at all: the accession would only occur if clear title was established, and the Museum Committee approved the accession. The MOU does not provide that the Springfield Science Museum will permanently curate the complete archaeological collection consistent with M.G.L. c. 9, s. 26A(1) and 27C; 950 CMR 70.13(1)(d), (3),(4), and (5); and 36 CFR 79. Please find enclosed a sample State Archaeologist's Custody Permit with terms and conditions required to curate archaeological collections in Massachusetts. In addition to the conditions summarized on the sample custody permit, additional terms consistent with 36 CFR 79 would need to be expressed in the curatorial agreement. Please either renegotiate a suitable curation agreement with the

Springfield Science Museum, or locate another institution that is capable and willing to commit to curate the complete collection according to the state and federal requirements. Please provide me a copy of the draft agreement for my review and approval.

Please describe the archival methods and materials proposed to be used for packaging records and artifacts. Please describe the proposed methods for curation of digital data at the curatorial facility that provides reasonable expectation of preserving the integrity and readability of the digital data. Please propose to provide the MHC a copy of the transmittal documentation.

Professional Qualifications

Regarding the professional qualification of your research team, please note that under the State Archaeologist's permit regulations, members of the research team must have considerable experience in the northeast (see 950 CMR 70.10). Please indicate which members of your team will conduct and supervise the field and laboratory components of your scope of work.

Applicable Laws & Regulations

The archaeological investigation is proposed in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 Fed. Reg. 190)(1983)), and Massachusetts General Laws, Chapter 9, Sections 26A and 27C (950 CMR 70). The proposed archaeological investigation is not being undertaken in compliance with the Massachusetts Environmental Policy Act nor with 950 CMR 71, 72 or 73, as indicated on pages 1, 3, 5, and 7. Inapplicable regulations should not be cited. Please review the pertinent laws and regulations that apply to your proposed investigations, and please revise the research design and methodology to reference correctly only the pertinent laws and regulations that are applicable to the proposed investigation.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), the Secretary of the Interior's *Standards and Guidelines for Archeology & Historic Preservation* (48 Fed. Reg. 190 (1983)), and M.G.L. c. 9, ss. 26-27C (950 CMR 70). If you have questions or require additional information, please contact Jonathan K. Patton at this office.

Sincerely,



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

Enclosure: SA Sample Custody Permit



The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

CUSTODY PERMIT

Pursuant to M.G.L. Ch. 9, s. 27C and 950 CMR 70, the State Archaeologist may make arrangements for the disposition or display of artifacts, objects and specimens and their accompanying field and laboratory records ("the collection") recovered under a State Archaeologist's permit in appropriate institutions located within the Commonwealth. Pursuant to this authority, the State Archaeologist hereby grants custody of the collections recovered from:

Permit No.	Town	Site/Project Name
To the following institution:		
Institution		
Address		
Custodian		
Telephone		

SAMPLE

Provided that the following conditions are met:

- 1) The collection shall be maintained in accordance with professional archaeological curation standards.
- 2) During accessioning, analysis, storage, and display of the collection, steps shall be taken to insure that correlations between specimens and the field, laboratory and storage records are maintained, so that records of the provenience and contextual relationships of the specimens are not confused or obscured.
- 3) The collection shall be maintained in a safe and secure storage area with clean and dry conditions which can protect against reasonably foreseeable dangers to the collection. The collection area shall be inspected on a regular schedule by institution staff.
- 4) The State Archaeologist shall be notified immediately of any change in the location or condition of the collection.



Northfield Mountain Station
99 Millers Falls Road
Northfield, MA 01360
Ph: (413) 659-4489
Fax: (413) 659-4459
Email: john.howard@gdfsuezna.com

John S. Howard
Director FERC Hydro Compliance
Chief Dam Safety Engineer

Via Certified Mail

March 31, 2014

Doug Harris
Narragansett Indian Tribal Historic Preservation Office
Narragansett Indian Tribe
Narragansett Indian Longhouse
4425-A South County Trail
Charlestown, RI 02813

Re: Federal Energy Regulatory Commission Relicensing of the Turners Falls Hydroelectric and Northfield Mountain Pumped Storage Project, (FERC Nos. 1889 and 2485) – Initiation of Phase IA Archaeological Survey

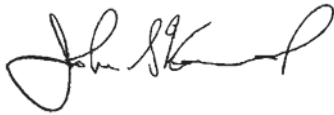
Dear Doug:

FirstLight Hydro Generating Company (FirstLight) will be conducting archaeological investigations in connection with the Federal Energy Regulatory Commission's (the Commission's) relicensing of FirstLight's Turners Falls Hydroelectric and Northfield Mountain Pumped Storage Projects on the Connecticut River in Franklin County, Massachusetts, Cheshire County, New Hampshire, and Windham County, Vermont (Appendix 1). The archaeological studies will assist the Commission in meeting its obligation under section 106 of the National Historic Preservation Act (NHPA), as amended, to consider the effect of relicensing the Projects on historic properties. The archaeological studies will identify known archaeological resources listed in, or eligible for listing in, the National Register of Historic Places (NRHP), and identify and assess any potential effects to these resources from continued operation and maintenance of the Projects.

Initially, the archaeological studies will consist of a Phase IA reconnaissance survey, which is designed to identify known archaeological sites and areas that are sensitive for the presence of archaeological sites within each Project's Area of Potential Effect (APE). The APE for each Project is depicted on maps in Appendix 1. We have recently begun the research component of the Phase IA reconnaissance survey by conducting document searches at the State Historic Preservation Offices in Vermont, Massachusetts, and New Hampshire. We will be continuing document research for the next several months as well as initiating a walkover and boat survey of the APE when ground and water conditions permit. The Phase IA field survey will not include any subsurface testing or artifact collection. We are writing to ascertain whether, and in what capacity, the Narragansett Indian Tribe would like to participate in the Phase IA reconnaissance survey.

In addition, in accordance with your request, we sent you and the Nolumbeka Project a letter dated January 31, 2014 in which we requested a meeting with you in order to discuss initiation of the Traditional Cultural Properties study and to introduce you to our proposed ethnographer for the Traditional Cultural Properties study. We look forward to hearing from you to discuss initiation of the Traditional Cultural Properties study with suggested dates and times when we could meet.

Sincerely,

A handwritten signature in black ink, appearing to read "John Howard", with a stylized, cursive script.

John Howard

cc: Kimberly Bose, Secretary, FERC (filed electronically)
Massachusetts Historical Commission
New Hampshire Division of Historical Resources
Vermont Division for Historic Preservation
John Ragonese, TransCanada



Northfield Mountain Station
99 Millers Falls Road
Northfield, MA 01360
Ph: (413) 659-4489
Fax: (413) 659-4459
Email: john.howard@gdfsuezna.com

John S. Howard
Director FERC Hydro Compliance
Chief Dam Safety Engineer

Via Certified Mail

March 31, 2014

Joe Graveline
Nolumbeka Project
88 Columbus Avenue
Greenfield, MA 01301

Re: Federal Energy Regulatory Commission Relicensing of the Turners Falls Hydroelectric and Northfield Mountain Pumped Storage Project, (FERC Nos. 1889 and 2485) – Initiation of Phase IA Archaeological Survey

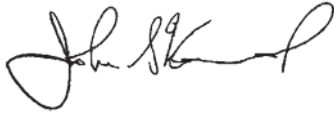
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In addition, as requested by Doug Harris of the Narragansett Indian Tribe (Tribe) , we sent you and the Tribe a letter dated January 31, 2014 in which we requested a meeting with you in order to discuss initiation of the Traditional Cultural Properties study and to introduce you to our proposed ethnographer for the Traditional Cultural Properties study. We look forward to hearing from you to discuss initiation of the Traditional Cultural Properties study with suggested dates and times when we could meet.

Sincerely,

A handwritten signature in black ink, appearing to read "John Howard". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Howard".

John Howard

cc: Kimberly Bose, Secretary, FERC (filed electronically)
Massachusetts Historical Commission
New Hampshire Division of Historical Resources
Vermont Division for Historic Preservation
John Ragonese, TransCanada



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99 Millers Falls Road
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John S. Howard
Director FERC Hydro Compliance
Chief Dam Safety Engineer

Via Certified Mail

April 15, 2014

Doug Harris
Narragansett Indian Tribal Historic Preservation Office
Narragansett Indian Tribe
Narragansett Indian Longhouse
4425-A South County Trail
Charlestown, RI 02813

Re: Federal Energy Regulatory Commission Relicensing of the Turners Falls Hydroelectric and
Northfield Mountain Pumped Storage Project, (FERC Nos. 1889 and 2485)

Dear Doug:

By letter dated March 31, FirstLight notified you of the initiation of Phase IA archaeological surveys being conducted in connection with the Federal Energy Regulatory Commission (the Commission's) relicensing of FirstLight's Turners Falls Hydroelectric and Northfield Mountain Pumped Storage Projects on the Connecticut River in Franklin County, Massachusetts, Cheshire County, New Hampshire, and Windham County, Vermont. We attached maps depicting each Project's proposed Area of Potential Effect (APE), which had been included as figures in Study No. 3.7.1 of FirstLight's Revised Study Plan, dated August 14, 2013. We are sending this letter to provide maps depicting the final APE for each Project. See Figure Nos. 3.7.2-1 through 3.7.2-6.

If you would like to discuss the Phase IA archaeological survey or the Traditional Cultural Properties study, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "John Howard", with a stylized, flowing script.

John Howard

Cc: Kimberly Bose, Secretary, FERC (filed electronically)
Massachusetts Historical Commission
New Hampshire Division of Historical Resources
Vermont Division for Historic Preservation
John Ragonese, TransCanada

Encl.



Northfield Mountain Station
99 Millers Falls Road
Northfield, MA 01360
Ph: (413) 659-4489
Fax: (413) 659-4459
Email: john.howard@gdfsuezna.com

John S. Howard
Director FERC Hydro Compliance
Chief Dam Safety Engineer

Via Certified Mail

April 15, 2014

Joe Graveline
Nolumbeka Project
88 Columbus Avenue
Greenfield, MA 01301

Re: Federal Energy Regulatory Commission Relicensing of the Turners Falls Hydroelectric and Northfield Mountain Pumped Storage Project, (FERC Nos. 1889 and 2485)

Dear Joe :

By letter dated March 31, FirstLight notified you of the initiation of Phase IA archaeological surveys being conducted in connection with the Federal Energy Regulatory Commission (the Commission's) relicensing of FirstLight's Turners Falls Hydroelectric and Northfield Mountain Pumped Storage Projects on the Connecticut River in Franklin County, Massachusetts, Cheshire County, New Hampshire, and Windham County, Vermont. We attached maps depicting each Project's proposed Area of Potential Effect (APE), which had been included as figures in Study No. 3.7.1 of FirstLight's Revised Study Plan, dated August 14, 2013. We are sending this letter to provide maps depicting the final APE for each Project. See Figure Nos. 3.7.2-1 through 3.7.2-6.

If you would like to discuss the Phase IA archaeological survey or the Traditional Cultural Properties study, please do not hesitate to contact me.

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John Howard

Cc: Kimberly Bose, Secretary, FERC (filed electronically)
Massachusetts Historical Commission
New Hampshire Division of Historical Resources
Vermont Division for Historic Preservation
John Ragonese, TransCanada



4425 Forbes Boulevard
Lanham, Maryland 20706

Main 301-306-6981
Fax 301-306-6986

April 25, 2014

Ms. Brona Simon
State Historic Preservation Officer
Executive Director
State Archaeologist
Massachusetts Historical Commission
220 Morrissey Boulevard
Boston, MA 02125

RE: Revised State Archaeologist's Permit Application for Turners Falls Hydroelectric (FERC No. 1889) and Northfield Mountain Pumped Storage (FERC No. 2485) Projects in Franklin County, Massachusetts

Dear Ms. Simon,

Thank you for your comment letter of February 24, 2014 regarding TRC Environmental Corporation's (TRC) State Archaeologist's permit application for the Firstlight Hydro Generating Company (FirstLight) Turners Falls and Northfield Mountain Hydroelectric Relicensing Projects. As per your comments, TRC is pleased to submit this revised permit application, supporting research design, and professional qualifications for a Reconnaissance Survey of the Relicensing Projects.

As demonstrated in our prior submittal, the proposed Research Team is composed of key individuals with considerable experience in the archaeology of the Northeast. Key elements of the revised research design for this permit include:

- Detailed discussion of proposed field and archival research and expected results;
- Application of previous Connecticut River Valley research to the proposed study methods;
- Identification of societies, repositories, commissions, and tribes to be consulted during research;
- Corrections to applicable state regulations for the proposed study.

Please note that the proposed field methodology is for a non-collection survey. As such, in accordance with your February 24, 2014 comment letter, this revised permit application does not present in its research design a methodology for artifact analysis or address artifact curation issues. These issues will be addressed in future permit application(s), as needed.

Please do not hesitate to contact me at (301) 276-8040, or tsara@trcsolutions.com should you have any questions or comments during your review of this application.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Tim Sara", written over a horizontal line.

Timothy R. Sara, RPA
Program Manager, Archaeology

cc: John Howard, FirstLight
Mark Wamser, GSE
Sarah Verville, TRC
Richard Will, TRC

TRC File: 184005.2014.0649



May 7, 2014

Timothy R. Sara

Principal Investigator

TRC Environmental Corporation

4425 Forbes Boulevard

Lanham, MD 20706

The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth

Massachusetts Historical Commission

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 Mr. Sara:

Staff of the Massachusetts Historical Commission (MHC), the office of the State Historic Preservation Officer and the State Archaeologist, have reviewed the revised State Archaeologist's permit application for reconnaissance archaeological survey, received April 28, 2014, for the project referenced above.

Additional information is required regarding the revised research design and methodology. Please submit the following additional information:

The revised permit application indicates that the reconnaissance survey will not include collection of artifacts or samples. However, the proposed investigation will generate field notes and research records. A curatorial facility for the reconnaissance survey research records must be specified in the complete permit application (see 950 CMR 70.13(5)). Please submit a revised Appendix B that specifies the location of the proposed curatorial institution (item #4). If the Springfield Science Museum, which is a part of the Springfield Museums organization, is the proposed curatorial facility for the resulting documentation, then a draft curation agreement with the Springfield Science Museum, consistent with State Archaeologist's Custody Permit terms and conditions and 36 CFR 79, should be submitted for my review and approval.

Please describe the archival methods and materials proposed to be used for packaging research records. Please describe the proposed methods for curation of digital data at the curatorial facility that will preserve the integrity and readability of the digital data. Please propose to provide the MHC a copy of the transmittal documentation.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), the Secretary of the Interior's *Standards and Guidelines for Archeology & Historic Preservation* (48 Fed. Reg. 190 (1983)), and M.G.L. c. 9, ss. 26-27C (950 CMR 70). If you have questions or require additional information, please contact Jonathan K. Patton at this office.

Sincerely,

A handwritten signature in blue ink that reads "Brona Simon".

Brona Simon

State Historic Preservation Officer

Executive Director

State Archaeologist

Massachusetts Historical Commission

220 Morrissey Boulevard, Boston, Massachusetts 02125

(617) 727-8470 • Fax: (617) 727-5128

www.sec.state.ma.us/mhc



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

June 9, 2014

Timothy R. Sara
Principal Investigator
TRC Environmental Corporation
4425 Forbes Boulevard
Lanham, MD 20706

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 Mr. Sara:

Staff of the Massachusetts Historical Commission (MHC), the office of the State Historic Preservation Officer and the State Archaeologist, have reviewed the revised State Archaeologist's permit application, including a draft curation agreement with the Springfield Science Museum, for reconnaissance archaeological survey, received June 5, 2014, for the project referenced above.

The draft curation agreement with the Springfield Science Museum is consistent with State Archaeologist's Custody Permit terms and conditions and 36 CFR 79. Please submit the finalized curation agreement for my signature.

Please find enclosed the State Archaeologist's permit for the investigation and I look forward to reviewing the results.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), the Secretary of the Interior's *Standards and Guidelines for Archeology & Historic Preservation* (48 Fed. Reg. 190 (1983)), and M.G.L. c. 9, ss. 26-27C (950 CMR 70). If you have questions or require additional information, please contact Jonathan K. Patton at this office.

Sincerely,

A handwritten signature in blue ink, reading "Brona Simon".

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

Encl: SA permit



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

PERMIT TO CONDUCT ARCHAEOLOGICAL FIELD INVESTIGATION

Permit Number 3468 Date of Issue June 9, 2014
Expiration Date June 9, 2015

TRC is hereby
authorized to conduct an archaeological field investigation pursuant to
Section 27C of Chapter 9 of General Laws and according to the regulations
outlined in 950 CMR 70.00.

Turners Falls Hydroelectric & Northfield Mountain Pumped Storage Projects,
Northfield, Montague, Gill, Erving, & Greenfield

Project Location

A handwritten signature in blue ink that reads "Brona Simon".

Brona Simon, State Archaeologist
Massachusetts Historical Commission