

## **Relicensing Study 3.7.2**

# **RECONNAISSANCE-LEVEL HISTORIC STRUCTURES SURVEY**

## **Initial Study Report Summary**

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

*Prepared for:*



*Prepared by:*



**SEPTEMBER 2014**

## 1.1 Study Summary and Consultation Record to Date

Between November 2013 and March 2014, TRC, on behalf of FirstLight, conducted background research and fieldwork as part of the historic architectural survey and National Register of Historic Places (NRHP) evaluation of all buildings, structures, objects, sites, and districts 50 years or older within the Projects' Area of Potential Effects (APE). The survey's objective is to provide information about previous NRHP evaluations of historic architectural resources within the Project boundaries, as well as recommendations regarding the NRHP eligibility of surveyed resources that have not been evaluated previously. The 2013-2014 historic architectural survey consisted of background research on previously identified architectural resources in the APE; preparation of a historic context of the APE from the colonial period to the present; a survey of all architectural resources 50 years or older within the APE; and evaluation of their NRHP eligibility, either as an individual resource or as a contributing resource in an NRHP-listed or -eligible historic district. Between March and August 2014, TRC has entered the collected information onto the respective state's architectural inventory forms and formulated justifications for NRHP eligibility for the surveyed resources. A report of survey findings is in progress at this time.

The historic architectural survey and evaluation has been carried out by qualified architectural historians and industrial historians who meet the Secretary of the Interior's Professional Qualification Standards (36 C.F.R. § 61). In addition, the survey has followed all applicable federal and state guidelines, including those contained in National Register Bulletin 24, *Guidelines for Local Surveys: A Basis for Preservation Planning* (National Park Service 1978, rev. 1985); the Massachusetts Historical Commission's (MHC) *Historic Properties Survey Manual* (1995); and the New Hampshire Division of Historical Resources (NHDHR) *Area and Individual Form Manuals* (2013). The Vermont Division of Historic Preservation (VDHP) and NHDHR do not currently have state-specific survey guidelines.

### *Consultation Record* ([Appendix A](#))

On November 27, 2013, FERC defined the APE for the Projects in accordance with Section 106 of the National Historic Preservation Act (NHPA) and in consultation with the three State Historic Preservation Offices (SHPOs) for the states included within the Project boundaries: MHC, NHDHR, and VDHP, along with the Narragansett Indian Tribe, and the Nolumbeka Project. Consultation with each SHPO has been both by letter and in person, as follows:

June 21, 2013: MHC commented on submitted Project Notification Form (PNF)

July 15, 2013: VDHP comment letter on revised proposed study plan.

August 26, 2013: MHC comment letters on revised proposed study plan.

November 18, 2013: TRC Architectural Historians Geoffrey Henry and Ellen Rankin met with MHC reviewer Jonathan Patton to discuss the APE for historic structures, survey methodology, and reporting standards.

November 20, 2013: Mr. Henry and Ms. Rankin met with VDHP architectural historian Jamie Duggan and archeologist Scott Dillon to discuss the APE for historic structures, survey methodology, and reporting standards.

November 21, 2013: Mr. Henry and Ms. Rankin met with Edna Feighner and Nadine Peterson from NHDHR to discuss the APE for historic structures, survey methodology, and reporting standards. On December 5, 2013, FirstLight sent a letter to NHDHR enclosing a memorandum of the November 21, 2013 meeting.

By letters dated December 19, 2013 and January 9, 2014 respectively, the MA and VT SHPOs issued written concurrence with the FERC-defined APE.

## **1.2 Study Progress Summary**

### Task 1: Review of Existing Information

Research has been conducted to date at the separate MHC, VDHP, and NHDHR archives. TRC searched for, and made copies of, survey forms for all previously surveyed resources, National Register nomination forms and determinations of eligibility. Research on local history as well as site-specific research has been conducted at public libraries in Greenfield, Turners Falls, Erving, Northfield (MA), Vernon and Brattleboro (VT), and Hinsdale (NH), at the Montague, Gill, and Northfield (MA) Town Offices, and the Great Falls Discovery Center in Turners Falls.

The initial phase of the survey included a background review of the 31 previously identified resources within the APE. The Turners Falls Historic District, consisting of historic industrial, residential, and commercial buildings in Turners Falls, was listed in the NRHP in 1983 and contains 13 contributing resources located within the Projects' APE. Six historic resources in the APE—Cabot Power Station and Dam; Eleventh Street Bridge; East Mineral Road Bridge; Gill-Montague Bridge; French King Bridge; and Schell Memorial Bridge—previously have been determined eligible for the NRHP by the MHC. Three previously surveyed resources—Central Vermont Railroad Bridge over the Connecticut River (MA); Boston & Maine Railroad-Fort Hill Branch Bridge over Ashuelot River (NH); and Boston & Maine Railroad-Fort Hill Branch Bridge Piers over the Connecticut River (NH)—have been determined not eligible for NRHP listing. Eight previously surveyed resources have not been evaluated for NRHP eligibility.

TRC also has conducted background research on the history and development of the Projects' APE and its surroundings for the preparation of an historic context spanning the colonial period to the present. Published histories and previous architectural and historical studies of individual towns and villages in Franklin County, MA, Windham County, VT, and Cheshire County, NH were consulted, as were historic maps and atlases of the three counties. FirstLight archivists have scanned historic photographs and building and engineering records of FirstLight-owned facilities including the Turners Falls Dam, Power Canal, Gatehouse, and Cabot Station. FirstLight staff and other individuals knowledgeable about local history and the history of the area's hydroelectric facilities have been interviewed. The historic context has identified the themes of recreation, transportation (including canals and railroads), and hydroelectric power as important themes in the history and development of the Projects' APE.

Pending review of the final report on survey findings by the respective SHPOs and FERC (with possible requests for further information), it is not anticipated that additional research and file review will be necessary.

### Task 2: Fieldwork

In November 2013, TRC conducted a windshield survey to confirm the results of the background research and determine the presence of additional historic architectural resources within the project area. In March 2014, TRC conducted a comprehensive field survey consisting of a systematic walkover of the lands within the Projects' APE. The survey team of architectural historians visited each of the previously identified resources and documented through field notes and descriptions any other resource that appeared to be 50 years or older. Information about the current appearance, including the setting, physical condition, and character-defining architectural features of the resources and any secondary buildings were recorded on the appropriate state architectural inventory forms. High-resolution digital photographs of multiple views were taken of each resource including general context views that show the resource in relation to

one another and their surroundings. TRC mapped the locations of the previously and newly surveyed resources on the relevant United States Geological Survey (USGS) quadrangle maps.

Pending review of the final report on survey findings by the respective SHPOs and FERC (with possible requests for further information and/or photographs), it is not anticipated that additional fieldwork will be necessary.

#### Task 3: Desktop Analysis

Upon completion of the field investigations, TRC analyzed all collected data and prepared an historic context that identifies the significant themes, events, and/or people that had an impact on the historical development of the area and its built resources. TRC determined the areas, period(s), and level(s) of significance for each surveyed resource and applied the NRHP criteria for evaluation.

Information collected during the research and fieldwork tasks has been entered into the applicable state architectural inventory form. For each state, the inventory form is the primary means for documenting a historic resource. Massachusetts uses the MHC standard inventory forms (Forms A through H) developed for eight categories of historic resources. Vermont has a standard inventory form for historic structures. Both of these states use these forms as well as an accompanying survey report to evaluate projects. In New Hampshire, there are two forms used for Section 106 Projects, primarily the Project Area Form, and this is used to record and evaluate historical resources, rather than an accompanying report.

Pending review of the final report on survey findings by the respective SHPOs and FERC (with possible requests for further information), it is not anticipated that additional data entry will be necessary.

#### Task 4: Report Development

A report on the findings of the 2013-2014 architectural survey is in progress at this time. The report will include resources in all three states and will consist of the following sections: Project Description and Location; Definition of the APE; Survey Methodology; Historic Context; and NRHP Status and Evaluation of Previously and Newly Surveyed Resources. The final report will be transmitted to the MHC and VDHR for review and concurrence with NRHP evaluations. The NHDHR will only review the Project Area Form and will provide comments on recommendations (if any) for further survey work in New Hampshire. It is anticipated that the final report (and in the case of New Hampshire, the Project Area Form) will be submitted to FERC and the respective SHPOs in the 4<sup>th</sup> quarter of 2014.

### **1.3 Variances from Study Plan and Schedule**

There were no variations from the FERC-approved study plan.

### **1.4 Remaining Activities**

Remaining activities include preparation of final report, submittal of state survey forms to SHPOs for review and submittal of final report and survey forms to SHPOs and FERC for determinations of NRHP eligibility.

# **Appendix A**

## **SHPO Correspondence and Comments**



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## The Commonwealth of Massachusetts

June 21, 2013

William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

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 Project Notification Form (PNF), received by the MHC on June 3, 2013, and the MHC's files, for the project referenced above.

The MHC, as the office of the Massachusetts State Historic Preservation Officer, is reviewing and commenting on the project pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), to assist and advise the Federal Energy Regulatory Commission (FERC) in fulfilling its responsibilities.

The USGS maps provided in the PNF outline a proposed project area of potential effect. 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. Please provide the MHC with the FERC's determination of the area of potential effect (36 CFR 800.4(a)(1)).

The PNF indicates that Firstlight has retained the TRC Companies as its cultural resources consultant. Project information should be provided to TRC to assist in its evaluation efforts for proposed impacts to significant historic and archaeological resources during the proposed cultural resource survey. TRC will apply for a State Archaeologist's Field Investigation Permit (950 CMR 70) to conduct the previously requested archaeological reconnaissance survey. The archaeological survey Research Team should include individuals with previous relevant experience in ancient and historical period archaeology of the glaciated Northeast and in the Connecticut River Valley region of New England (see 950 CMR 70.10). The MHC's review and comment on the proposed research design and methodology will assist FERC in developing the scope of the identification efforts (36 CFR 800.4(a)).

The MHC looks forward to reviewing the scope of the proposed identification and evaluation efforts proposed as part of the Firstlight Study Plans, 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. The archaeological research design and methodology should include a description of TRC's facilities, equipment, staffing, and other resources necessary to undertake archaeological research, fieldwork, laboratory processing, analysis, and reporting to carry projects to completion in accordance with the Standards for Field Investigation (950 CMR 70.13). An adequate curatorial facility for the archaeological materials and records of the investigation should be located prior to submitting the permit application, with preference for curation within Massachusetts for the Massachusetts survey area.

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  
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





**State of Vermont**  
**Division for Historic Preservation**  
One National Life Drive, Floor 6  
Montpelier, VT 05620-0501  
[www.HistoricVermont.org](http://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



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

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SECRETARY OF THE  
COMMISSION  
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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.  
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



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

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

December 5, 2013

Nadine Peterson  
New Hampshire Division of Historical Resources  
State Historic Preservation Office  
19 Pillsbury Street  
Concord, NH 03301-3570

*VIA CERTIFIED MAIL*

Re: FirstLight Hydro Generating Company, Turners Falls Hydroelectric Project (FERC Project No. 1889) and Northfield Mountain Pumped Storage Project (FERC Project No. 2485)

Dear Ms. Peterson:

On November 21, 2013, Geoffrey Henry and Ellen Rankin from TRC met with you and Edna Feighner to discuss the Area of Potential Effect (APE) for surveying historic structures, survey methodology, and reporting format in connection with the proposed relicensing of FirstLight Hydro Generation Company's (FirstLight) Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project. Your office asked that TRC submit a memorandum of the meeting for your review and concurrence. Accordingly, TRC has prepared the attached memorandum of the discussions of the meeting for your review and concurrence. FirstLight would appreciate obtaining your concurrence or suggested changes to the memorandum by January 6, 2014 by responding to Geoffrey Henry of TRC [ghenry@trcsolutions.com](mailto:ghenry@trcsolutions.com).

One of the topics discussed was the status of a letter from the Federal Energy Regulatory Commission (FERC) requesting your concurrence with the proposed APE for historic structures. We note that FERC issued its letter requesting concurrence on November 27, 2013. I have attached a copy for your convenience in the event you haven't received it.

If you have any questions regarding the meeting memorandum, please contact me at the above address or Geoffrey Henry at [ghenry@trcsolutions.com](mailto:ghenry@trcsolutions.com).

Please feel free to contact me if you have any questions.

Sincerely,

John Howard  
Director FERC Hydro Compliance

cc: Edna Feighner

Enclosure

## MEETING MEMO

### MEETING WITH NEW HAMPSHIRE SHPO TO DISCUSS FIRSTLIGHT TURNERS FALLS/NORTHFIELD MOUNTAIN PROJECTS

ATTENDEES: Edna Feighner and Nadine Peterson, New Hampshire SHPO and Geoffrey Henry and Ellen Rankin, TRC Environmental

PLACE/DATE/TIME: New Hampshire SHPO, Concord, NH, November 21, 2013, 1:00 PM

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1. Meeting was requested by TRC to discuss the FirstLight Turners Falls/Northfield Mountain APE for historic structures, survey methodology, and reporting format.
2. NH SHPO stated that they are awaiting the letter from FERC to confirm the APEs for the Projects.
3. TRC presented summary of windshield survey conducted 11/20/2013 within NH portion of the Project boundaries:
  - a. Bridge piers, abutments, roadbed, and trestles of abandoned Boston & Maine Railroad line over the Connecticut River and through Town of Hinsdale.
  - b. Bridge carrying Route 63 over Ashuelot River at Hinsdale.
  - c. Gaging station just east of Route 63 bridge (south bank) at Hinsdale.
  - d. Concrete culvert just west of Route 63 bridge (north bank) at Hinsdale.
4. TRC stated that FERC may request one report for all three (MA, VT and NH) SHPOs with one historic context but separate chapters for the NRHP evaluations for each state, with survey forms for each state attached as appendices. NHSHPO stated that they do not accept conventional survey reports as required by other SHPOs. Instead, they request all information be submitted on the NH SHPO "Project Area Form" found at <http://www.nh.gov/nhdhr/programs/survey.htm>. The Project Area Form is intended to minimize unnecessary survey work not consistent with the Project purpose and anticipated effects.
5. The Project Area Form should include a description of the project, geographic context, discussion of the 50+ year old resources in the APE, and an historic context relevant both to the survey area and the architectural resources identified. The historic context should utilize existing historic contexts (Ms. Peterson identified an existing NH railroad context), as well as Area Forms already completed for Hinsdale. The Project Area Form should conclude with recommendations on the need for further, more intensive survey to determine NRHP eligibility. The Project Area Form is submitted to NH SHPO for review by their DOE committee which meets twice-monthly.
6. Ms. Peterson stated that the anticipated project effects may determine TRC's recommendations for further survey efforts. For a re-licensing where there are no other anticipated actions (demolitions, construction, etc.), the Project Area Form may recommend no further survey work is warranted at this time. Ms. Peterson cautioned that the report should not use terms "effect" or "no effect" in accordance with Section 106 but rather "impacts" or "no anticipated consequences," as discussions of effects before NRHP determinations have been made are premature.

7. If normal project operations and variance in river flow may affect the B&M bridge piers/abutments in the CT River , then a recommendation should be made for intensive survey work for this resource. A Project Area Form for the Fort Hill Division of the B&M near Hinsdale was submitted to NH SHPO in 1994. Ms. Peterson stated that a new Project Area Form should be submitted updating the results of the 1994 survey.
8. Ms. Peterson stated that the Project Area Form is a planning document that may serve as the basis for NRHP decisions should there be future construction/demolition activities within the Project area that have the potential to affect historic resources.
9. NH SHPO requested TRC prepare a meeting memo and submit to them for review and concurrence for their project files.