

Relicensing Study 3.7.3

TRADITIONAL CULTURAL PROPERTIES STUDY

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

The objective of this study is to document any known Traditional Cultural Properties (TCPs) listed in, or eligible for, listing in the National Register of Historic Places (NRHP) within the Projects' Area of Potential Effect (APE) and to document and assess any potential effects to such properties from the continuing operation and maintenance of the Projects. As contemplated by National Register Bulletin 38, Guidelines for Evaluating and Documenting Traditional Cultural Properties (Parker & King 1990), TCPs are already known to the community as they are important in maintaining the continuing cultural continuity of the living community. Thus, the purpose of the TCP study is to record existing properties that possess a shared recognition and use by members of the living community for potential listing to the NRHP. A major component of the TCP study includes collection of information, through a series of interviews, from the Narragansett Indian Tribe (NIT) and other interested cultural /stakeholders such as the Nolumbeka Project, on properties that are rooted in the tribe's history and are important in maintaining the continuing cultural identity of the tribal community. The FERC-approved study plan provides that FirstLight shall consult with the NIT on the selection of the ethnographer, who will collect information from the NIT.

On January 20, 2014, FirstLight contacted the Tribal Historic Preservation Officer (THPO) for the NIT by telephone to request a meeting with the NIT and the Nolumbeka Project. All letters from FirstLight to the NIT and Nolumbeka Project were sent certified mail, return receipt requested. The NIT requested that FirstLight make its request for a meeting in writing. Accordingly, on January 31, 2014, FirstLight submitted a written request (see [Appendix A](#)) to the NIT and the Nolumbeka Project requesting a meeting. On March 31, 2014, FirstLight sent a letter ([Appendix A](#)) to the NIT and the Nolumbeka Project to ascertain whether, and in what capacity, the NIT and the Nolumbeka Project would like to participate in the Phase IA archeological reconnaissance survey. FirstLight also noted that it looked forward to hearing from the NIT and the Nolumbeka Project with suggested dates and times for a meeting to introduce FirstLight's proposed ethnographer for the TCP.

On April 15, 2014, FirstLight sent a letter ([Appendix A](#)) to the NIT and the Nolumbeka Project in which FirstLight enclosed figures representing the final APE for the Projects. FirstLight requested the NIT and the Nolumbeka Project to contact FirstLight if either entity wanted to discuss the Phase IA archaeological survey or the TCP study.

In response to correspondence from FERC and the Nolumbeka Project's letter ([Appendix A](#)) to FirstLight dated April 15, 2014, on April 24, 2014, FirstLight sent a letter ([Appendix A](#)) to the NIT and the Nolumbeka Project (hard copy and by e-mail) indicating its willingness to discuss compensating Tribal members for their time and expenses in participating in the TCP study.

On July 14, 2014, FirstLight's proposed ethnographer contacted the NIT by telephone to introduce himself to the NIT Deputy THPO. The ethnographer and the THPO had two telephone conversations on that day. The NIT Deputy THPO reiterated its earlier requests that FirstLight provide funding for the NIT to conduct its own archaeological study and for funds to build a database. The telephone conversations concluded with the NIT Deputy THPO agreeing to meet with FirstLight and the Nolumbeka Project at FirstLight's office (per the request of the Deputy THPO). On August 11, 2014, FirstLight's ethnographer reached the NIT Deputy THPO by telephone to discuss possible dates for a meeting. The NIT Deputy THPO stated that he was speaking with someone else and would call the ethnographer back. To date, the NIT has not called back.

1.2 Study Progress Summary

Task 1: Meeting with the Massachusetts, Vermont, and New Hampshire SHPOs, the Narragansett THPO, and the Nolumbeka Project

The objective of this task was to consult with the Massachusetts, Vermont, and New Hampshire SHPOs, the NIT THPO, and the Nolumbeka Project with respect to development of the precise APE for the Projects. 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 (CWRC) to discuss finalization of the APE for the archaeological study.¹ 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. The Massachusetts SHPO concurred with the definition of the APE by letter dated December 19, 2013. The Vermont SHPO concurred by letter dated January 9, 2014.

Task 2: Tribal Consultation and Documentation of TCPs

As set forth above, FirstLight has contacted the NIT on several occasions to introduce its ethnographer to the NIT and to discuss documentation of TCPs in accordance with the FERC-approved Study Plan. Documentation of TCPs has not occurred because the NIT has yet to respond to several requests for a meeting. Although FirstLight has offered to reimburse Tribal members for their labor and expenses incurred in participating in the TCP, the NIT's perspective is that FirstLight should provide funding to the Tribe so that the NIT can conduct its own parallel studies.

Task 3: Background Research

Background research was conducted at the three state SHPO offices and on the internet. There are no reported TCPs in the Projects' APE. There is one NIT TCP in the Project vicinity. Known as the Turners Falls Sacred Ceremonial Hill Site, which is located at the municipal airport in Turners Falls, Franklin County, Massachusetts, the site was listed in the NRHP in December 2008. The majority of information on additional TCPs, if any, would be gathered through interviews with NIT elders.

Task 4: Field Visit

This task involves a field visit among Tribal representatives, other stakeholders such as the Nolumbeka Project, and FirstLight to the potential TCPs within the Projects' APE. Because FirstLight has been unsuccessful in meeting with the NIT to document potential TCPs, no field visit has occurred.

Task 5: Report Development

FirstLight anticipates filing a final report documenting any further progress in implementing the FERC-approved Study Plan by the 1st quarter of 2015.

1.3 Variances from Study Plan and Schedule

The schedule for the FERC-approved Study Plan has not been met because it has not been possible to document TCPs with the NIT.

FirstLight anticipates filing a final report by the 1st quarter of 2015.

¹ The Massachusetts SHPO and the Narragansett Indian Tribe were also invited to participate in the telephone conference but did not attend.

1.4 Remaining Activities

Tasks 2 (Tribal Consultation and Documentation of TCPs) and 4 (Field Visit) will be conducted if the NIT participates in the FERC-approved TCP study. To date, NIT has not responded to FirstLight's requests to meet and commence TCP documentation.

Appendix A

Correspondence Record



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

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

Via Certified Mail

January 31, 2014

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

Joe Graveline
Nolumbeka Project
88 Columbus Avenue
Greenfield, MA 01301

Re: FirstLight's Traditional Cultural Properties Study Plan
Northfield Mountain Pumped Storage Project, FERC Project No. 2485
Turners Falls Hydroelectric Project, FERC Project No. 1889

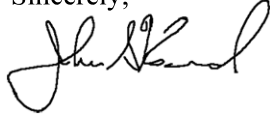
Dear Doug and Joe,

I am following up on a telephone conference call I had with Doug on January 20, 2014 regarding FirstLight's initiation of the Traditional Cultural Properties Study Plan. As part of the Federal Energy Regulatory Commission's (FERC) relicensing process for the Northfield Mountain and Turners Falls Projects, this Plan was approved by the FERC in its Study Plan Determination Letter (SPDL) dated September 12, 2013. Both the Traditional Cultural Resources Study Plan and FERC's SPDL are available on our relicensing website at <http://www.northfieldrelicensing.com>. As further background, I have attached a copy of our August 14, 2013 letter to the Narragansett Indian Tribal Historic Preservation Office, in which we first discussed our proposal to conduct a Traditional Cultural Properties study.

As a first step in moving forward with the Traditional Cultural Properties study, we would like to consult with you regarding the selection of the ethnographer. We have selected Dr. Richard T. Will, who is an anthropologist with a specialization in archaeology, Native American consultation, and oral history. Dr. Will has worked with members of the Penobscot Indian Nation, Passamaquoddy Tribe, and several Indian Nations in western New York. For example in 2005, Dr. Will was the principal investigator for, and author of, *Voices of the People: Perspectives on Project Effects by the Tuscarora*. This oral history was conducted in connection with the FERC relicensing of New York Power Authority's Niagara Power Project. For background information on Dr. Will, I have attached his resume to this letter.

The purpose of this letter is to request a meeting to introduce you to Dr. Will. We would like to suggest an initial meeting sometime during the week of March 3, 2014. Can you suggest some dates and times during that week for an initial meeting? If the week of March 3 is inconvenient, we would appreciate it if you could suggest some alternative dates and times. We look forward to hearing from you. Thank you.

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

Attachments:

- August 14, 2013 letter to the Narragansett Indian Tribal Historic Preservation Office
- Richard T Will Resume



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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

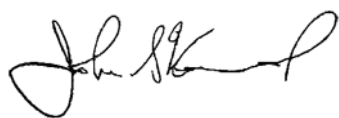
Dear Doug:

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,

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John Howard

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Massachusetts Historical Commission
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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

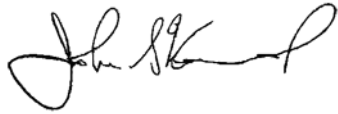
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Initially, the archaeological studies will consist of a Phase IA reconnaissance survey, which is designed to identify known archaeological sites and areas that are sensitive for the presence of archaeological sites within each Project's Area of Potential 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 Nolumbeka Project would like to participate in the Phase IA reconnaissance survey.

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.

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John Howard

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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", is written over a light blue horizontal line.

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.



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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
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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,

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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

ORIGINAL

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FILED
SECRETARY OF THE
COMMISSION

2014 APR 28 A 10 06

FEDERAL ENERGY
REGULATORY COMMISSION

April 15, 2014
John Howard
Northfield Mountain Station
99 Millers Falls Road
Northfield, MA 01360

Re: Federal Energy Regulatory Commission Relicensing of the Turners Falls
Hydroelectric and Northfield Mountain Pumped Storage Project, (FERC Nos. 1889-081
and 2485-063) – Initiation of Phase 1A Archaeological Survey

Dear John:

We are responding to your letter dated March 31, 2014 concerning the Phase 1A reconnaissance Survey and your additional request to meet with you to discuss the initiation of the Traditional Cultural Properties study and to meet your proposed ethnographer.

The Nolumbeka Project would like to participate in the Phase 1A reconnaissance survey including, but not limited to, the walk over and boat assessment of the APE. In addition we would also request to review, in a timely manner, the documents produced by the related archaeological research from the Historic Preservation Offices in Vermont, Massachusetts, and New Hampshire as well as the archaeological reports amassed by the project proponents in their files. We are seeking to add a parallel set of eyes with our indigenous cultural perspective to the process as we have requested repeatedly through our written correspondences with FERC, FirstLight and TransCanada.

The Nolumbeka Project has a number of concerns regarding what appears to be FirstLight's choice to assign non-tribal entities to determine what providing "Adequate" coverage of Tribal cultural resources will look like. Also, we see the lack of funding to support a balanced tribal collaboration with the utilities in this licensing process as falling short of the spirit and intent of the 106 Federal processes.

In addition to setting up a time to meet with FirstLight to discuss the initiation of the Traditional Cultural Properties study and meet with your ethnographer, we feel there also needs to be a meeting to find a solution to the lack of funding to support our research and lack of access to the documents the tribes and the Nolumbeka Project need for a balanced and complete review of the research data. This research data will be used to set the standards for the next fifty years on indigenous cultural preservation on the river and the surrounding affected areas of potential impact.

The dates, timing and content of the requested meetings needs to be clearly agreed to by Doug Harris before we can enter into these conversations with FERC and FirstLight. We look forward to working with you to see this process through to a successful completion.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Graveline". The signature is fluid and cursive, with a large loop at the beginning.

**Joe Graveline
President the Nolumbeka Project**

**cc: Kimberly Bose, Secretary, FERC
Massachusetts Historic Commission
New Hampshire Division of Historical Resources
Vermont Division for Historic Preservation
John Ragonese, TransCanada
Doug Harris NITHPO**



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

VIA CERTIFIED MAIL

April 24, 2014

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

Re: Traditional Cultural Properties Study
Northfield Mountain Pumped Storage Project, FERC Project No. 2485
Turners Falls Hydroelectric Project, FERC Project No. 1889

Dear Doug:

I am writing to follow up on my previous correspondence regarding FirstLight Hydro Generating Company's (FirstLight) Traditional Cultural Properties (TCP) Study, to be conducted as part of the Federal Energy Regulatory Commission's (FERC) relicensing process for FirstLight's Northfield Mountain Pumped Storage Project and Turners Falls Hydroelectric Project. In my August 14, 2013 letter, I indicated that in light of FirstLight's agreement to conduct the TCP Study in close consultation with the Narragansett Indian Tribe (Tribe), FirstLight felt that the extent of direct funding of tribal initiatives you proposed was unnecessary for purposes of the relicensing process. Subsequently, as a first step in moving forward with the TCP Study, I invited you, by letter dated January 31, 2014, to consult with FirstLight regarding the selection of the ethnographer for the TCP Study.

Although we have not yet heard from you, I understand, based on correspondence from FERC Staff and Joe Graveline's April 15, 2014 letter addressed to my attention, that funding concerns may be hampering the Tribe's ability to participate in the TCP Study. FERC Staff's April 11, 2014 letter indicates that while FERC cannot direct license applicants to fund or pay for tribal participation in the relicensing process, in some proceedings applicants have provided funding or assistance to tribes to carry out specific aspects of TCP investigations. FirstLight agrees with FERC Staff that the Tribe's participation in the TCP Study would be extremely beneficial. To that end, FirstLight is willing to discuss compensating tribal members for their time and expenses associated with participating in the TCP Study.

We therefore reiterate our request for a meeting to introduce you to our proposed ethnographer and discuss compensation issues. We can also discuss the Tribe's interest in participating in FirstLight's ongoing Phase IA archaeological reconnaissance survey.

We look forward to hearing from you.

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
FERC- Director Hydro Compliance

cc: Kimberly D. Bose, Secretary, FERC (filed electronically)
Joe Graveline, President, Nolumbeka Project Inc. (via certified mail)