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99 Millers Falls Road  
Northfield, MA 01360  
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Fax: (413) 659-4459  
Email: [john.howard@gdfsuezna.com](mailto:john.howard@gdfsuezna.com)

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

March 31, 2014

Ramona Peters  
Director  
Tribal Historic Preservation Department  
Mashpee Wampanoag Tribe  
483 Great Neck Road South  
Mashpee, MA 02649

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

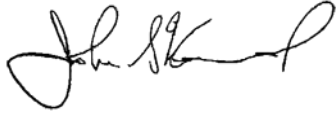
Dear Ms. Peters:

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 effects of relicensing of the Projects on historic properties. The 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 investigations 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 is depicted on Appendix 1.

FirstLight initiated the relicensing process on October 30, 2012 when it filed its Pre-Application Document (PAD) with the Commission and distributed the PAD to federal, state, and local agencies, interested non-governmental organizations, and to six Native American tribes, including the Mashpee Wampanoag Tribe. On November 8, 2012, the Commission sent a letter to Cedric Cromwell, Tribal Chair of the Mashpee Wampanoag (Tribe) inquiring about the Tribe's interest in the relicensing of these projects and providing an opportunity to meet with Commission staff to initiate communications between tribal and commission staffs. In connection with our obtaining a state archaeological investigation permit from the Massachusetts Historical Commission (MHC), MHC has recently asked that we contact you to notify you of the impending archaeological investigations. If you would like additional information about the archaeological investigations, or would like to participate in this study, please contact Tim Sara at

TRC by phone at 301-306-6981 or by email at TSara@trcsolutions.com at your earliest convenience, as FirstLight intends to begin field work later this spring.

Sincerely,

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John Howard

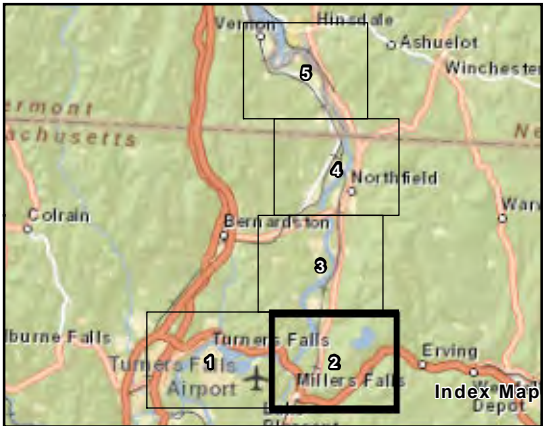
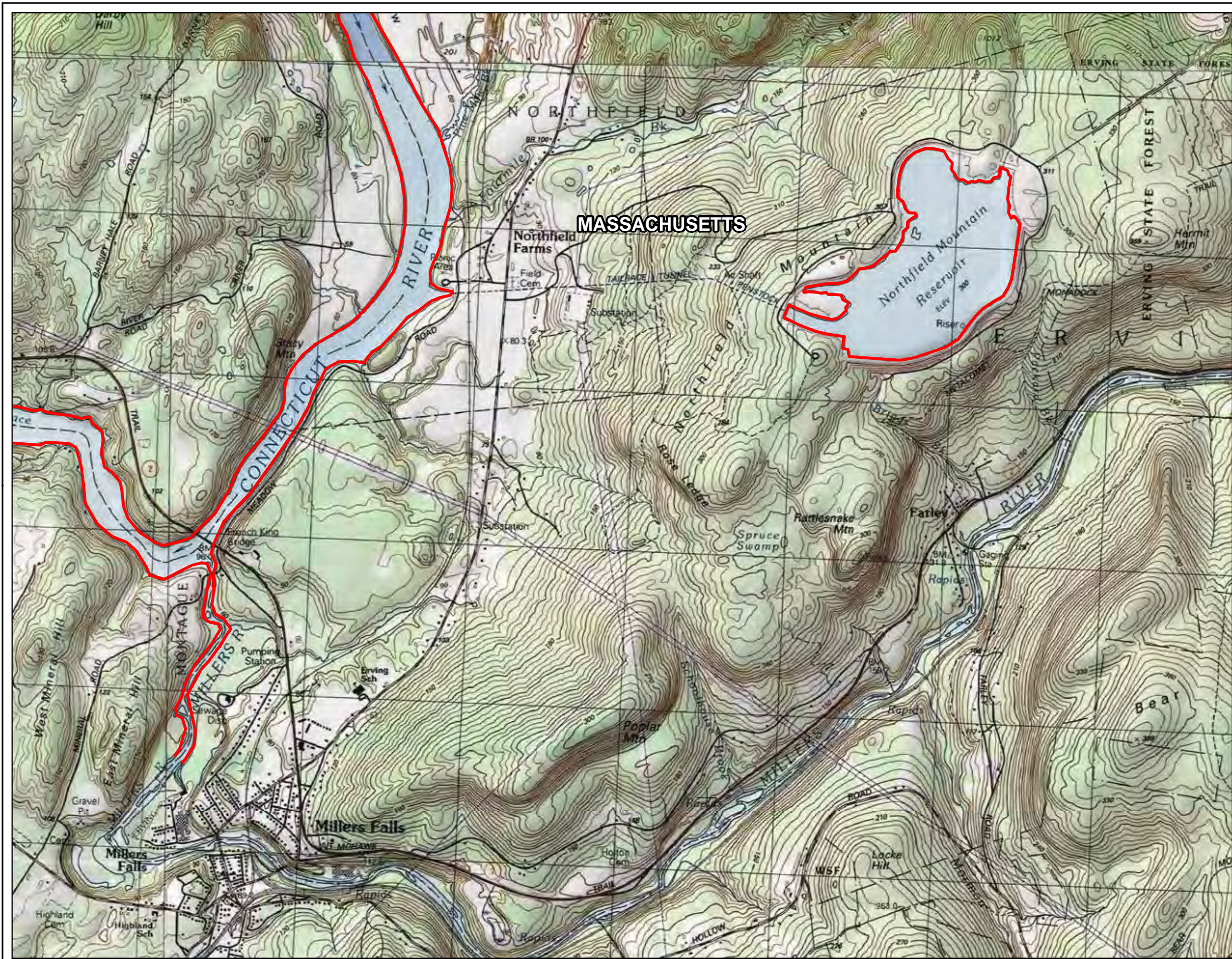
Cc: Federal Energy Regulatory Commission  
Massachusetts Historical Commission

Encl.









FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN

Figure 3.7.1-2  
Proposed Area of Potential Effect  
(Archaeology)

Legend

Proposed Area of  
Potential Effect\*

\* Proposed Area of Potential Effect defined  
by 10 meter offset from Normal High Water  
Mark.

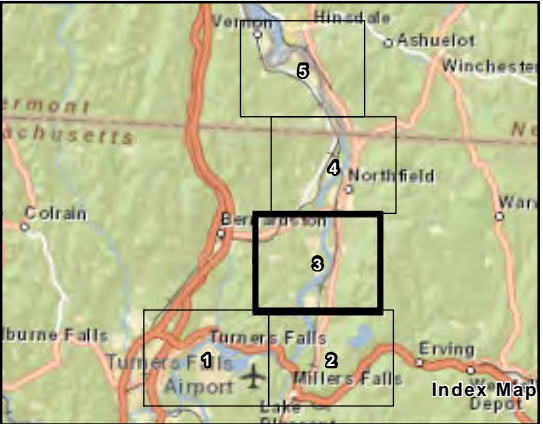
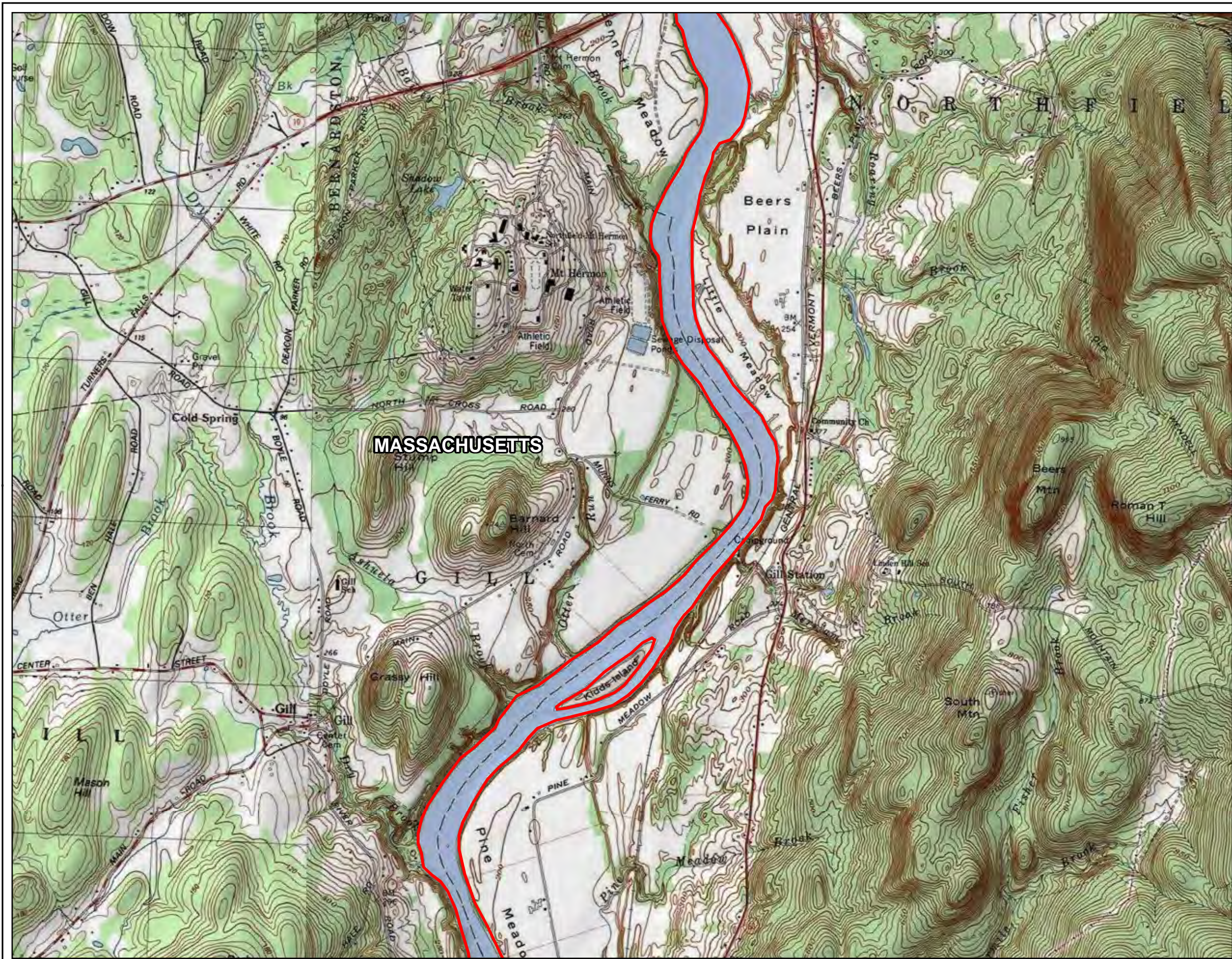
Service Layer Credits: Sources: Esri, DeLorme,  
NAVTEQ, USGS, Intermap, IPC, NRCAN, Esri Japan,  
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1 inch = 2,000 feet



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FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN


Figure 3.7.1-3  
Proposed Area of Potential Effect  
(Archaeology)

Legend

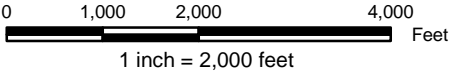
 Proposed Area of Potential Effect\*

\* Proposed Area of Potential Effect defined by 10 meter offset from Normal High Water Mark.

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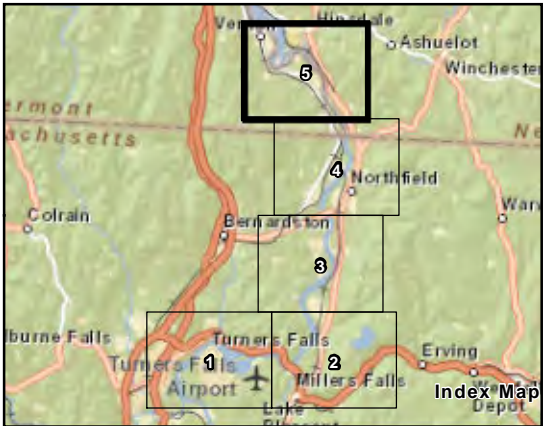
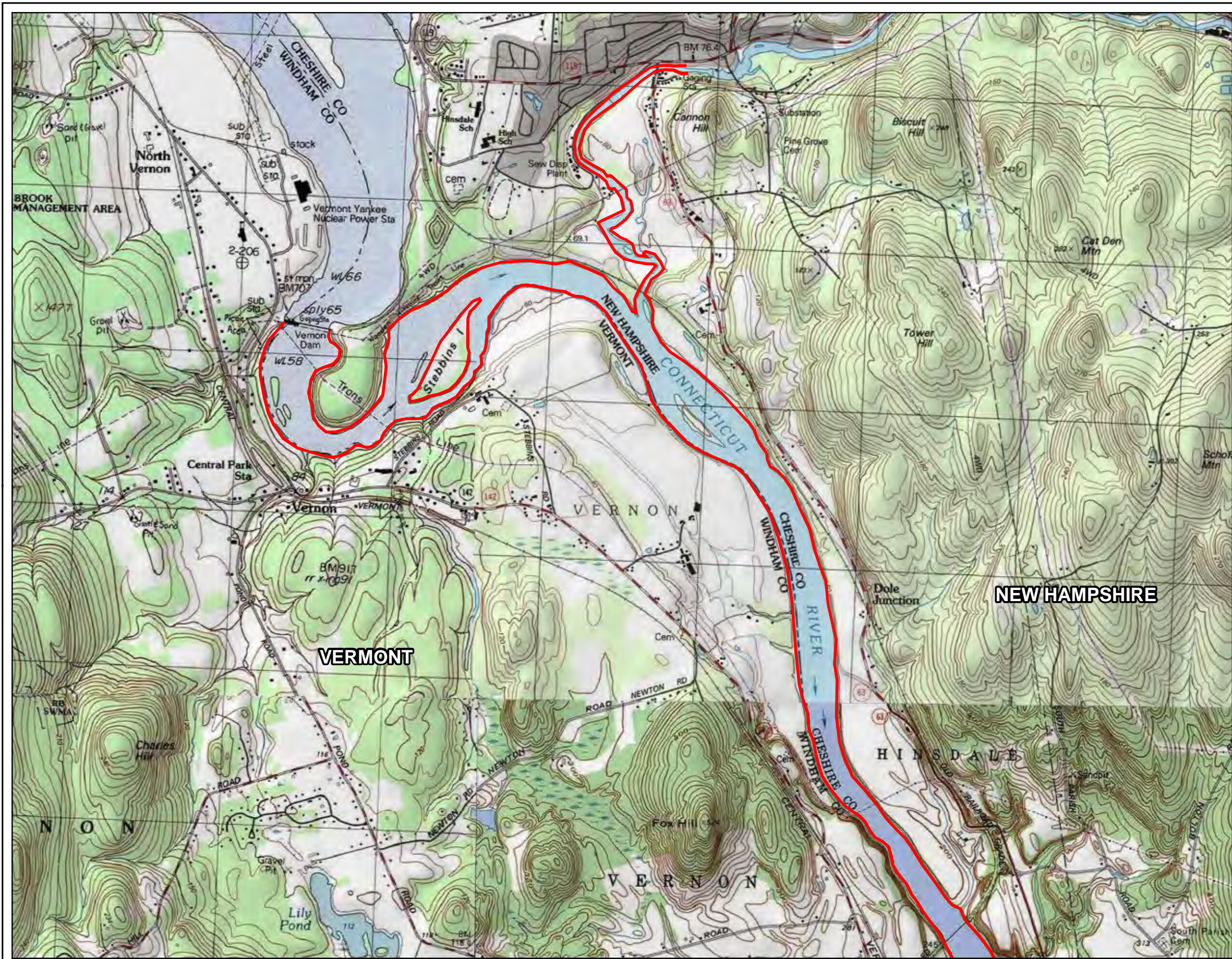
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**FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN**

**Figure 3.7.1-5  
Proposed Area of Potential Effect  
(Archaeology)**

**Legend**

 Proposed Area of Potential Effect\*

\* Proposed Area of Potential Effect defined by 10 meter offset from Normal High Water Mark.

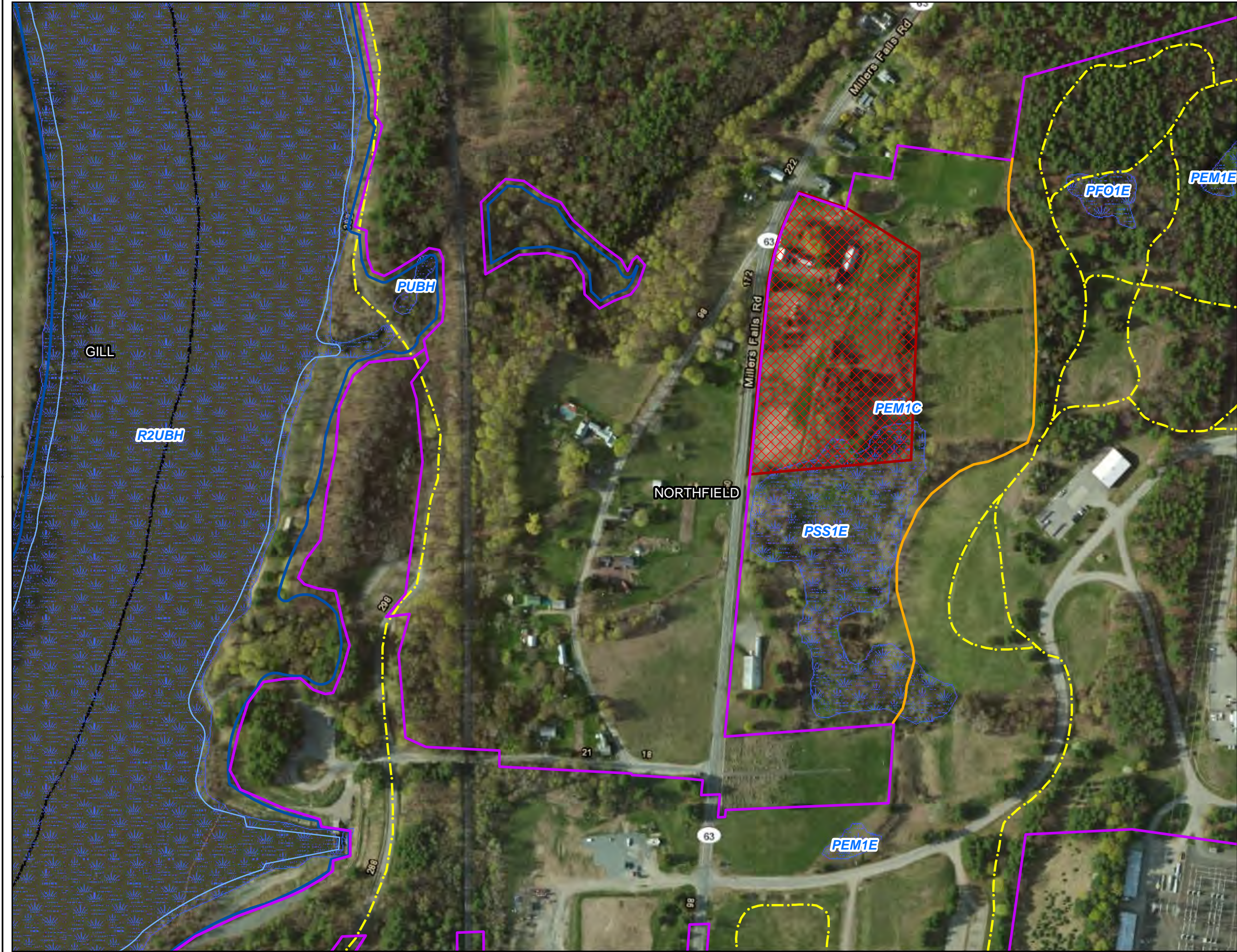


Service Layer Credits: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012

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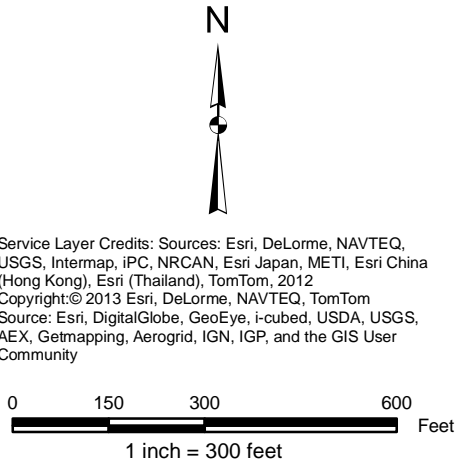




FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN

Figure 3.7.1-6  
Fuller Farm Property Location

- Legend
- Northfield/Turners Falls Project Boundary
  - Farm Property
  - Project Trail
  - Agricultural Buffer
  - Town Boundary
  - NWI Wetland
  - Water Elevation
    - Maximum
    - Minimum



Service Layer Credits: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012  
Copyright:© 2013 Esri, DeLorme, NAVTEQ, TomTom  
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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:

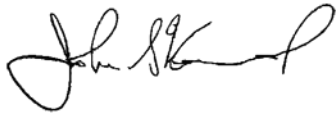
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In addition, in accordance with your request, we sent you and the Nolumbeka Project a letter dated January 31, 2014 in which we requested a meeting with you in order to discuss initiation of the Traditional Cultural Properties study and to introduce 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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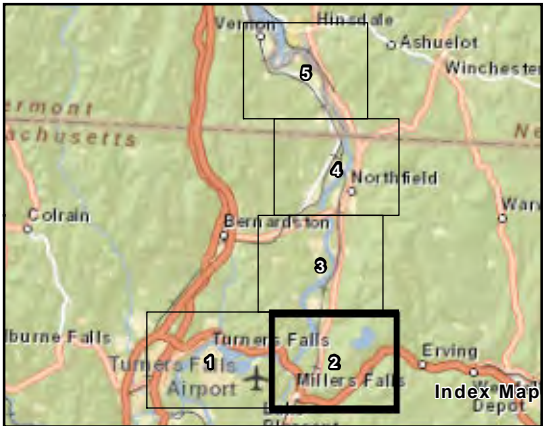
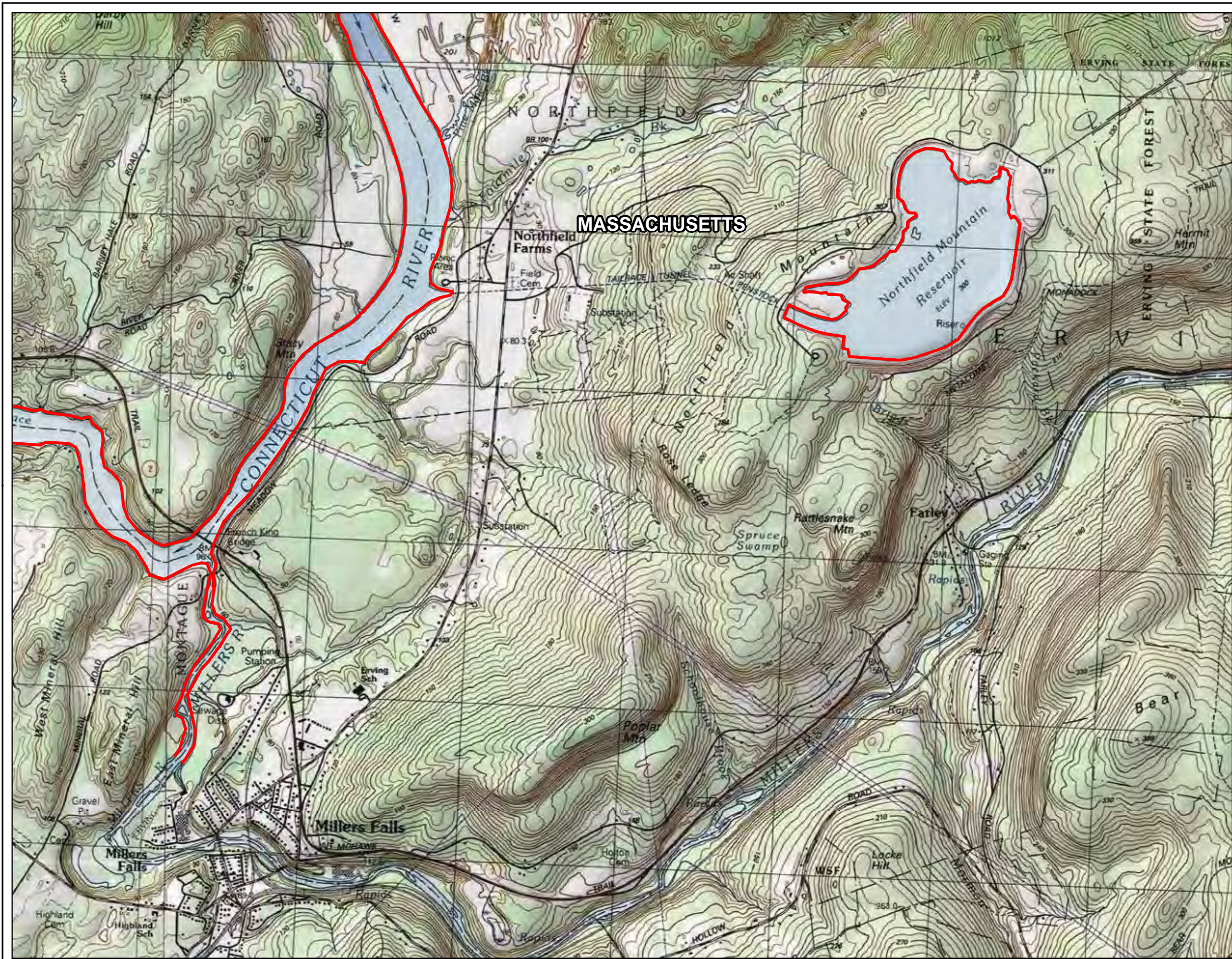
John Howard

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









FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN

Figure 3.7.1-2  
Proposed Area of Potential Effect  
(Archaeology)

Legend

Proposed Area of  
Potential Effect\*

\* Proposed Area of Potential Effect defined  
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Mark.

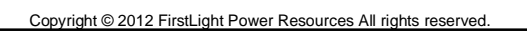
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1 inch = 2,000 feet

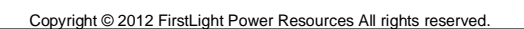


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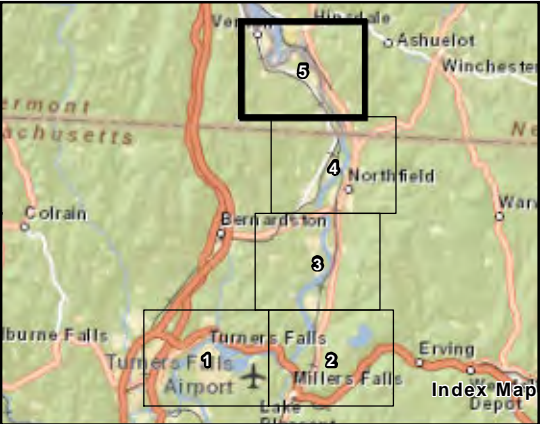
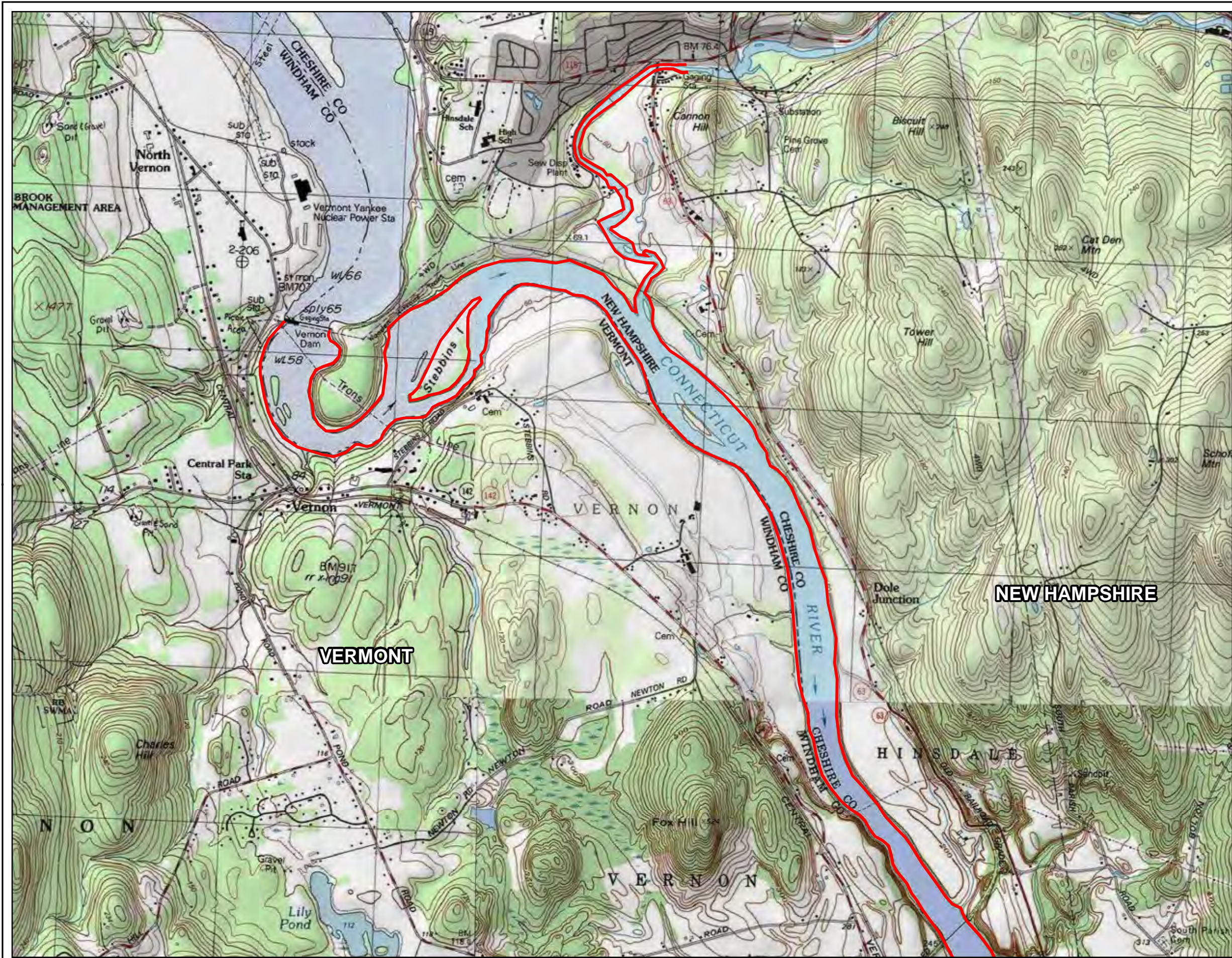














**FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN**

**Figure 3.7.1-5  
Proposed Area of Potential Effect  
(Archaeology)**

**Legend**

 Proposed Area of Potential Effect\*

\* Proposed Area of Potential Effect defined by 10 meter offset from Normal High Water Mark.



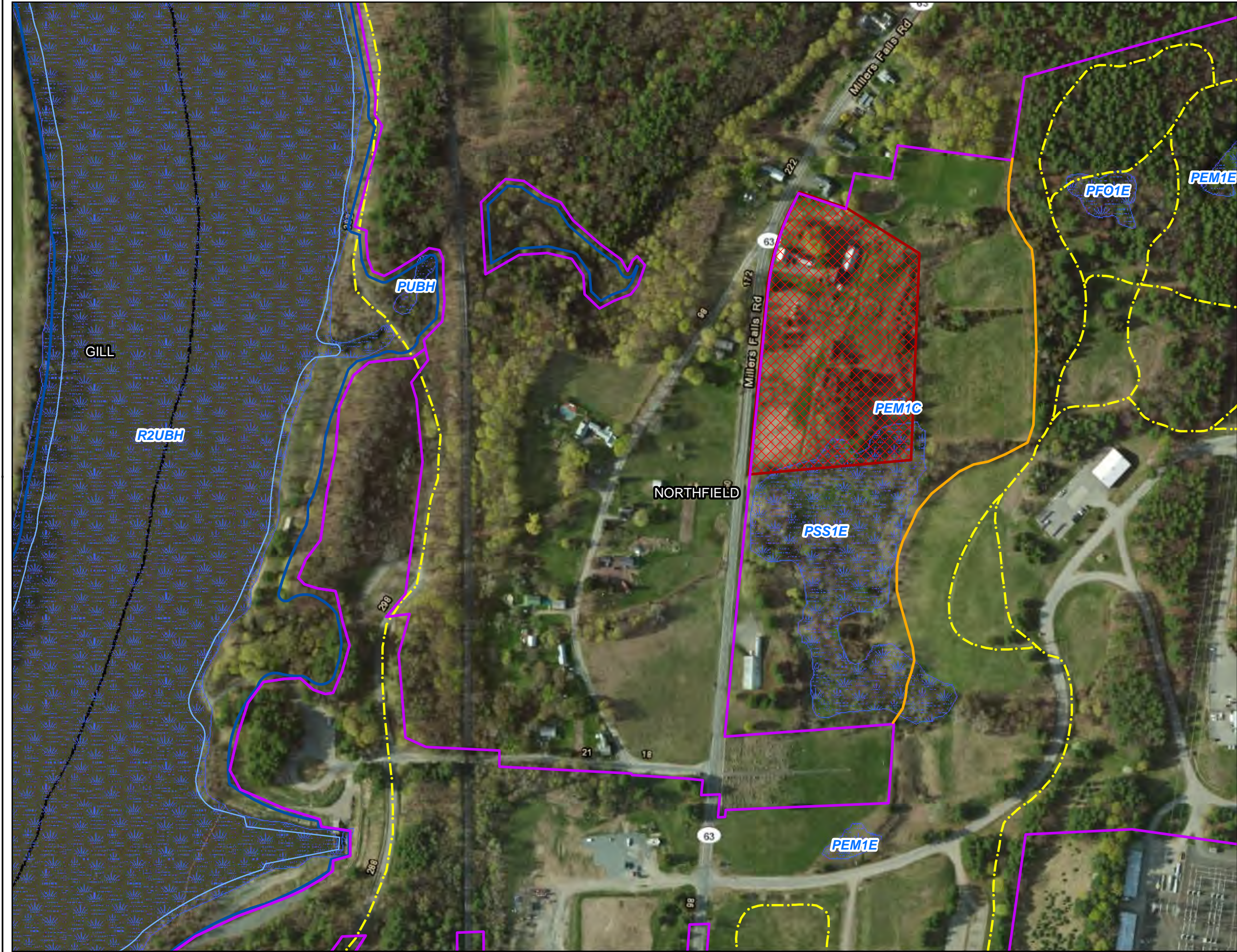
Service Layer Credits: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012

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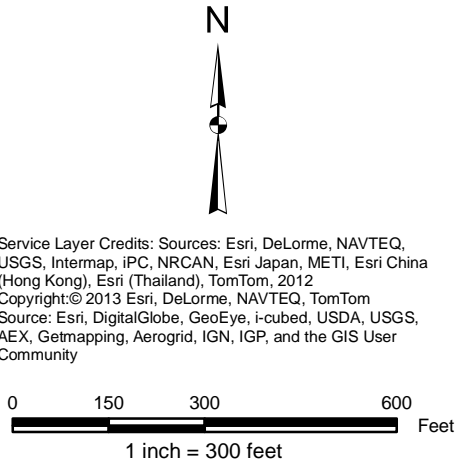




FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN

Figure 3.7.1-6  
Fuller Farm Property Location

- Legend
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  - Farm Property
  - Project Trail
  - Agricultural Buffer
  - Town Boundary
  - NWI Wetland
  - Water Elevation
    - Maximum
    - Minimum



Service Layer Credits: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012  
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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

Dear Joe:

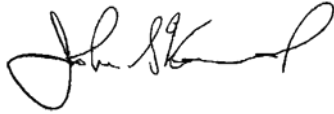
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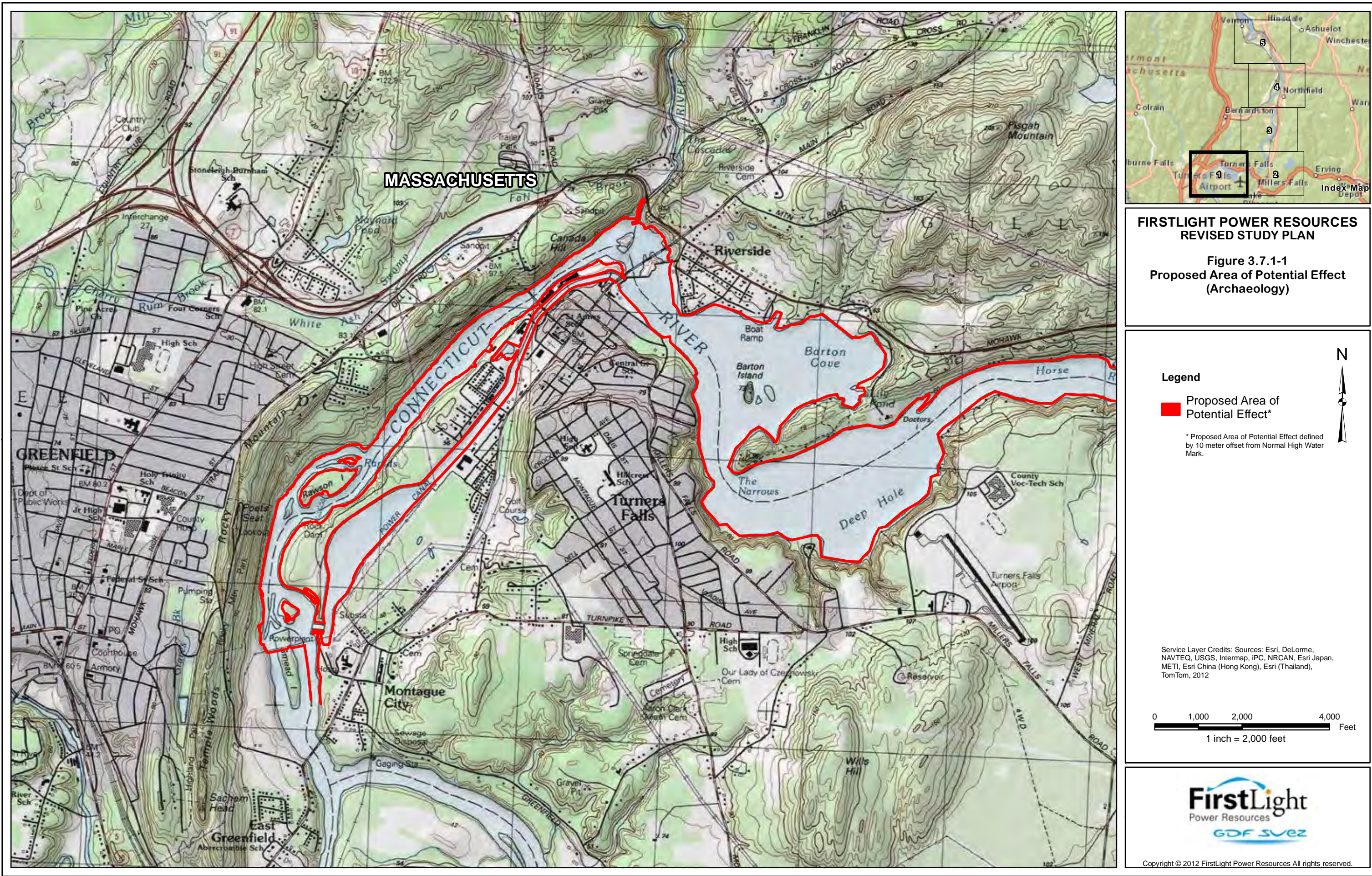
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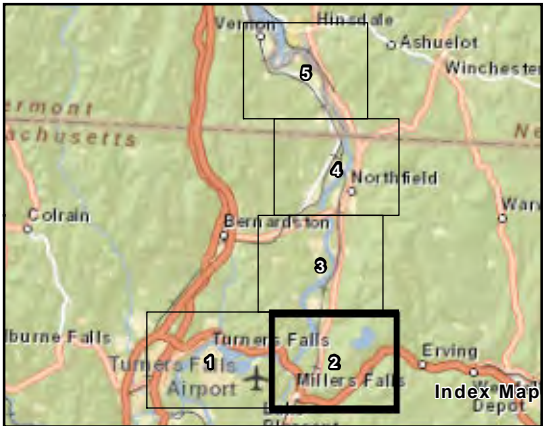
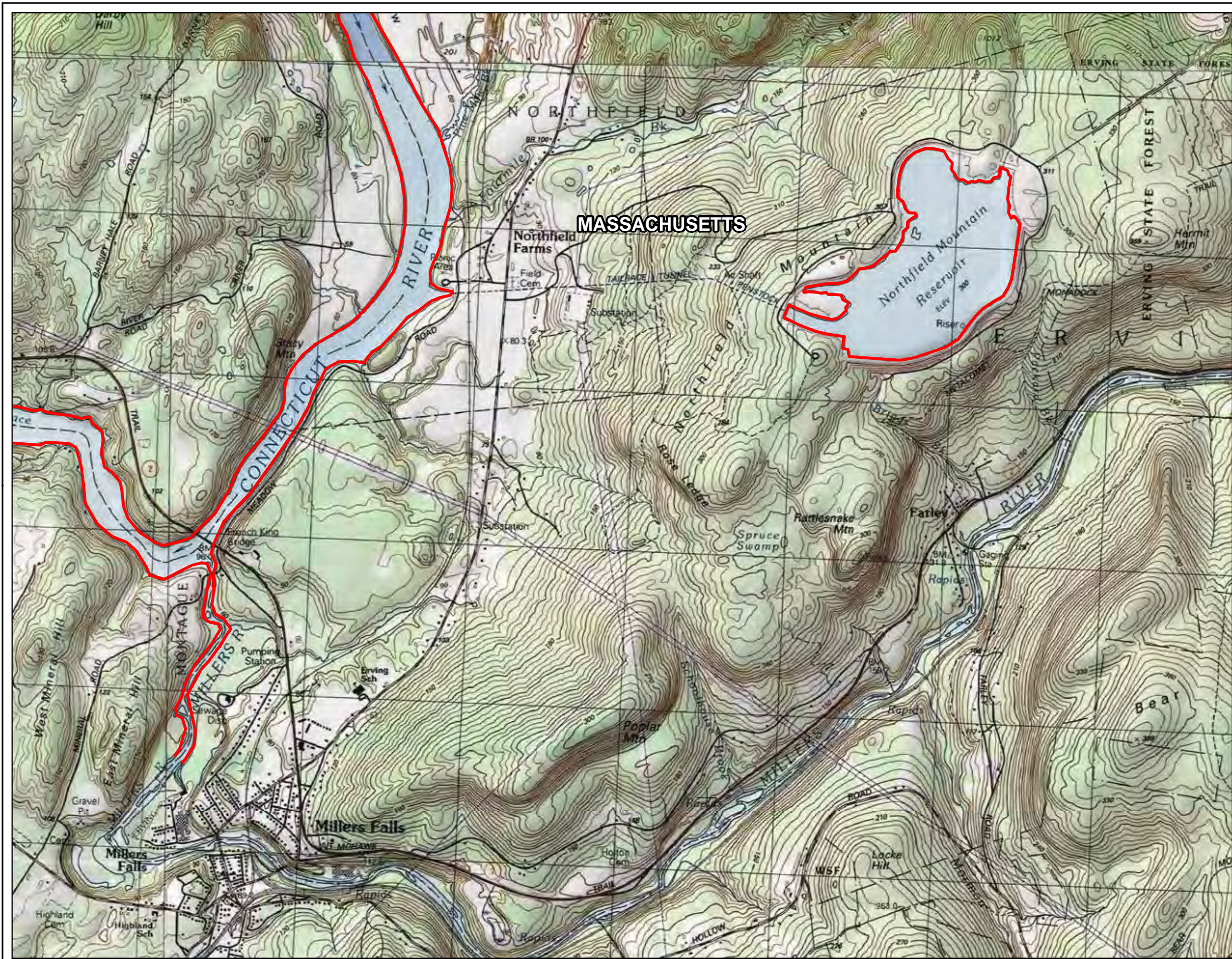
John Howard

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









FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN

Figure 3.7.1-2  
Proposed Area of Potential Effect  
(Archaeology)

Legend

Proposed Area of  
Potential Effect\*

\* Proposed Area of Potential Effect defined  
by 10 meter offset from Normal High Water  
Mark.

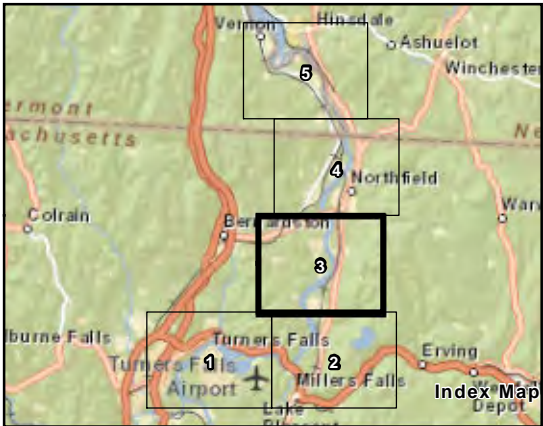
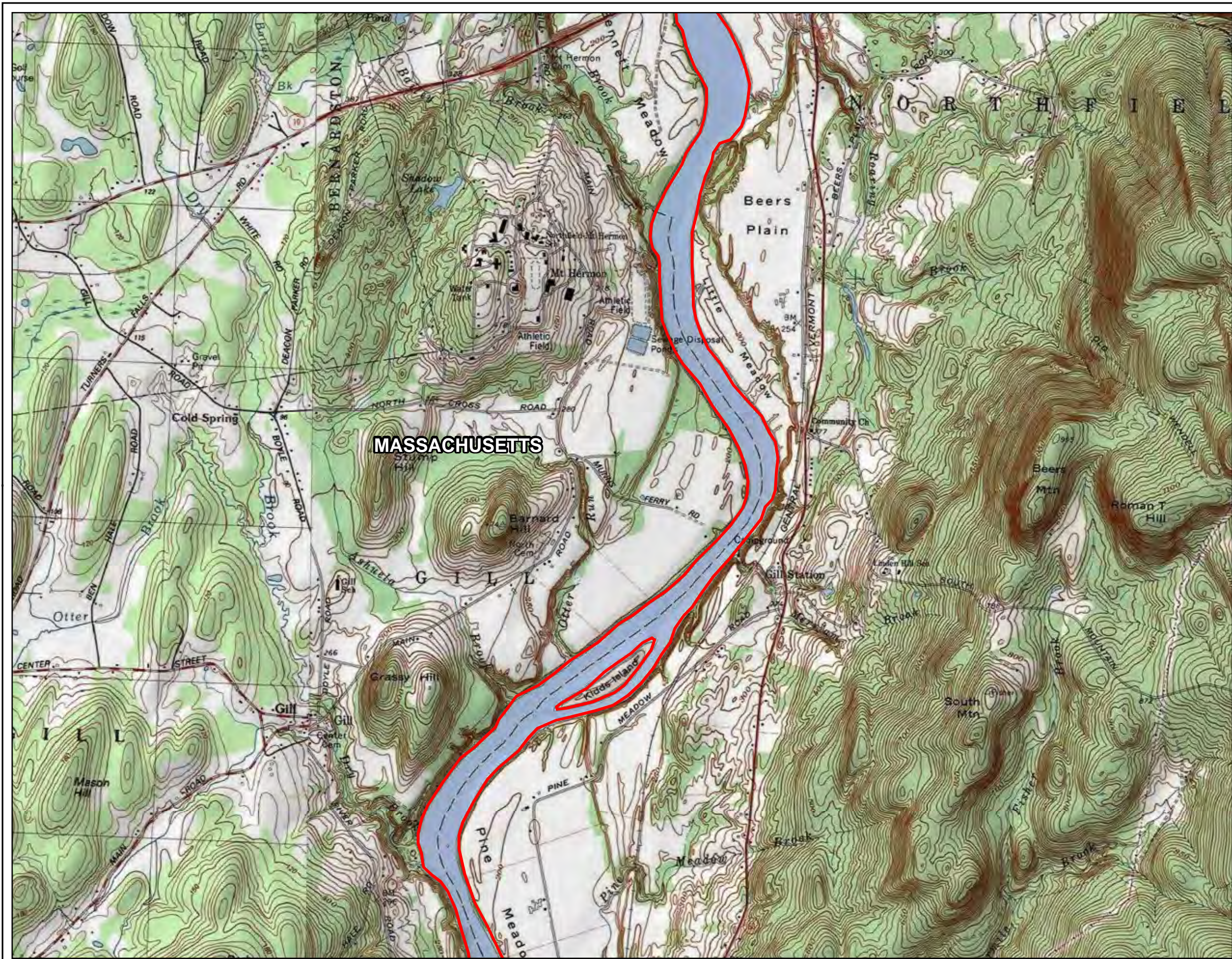
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Feet  
1 inch = 2,000 feet



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FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN

Figure 3.7.1-3  
Proposed Area of Potential Effect  
(Archaeology)

Legend

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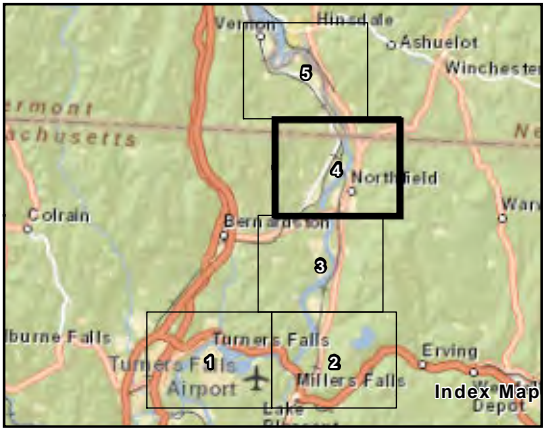
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**FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN**

**Figure 3.7.1-4  
Proposed Area of Potential Effect  
(Archaeology)**

**Legend**

 Proposed Area of Potential Effect\*

\* Proposed Area of Potential Effect defined by 10 meter offset from Normal High Water Mark.



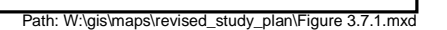
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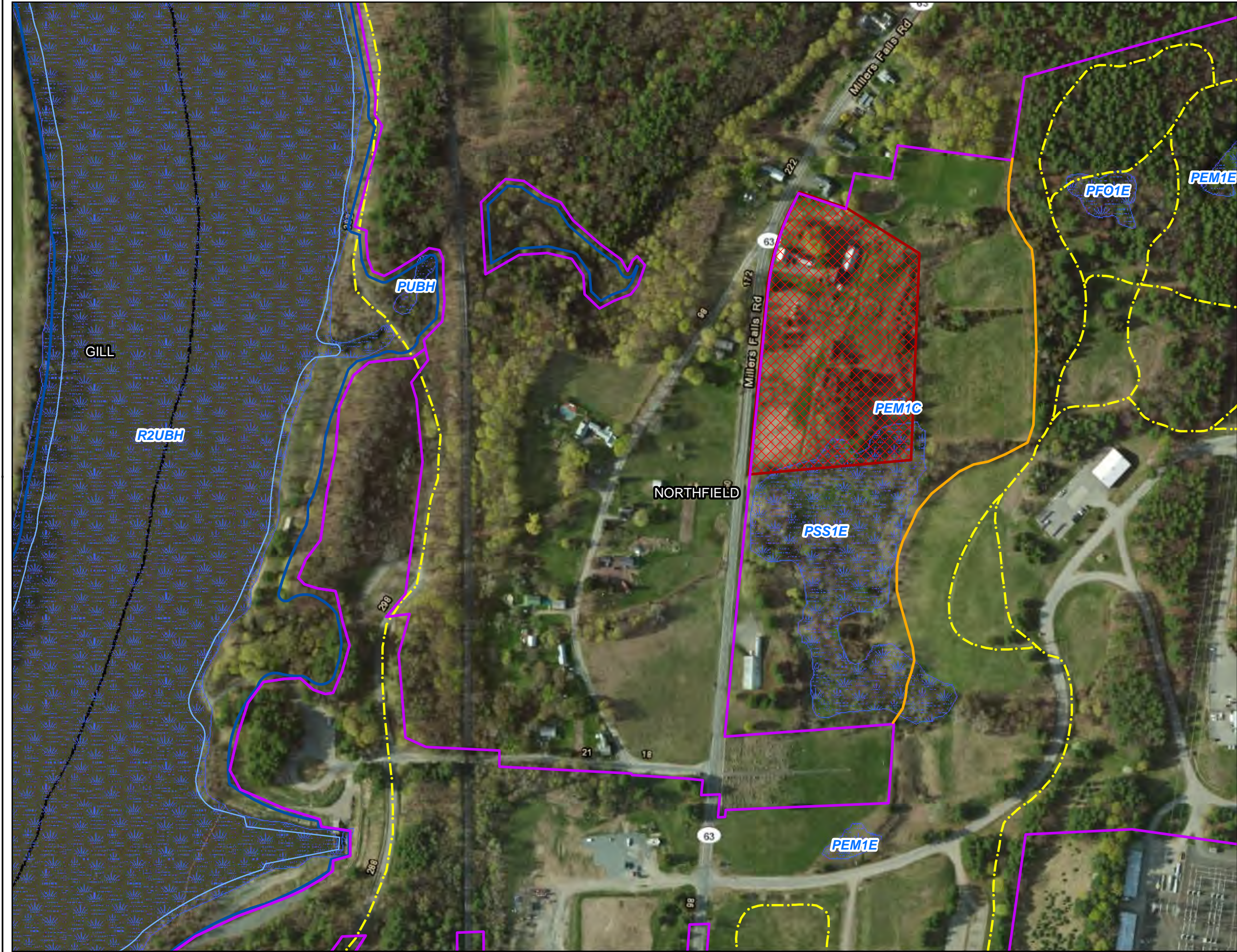
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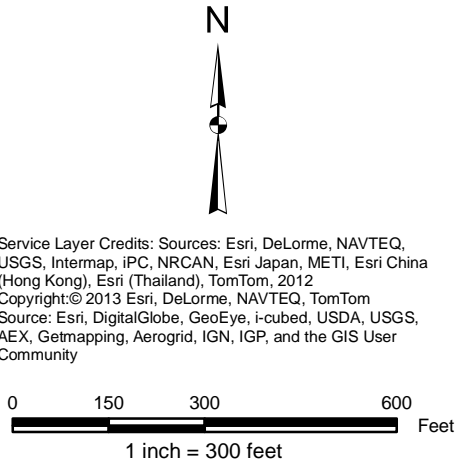




**FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN**

**Figure 3.7.1-6  
Fuller Farm Property Location**

- Legend**
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Service Layer Credits: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012  
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John S. Howard  
Director FERC Hydro Compliance  
Chief Dam Safety Engineer

March 31, 2014

Ms. Sherry White  
Historic Preservation Officer  
Stockbridge-Munsee Community  
W13447 Camp 14 Rd  
Bowler, WI 54416

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

Dear Ms. White:

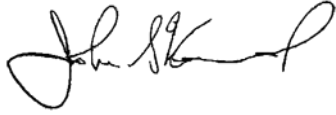
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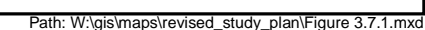
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John Howard

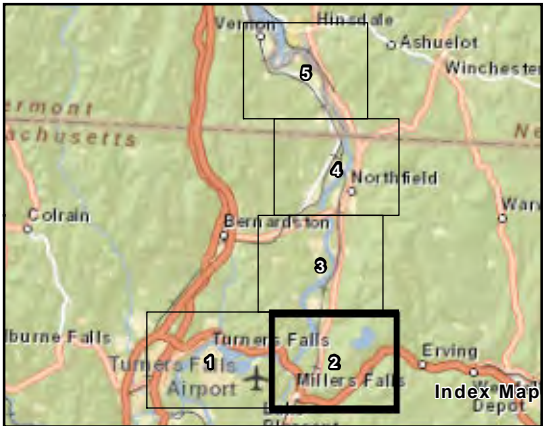
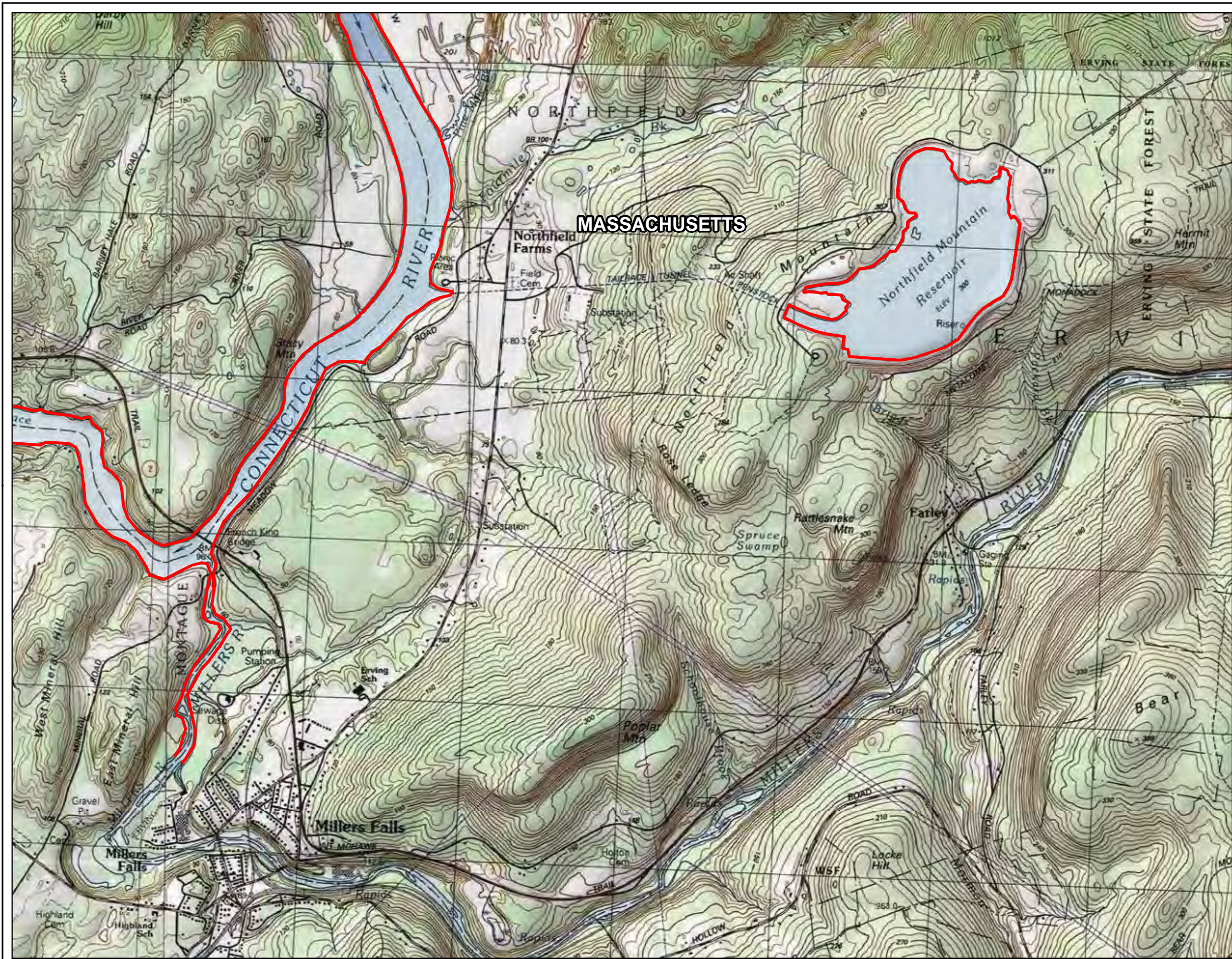
Cc: Federal Energy Regulatory Commission  
Massachusetts Historical Commission

Encl.










**FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN**

**Figure 3.7.1-2  
Proposed Area of Potential Effect  
(Archaeology)**

**Legend**

 Proposed Area of Potential Effect\*

\* Proposed Area of Potential Effect defined by 10 meter offset from Normal High Water Mark.

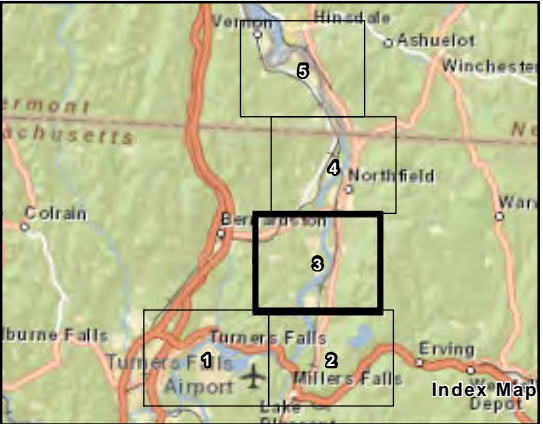
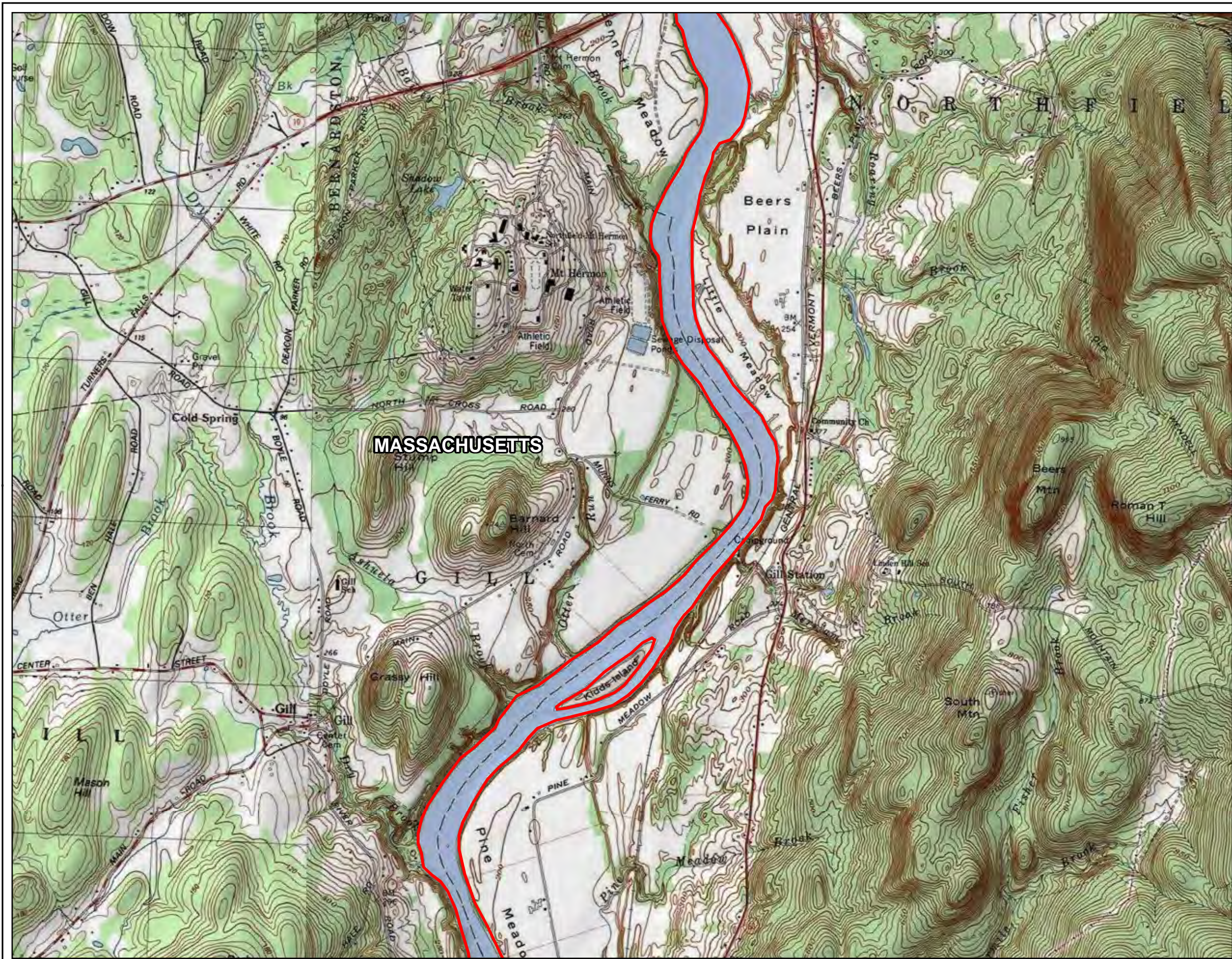
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1 inch = 2,000 feet



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FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN

Figure 3.7.1-3  
Proposed Area of Potential Effect  
(Archaeology)

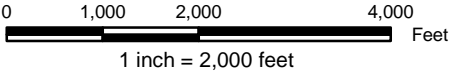
Legend

 Proposed Area of Potential Effect\*

\* Proposed Area of Potential Effect defined by 10 meter offset from Normal High Water Mark.

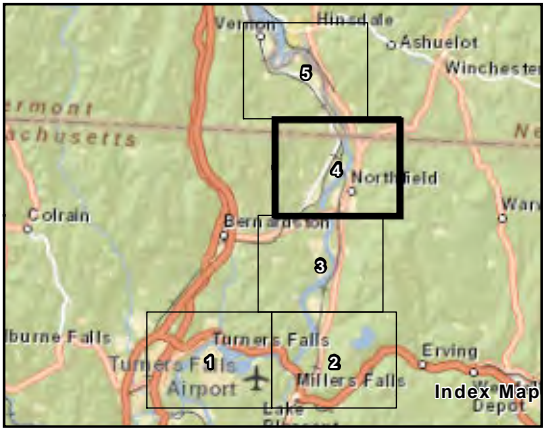


Service Layer Credits: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012



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**FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN**

**Figure 3.7.1-4  
Proposed Area of Potential Effect  
(Archaeology)**

**Legend**

 Proposed Area of Potential Effect\*

\* Proposed Area of Potential Effect defined by 10 meter offset from Normal High Water Mark.



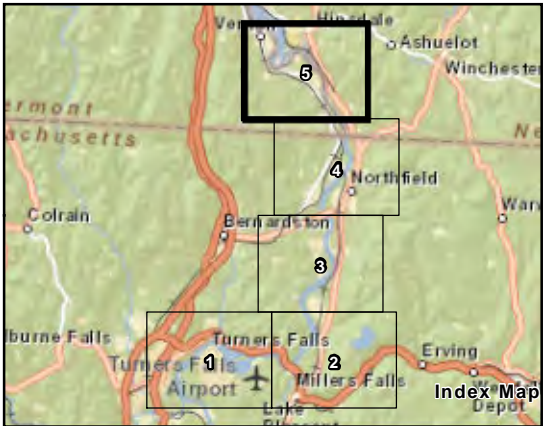
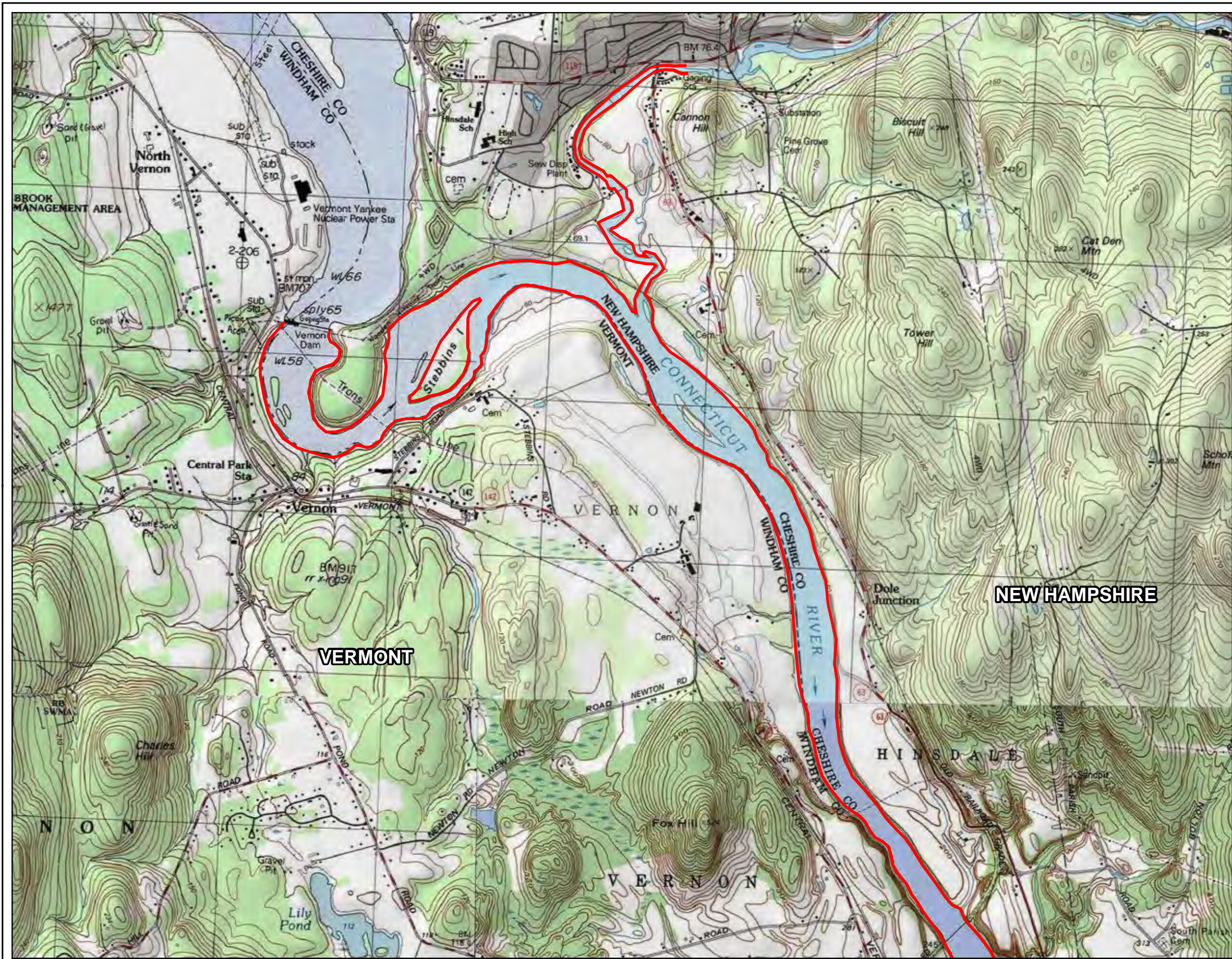
Service Layer Credits: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012

0 1,000 2,000 4,000 Feet

1 inch = 2,000 feet









**FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN**

**Figure 3.7.1-5  
Proposed Area of Potential Effect  
(Archaeology)**

**Legend**

 Proposed Area of Potential Effect\*

\* Proposed Area of Potential Effect defined by 10 meter offset from Normal High Water Mark.



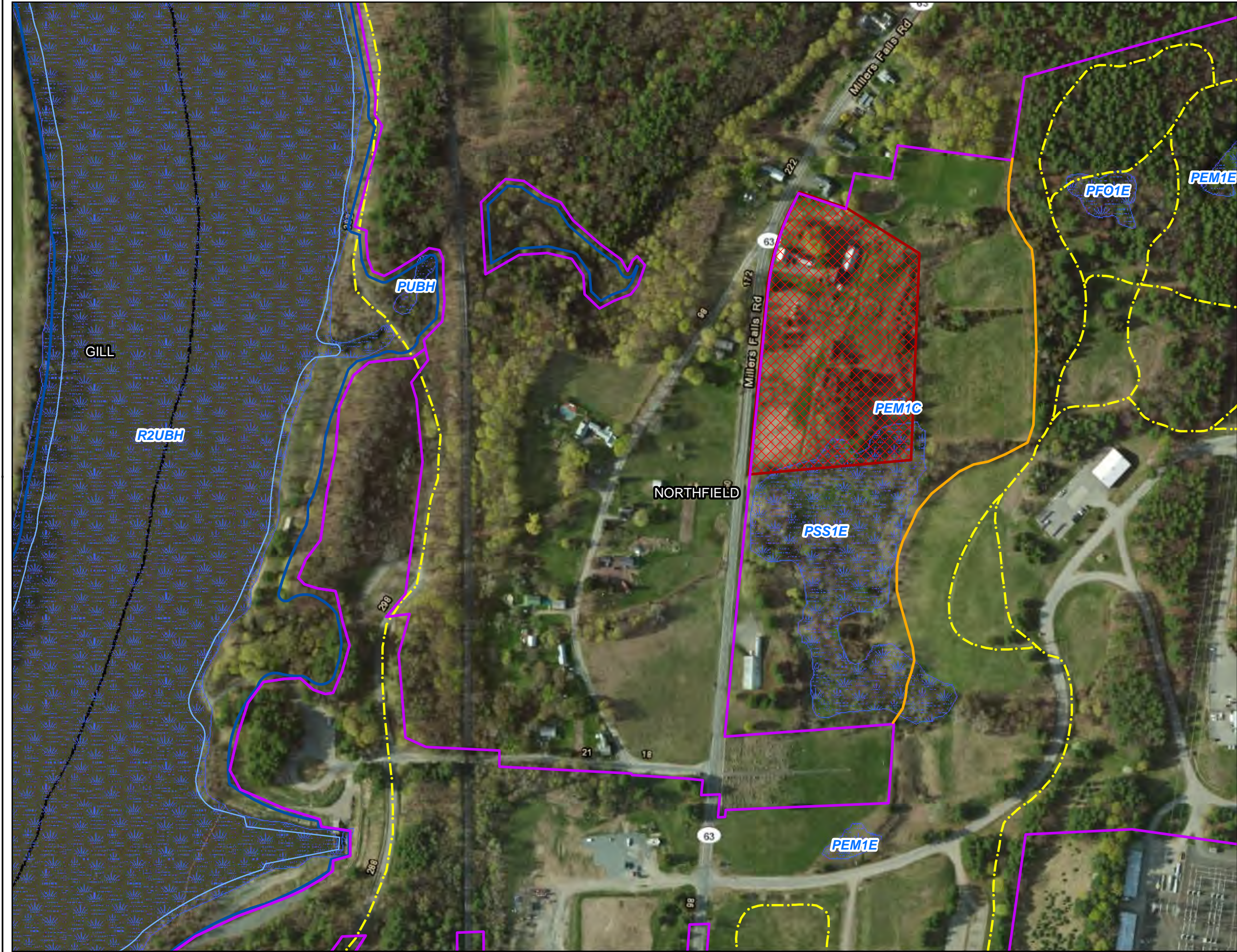
Service Layer Credits: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012

0 1,000 2,000 4,000 Feet

1 inch = 2,000 feet



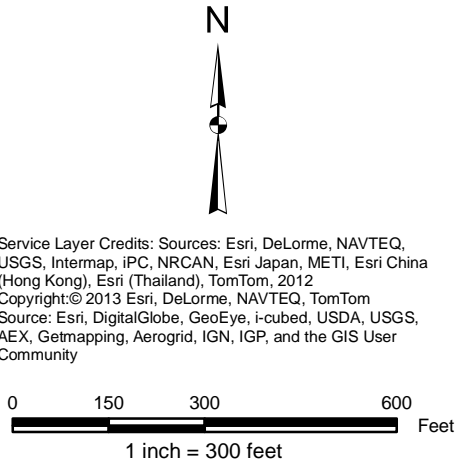




FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN

Figure 3.7.1-6  
Fuller Farm Property Location

- Legend**
- Northfield/Turners Falls Project Boundary
  - Farm Property
  - Project Trail
  - Agricultural Buffer
  - Town Boundary
  - NWI Wetland
  - Water Elevation
    - Maximum
    - Minimum



Service Layer Credits: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012  
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Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, and the GIS User Community



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99 Millers Falls Road  
Northfield, MA 01360  
Ph: (413) 659-4489  
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Email: [john.howard@gdfsuezna.com](mailto:john.howard@gdfsuezna.com)

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

March 31, 2014

Ms. Bettina Washington  
Tribal Historic Preservation Officer  
Wampanoag Tribe of Gay Head  
20 Black Brook Rd  
Aquinnah, MA 02535-1546

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

Dear Ms. Washington:

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 effects of relicensing of the Projects on historic properties. The 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 investigations 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 is depicted on Appendix 1.

FirstLight initiated the relicensing process on October 30, 2012 when it filed its Pre-Application Document (PAD) with the Commission and distributed the PAD to federal, state, and local agencies, interested non-governmental organizations, and to six Native American tribes, including the Wampanoag Tribe of Gay Head. On November 14, 2012, the Commission sent a letter to Cheryl Andrews-Maltais, Chairwoman of the Wampanoag Tribe of Gay Head (Tribe) inquiring about the Tribe's interest in the relicensing of these projects and providing an opportunity to meet with Commission staff to initiate communications between tribal and commission staffs.

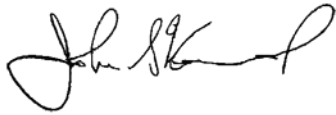
On December 6, 2012, Ken Hogan of the Commission staff followed up on the November 14<sup>th</sup> letter and left a voicemail for the Chairwoman. On December 28, 2012, Mr. Hogan left a second voicemail message for the Chairwoman, inquiring about the Tribe's interest in the Commission's relicensing



process for the above mentioned project and sent the Chairwoman (via email) the Commission's National Environmental Policy Act Scoping Document (issued on December 21, 2012).

In connection with our obtaining a state archaeological investigation permit from the Massachusetts Historical Commission (MHC), MHC has recently asked that we contact you to notify you of the impending archaeological investigations. If you would like additional information about the archaeological investigations, or would like to participate in this study, please contact Tim Sara at TRC by phone at 301-306-6981 or by email at [TSara@trcsolutions.com](mailto:TSara@trcsolutions.com) at your earliest convenience, as FirstLight intends to begin field work later this spring.

Sincerely,

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

John Howard

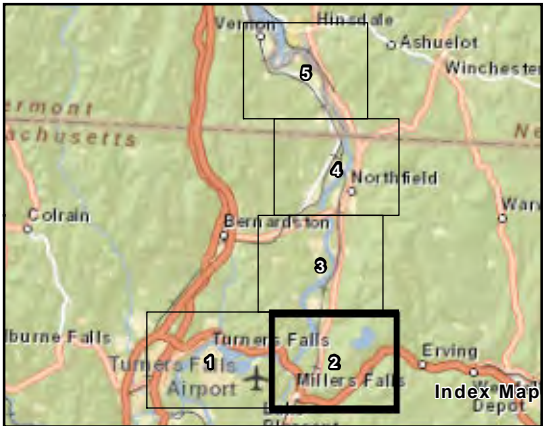
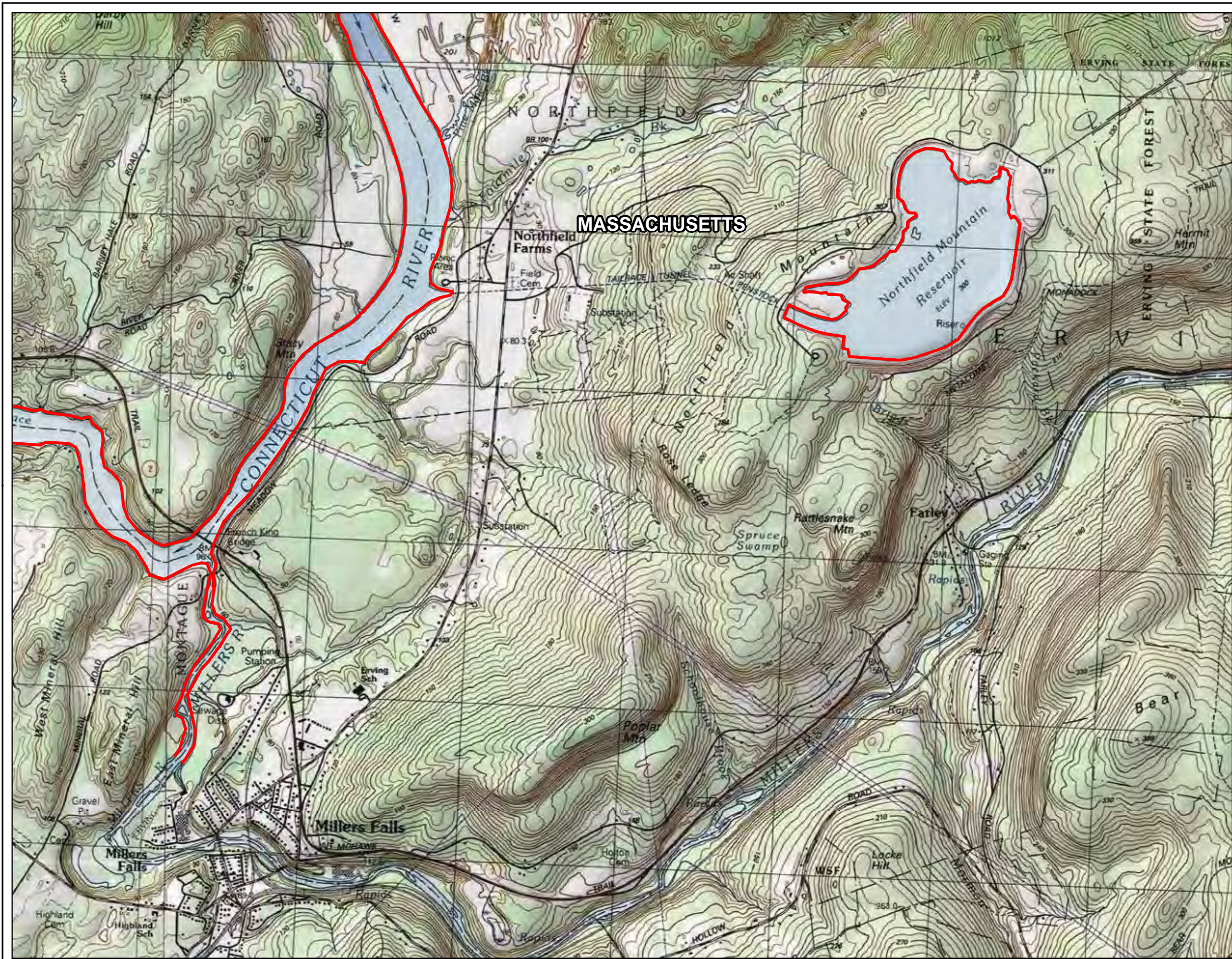
Cc: Federal Energy Regulatory Commission  
Massachusetts Historical Commission

Encl.










**FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN**

**Figure 3.7.1-2  
Proposed Area of Potential Effect  
(Archaeology)**

**Legend**

 Proposed Area of Potential Effect\*

\* Proposed Area of Potential Effect defined by 10 meter offset from Normal High Water Mark.

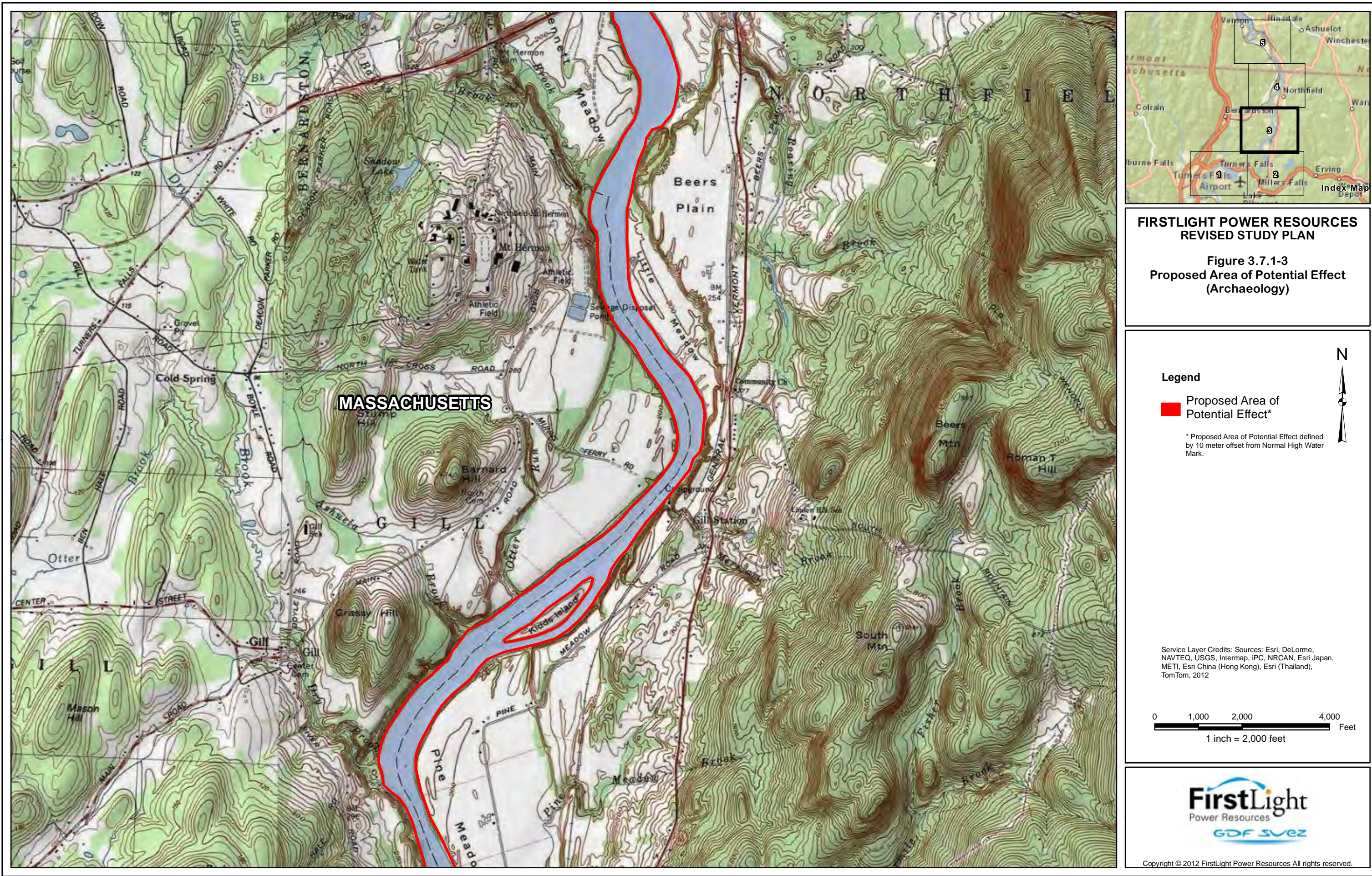
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1 inch = 2,000 feet

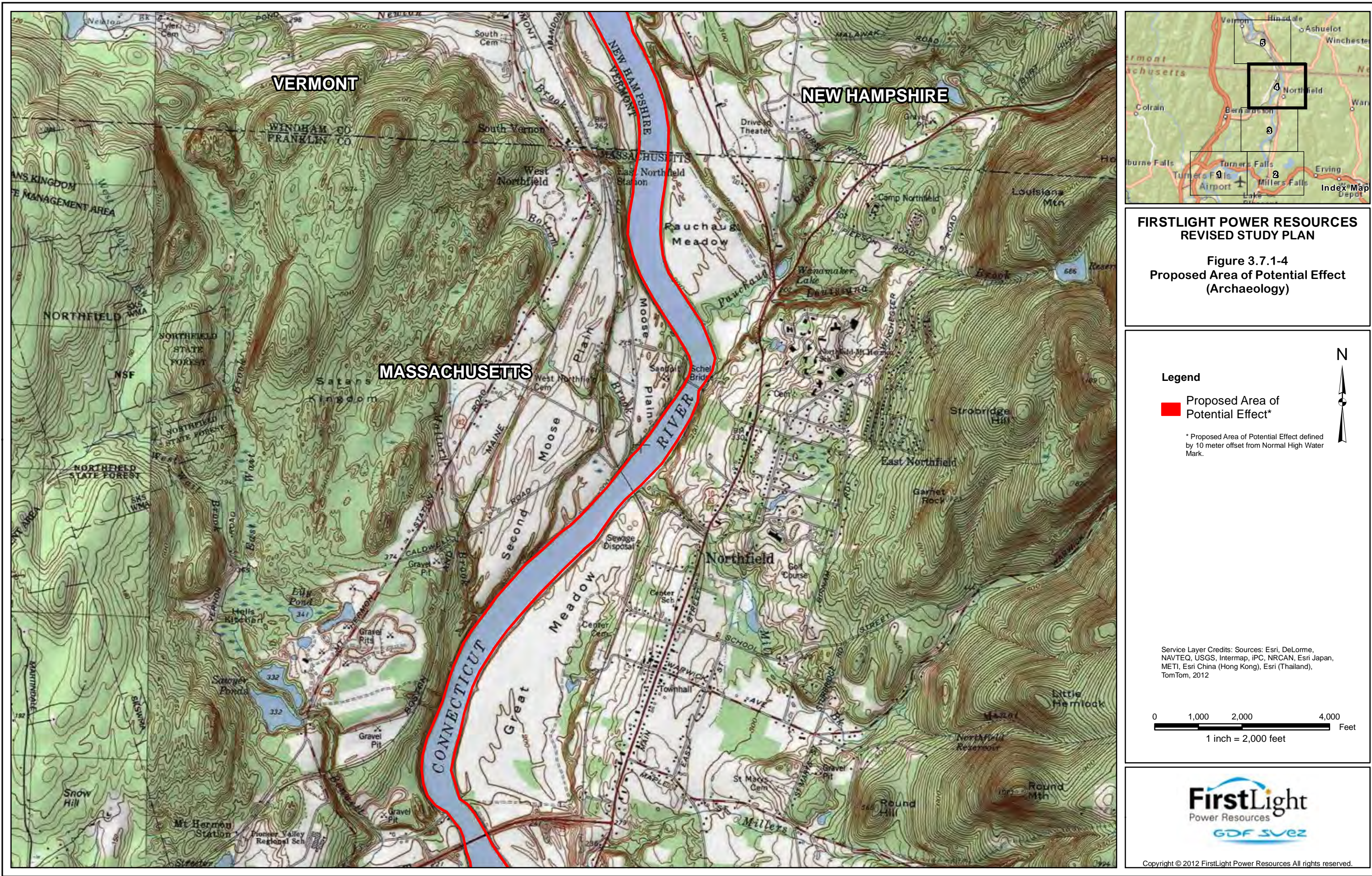


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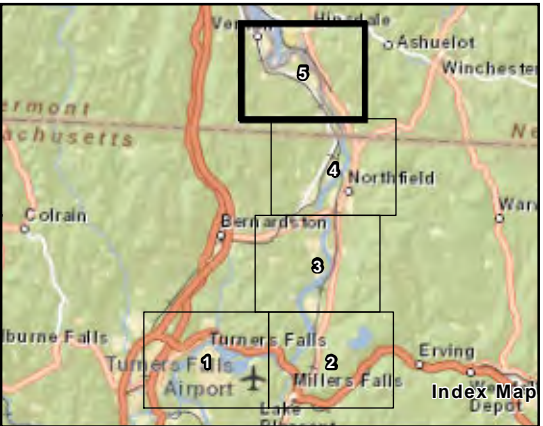
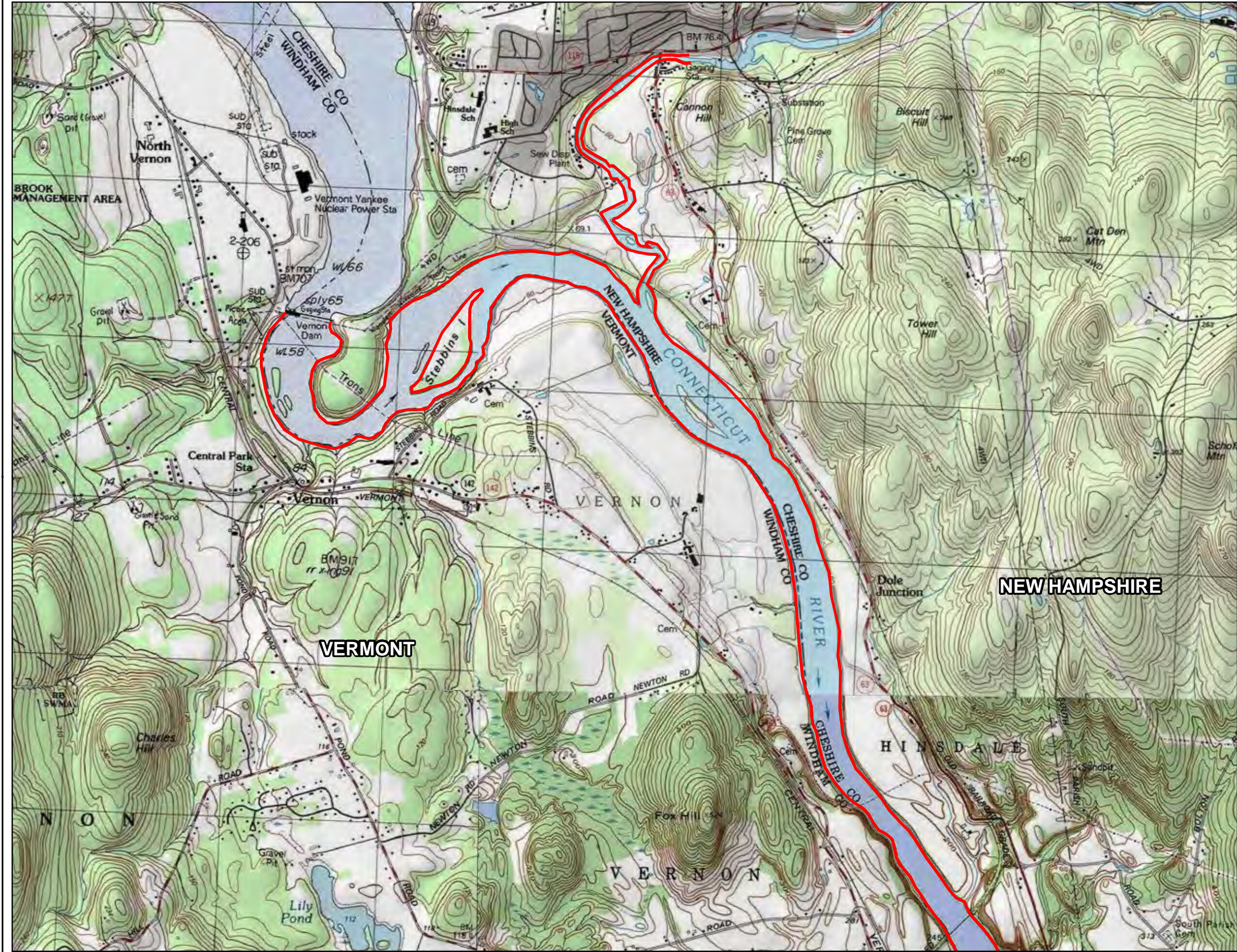












FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN

Figure 3.7.1-5  
Proposed Area of Potential Effect  
(Archaeology)

Legend

Proposed Area of  
Potential Effect\*

\* Proposed Area of Potential Effect defined  
by 10 meter offset from Normal High Water  
Mark.

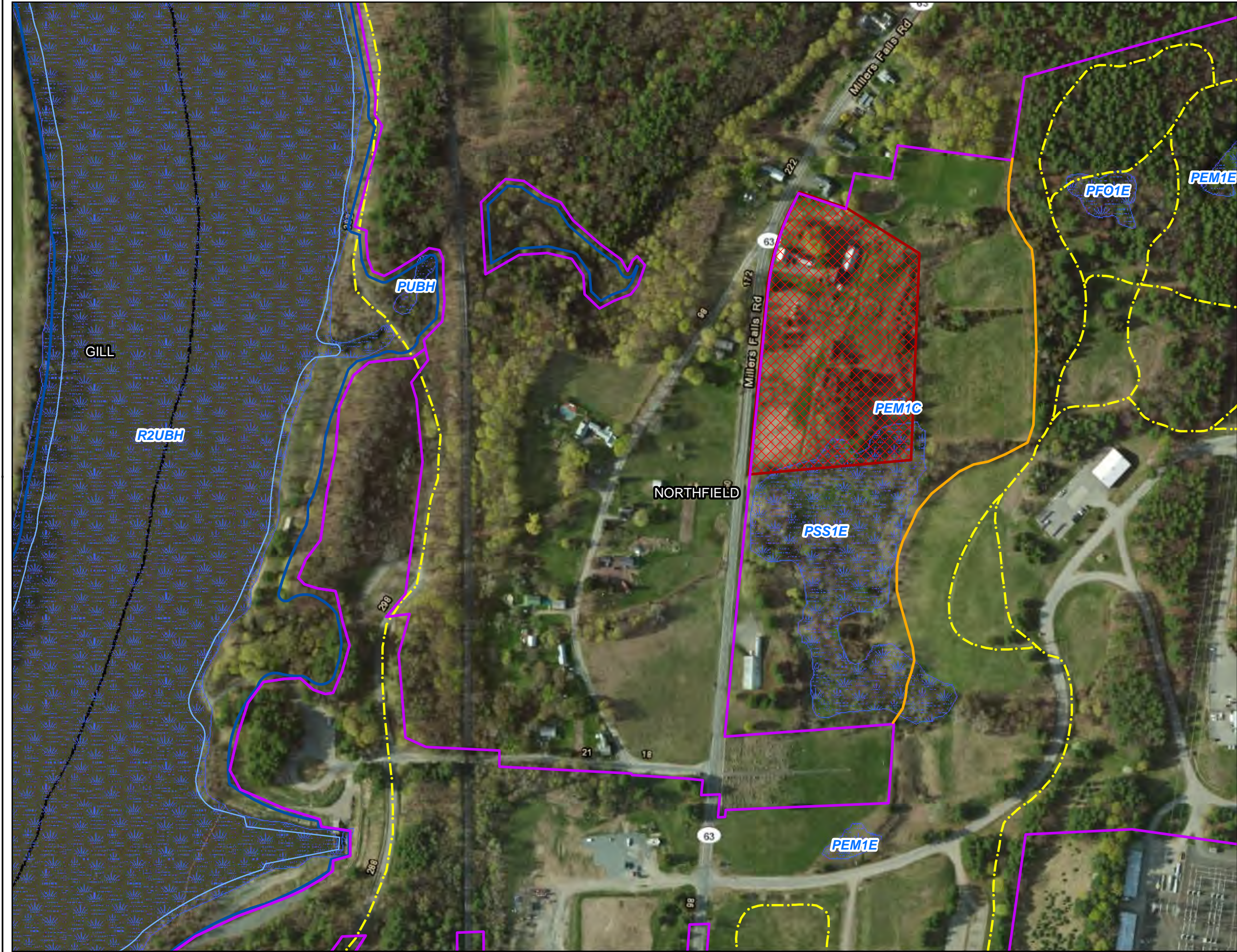
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NAVTEQ, USGS, Intermap, IPC, NRCAN, Esri Japan,  
METI, Esri China (Hong Kong), Esri (Thailand),  
TomTom, 2012

0 1,000 2,000 4,000  
Feet  
1 inch = 2,000 feet



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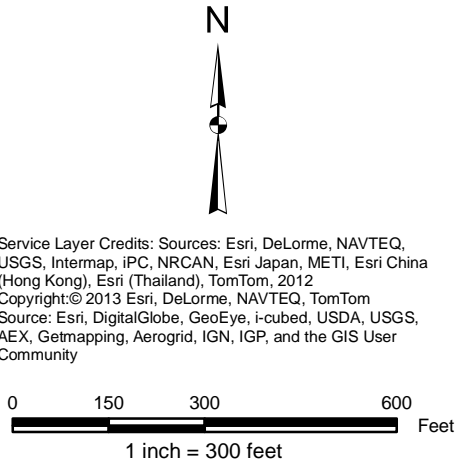




**FIRSTLIGHT POWER RESOURCES  
REVISED STUDY PLAN**

**Figure 3.7.1-6  
Fuller Farm Property Location**

- Legend**
- Northfield/Turners Falls Project Boundary
  - Farm Property
  - Project Trail
  - Agricultural Buffer
  - Town Boundary
  - NWI Wetland
  - Water Elevation
    - Maximum
    - Minimum



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