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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 that reads "Joe Graveline". The signature is written in a cursive style with a large, looping initial "J".

**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**

Document Content(s)

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