

Relicensing Study 3.7.3

TRADITIONAL CULTURAL PROPERTIES STUDY

Study Report

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

Prepared for:



Prepared by:



MARCH 2015

EXECUTIVE SUMMARY

FirstLight Hydro Generating Company (FirstLight), a subsidiary of GDF SUEZ North America, Inc., is the current licensee of the Northfield Mountain Pumped Storage Project (Northfield Mountain Project, FERC No. 2485) and the Turners Falls Hydroelectric Project (Turners Falls Project, FERC No. 1889). FirstLight has initiated with the Federal Energy Regulatory Commission (FERC, the Commission) the process of relicensing the two Projects using the FERC's Integrated Licensing Process (ILP). The current licenses for the Northfield Mountain and Turners Falls Projects were issued on May 14, 1968 and May 5, 1980, respectively, with both set to expire on April 30, 2018. This report documents the results of Study No. 3.7.3 *Traditional Cultural Properties Study*.

For the relicensing, FERC issued its first study plan determination letter (SPDL) for the Turners Falls and Northfield Projects on September 13, 2013, approving the revised study plan (RSP) with certain modifications¹. FERC's SPDL required FirstLight to conduct a Traditional Cultural Properties (TCP) Study, which is the subject of this report. The objective of the TCP study is to document any 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 adverse effects to such properties from the continuing operation and maintenance of the Projects. The APE as defined by FERC includes "all lands within the current FERC Project Boundary in addition to any other lands outside the FERC Project Boundary where historic properties could be affected by project - related adverse effects. On lands adjacent to the project boundaries, the APE would also include an additional 10 meters (33 feet) of lands inland from the top of banks of the Connecticut River and associated tributaries."

A TCP investigation is conducted through consultation with the people who identify and associate such historic properties of religious and cultural significance in an on-going fashion to maintain their cultural identity. In this case, the RSP envisioned consultation, including interviews and a field visit with the Narragansett Indian Nation (NIT) and the Nolumbeka Project, to document TCPs in the Projects' APE. FirstLight contacted the NIT and the Nolumbeka Project numerous times in 2014 to initiate tribal consultation and documentation of TCPs. Despite these attempts, interviews and a field visit with Tribal members to document TCPs have not occurred because the NIT and the Nolumbeka Project have not responded to FirstLight's requests for a meeting. Consequently, the consultation did not result in the identification of any TCPs within the Projects' APE.

Background research conducted in accordance with the RSP identified one NRHP listed TCP in the Project vicinity. The TCP is located at the Turners Falls Municipal Airport, Franklin County, Massachusetts. Known as the Turners Falls Sacred Ceremonial Hill Site, it consists of four visible stone piles and an extended row of stacked stones. No NRHP listed TCPs in the Projects' APE were identified.

¹ FERC issued a second SPDL on February 21, 2014, but it applied primarily to the aquatic studies.

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LIST OF ABBREVIATIONS

| | |
|-------|--|
| APE | Area of Potential Effect |
| FERC | Federal Energy Regulatory Commission |
| IAIS | Institute for American Indian Studies |
| ILP | Integrated Licensing Process |
| MAS | Massachusetts Archaeological Society |
| MHC | Massachusetts Historical Commission |
| MCIA | Massachusetts Commission on Indian Affairs |
| NHDHR | New Hampshire Division of Historical Resources |
| NIT | Narragansett Indian Tribe |
| NOI | Notice of Intent |
| NRHP | National Register of Historic Places |
| PAD | Pre-Application Document |
| PSP | Proposed Study Plan |
| RSP | Revised Study Plan |
| SD1 | Scoping Document 1 |
| SD2 | Scoping Document 2 |
| SHPO | State Historic Preservation Officer |
| SPDL | Study Plan Determination Letter |
| TCP | Traditional Cultural Property |
| THPO | Tribal Historic Preservation Officer |
| VDHP | Vermont Division of Historic Preservation |
| VY | Vermont Yankee Nuclear Power Plant |

1 INTRODUCTION

FirstLight Hydro Generating Company (FirstLight), a subsidiary of GDF SUEZ North America, Inc., is the current licensee of the Northfield Mountain Pumped Storage Project (Northfield Mountain Project, FERC No. 2485) and the Turners Falls Hydroelectric Project (Turners Falls Project, FERC No. 1889) (Figure 1.0-1). FirstLight has initiated with the Federal Energy Regulatory Commission (FERC, the Commission) the process of relicensing the Northfield Mountain and Turners Falls Projects using the FERC's Integrated Licensing Process (ILP). The current licenses for Northfield Mountain and Turners Falls Projects were issued on May 14, 1968 and May 5, 1980, respectively, and both expire on April 30, 2018.

As part of the ILP, FERC conducted a public scoping process during which various resource issues were identified. On October 31, 2012, FirstLight filed its Pre-Application Document (PAD) and Notice of Intent (NOI) with the FERC. The PAD included FirstLight's preliminary list of proposed studies. On December 21, 2012, FERC issued Scoping Document 1 (SD1) and preliminarily identified resource issues and concerns. On January 30 and 31, 2013, FERC held scoping meetings for the two Projects. FERC issued Scoping Document 2 (SD2) on April 15, 2013.

FirstLight filed its Proposed Study Plan (PSP) on April 15, 2013 and per the Commission regulations held a PSP meeting at the Northfield Visitors Center on May 14, 2013. Thereafter, FirstLight held ten resource-specific study plan meetings to allow for more detailed discussions on each PSP and on studies not being proposed. On June 28, 2013, FirstLight filed with the Commission an Updated PSP to reflect further changes to the PSP based on comments received at the meetings. On or before July 15, 2013, stakeholders filed written comments on the Updated PSP.

FirstLight filed a Revised Study Plan (RSP) on August 14, 2013 with FERC addressing stakeholder comments. On September 13, 2013, FERC issued its first Study Plan Determination Letter (SPDL) in which many of the studies were approved or approved with FERC modification. This study, Study No. 3.7.3-Traditional Cultural Properties Study, was approved by FERC with modification. Note that, due to the impending closure of Vermont Yankee (VY), FERC did not act on 19 proposed or requested studies pertaining to aquatic resources. The SPDL on these 19 studies was deferred until after FERC held a technical meeting with stakeholders on November 25, 2013 regarding any necessary adjustments to the proposed and requested study designs and/or schedules due to the impending VY closure. FERC issued its second SPDL on the remaining 19 studies on February 17, 2014, approving the RSP with certain modifications.

The Turners Falls and Northfield Mountain Projects encompass seven towns from three different states (Figures 1.0-2 through 1.0-6). In Massachusetts, five towns are in the Project area, all of which are located in Franklin County. From south to north, they include: Greenfield, Montague, Erving, Gill, and Northfield. In Vermont and New Hampshire, the towns include Vernon, Windham County, and Hinsdale,

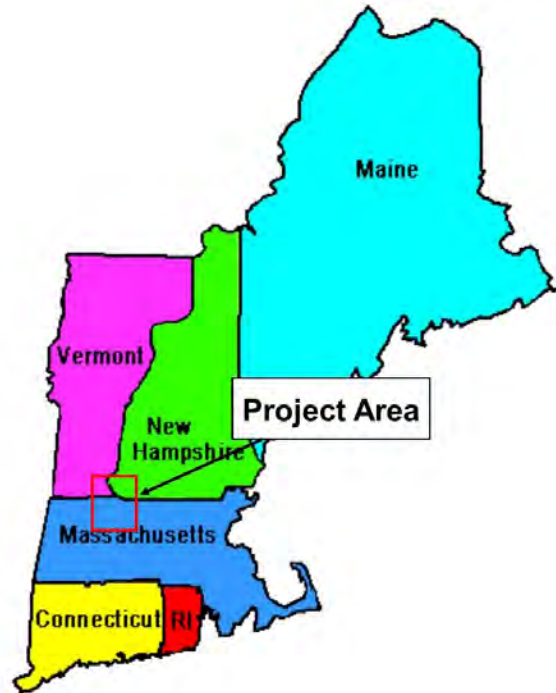


Figure 1.0-1. Map of New England showing the location of the First Light Project area

Cheshire County, respectively. The Northfield Mountain Storage Project is located entirely within the town of Erving, Franklin County, Massachusetts and sits atop Northfield Mountain.

The objective of this Traditional Cultural Properties (TCP) Study is to document any known TCPs listed in, or eligible for, listing in the 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. The study was performed by TRC. Richard Will, Ph.D. served as the Ethnographer for the study. Background research was performed by Dr. Will, Edward Moore, M.S., and Tim Sara, M.A. who served as Principal Investigator for the Phase IA Archaeological Reconnaissance Survey (Study No. 3.7.1).

1.1 Traditional Cultural Properties Study Methodology

As set forth in the RSP, the methodology for the TCP required consultation with the Vermont, New Hampshire, and Massachusetts State Historic Preservation Offices (SHPOs), the Narragansett Indian Tribe (NIT) Tribal Historic Preservation Officer (THPO), and the Nolumbeka Project with respect to development of a precise APE for the Projects, tribal consultation and documentation of TCPs, background research, and a field visit to the potential TCPs within the Projects' APEs.

1.1.1 Consultation on Development of the Projects' APEs

On October 31, 2013, a telephone conference was held among FirstLight, the Vermont and New Hampshire SHPOs, the Nolumbeka Project, and the Connecticut River Watershed Council (CWRC) to discuss finalization of the APE. The Massachusetts SHPO and the NIT were also invited to participate in the conference call but did not attend. By letter dated November 27, 2013, FERC issued a letter confirming that consultation had taken place and seeking concurrence on the definition of the APE as discussed in the October 2013 teleconference. 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.

The APE as defined by FERC includes “*all lands within the current FERC Project Boundary in addition to any other lands outside the FERC Project Boundary where historic properties could be affected by project - related adverse effects. On lands adjacent to the project boundaries, the APE would also include an additional 10 meters (33 feet) of lands inland from the top of banks of the Connecticut River and associated tributaries*” ([Figures 1.0-2 through 1.0-6](#)).

1.1.2 Tribal Consultation and Documentation of TCPs, and Associated Field Visit

A TCP is a property that is eligible for inclusion in the NRHP because of its association with the cultural practices or beliefs of a living community that 1) is rooted in the community's history, and 2) is important in maintaining the continuing cultural identity of the community ([Parker & King, 1990](#); [Parker, 1993](#)). There are three TCP categories. The first is a location that is associated with traditional beliefs about origins, cultural history, or nature of the world. The second type of property is a location where religious practitioners have gone historically and are known to go today to perform ceremonial activities in accordance with traditional cultural rules or practice. The final type is a location where a community carries out economic, artistic, or other cultural practices important to maintaining its historic identity

Importantly, a TCP must be categorized as a building, structure, object, site, or district. The TCP may be defined as a site so long as it is the location of a significant event or activity, regardless of whether the event or activity left any evidence of its occurrence. A culturally significant natural landscape also may be identified as a TCP. Even a natural object, such as a tree or rock outcrop may be eligible as a TCP if it is associated with a significant tradition or use. The fishing docks used by the Tuscarora Indians on the Niagara River in western New York are a good example of a potential TCP ([Will, 2005](#)), although the fishing docks were eventually listed as a site rather than as a TCP ([Herter, 2012](#)). For eligibility to the

NRHP, a TCP must meet one or more of the eligibility criterion (A, B, C, and D) as defined by the NRHP ([Andrus & Shrimpton, 1990](#)).

Finally, significance of a TCP is determined by the community that values it. In general, the TCP should be important in maintaining traditions over the past 50 years. Use of a TCP does not have to be continuous, but there should at least be a pattern of use or continued value ([Parker & King, 1990](#)).

Consequently, a TCP investigation is conducted through consultation with the people who identify and associate such historic properties of religious and cultural significance in an on-going fashion to maintain their cultural identity.

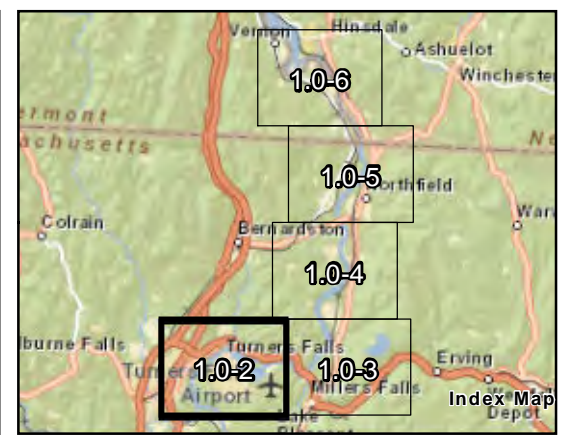
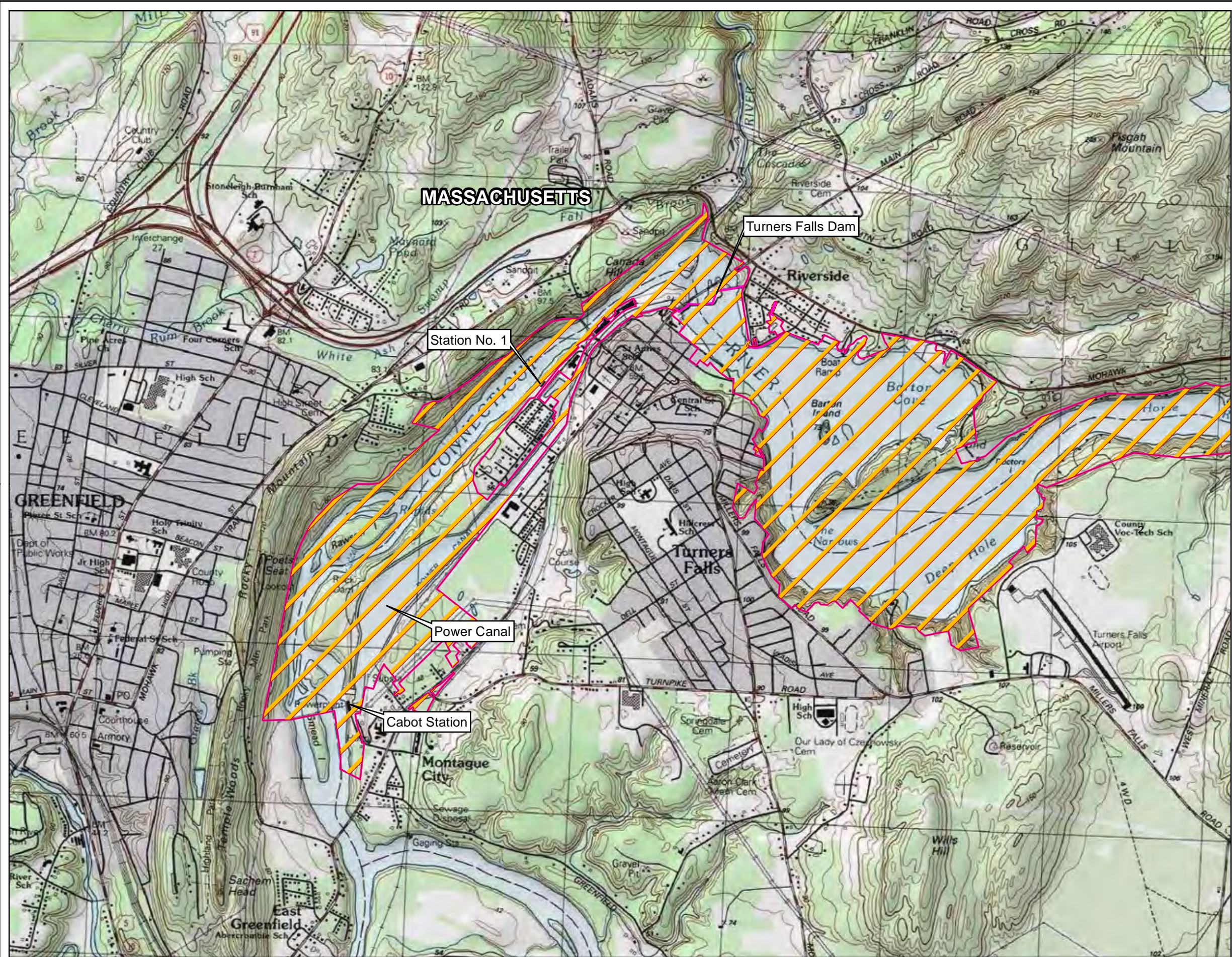
It involves multiple interviews between the ethnographer and tribal members who are willing to share tribal information on TCPs. The oral traditions and information collected during the interviews are used to help document the potential TCPs. It may also involve a field visit between the ethnographer and Tribal members to the potential TCPs to enable the ethnographer to obtain additional information to assist in the evaluation of the potential TCPs.

In order to continue the process of documentation of potential TCPs in accordance with the FERC-approved study plan, on January 20, 2014, FirstLight contacted the NIT Deputy THPO by telephone to request a meeting with the NIT and the Nolumbeka Project.² The NIT requested that FirstLight make its request for a meeting in writing. Accordingly, on January 31, 2014, FirstLight submitted a written request to the NIT and the Nolumbeka Project requesting a meeting. On March 31, 2014, FirstLight sent a letter 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 being conducted in connection with the Projects' relicensing efforts. 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 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. The Nolumbeka Project responded to FirstLight's March 31, 2014 correspondence by letter dated April 15, 2014, stating that in addition to setting up a meeting to discuss the initiation of the TCP study and meet FirstLight's proposed ethnographer, the Nolumbeka Project felt that a meeting was needed to discuss its lack of funding to support its own research. In response to correspondence from FERC and the Nolumbeka Project's letter to FirstLight dated April 15, 2014, on April 24, 2014, FirstLight sent a letter 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. All letters from FirstLight to the NIT and Nolumbeka Project were sent certified mail, return receipt requested. They are included in [Appendix A](#). 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 his earlier requests that FirstLight provide funding for the NIT to conduct its own archaeological and TCP studies and for a number of initiatives. These included requests for funds to build a database, to participate in botanical studies to help identify traditional plants and medicinal herbs, and for a feasibility study, which would assess, among other items, the establishment of an inter-tribal facility in the Town of Montague. 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



² The NIT and the Nolumbeka Project have been consulted since the onset of the relicensing process during which timeframe the NIT had identified one listed TCP in the Projects' vicinity.

else and would call the ethnographer back. There has been no communication from the NIT Deputy THPO since the August 11, 2014 phone call. Subsequent correspondence to the NIT relating to FirstLight's Phase IA archaeological survey has been returned to FirstLight from the U.S. Postal Service unclaimed. FirstLight, thus, has been unable to conduct interviews or a field visit with Tribal members to document and evaluate potential TCPs with the Projects' APE.



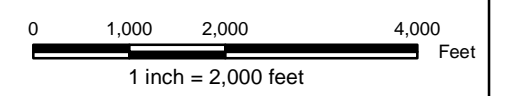
FIRSTLIGHT POWER RESOURCES
Figure 1.0-2
Area of Potential Effect (APE)
 USGS 7.5 Minute Quadrangle maps, depicting the central portion of the Turners Falls Hydroelectric Project Area of Potential Effect (APE) Segments in Massachusetts

Legend

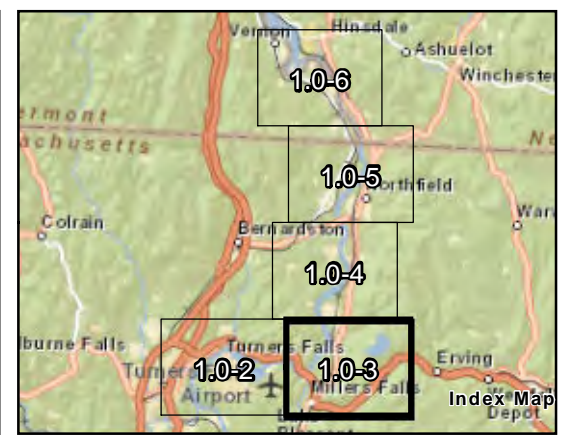
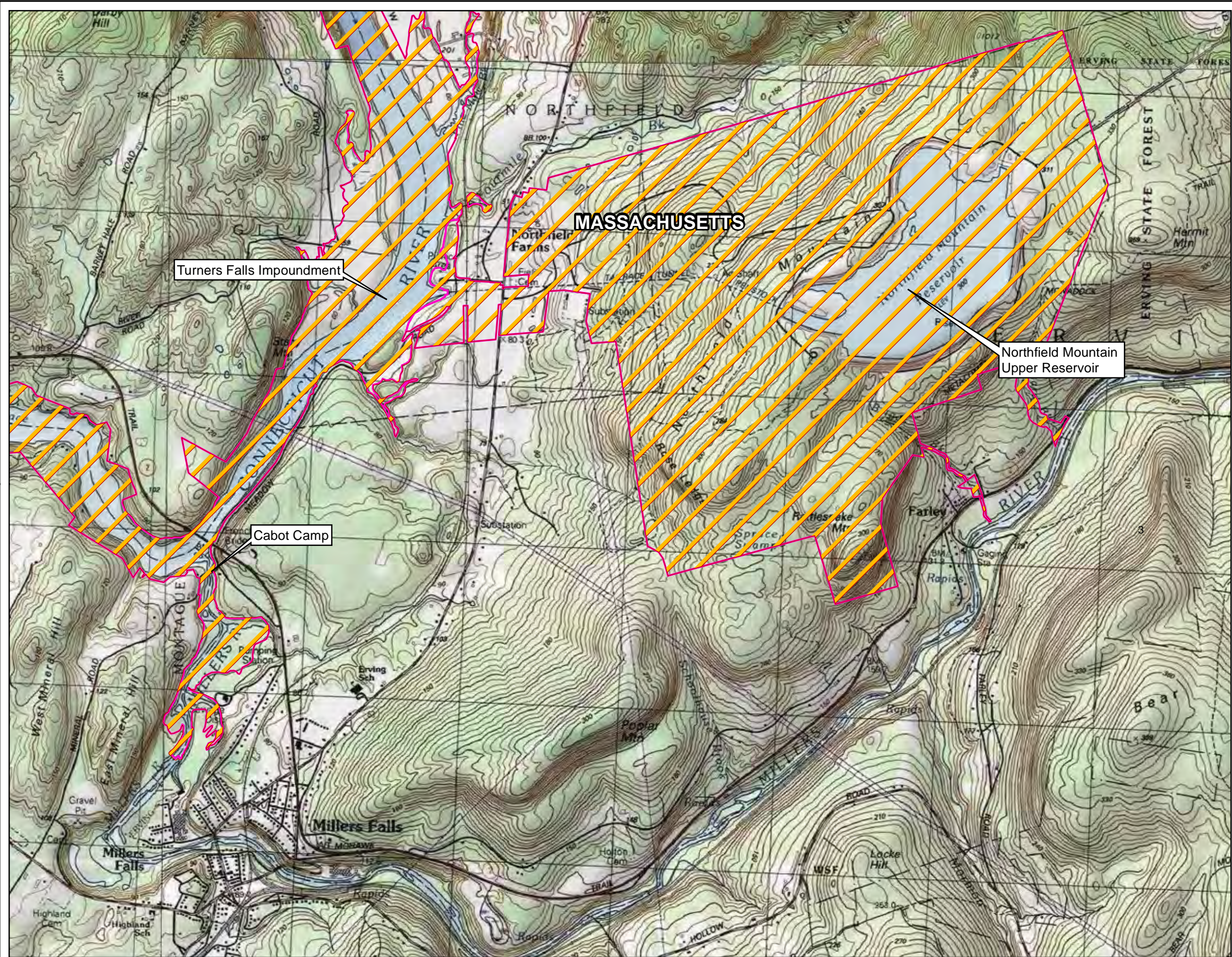
-  Area of Potential Effect*
-  Project Boundary

* Final Area of Potential Effect defined by Northfield Mountain/Turners Falls Project Boundary

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FIRSTLIGHT POWER RESOURCES
Figure 1.0-3
Area of Potential Effect (APE)
 USGS 7.5 Minute Quadrangle maps, depicting the central portion of the Turners Falls Hydroelectric Project Area of Potential Effect (APE) Segments in Massachusetts

Legend

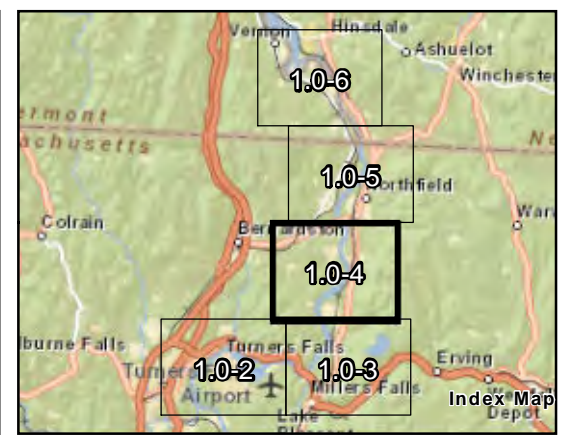
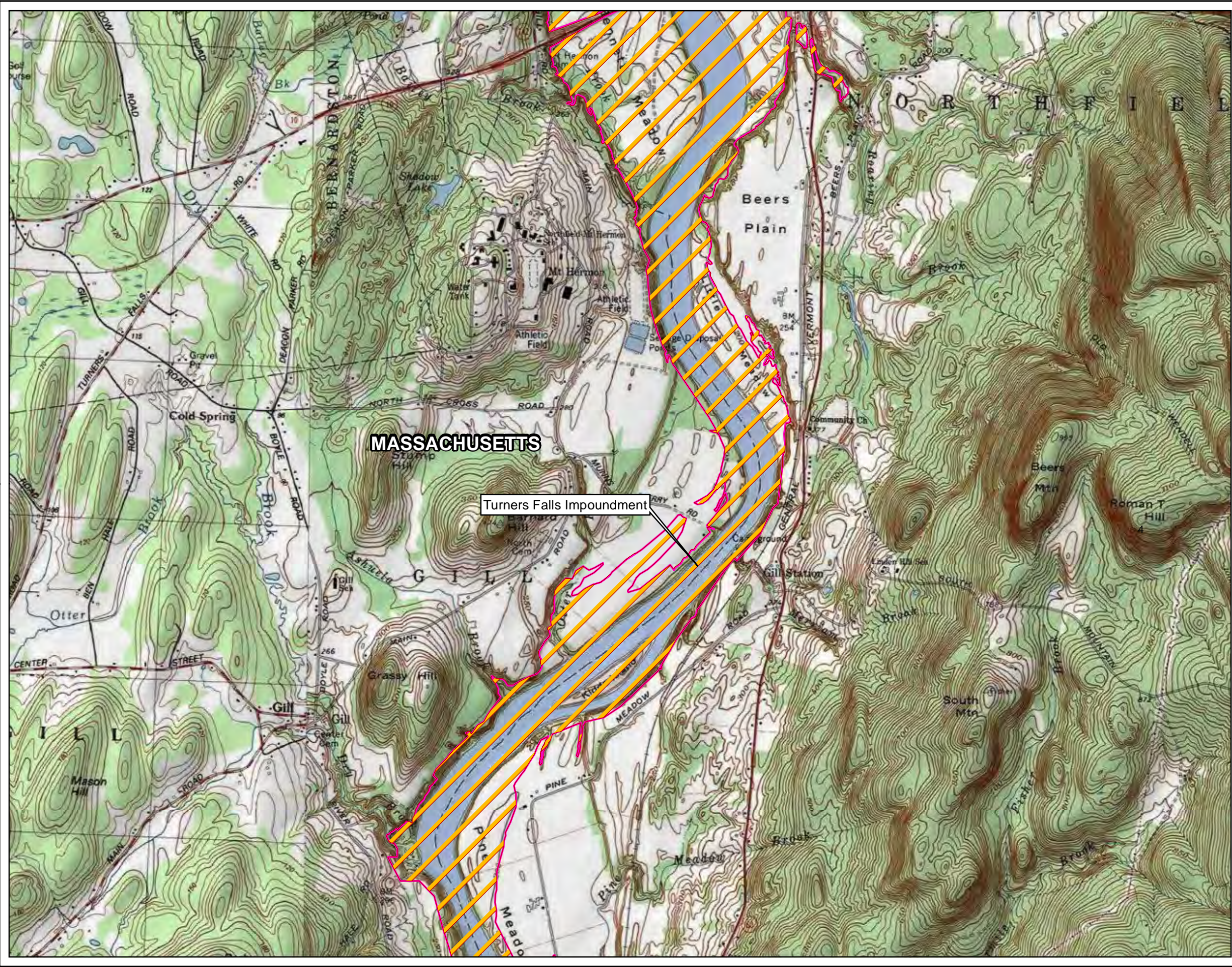
- Area of Potential Effect*
- Project Boundary

* Final Area of Potential Effect defined by Northfield Mountain/Turners Falls Project Boundary

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 1 inch = 2,000 feet

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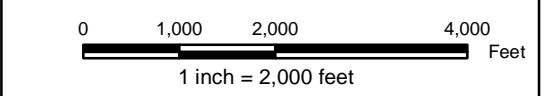
FIRSTLIGHT POWER RESOURCES
Figure 1.0-4
Area of Potential Effect (APE)
 USGS 7.5 Minute Quadrangle maps, depicting the central portion of the Turners Falls Hydroelectric Project Area of Potential Effect (APE) Segments in Massachusetts

Legend

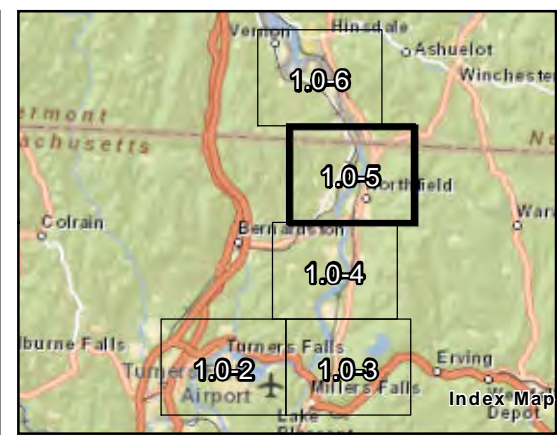
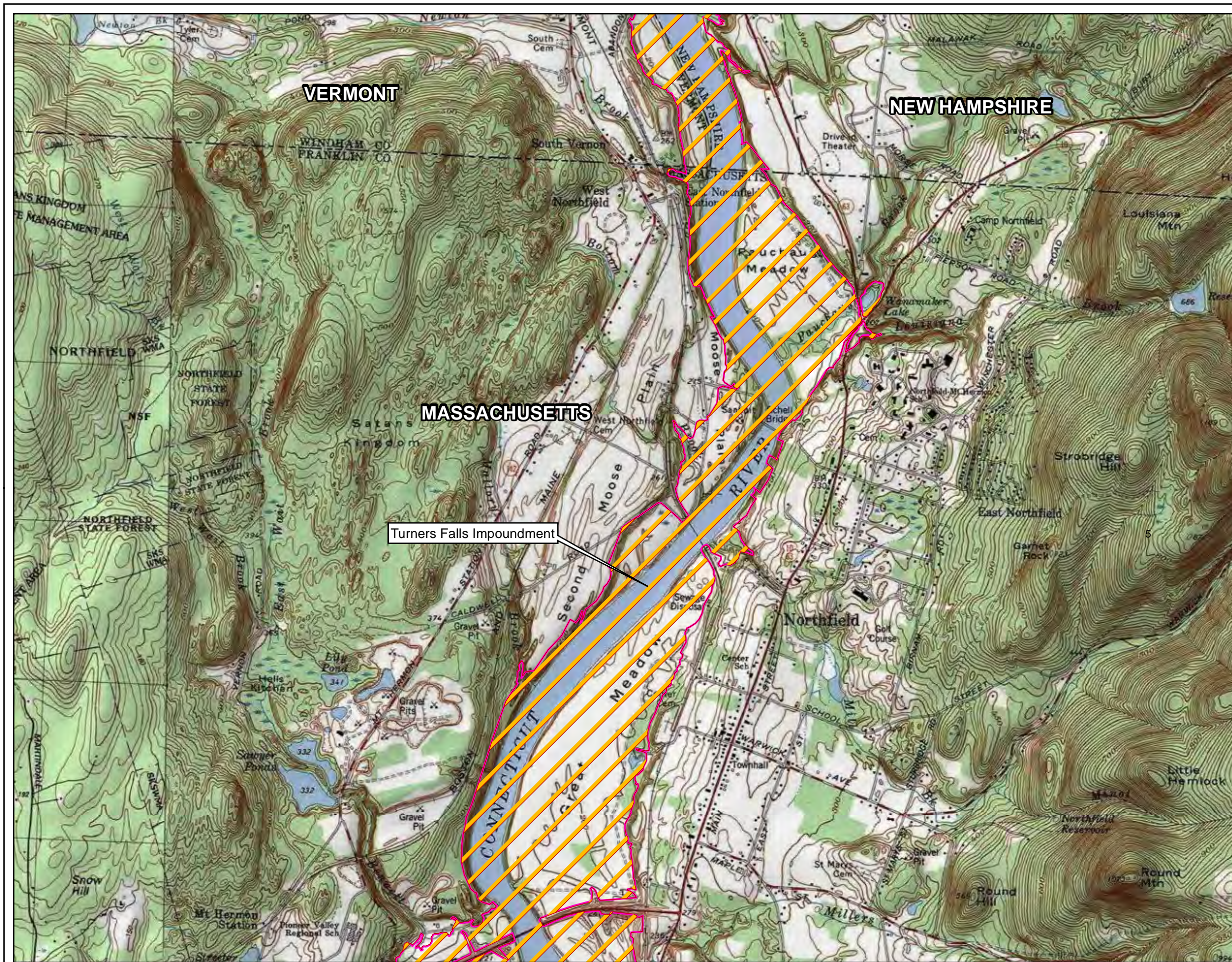
-  Area of Potential Effect*
-  Project Boundary

* Final Area of Potential Effect defined by Northfield Mountain/Turners Falls Project Boundary

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FIRSTLIGHT POWER RESOURCES
Figure 1.0-5
Area of Potential Effect (APE)
 USGS 7.5 Minute Quadrangle maps, depicting the central portion of the Turners Falls Hydroelectric Project Area of Potential Effect (APE) Segments in Massachusetts, Vermont, and New Hampshire

Legend

-  Area of Potential Effect*
-  Project Boundary

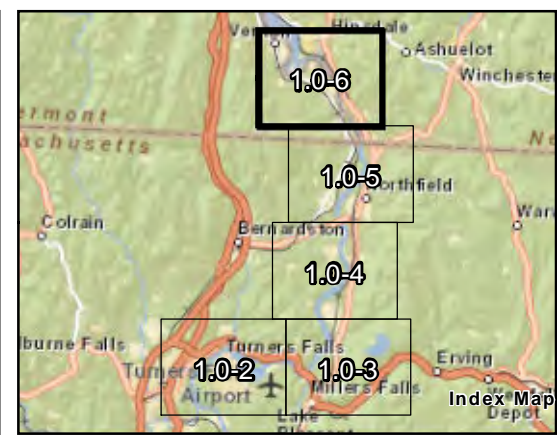
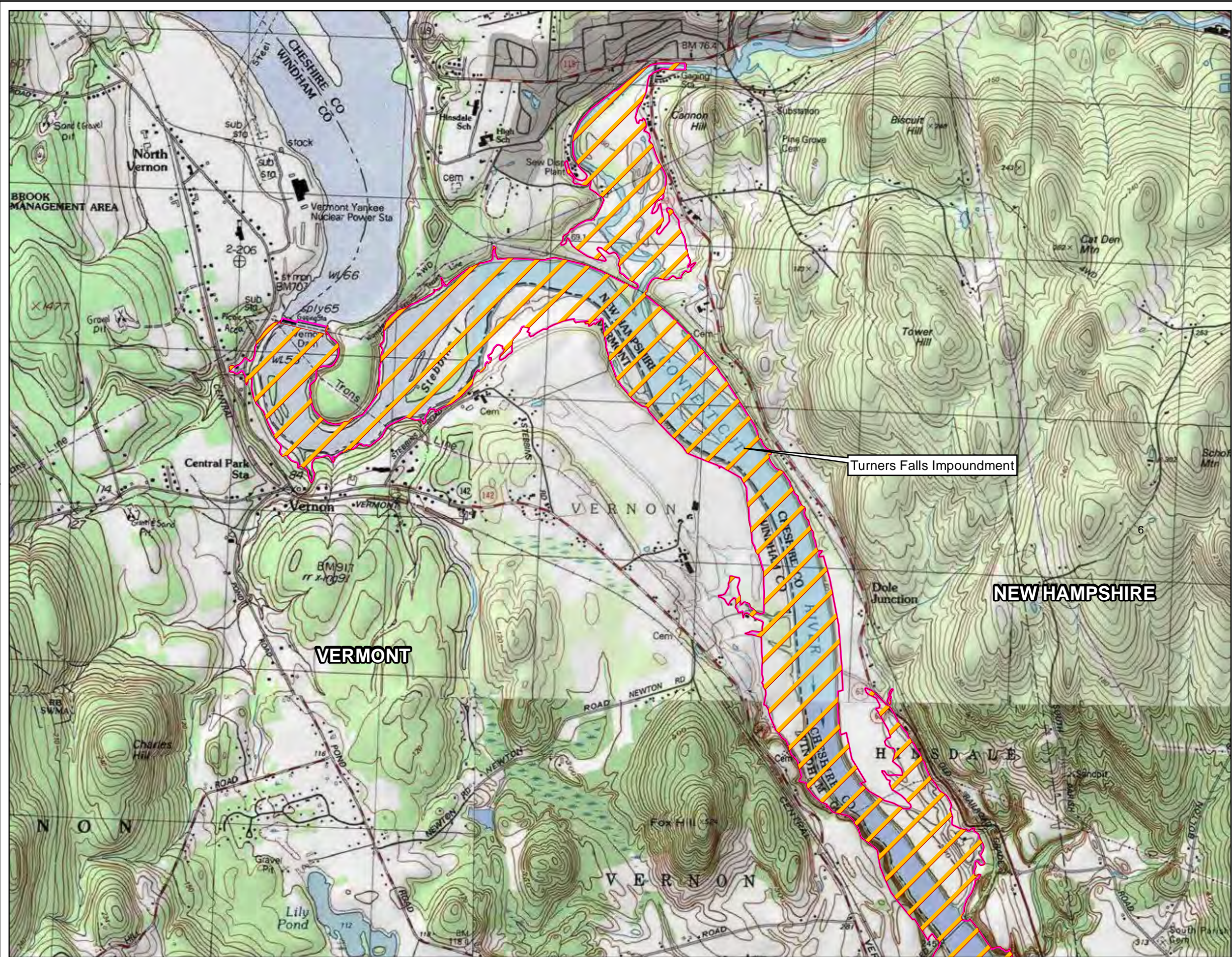
* Final Area of Potential Effect defined by Northfield Mountain/Turners Falls Project Boundary

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 1 inch = 2,000 feet



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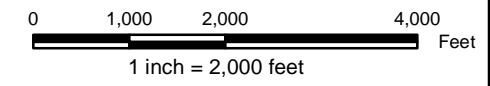
FIRSTLIGHT POWER RESOURCES
Figure 1.0-6
Area of Potential Effect (APE)
 USGS 7.5 Minute Quadrangle maps, depicting the central portion of the Turners Falls Hydroelectric Project Area of Potential Effect (APE) Segments in Massachusetts, Vermont, and New Hampshire

Legend

- Area of Potential Effect*
- Project Boundary

* Final Area of Potential Effect defined by Northfield Mountain/Turners Falls Project Boundary

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2 BACKGROUND RESEARCH

The methods of archival research initially involved a search of state files at the offices of the Massachusetts, NH, and VT SHPOs to identify known TCPs in the Project vicinity. In the summer of 2014, background research was conducted by Edward Moore and other TRC personnel, which included research at local repositories and interviews with persons knowledgeable of the cultural history of the area. Included in these consultations were local historical commissions, historical societies, the libraries of the towns of Erving, Gill, Greenfield, Montague, and Northfield, the Massachusetts Archaeological Society (MAS), the Pocumtuck Valley Memorial Association, the Great Falls Discovery Center, and the Springfield Museums. Also contacted were the Institute for American Indian Studies (IAIS), the Massachusetts Commission on Indian Affairs (MCIA), as well as the THPOs of the Mashpee Wampanoag Tribe, the Stockbridge-Munsee Band of Mohican Indians, and the Wampanoag Tribe of Gay Head (Aquinnah) of Massachusetts, the NIT, and the Nolumbeka Project (see [Sara et al. 2014](#) and [Appendix B](#)). In addition, Dr. Will conducted internet research to determine whether there were any known TCPs in the Project vicinity.

The research identified one NRHP listed TCP in the Project vicinity, which is located at the Turners Falls Municipal Airport, Franklin County, Massachusetts. Known as the Turners Falls Sacred Ceremonial Hill Site, it consists of four visible stone piles and an extended row of stacked stones. Initially, the Massachusetts SHPO assessed the site as not eligible for listing to the NRHP in 2008. This decision was later overturned by the Secretary of the Interior based on a variety of documents, consultation with tribal spokespersons, THPOs, and oral history that was not submitted with the original nomination. The property was listed under Criteria A and D for its association with events that have made a significant contribution to the broad patterns of Narragansett, Aquinnah-Wampanoag, and Mashpee-Wampanoag history ([U.S. Department of the Interior 2008](#)).

Online research was also completed that involved entering keys words (or acronyms) into Google search engine to locate web addresses that might have useful information for the TCP study. Key words included: ACHP, ceremonial, cultural landscapes, Massachusetts, National Register of Historic Places (NRHP), Narragansett, Nolumbeka, New England, northeast, ritual, spiritual, and stone piles. These entries were searched individually or in one, two, or three word combinations. The addresses for the various websites that were visited appear at the end of the “References Cited” section. They fall into three categories.

- The first category is largely composed of federal government websites that provide information on the identification and assessment of TCPS or sites of religious and/or ceremonial significance. Other topics addressed include Native American consultation. These websites are largely maintained either by the National Parks Service or the Advisory Council on Historic Preservation. These are the websites most often consulted by people working with Section 106 of the National Historic Preservation Act to ensure proper guidance for conducting cultural resources investigations on projects that require federal review.
- The second category of websites includes those for TCPs identified as eligible for listing in the NRHP. There are several TCPs identified across the country. Many of these are not Native American. The search was refined by combining key words into phrases, such as “TCP Northeast,” TCP Narragansett,” or TCP Massachusetts. This narrowed the number of returns to a small group that primarily focused on the Turners Falls Sacred Hill Ceremonial site, which is located in the Projects’ vicinity but not within the Project boundary, and the Nantucket Sound Traditional Cultural Property, which is not located within the Projects’ vicinity. Both these TCPs are listed on the NRHP.

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- The third category of websites concerns the attribution of natural rocks and man-made rock piles or structures to Native American construction. These websites are numerous and discussion in them is largely based on presumption rather than scientific analysis. On the one-hand, many people argue that these man-made stone piles, which dot the New England landscape, are the product of 18th- and 19th-century land clearing and farming activities. On the other hand, there is an equally large group who argue that these stone features are Native American (or Viking) in origin and have ceremonial and sacred significance to the people who built them. Whether any of these natural rocks and man-made rock piles or structures, to the extent they are located in the Projects' APE, is a potentially eligible TCP cannot be evaluated without participation of the NIT and the Nolumbeka Project in the study.

The background research did not identify any known TCPs, listed or otherwise, within the Projects' APE.

3 CONCLUSION

A TCP study is undertaken for the benefit of a people who maintain a link with a defined geographic area (in this case the Projects' APE) so that the operation of a project does not affect the on-going use of an historic property that has religious or cultural importance for at least 50 years. A multitude of efforts involving certified mailings and telephone calls failed to facilitate constructive engagement of the NIT and the Nolumbeka Project to identify and assess any TCPs that may exist within the Projects' APE. The background research conducted for this study, as well as the Phase IA archaeological survey, also did not identify any known TCPs within the Projects' APE.

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www.nps.gov/nr/research/index.htm/

National Register of Historic Places Program: Traditional Cultural Properties Request for Comments.

http://www.achp.gov.na/cultural_landscapes.html

Native American Traditional Cultural Landscapes. Advisory Council on Historic Preservation. Washington, D.C

www.achp.gov/regs-tribes.html

Consulting with Indian tribes in the Section 106 Review process. Advisory Council on Historic Preservation., Washington, D.C.

<http://www.saa.org/portals/0/saa/publicatins/sabulletin/13-3/SAA7.html>.

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Massachusetts Historical Commission review of the eligibility of the Nantucket Sound Traditional Cultural Property. MHC 11/05/2009.

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The Narragansett Indian Tribal Historic Preservation Office (NITHPO).

<http://nolumbekaproject.blogspot.com>

The Nolumbeka project: Preserving New England's Tribal Heritage.

www.neara.org

New England Antiquities Research Association.

<http://rockpiles.blogspot.com/2009/10/native-american-tribal-historic.html>

Native American Tribal Officer Speaks Out About Ceremonial Stone Structures. October 2001.

www.nativenewenglandstones.blogspot.com

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www.stonestructures.org

Stone Structures of the Northeastern United States.

www.indianrockpiles.weetu.com/articles/indianrockpiles.html

Indian Ceremonial Rock Piles in eastern Massachusetts. Peter Waksman. 2005.

www.stonestructures.org/html/historic-links-to-stone-structures.html

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www.thewesterlysun.com/news/latestnews/408-field-of-rock-cairns-complicates-plan-for-proposed-hopkins-subdivision.html

Field of Rock Cairns Complicates Plan for Proposed Hopkins Subdivision. Cynthia Drummond . 2014. Westerly, RI.

<http://ceramional-landscapes.com/gallery 3/>

Ceremonial landscapes: A sampling of Native American Stone Constructions found in the State of Rhode Island.

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Indian tribes say Carlisle Site Bears Signs of Sacred Past. Sally Heaney. 2005. Boston.com, local news.

www.sfgate.com/news/article/tribe-developer-battle-over-rock-mounds-3204465.php

Tribe and Developer Battle Over Rock Mounds. Ray Henry. July 20, 2008. SFGATE

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<http://1000nations.wordpress.com/2012/11/09>

On Native American sacred Sites and Religious freedom in North America. Sean Cruz and Winona LaDuke. Forum on Sustainable Development. Brazil. 2012.

**APPENDIX A – CORRESPONDENCE
RECORD**



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

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

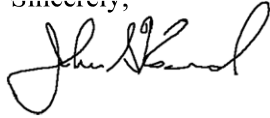
Dear Doug and Joe,

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,



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



Northfield Mountain Station
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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

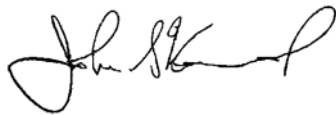
Dear Doug:

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,

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



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

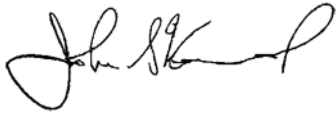
Dear Joe:

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 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.

Sincerely,

A handwritten signature in black ink, appearing to read "John Howard". The signature is fluid and cursive, with a large initial "J" and "H".

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
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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 that reads "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

Encl.



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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

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.

Sincerely,

A handwritten signature in black ink, appearing to read "John Howard", is written in a cursive style.

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

The Nolumbeka Project Inc.
88 Columbus Avenue
Greenfield, MA 01301
Ph: (413) 657-6020
Fax: (413) 498-4318
Email: oldgraywolf@verizon.net

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 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**



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Internet: john.howard@gdfsuezna.com

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)

**APPENDIX B – RECORD OF RESEARCH
CONSULTATION**

| Organization/Contact | Resources | Relevance to Investigation | Results of Consultation |
|--|--|--|---|
| Erving Consultation | | | |
| Erving Historical Commission Bruce Scott, Chair 12 East Main Street Erving MA 01344 historical.bruce.scott@erving-ma.org (413) 422-2800, Ext 101 | <ul style="list-style-type: none"> A resource for information about historical resources and preservation activities within the town of Erving. | <ul style="list-style-type: none"> Town agency responsible for ensuring that preservation concerns are considered in community planning and development decisions. | Attempted to contact Mr. Scott and other members of the Historical Commission and received no response. Obtained digital information on historic built environment from Commission website links. |
| Erving Historical Society Main Street Erving, MA (mailing address: 9 Moore St. Millers Falls, MA 01349 | <ul style="list-style-type: none"> A resource for information about historical resources and preservation activities within the town of Erving. | <ul style="list-style-type: none"> Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | Attempted to visit location on several occasions, but was closed. |
| Erving Public Library Marion Overgaard, Librarian 17 Moore Street Erving, MA 01344 ervinglibrary@cwmars.org (413) 423-3348 | <ul style="list-style-type: none"> Local history <u>resources</u>. | <ul style="list-style-type: none"> Information on Erving history will be used to develop historic context. Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | Obtained resources that will aid in developing the precontact and historic context. Obtained contact information for individuals affiliated with the Erving Historical Commission. |
| Gill Consultation | | | |
| Gill Historical Commission Ivan Ussach and Pam Shoemaker, Commission members 325 Main Road Gill, MA 01354-9758 bgy@commonwaters.org pshoe27@gmail.com | <ul style="list-style-type: none"> A resource for information about historical resources and preservation activities within the town of Gill. | <ul style="list-style-type: none"> Town agency responsible for ensuring that preservation concerns are considered in community planning and development decisions. | Pam Shoemaker and Ivan Ussach were not aware of any potentially unrecorded archaeological resources in the Project APE but offered their assistance as the project moves forward. |
| Gill Historical Society Route 2, Gill, MA 01376 413-863-2505 | N/A | N/A | Society is no longer active as per Ivan Ussach (Gill Historical Commission) |
| Gill Public Library (Slate Memorial Library) <u>Jocelyn Castro-Santos</u> , Library Director 332 Main Road, Gill, MA 01354-9758 gill.slate.library@gmail.com | <ul style="list-style-type: none"> Local history <u>resources</u>. | <ul style="list-style-type: none"> Information on Gill history will be used to develop historic context. Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | Obtained resources that will aid in developing the precontact and historic context. Obtained contact information for individuals affiliated with the Gill Historical Commission. |

| Organization/Contact | Resources | Relevance to Investigation | Results of Consultation |
|---|--|--|---|
| Greenfield Consultation | | | |
| Greenfield Historical Commission John Passiglia, Chair 114 Main Street Greenfield, MA 01301 ironjohnny@msn.com (413) 772-1548 | <ul style="list-style-type: none"> A resource for information about historical resources and preservation activities within the town of Greenfield. | <ul style="list-style-type: none"> Town agency responsible for ensuring that preservation concerns are considered in community planning and development decisions. | Mr. Passiglia knew of no potentially unrecorded archaeological resources in the project area but offered his assistance in the future. |
| Greenfield Public Library Lisa Prolman, Librarian 402 Main Street Greenfield, MA 01301 eboyer@greenfield-ma.gov (413) 772-1544 x 109 | <ul style="list-style-type: none"> “Greenfield Room”- local history <u>resources</u>. | <ul style="list-style-type: none"> Information on Greenfield history will be used to develop historic context. Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | Conducted research in the library’s “Greenfield Room” and obtained resources that will aid in developing the precontact and historic context. |
| Historical Society of Greenfield Peter Miller 43 Church St. Greenfield MA 01301 | <ul style="list-style-type: none"> A resource for information about historical resources and preservation activities within the town of Greenfield. | <ul style="list-style-type: none"> Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | Mr. Miller knew of no potentially unrecorded archaeological resources in the Project APE. |
| Montague Consultation | | | |
| Carnegie (Montague) Public Library <i>Linda Hickman,</i> <i>Library Director</i> 201 Avenue A Turners Falls, MA 01376 (413) 863-3214 | <ul style="list-style-type: none"> Local history <u>resources</u>. | <ul style="list-style-type: none"> Information on local history will be used to develop historic context. Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | Obtained resources that will aid in developing the precontact and historic context. |
| Montague Historical Commission Janel Nockleby, Chairperson 1 Avenue A Turners Falls, MA 01376 (413) 367-2184 Dr. Mary Melonis, former Chairperson (413) 367-2184 marymelonis18@comcast.net | <ul style="list-style-type: none"> A resource for information about historical resources and preservation activities within the town of Montague. | <ul style="list-style-type: none"> Town agency responsible for ensuring that preservation concerns are considered in community planning and development decisions. | Ms. Nockleby and Dr. Melonis were not aware of any potentially unrecorded archaeological resources in the Project APE but offered their assistance in the future. |

| Organization/Contact | Resources | Relevance to Investigation | Results of Consultation |
|--|--|---|---|
| Montague Historical Society Dr. Mary Melonis, Archivist 34 Central St. Montague, MA 01351 (413) 367-2184 marymelonis18@comcast.net | <ul style="list-style-type: none"> A resource for information about historical resources and preservation activities within the town of Montague. | <ul style="list-style-type: none"> Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | Dr. Melonis was not aware of any potentially unrecorded archaeological resources in the Project APE. She offered her assistance as the project moves forward. |
| Northfield Consultation | | | |
| Northfield Historical Commission Joel Fowler ins37@comcast.net | <ul style="list-style-type: none"> A resource for information about historical resources and preservation activities within the town of Northfield. | <ul style="list-style-type: none"> Town agency responsible for ensuring that preservation concerns are considered in community planning and development decisions. | Met with Joel Fowler and Joanne Gardner at the Northfield Historical Society Museum. Mr. Fowler recalled collecting Native American stone tools in the vicinity of site 19FR001 on eastern bank of the Connecticut River when he was younger (ca. 1960s). Mr. Fowler offered his assistance in the future regarding cultural resources and preservation issues related to Northfield. |
| Northfield Historical Society and Museum Joanne Gardner 13 Pine Street Northfield MA (413) 498-5565 Gardner159@yahoo.com | <ul style="list-style-type: none"> A resource for information about historical resources and preservation activities within the town of Northfield. | <ul style="list-style-type: none"> Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | Met with Joel Fowler and Joanne Gardner at the Northfield Historical Society Museum. Viewed artifact collections from amateur archaeologists in the area. Artifacts lacked provenience information. Ms. Gardner was not aware of any potentially unrecorded archaeological resources in the Project APE but offered her assistance as the project moves forward. |
| Northfield Public Library (Dickinson Memorial Library) Deb Kern, Director 115 Main Street Northfield MA 01360 dkern@cwmares.org (413) 498.2455 | <ul style="list-style-type: none"> Local history <u>resources</u>. | <ul style="list-style-type: none"> Information on local history will be used to develop historic context. Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | Ms. Kern referred us to the local history room of the library where we obtained resources related to the history of the Project APE. She also provided contact information for Joel Fowler who is associated with the Northfield Historical Society. |

| Organization/Contact | Resources | Relevance to Investigation | Results of Consultation |
|--|---|--|--|
| General Consultation | | | |
| <p>Historic Deerfield Visitor Center PO Box 321 84B Old Main Street Deerfield, MA 01342 413-774-5581</p> | <ul style="list-style-type: none"> Pamphlets and miscellaneous resources on history of the area | <ul style="list-style-type: none"> Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | <p>Obtained resources that will aid in developing the precontact and historic context.</p> |
| <p>Institute for American Indian Studies (IAIS), Washington, Connecticut <u>Lucianne Lavin, PhD,</u> Research & Collections 38 Curtis Road P.O. Box 1260 Washington, CT 06793 <u>llavin@iaismuseum.org</u> (860) 868-0518</p> | <ul style="list-style-type: none"> Houses materials from collectors in the Connecticut Valley including the Edward H. Rogers collection from excavations in Gill. | <ul style="list-style-type: none"> Contact with knowledgeable groups or individuals and additional understanding of avocational archaeology and collecting may help to identify locations sensitive for archaeological resources. | <p>Dr. Lavin confirmed that the IAIS is in possession of the Rogers collection and noted that portions of the collection are well-organized and include extensive notes. Dr. Lavin indicated that the Institute may have other collections from the Project APE and referred us to Lisa Piastuch the Curator/Asst. Executive Director.</p> |
| <p>Massachusetts Archaeological Society (MAS) Library and the Robbins Museum of Archaeology Frederick A. Robinson, Vice President 17 Jackson Street, Middleborough, Massachusetts 02346 Phone: (508) 947-9005 Cell: (401) 529-3584 Dbdlt52@verizon.com <u>info@massarchaeology.org</u></p> | <ul style="list-style-type: none"> Resources related to archaeology and anthropology of Massachusetts. TRC has obtained and reviewed digital copies of the MAS bulletins from 1939 to 2010 for articles relating to the Connecticut River Valley. | <ul style="list-style-type: none"> Additional understanding of the history of archaeology in the Project APE as well contact with knowledgeable groups or individuals will help to identify archaeologically sensitive areas. | <p>Mr. Robinson gave us a tour of the Robbins Museum. The majority of the artifacts on display were from amateur archaeological excavations in eastern Massachusetts and had little relevance to our Project APE. Mr. Robinson also oriented us to the MAS Library. He pulled the MAS topographic maps showing archaeological site locations and we confirmed that all sites recorded by the MAS are also recorded with the MHC. The librarian pulled a number of resources related to the archaeology of the Project APE.</p> |
| <p>New England Antiquities Research Association Anne Wirkkala Assistant Director of Learning Resources New Hampshire Technical Institute</p> | <ul style="list-style-type: none"> NEARA Site Report Sheets | <ul style="list-style-type: none"> Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | <p>Obtained copies of NEARA site Report Sheets for potential Native American ceremonial sites located in the project vicinity.</p> |

| Organization/Contact | Resources | Relevance to Investigation | Results of Consultation |
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| <p>Pocumtuck Valley Memorial Association/Deerfield Memorial Libraries/ Deerfield Memorial Hall David C. Bosse, Librarian, 6 Memorial Street Deerfield, MA, 01342. pvmaoffice@deerfield.history.museum library@historic-deerfield.org (413) 775-7125</p> | <ul style="list-style-type: none"> Resources related to the history of the Connecticut River Valley. | <ul style="list-style-type: none"> Information on local history will be used to develop historic context. Contact with knowledgeable groups or individuals may help to identify locations sensitive for archaeological resources and/or aboriginal burials. | <p>Obtained resources that will aid in developing the Precontact and Historic Context.</p> |
| <p>Springfield Museums Maggie Humberston, Head of Library and Archives Wood Museum of Springfield History, 21 Edwards St. Springfield, MA 01103 mhumberston@springfieldmuseums.org 1(800) 625-7738</p> | <ul style="list-style-type: none"> Houses the Connecticut Valley Historical Society collection. | <ul style="list-style-type: none"> Information on local history will be used to develop historic context. Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | <p>The Connecticut Valley Historical Society collection includes meeting minutes and other administrative materials which are of little relevance to the Project. Obtained resources that will aid in developing the precontact and historic context.</p> |
| <p>Springfield Museums Dr. Ellen Savulis, Curator of Anthropology at the Springfield Museum 21 Edwards St. Springfield, MA 01103 Email: esavulis@springfieldmuseums.org</p> | <ul style="list-style-type: none"> Houses the collection of the Connecticut Valley Historical Museum including materials from collectors in the region such as the Walter Rodiman collection and the Dr. Anson Cobb collection. | <ul style="list-style-type: none"> Contact with knowledgeable groups or individuals and additional understanding of avocational archaeology and collecting may help to identify locations sensitive for archaeological resources. | <p>Dr. Savulis confirmed that the Rodiman and Cobb collections are in the holdings of the Springfield Museum which are available to researchers by appointment. The collections may be helpful during later Phases of archaeological research for comparative lithic studies depending on the level of provenience information included in the collections.</p> |
| Consultation with Knowledgeable Individuals | | | |
| <p>Jacob L'Etoile, farmer Pine Meadow Rd. Northfield, MA (413)498-2968</p> | <ul style="list-style-type: none"> Interview | <p>Make contact with knowledgeable groups or individuals that may help to identify archaeologically sensitive areas.</p> | <p>Mr. L'Etoile provided interesting insight into the geology of the Project APE.</p> |
| <p>Ed Gregory Local Historian and author (413)772-6677 Email: golfserv@comcast.net</p> | <ul style="list-style-type: none"> Author of the publication: <i>The Turners Falls Canal</i> | <ul style="list-style-type: none"> Information on local history will be used to develop historic context. Contact with knowledgeable groups or individuals may help to identify locations sensitive for archaeological resources. | <p>Mr. Gregory's areas of expertise include the local history, people, and places of the Turners Falls area. He offered his assistance as the project moves forward.</p> |

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| <p>Dr. Curtiss Hoffman Anthropology Department, Bridgewater State University (508)531-2249 Clhoffman@bridgew.edu</p> | <ul style="list-style-type: none"> • Interview • 2014 MAS bulletin | <ul style="list-style-type: none"> • Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | <p>Dr. Hoffman is part of an effort to research and inventory potential Native American ceremonial sites or “stone structures.” He referred us to the New England Antiquities Research Association for more information.</p> |
| <p>Jane McGahan Local Historian and Amateur Archaeologist, Former FirstLight employee Home: (413) 774-2300 Cell: (413) 768-0820 megahja@comcast.net</p> | <ul style="list-style-type: none"> • Interview | <ul style="list-style-type: none"> • Contact with knowledgeable groups or individuals may help to identify archaeologically sensitive areas. | <p>Ms. McGahan described a number of excavations she was part of over the course of the last few decades. We consulted Project APE maps and confirmed these sites were recorded with the MHC. Ms. McGahan is a resource for information on amateur archaeology in the Project APE. She offered her assistance as the project moves forward.</p> |
| <p>Fred Nores Landowner</p> | <ul style="list-style-type: none"> • Interview | <ul style="list-style-type: none"> • Contact with knowledgeable groups or individuals may help to identify locations sensitive for archaeological resources. | <p>Mr. Nores informed TRC personnel that he and his neighbors have found numerous Native American stone tool artifacts in freshly plowed agricultural fields in the low-lying areas of the banks of the Connecticut River. Also noted the presence of “corn caves” which he described as large surface depressions where Native Americans stored grain. Mr. Nores was unsure of the location of these possible features.</p> |
| <p>Sean Werle New England Environmental, Inc. (413)348-0032 swerle@neeinc.com</p> | <ul style="list-style-type: none"> • Interview | <ul style="list-style-type: none"> • Contact with knowledgeable groups or individuals may help to identify locations sensitive for archaeological resources. | <p>Mr. Werle drove the boat for the majority of the reconnaissance work. He is very familiar with the Project APE and provided valuable information on the natural and cultural history of the Project APE.</p> |

Native American Consultation

| Organization/Contact | Resources | Relevance to Investigation | Results of Consultation |
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| <p>Massachusetts Commission on Indian Affairs (MCIA) Commissioners: Joanne Dunn Janice Falcone Gail Hill Christopher Montgomery Beverly Wright (617) 573-1291</p> | <ul style="list-style-type: none"> A resource for information about Native American culture, resources and preservation issues for the State of Massachusetts. | <ul style="list-style-type: none"> MCIA assists Native American individuals, tribes and organizations in their relationship with state and local government agencies and advises the Commonwealth in matters pertaining to Native Americans. | <p>Attempted to contact by phone.</p> <p>Sent letter on November 19, 2014 to Joanne Dunn, Executive Director, to determine if the MCIA had information to share on the cultural history of the project area. No response received.</p> |
| <p>Mashpee Wampanoag Tribe Ramona Peters, Historic Preservation Director 431 Main St, Mashpee, MA 02649 rpeters@mwtribe.com (508) 477-6186</p> | <ul style="list-style-type: none"> A resource for information on the culture and resources of the Mashpee Wampanoag Tribe | <ul style="list-style-type: none"> Maintains and protects cultural resources important to the Mashpee Wampanoag Tribe. Contact with the tribe may provide information on possible cultural resources and sensitive areas within the Project APE important to Native Americans. | <p>Contacted by letter dated March 31, 2014 inviting participation in archaeological studies. No response received.</p> |
| <p>Narragansett Indian Tribe Doug Harris, Deputy Tribal Historic Preservation Officer 4425-A South County Trail Charlestown, RI 02813 dh@nithpo.com (401) 539-1190</p> | <ul style="list-style-type: none"> A resource for information on the culture and resources of the Narragansett Indian Tribe. | <ul style="list-style-type: none"> Maintains and protects cultural resources important to the Narragansett Indian Tribe Contact with the tribe may provide information on possible cultural resources and sensitive areas within the Project APE important to Native Americans. | <p>Contacted by letter dated January 31, 2014 requesting consultation regarding selection of ethnographer for TCP study. Contacted by letter dated March 31, 2014 inviting participation in archaeological studies. Contacted by letter dated April 24, 2014 requesting meeting with Project ethnographer to discuss TCP study.</p> <p>No response received.</p> |
| <p>The Nolumbeka Project Inc. Joe Graveline, President 88 Columbus Avenue Greenfield, MA 01301 (413) 657-6020</p> | <ul style="list-style-type: none"> A resource for information on the culture and resources of the Nolumbeka. | <ul style="list-style-type: none"> Maintains and protects cultural resources important to the Nolumbeka Project. Contact with the Project may provide information on possible cultural resources and sensitive areas within the Project APE important to Native Americans. | <p>Contacted by letter dated March 31, 2014. Response received by letter dated April 15, 2015 indicating desire to participate in reconnaissance survey and TCP study but required funding.</p> |

| Organization/Contact | Resources | Relevance to Investigation | Results of Consultation |
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| <p>Stockbridge-Munsee Band of Mohican Indians Sherry White Historic Preservation Officer W13447 Camp 14 Road Bowler, WI 54416 sherry.white@mohican-nsn.gov (715) 793-3970</p> | <ul style="list-style-type: none"> A resource for information on the culture and resources of the Stockbridge-Munsee Band of Mohican Indians. | <ul style="list-style-type: none"> Maintains and protects cultural resources important to the Stockbridge-Munsee Band of Mohican Indians. Contact with the tribe may provide information on possible cultural resources and sensitive areas within the Project APE important to Native Americans. | <p>Contacted by letter dated March 31, 2014 inviting participation in archaeological studies. Received response on April 10, 2014 from Bonney Hartley, Tribal Historic Preservation Assistant, Stockbridge-Munsee Band of Mohican Indians requesting a copy of the archaeological survey report</p> |
| <p>Wampanoag Tribe of Gay Head (Aquinnah) of MA Bettina Washington, Tribal Historic Preservation Officer 20 Black Brook Road Aquinnah, MA 02535-1546 645-9265, ext. 175</p> | <ul style="list-style-type: none"> A resource for information on the culture and resources of the Wampanoag Tribe of Gay Head (Aquinnah). | <ul style="list-style-type: none"> Maintains and protects cultural resources important to the Wampanoag Tribe of Gay Head (Aquinnah). Contact with the tribe may provide information on possible cultural resources and sensitive areas within the Project APE important to Native Americans. | <p>Contacted by letter dated March 31, 2014 inviting participation in studies. No response received.</p> |