

**Relicensing Study 3.7.2**  
**HISTORIC ARCHITECTURAL**  
**RESOURCES SURVEY &**  
**NATIONAL REGISTER**  
**EVALUATION**  
**Updated Study Report Summary**

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

*Prepared for:*



*Prepared by:*



**SEPTEMBER 2015**

## 1.1 Study Summary

Between November 2013 and August 2015, TRC, on behalf of FirstLight, conducted an historic architectural survey and National Register of Historic Places (NRHP) evaluation of all buildings, structures, objects, sites, and districts 50 years or older within the Projects' Area of Potential Effects (APE). The survey's objective is to identify resources within the APE that are NRHP-listed or eligible for listing. The historic architectural survey consisted of background research on previously identified architectural resources in the APE; preparation of an historic context; field survey of all architectural resources 50 years or older within the APE; evaluation of their NRHP eligibility, either as an individual resource or as a contributing resource in an NRHP-listed or -eligible historic district; and preparation of a final report of survey findings for submission to the appropriate state and federal review agencies. The Northfield Mountain Pumped Storage Facility, built between 1968 and 1972, was also surveyed, as it will be 50 years old by the time the current license expires in 2018.

TRC has entered the collected information onto the respective state's architectural inventory forms and formulated justifications for NRHP eligibility for the surveyed resources. A report of survey findings, Study No. 3.7.2 *Historic Architectural Resources Survey & National Register Evaluation* (TRC 2014) was submitted to the Massachusetts, Vermont and New Hampshire SHPOs and to FERC on December 31, 2014. During 2015, FirstLight received written responses from each SHPO on the results of the architectural survey, and has conducted additional research and fieldwork during June and July, 2015 to address these comments.

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

## 1.2 Study Progress Summary

### Task 1: Review of Existing Information

Since the date of the Initial Study Report (ISR) in September 2014, TRC conducted additional background research on the history and development of the Projects' APE and its surroundings for the preparation of an historic context spanning the colonial period to the present. Published histories and previous architectural and historical studies of individual towns and villages in Franklin County, MA, Windham County, VT, and Cheshire County, NH were consulted. Research sources have included primary and secondary source histories of individual and district resources in the Project APE, as well as of the project area; historic maps, atlases, and gazetteers; historic photographs and postcards; historic architectural and engineering drawings, plans, and specifications; US population and manufacturing census information; and professional engineering magazines and journals. Online research was also conducted on such popular sources as Ancestry.com.

The historic context prepared as a part of this study identified the themes of recreation, transportation (including canals and railroads), and hydroelectric power as important themes in the history and development of the Projects' APE and was incorporated into the Study No. 3.7.2 *Historic Architectural Resources Survey & National Register Evaluation* (TRC 2014). The architectural survey report was submitted to each SHPO and FERC on December 31, 2014.

In their written comments on the architectural survey report, neither the VDHP nor the NHDHR requested additional research. In its response letter of January 30, 2015, MHC requested further consultation with MHC’s NRHP staff, planning staff from the Towns of Gill and Montague, and the two Town historical commissions and Town historic district commissions to verify both the boundaries and the historic research conducted for pending NRHP nominations for the Riverside and Gill Center Historic Districts in Gill. TRC subsequently consulted with MHC staff and individuals from both towns and is incorporating this research information into an addendum to the *Historic Architectural Resources Survey & National Register Evaluation* (TRC 2014) (Historic Architectural Resources Addendum), to be submitted to MHC and FERC in the fourth quarter of 2015.

#### Task 2: Fieldwork

In their written comments on the architectural survey report, neither the VDHP nor the NHDHR requested additional field survey. In its response letter of January 30, 2015, MHC requested additional fieldwork to verify NRHP boundaries and identify contributing and non-contributing resources within the following areas: Riverside Historic District (Gill); Gill Center Historic District (Gill); “the Patch” Historic District (Montague); Turners Falls Power & Electric Company Historic District (Montague); and Cabot Camp (Montague).<sup>1</sup> In July 2015, TRC conducted fieldwork in the above areas and is creating maps that delineate the National Register boundaries, with both contributing and non-contributing resources clearly marked on parcel-level aerial base maps.

In its January 30, 2015 letter, MHC also requested fieldwork be conducted to verify boundaries for a potential 65-mile-long Mohawk Trail Historic District and to identify contributing and non-contributing resources within this linear district. FirstLight responded with a more tightly focused survey of those sections of the Mohawk Trail located within the Project APE. This survey methodology was approved by MHC on May 13, 2015 to include two sections of the Mohawk Trail from which parts of the Turners Falls Hydroelectric Project are visible. In July 2015, a survey was conducted of a 588-foot-long section in Erving and the 5.77-mile section between the New England Central Railroad Line in Erving on the east and the intersection with Turners Falls Road in Greenfield on the west.

FirstLight will submit an Historic Architectural Resources Addendum to MHC and FERC on the results of the additional fieldwork carried out in 2015, including the newly created district maps requested by MHC, in the fourth quarter of 2015.

#### Task 3: Desktop Analysis

The data analysis referenced in the Initial Study Report for Study No. 3.7.2 was completed in 2014 and results are reported in Study No. 3.7.2 *Historic Architectural Resources Survey & National Register Evaluation* (TRC 2014). Analysis of the additional background research and field investigation resulting from MHC’s January 30 and May 13, 2015 comments are underway.

#### Task 4: Report Development

As noted above, FirstLight submitted its Study No. 3.7.2 *Historic Architectural Resources Survey & National Register Evaluation* (TRC 2014) along with required state survey forms and mapping to FERC, MHC, VDHP, and NHDHR on December 31, 2014. The VDHP has since indicated concurrence with the survey report findings that there are no historic resources located within the Project APE in Vermont and that no further survey work in Vermont is required.

By letter dated February 2, 2015, the NHDHR requested clarification of the findings of the Project Area Form, which had been submitted as Appendix C to the *Historic Architectural Resources Survey & National*

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<sup>1</sup> The Gill Center Historic District was subsequently determined to be outside the Project APE.

*Register Evaluation* (TRC 2014) and additional mapping of resources and resource boundaries in New Hampshire. In July 2015, FirstLight submitted the revised NH Project Area Form and mapping. By letter dated July 22, 2015, NHDHR concurred with the report's findings that no additional survey work in New Hampshire is required.

FirstLight is developing an Historic Architectural Resources Addendum on the results of the background research and fieldwork carried out in 2015, which is anticipated to be filed with MHC and FERC in the fourth quarter of 2015.

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

To date, there are no variances from the study plan or schedule.

### **1.4 Remaining Activities**

- Preparation of the Historic Architectural Resources Addendum, which is anticipated to be filed with MHC and FERC in the fourth quarter of 2015.