



**Cowasuck Band of the Pennacook - Abenaki People**  
**COWASS North America, Inc.**  
**The Abenaki Nation of Vermont, Inc.**  
**840 Suncook Valley Road**  
**P.O. Box 52**  
**Alton, NH 03809-0052**  
**(603) 776-1090 - FAX (603) 776-1091**



25 April 2017

Ms. Kimberly Rose  
Federal Energy Regulatory Commission  
Office of Energy Projects / Division of Hydropower Licensing  
Washington, DC 20426

Subject: First Light Turner Falls Project No. P-1889-081  
First Light Northfield Pump Storage Project No. P-2485-063

Re: Request for Consultation Status in regard to Section 106 NHPA as a Federal  
Native American Indian Tribal (Indigenous) Organization

Ms. Rose,

My name is Paul W. Pouliot, I represent the Cowasuck Band of the Pennacook-Abenaki People (Cowasuck Band) as the Sag8mo (Grand Council Chief or principal speaker), THPO, and president of our tribal non-profit organizations. I am contacting you today to submit our formal request for consultation status in regard to Section 106 NHPA as a Federal Native American Indian (Indigenous) tribal organization relevant to these subject projects.

For informative purposes our Cowasuck Band went on record in 1993 with the U.S. Department of the Interior - Bureau of Indian Affairs that we were seeking federal acknowledgment and protection under 25 U.S.C. as a federal Native American Indian (Indigenous) tribal entity. The formal announcement of this acknowledgment request was made on April 6, 1995, in the Federal Register Volume 60, Number 66, Page 17614. Since that date the Cowasuck Band has developed ongoing and continuing relationships with several federal and state agencies and as such has received governmental financial and other resources as a federal tribal entity. Our status as a federal "tribe" under 25 U.S.C. has been further established by affirmed First and Second Circuit case challenges that broadened the "tribe" definition beyond the previously accepted federal standard that required formal tribal acknowledgment.

As for our federal tribal eligibility for Section 106 NHPA Consultation: Our Cowasuck Band, and particularly myself, have been actively engaged as a consulting party with numerous federal and state agencies on a wide array of projects and issues since the 1990's to present. The Cowasuck Band believes that it meets the established status as a federal Native American Indian (Indigenous) tribal organization for the purposes of Section 106 NHPA and the Bureau of Indian Affairs - Native American Graves Protection and Repatriation Act (NAGPRA). A confidential document that provides a detailed explanation and noted citations under 25 U.S.C. can be provided to General Counsel if requested.

As for these project's proposed loci and APEs, they all appear to be fully within our tribal traditional homelands. We consider our homelands, or N'dakinna, to encompass all of New Hampshire, portions of southern Quebec, and major sections of Massachusetts,

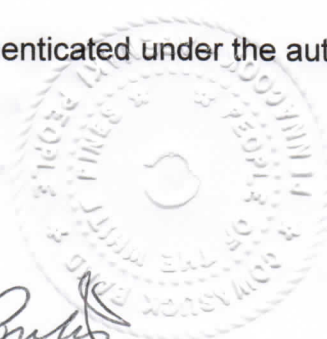
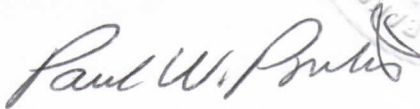
Vermont and Maine. For a full description of N'dakinna please see our Constitution of Our People, Article 1, Section 11 on our website at: [www.cowasuck.org](http://www.cowasuck.org) and also on record with the Bureau of Indian Affairs as submitted with our acknowledgment documents.

In addition to this request for consultation status we also request access to all project documentation, details, surveys, reports, any other pertinent information, and resources relevant to our potential consultation efforts.

In advance, I thank you for your timely consideration on our request for consultation status.

This request is authenticated under the authority of our tribal seal on this 25rd day of April 2017.

Sincerely,



Paul W. Pouliot  
Sag8mo and THPO, Cowasuck Band of the Pennacook-Abenaki People  
President, COWASS North America, Inc.  
President, The Abenaki Nation of Vermont, Inc.