

Rich Holschuh
THPO For Elnu Abenaki Tribe
117 Fuller Drive
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March 15, 2020

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C 20426

Re: FirstLight Hydro Generating Company, Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485)
Comments on Traditional Cultural Properties Study No. 3.7.3 and Relicensure Progress in General

Dear Secretary Bose:

Elnu Abenaki have been participating in FirstLight's relicensing process for Project Nos. 1889 and 2485 since 2015. Our interests are wide-ranging, from fisheries to access to archaeology, and anchored in the nature of an indigenous culture's identification with their respective homelands. The Abenaki people are a notably river-centric set of cultures. They converge within and derive meaning from traditional cultural relationships with specific rivers, their watersheds, and the surrounding landscapes within which they are embedded. The River of immediate concern for Elnu Abenaki and our relations is the mid-Connecticut, exactly the setting for these Projects. The operation and relicensure of the Projects under discussion has impacted and will continue to affect those interests in an ongoing, significant, and deleterious manner.

We are alarmed and concerned at the lack of response, dialogue, and accountability by the licensees and the delegated agencies to our concerns, which are clearly stated and protected in the various Federal statutes and policies, administered through this process by FERC. We are not being heard. Our traditional homelands, centered on the Connecticut River including the Project areas, are being degraded and mismanaged. We refer to our previous filing, to this effect, of November 28, 2019, stating these concerns. There as been no reciprocity or reply, from either FERC or the licensees.

A perfect example, but not the only one, is the area known as the Rock Dam, on the mainstem bypass reach between the Turners Falls Dam and Cabot Station outfall. This is an ancient traditional fishing place, relatively unspoiled by the historic hydroelectric impoundments, and surrounded by very sensitive, well-documented archaeological sites. On a related note, the Rock Dam site is also implicated in its significance to the anadromous fish runs subject to their own relicensure Studies, not to mention the sole CT River spawning site for the Federally-listed shortnose sturgeon. That all of these, and other, factors converge on this particular site and its environs is exemplary of indigenous

significance, which is driven by cultural relationship with both human and other-than-human entities, including the River itself. This is precisely why the Traditional Cultural Properties recognition process was created.

We request your attention to this situation and a response to our request for active, constructive dialogue.

Sincerely,

Richard Holschuh, Liaison (THPO) for Elnu Tribe of the Abenaki

Roger Longtoe Sheehan, Chief, Elnu Tribe of the Abenaki

Jim Taylor, Councilman, Elnu Tribe of the Abenaki