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July 10, 2013

Ken Hogan, Project Supervisor
Federal Energy Regulatory Commission
Office of Energy Projects
Division of Hydropower Licensing
Washington, DC 20426

RE: Wilder Dam Project No. 1855-026
Bellows Falls Project No. 1855-045
Vernon Project No. 1904-073
Turners Falls Project No. 1889-081
Northfield Pump Storage Project No. 2485-063

Dear Mr. Hogan,

The Nolumbeka Project wishes at this time to respond to the proposed study plans as offered by Trans Canada and First Light.

We will start with First Light's response to our study request 1. We asked for a comprehensive investigation and mapping of the of the ancient trail systems and fishing stations and other special places that exist on the river's edge and up on the Wissatinnewag village site proper.

First Light's response suggests that archaeological surveys will result in reports that will discuss cultural landscape as a result of the surveys, but they indicate they will not be looking at steep grades and wetlands, they also indicated they will not do TCP study. The Nolumbeka project will be requesting a TCP study. That request will be filed with this letter.

Our request was clearly asking for studies of the built earthworks and trail systems that were created many thousands of years ago on the Wissatinnewag Village Site out of the need to access some of the most productive fishing in the river on what is now called the Bypass Reach. The Bypass Reach area abuts the Wissatinnewag Village site. This terrain is a steep rock ledge that goes right down to the ancient waters edge. These built trail systems were not simply ruts worn in the earth by thousands of years of use, but were engineered roadways that required the builders to cut into the upper ledge materials and redeposit that material down grade to create a safe traversing trail system to access fishing earthworks ledges on the ancient Lake Hitchcock shoreline and later down to the river. They included fishing, ceremonial sighting, and canoe-launching stations.

First light indicated that Nolumbeka offered no nexus or direct link to the project area in our study requests. Nolumbeka feels strongly about the fact that the Wissatinnewag Village site existed 12,000 years before colonial boundaries and lines were ever drawn on a map. First light offered up on their project boundaries map a lined off area showing the Wissatinnewag Village property. The village is a congruent and fully connected cultural resource that goes right to the water's edge, and in this area has not been degraded or impacted by modern progress with the exception of the damming of the river in the last hundred years, and the loss of the natural water flow rates. This cultural resource is a rare jewel. We would also like to point out that we created the conservation easement that abuts First Light's land on the rivers edge. Nolumbeka has a legal agreement with U.S. Fish and Wildlife in our conservation easement partnership that articulates our shared stewardship for the protection of the Wissatinnewag property. In this contract we share responsibility for the safeguarding of the cultural resources that connect with First Light's property, and we use that section of the Wissatinnewag village for educational programs that promote the protection of Native American cultural resources and a Native viewpoint of the history of the region. We feel we have a stronger than average connection or nexus to the river resource area and First Lights operations impact nexus.

First light and trans Canada would like to eliminate steep slopes and or swamps or wetlands from study consideration. This request by the Licensee's is exactly why we recommended the need for more culturally sensitive and better-trained researchers. To address wetlands, Nolumbeka feels there needs to be an educational component that might help First Light, Trans Canada and FERC understand how important to Native cultural values wetlands have always been. Wetlands have been for thousands of years one of the most powerful gathering places for healing resources and ceremony, as well as foraging and are very often associated with ceremonial stone landscapes. To disregard the need to look more closely at wetlands is to marginalize a culture's ceremonial connection to the land, their history and values. Many important archaeological discoveries have been located in what were considered wetland areas. Nolumbeka would like to request that steep slopes and wetlands be included in the cultural studies, inventory and project boundaries discussions. If the Licensee's choose not to look at steep slopes and wetlands they will not have a complete inventory of the cultural resources in their project areas.

Nolumbeka also requests to be a part of the on the ground field studies and data analysis component of this project licensing process. Since 1997 we have been doing research, data analysis and field monitoring of archaeological sites and have worked closely with the Narragansett (NITHPO). We have created a digitized historic cultural database and have worked with a number of tribes including the Narragansett (NITHIPO) to assist in their cultural and historical research when the tribes have been working to protect their cultural resources on project impacted lands. The Nolumbeka Project has been one of the early organizations involved with the discoveries of a number ceremonial stone landscapes. We have offered to continue our work with the Narragansett Tribe to create a centralized database in the Gill Turners Falls area to streamline and make study reports and oral histories more accessible to the tribes when projects impacts might need to be taken into consideration in the river boundaries area.

We are aware that a number of archaeological 1A studies have been done without tribal partnership. Trans Canada has requested the right to recycle an archaeological 1A study created five years ago under an old licensing issue without tribal participation or monitoring. We feel that is not the way to build trust with the tribes or the public and seem to not be congruent with the spirit of the 106 processes. Nolumbeka pointed out in our first letter to FERC that we felt it was important to bring on board professionals trained by the tribes to recognize the life ways and sacred practices and spaces of the indigenous peoples of this river valley culture. The Nolumbeka Project sees the recycling of Trans Canada's 5-year-old archaeological 1A study as a short cut that undermines the 106 processes.

In 2.1.6 Cultural Resources FERC def # 6 FERC requested First light to provide available information of Indian Traditional Cultural and Religious Properties as specified in 5.6 (d) (3) (x) (B), and 5.6 (d) (3) (x) (C).

First Light replied, "There are no known Indian traditional cultural properties (TCPs) or religious properties within the Turners Falls Project and Northfield Mountain Project boundaries". First light acknowledged The Turners Falls Sacred Ceremonial Hill Site, but claimed that it was not located in either of the projects boundaries.

Nolumbeka would like to respond that the Turners Falls Sacred Ceremonial Hill Site is not just a hill at the Turners Falls Airport, but is as a district that covers a 20-mile radius. This district covers a great deal of First Light's Project boundaries. Also some of the stone structures located on the Wissatinnewag Village property are a component of the Ceremonial Hill and have a direct line of vision and contextual connection to that location.

There is an Indian village currently underwater in Barton Cove, and in First Light's APE. Prior to the raising of the water level for the hydro production, that piece of land was pastureland and well before it was a pasture it was a part of the Great Falls village that was attacked by William Turner in the early dawn raid at the Great Falls on May 19, 1676. This site is by its very nature a traditional cultural property and also a religious property. Under water in that area are some of the cultural artifacts of that village and the attack, which includes a number of muskets that were being repaired at the village at that time as well as the forge and at least 2 pigs of lead. It can be expected that the personal artifacts of some of the victims could well be under water in that locus as well.

Just south of the By-Pass Reach area there are shell middens on the north end of the islands that were deposited over thousands of years during the warmer months when the prevailing winds are out of the south. Nolumbeka would like to see studies of these middens. We feel they could reveal significant new information on the sturgeon and shellfish habitat in the By-Pass Reach area and the river in general. It is also common for cultural discarded artifacts to be located in the disposal sites such as midden areas. These are well within First Light's APE. Nolumbeka feels First light's operations have had an impact on the cultural resources within their APE with erosion most especially but not limited to the area in and around the islands and on the shell midden sites as well as

directly across from the Northfield Mountain Project and at many points down river including the Kells Farm Paleo Indian Site.

Nolumbeka would like to respond to 2.2.2 Cultural Resources (FERC AIR #2)

FERC requested First Light to include in your study proposal that you would also consult with the Vermont, Massachusetts, and New Hampshire SHIPO'S and any involved Indian Tribe or other interested parties in formulating each of the tasks.

First light has not consulted with any Indian tribe that we know of, nor have they consulted with The Nolumbeka Project in formulating what the projects APE will look like. We have yet to see any research data for review on the known cultural resources in the project boundaries. It appears to us that First Light will create the APE with only SHIPO review and has not brought in the Tribes and other interested parties including Nolumbeka. We would like to have the chance, in a timely manner, to review and respond to the data that will be used to set the projects APE.

Nolumbeka feels First light misunderstood the study request from a number of other interested parties including Nolumbeka and the Town of Montague regarding the Great Falls Native Cultural Park. The study requests for the Great Falls Native Cultural Park was a request to study what it would look like for the Licensee's to help create the Great Falls Native Cultural Park as a way to give back to the Native American community and the general public something of cultural value that would help create historic tourism as a form of recreation and education in this area. This would go a long way to make up for the cultural resources that have been compromised on the river over the years during the development of Hydro Power. These Native American cultural resources were not addressed during the last licensing process many years ago. Nolumbeka has documented a number of cultural resources that have been damaged, destroyed and or lost and have on a number of occasions slipped by First Light's accountability to those resources over the years. The Great Falls Native Cultural Park would also allow for a more balanced Native historical viewpoint on the Great Falls massacre of May 19,1676. This story is a powerful piece of history that needs to be told from a Native perspective. Nolumbeka feels that the story told from that perspective would contribute to the Recreational Historic Tourism in our area. A number of years ago a study was done to get a sense of what percentage of sites listed on the National Register of Historic Places are Native American sites compared to other cultural groups. In Massachusetts out of the 3,602 sites listed only 1 out of 300 sites were Native American. That is 0.33% of the sites listed. In Maine out of 1,295 sites listed there were 102 Native sites. That is 1 out of 12.7 sites listed as Native American. The Great Falls Native Cultural Park is a chance to shift the trend that has led to such low numbers of Indian sites listed on the National Register of Historic Places that has prevailed here in Massachusetts for over 40 years. The Great Falls Native Cultural Park would expand a form of recreation that is catching on all over the world, Recreational Historic Tourism. Right here in the Great Falls area, the State Massachusetts has the history of a fascinating 12,000-year-old Indigenous culture that could be taped into as part of Recreational Historic Tourism. This is a form of recreation that has been overlooked for too many years. Nolumbeka strongly supports a study by the Licensee's to create a Native Cultural Park in the Montague Gill area.

2.3.3 Cultural Resources (FERC AIR 37)

In addition to the FERC, Massachusetts, Vermont and New Hampshire recommendation to do a Phase 1A Archaeological Survey and Historic Structure Survey, Nolumbeka requests that FERC consider requiring that survey to include Native American built stone structures, earthworks and ceremonial stone built landscapes in the APE as is the case in other states like Ohio, and if physically connected to go beyond the APE. Nolumbeka finds the APE maps we currently have to view, offer very little insight on what exactly is out there for cultural resources. Without the ability to review any studies that have been done, we find there is no way for us or the tribes to participate on the assessment of the applicability of the suggested APE Boundaries. Nolumbeka would like to review the research and compare it with what we know to exist in our archives before we would feel we have been allowed to be a contributor in this process. We have been doing this type of research work for the tribes since 1997, and we understand the process well enough to lend additional viewpoints and conversation to the decision making process in formulating each of the tasks.

3.4 Terrestrial Wildlife and Botanical Resources

3.4.1 Baseline Study of Terrestrial Wildlife and Botanical Resources at the Turners Falls Impoundment, the Bypass Reach and below Cabot Station within the Project Boundary

The Nolumbeka Project feels that our first request to do terrestrial wildlife and botanical resources studies on the Wissatinnewag property are congruent with 3.4.1 and would add to the body of knowledge that the Recreational Historic Tourism public would appreciate in their forays to the Turners Falls Gill- Greenfield historic site visits. Nolumbeka would like to take part in this process and would be happy to assist researchers on and around the Wissatinnewag Village Site.

3.6

3.6.1 Recreation Use/User Contact Survey

The Nolumbeka Project considers ourselves to be a unique stakeholder group do to the fact that we own a 41 acre 12,000 year old village site conservation easement in partnership with US Fish and Wildlife's 21 acre portion of the combined 63 acre Wissatinnewag Historical Village Site proposed to be a part of a Recreational Historic Tourism Plan for the Towns of Gill, Turners Falls and Greenfield. Our knowledge of the Bypass Reach is augmented by our access to that part of the river through our land and our mission as a cultural preservation nonprofit. We feel we could be of use to help assess possible access points in the Bypass Reach part of the river and possible canoe portage trails that might be feasible.

3.6.5

The Nolumbeka Project considers our use of the land in the project area in harmony with the cultural history and attraction to the Great Falls area, and we request to be identified as such in the goals and objectives in consideration in 3.6.5

The Nolumbeka Project Study Request 4

As part of our study request 4, Nolumbeka and the Narragansett (THPO) asked for a study to create a centralized housing facility in the Gill Turners Falls area for our archives and study programs, as well as a centralized housing facility to digitized and disseminate to appropriate tribes and researchers, the total of documents that have been amassed over the years on cultural studies done up and down the Connecticut River and in the surrounding area. The public perception at this time is that if just such a facility were in place now the current licensing process would be much streamlined as there would be no disconnect with what is out there and where it is and how it might impact any of the Licensee's projects on the river and beyond. There will be a need for just such a facility many times over the next 30 to 40 years of this license issue, and the Nolumbeka Project would be happy to team up with any of the tribes, the SHIPOs and the Licensees to create the protocols and institute such a program. Right now the cultural data that is out there is still in the early twentieth century mindset and access. This condition makes it difficult for a transparent exchange of data and research needed by the tribes and other interested parties to facilitate a balanced decision making process on the proposed Licenses for First Light and Trans Canada or any future projects that might need cultural impact consideration. The Nolumbeka Project feels our request could play an important part of creating a new attitude around Native American cultural preservation efforts here in the Connecticut River Valley and beyond and we strongly encourage FERC to support just such an endeavor.

Thank you,

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