

TO: Federal Energy Regulatory Commission
Office of Energy Projects
888 First Street, N. E.
Washington D. C. 20426

FROM: John T. B. Mudge
25 Lamphire Hill Lane
Lyme, N. H. 03768-3108
Tel: 603-795-4350 Fax: 603-795-4355
Email: JMudgeNH@aol.com

RE: **Wilder Project, (FERC No. 1892-026)**
Bellows Falls Project, (FERC No. 1855-045)
Vernon Hydroelectric, (Project No. 1904-073)

TransCanada Hydro Northeast Inc.'s ILP Study 33 — Traditional Cultural Properties dated May 16, 2016.

DATE: July 9, 2016

CONTENTS: Landowner's comments, Study #33

To the reader:

For further information or to visit the Mudge fields referred to on the following pages please contact me at the above address and phone.

— *John Mudge*

I have received and read the ILP Study 33, Traditional Cultural Properties Study, prepared for TransCanada by Willamette Cultural Resources of Portland, Oregon, and Normandeau Associates of Bedford, New Hampshire. I also attended, via telephone, that portion of the June 1, 2016, Updated Study Results Meeting where this study was discussed. My comments here are based on my reading of the study, comments made by others on June 1st, and my knowledge of the area.

During the June 1st teleconference several people made comments describing this study as an “outline.” More about that later.

Study 33 includes in Table 2, page 24, a list of Native American place names near the project area, the Connecticut River Valley. It was pointed out during the June 1st meeting that Study 33 has translated many of the names incorrectly. In Section 13.0 of Study 33, page 32, is the list of literature cited in preparing the report. The study does not cite *Where the Great River Rises*, edited by Rebecca Brown and published in 2009 by the Dartmouth College Press and the Connecticut River Joint Commissions. Page 137 of that book is a much more complete and accurate list of selected Abenaki names in the Connecticut River watershed. As this book was so recently prepared and published by a group intimately familiar with the Connecticut River, I believe that it is a significant omission that Study 33 fails to either use or mention this publication. That omission has resulted in the incorrect translation of Native American names.

Study 33 omits any mention of Dartmouth College. Dartmouth College would undoubtedly be a natural source of information about the traditional cultural and history of the region. The Dartmouth College web site reads, (emphasis added): “Dartmouth’s founder, the Rev. Eleazar Wheelock, a Congregational minister from Connecticut, established the College as *an institution to educate Native Americans...* In 1972—the same year the College became coeducational—Dartmouth reaffirmed its founding mission and *established one of the first Native American Programs in the country.* With nearly 1,000 alumni, *there are now more Native graduates of Dartmouth than of all other Ivy League institutions combined...* Governor Wentworth provided the land that would become *Dartmouth’s picturesque 269-acre campus on the banks of the Connecticut River, which divides New Hampshire and Vermont.*”

As Study 33 fails to anywhere mention Dartmouth College, I must conclude that the authors of the report did not make any effort to utilize the resources of the college in preparing the study. The failure to utilize the resources of Dartmouth College is a significant omission on the part of TransCanada and the authors of the study.

Study 33 fails to mention whether the authors made any contact with the New Hampshire state archeologist. Again, a failure to have requested the assistance of or get suggestions from the state archeologist is a significant omission on the part of TransCanada and the authors of the study.

As noted above, several of the attendees of the June 1st meeting described Study 33 as an “outline.” Based on my reading of Study 33, and my ownership of a large library of books on New Hampshire and New England history, I would describe Study 33 as a combination of several entries from Wikipedia and the 1965 booklet, *Indians of New Hampshire* by Eva Speare which for many years was used when New Hampshire history was taught in the fourth grade. Perhaps Study 33 would be more complete if TransCanada included a diorama.

On June 1st one of the callers identified herself as being in Fairlee, Vermont, and she was familiar with a Phase 2 archeological dig being done there. She described the erosion on the site and suggested that the erosion should be documented.

The issue of erosion is being more thoroughly addressed in Studies 1, 2 & 3.

However, it should be noted here that erosion on the banks of the Connecticut River has been a significant problem for Native American sites. Perhaps the reports from the Public Archeology Laboratory, PAL, will describe the erosion at some of the sites they have researched. Perhaps because the authors of Study 33 failed to consult with the New Hampshire State Archeologist, they did not learn about an area in Haverhill, New Hampshire, known as the Ingalls Site. In recent years that site was extensively researched before erosion destroyed it. The Ingalls site is one of the most famous Native American / archeological sites in the area.

In different reports and discussions I am referred to as the only landowner in New Hampshire who allowed PAL to dig on his property— over a total of three weeks in 2015 both Phase 1 and Phase 2 digs were conducted on the property. The riverbank right beside the site of the digs is shown below. This picture was taken at a time when the level of the water had been lowered, and the mud flats that are common when the water level is low are clearly visible.



Yes, this is the riverbank right beside where PAL conducted its digs in 2015 on the Mudge farmland in Lyme, New Hampshire.

What was here when the first Native Americans stopped here? Today there is no riparian buffer as that has been destroyed by erosion. Today there is no gently sloping riverbank as that has been destroyed by erosion. As a result of the erosion, historic artifacts that were here have been forever destroyed and lost. According to the May 31, 2016, letter from TransCanada, "Response to Comments," this type of situation is classified as "eroding - vegetated." *However, there is no vegetation here.* The riverbank has been undercut because of the operations of the Wilder Dam and this causes the overhanging and unstable clumps of roots and soil that will soon fall into the river, taking with them more soil and historic artifacts. Riverbank erosion such as this is a very common sight on this section of the Connecticut River.

Lastly, on multiple occasions I have been told that I would be forwarded a copy of the PAL report describing the findings on the Mudge property. I have never received that report.

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