

Wendell Historical Commission  
Town of Wendell  
P.O. Box 41  
Wendell, MA 01379

April 7, 2018

To Leo Roy, Commissioner  
To Whitney Hatch, Chair, DCR Stewardship Council  
Department of Conservation and Recreation  
251 Causeway St., Ninth Floor, Suite 600  
Boston, MA 02114

**RE: CULTURAL RESOURCE EMERGENCY CONCERN IN WENDELL STATE FOREST**

Dear Commissioner Roy, and Chairman Hatch,

The Wendell Historical Commission, The Town of Wendell, and four federally recognized tribes in New England (Wampanoag Tribe of Gay Head (Aquinnah), Mohegan Tribe, Mashantucket Pequot Tribe, Narragansett Indian Tribe), currently have a serious preservation interest in Wendell State Forest, where Tribal Historic Preservation Officers from two of the signatory Tribes have preliminarily confirmed the presence of a large area of indigenous ceremonial stone landscape features located within the Brook Road Logging area. The Town of Wendell and these four Federally Recognized New England Tribes currently have a Memorandum of Understanding to protect indigenous ceremonial stone landscapes within the bounds of Wendell (see attached document).

We are writing to express our growing concern that DCR has not provided an official written response to Wendell Historical Commission's letter of February 22, 2018 to DCR, and to an evident pattern of lack of adherence to DCR's own guidelines by DCR. We will continue to document this pattern.

We provide here our specific concerns in **eight points** with details attached in a report describing our cultural resource emergency concern:

- 1) Lack of compliance with significant numerous DCR guidelines and policies
- 2) Failure to reserve and remove large area of significant features from the silvacultural prescription as per LD+MG pg 43: Exclude or Defer.
- 3) Failure to comply with Appendix G. DCR Cultural Resource Policy: 4. Emergency Scenarios/Procedures: discovery of an unanticipated cultural resource requires that logging shall be halted
- 4) No Eastern Connecticut Valley District Forest Resource Management Plan has been established.
- 5) **State Register ceremonial stone landscape** site 6.5 miles from WSF, Brook Rd.: The Turners Falls Sacred Ceremonial Hill Site ceremonial stone landscape, declared eligible for National Register by the Keeper of The National Register . The report recognizes a significant 16 mile radius pauwau (medicine) district centered at Turners Falls. Wendell Brook Rd. lies within this identified district.
- 6) Lack of protection of site location mandated by MGL Ch 40 S 8D. "sites...shall not be a public record." Every feature has been marked in hot pink logging tape.

- 7) "Resource Management Guidelines to be determined by the resource specialist who identified the resource." This was not done. Tribes given no time to do a site specific mapping survey.\*
- 8) "DCR **shall** provide for the stewardship of all known and **potential cultural resources** on DCR property." APPLICABILITY: All Divisions, Departments, Bureaus, and Staff.  
"Site examinations reveal that astronomical observation and alignments were very important components of ceremonial stone landscape sites. ...finding that features align astronomically is a strong indicator that a place has ceremonial significance." A "feature's location may also provide an alignment link from one landscape site to another to form a district." There are preliminary indications of significant alignments between features within the Brook Road site as well as between the Brook Rd. site and other known ceremonial landscapes in the area. These elements **MUST** be protected as part of the **potential resource** to be protected, until a formal, thorough Tribal Historic Preservation Mapping and Report can be performed. Flagging each individual site **DOES NOT** protect the potential resource. The potential meaning **WILL BE DESTROYED** by skidders.

For all of the above stated reasons, and to prevent irreparable damage to the important irreplaceable cultural resources in question, we, The Wendell Historical Commission, claim that a complete halt to the improperly conceived Brook Rd. Logging Project is warranted.

Wendell Historical Commission:

Joseph Coll, Chairman

Lisa Hoag, Secretary

Melinda Godfrey

cc:

Priscilla Geigis, Priscilla Geigis, Deputy Commissioner for Preservation and Planning for DCR

Peter Church, Director of Forest Stewardship for DCR

Patrice Kish, Director, Office of Cultural Resources for DCR

cc:

Bettina Washington, THPO: Wampanoag Tribe of Gay Head (Aquinnah)

Marissa Turnbull, THPO: Mashantucket Pequot Nation

James Quinn, THPO: Mohegan Tribe

Elaine Thomas, Deputy THPO: Mohegan Tribe

Doug Harris, Preservationist for Ceremonial Landscapes, Narragansett Tribe

cc: Wendell Select Board

Town of Wendell

P.O. Box 41

Wendell, MA 01379

cc: Attorney General Maura Healey

Office of the Attorney General

1 Ashburton Place

Boston, MA 02108

\* 36 C F R 800.4 (c ) (1): "...Indian Tribes possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them."

Please see attached Emergency Cultural Resources Concerns Report and related references.

## **CULTURAL RESOURCE EMERGENCY CONCERN IN WENDELL STATE FOREST REPORT APRIL 7, 2018**

THE WENDELL HISTORICAL COMMISSION wishes to express our growing concern that DCR has not provided an official written response to Wendell Historical Commission's letter of February 22, 2018 to DCR, and to an increasingly evident pattern of lack of adherence to DCR's own guidelines by DCR. We will continue to document this pattern.

We once more reiterate our concern for the preservation of significant, sensitive, fragile cultural resources lying within the Wendell State Forest; Brook Rd. Logging Project Area, in which the Wendell Historical Commission, The Town of Wendell, and four federally recognized tribes in New England (Wampanoag Tribe of Gay Head (Aquinnah), Mohegan Tribe, Mashantucket Pequot Tribe, Narragansett Indian Tribe), currently have a serious preservation interest. Tribal Historic Preservation Officers from two of the signatory Tribes have preliminarily confirmed the presence of a large area of indigenous ceremonial stone landscape features within the Wendell State Forest Brook Road Logging area. The Town of Wendell and these four Federally Recognized New England Tribes currently have a Memorandum of Understanding to protect indigenous ceremonial stone landscapes within the bounds of Wendell (see attached document).

### **We provide here our specific concerns:**

#### **1. Lack of compliance with DCR guidelines and policies:**

We state again that DCR has not met or fulfilled its own management guidelines and cultural resources policy as stated in the "Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines" (LD+MG), and in "Appendix G. DCR Cultural Resources Policy". DCR's actions are incorrect and do not fulfill the intent of these guidelines and policies.

2. In particular, DCR has failed to address the fact that this a large area of sensitive, fragile, cultural resources in this parcel of land that do qualify as a Zone 1 "Significant Feature Overlay" classification. To wit: **"Within Woodlands, large areas of sensitive resources as described above (to protect areas of historical and cultural significance) will not be included in project prescriptions and will be effectively reserved or excluded from harvesting by their exclusion from the silvicultural prescription."** (LD+MG), pg 43).

#### **3. DCR has failed to comply with Appendix G. DCR Cultural Resources Policy: 4. Emergency Scenarios/Procedures:**

"In the event an unanticipated site of archaeological or cultural significance is encountered during the project implementation stage, project work shall be halted and OCR (Office of Cultural Resources) shall be notified. OCR shall initiate the review process with MHC (Massachusetts Historical Commission) and make a recommendation to the Deputy Commissioner of Planning & Engineering whether or not to suspend all aspects of project implementation during consultation with MHC." (pg 25)

#### **4. No Eastern Connecticut Valley District Forest Resource Management Plan.**

This plan is essential to provide specific details for unique, irreplaceable cultural resources within the Eastern Connecticut Valley. An Eastern Connecticut Valley District FRMP must be created and subjected to a formal public comment period, and a formal acceptance, before any logging proposals should be allowed. The "Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines" is a broad state wide planning document, never intended as a Forest Resource management Plan (FRMP).

#### **5. There is a State Register Ceremonial Stone Landscape 6 miles from Wendell State Forest Brook Rd. area:**

This is an important example of why a district-specific FRMP is needed. The **Turners Falls Sacred Ceremonial Hill Site**, at Turners Falls Airport, lies 6.5 miles away from the Brook Rd. Logging area, in the neighboring town of Montague. **The Turners Falls Sacred Ceremonial Hill Site has received a Declaration of Eligibility for Inclusion in the National Register (DoE), and is therefore included in the Massachusetts State Register** (Appendix G. DCR Cultural Resources Policy: 1. Definitions: State Register). The Turners Falls Determination of Eligibility report recognizes a significant pauwau (medicine) district within "a radius of 16 miles centered on the ceremonial prayer hill". "Other identified sites within this pauwau (medicine) district include **Dry Hill** [location redacted,] Montague." The Dry Hill site, which lies in close proximity to the Brook Rd Logging Project, may be associated astronomically with the Brook Road site. Because the Eastern Connecticut Valley FRMP has not yet been created, there is no process for protecting important and related cultural resources.

#### **6. Lack of protection of site location mandated by MGL Ch 40 S 8D:**

MGL Chapter 40, Section 8D, states, "Any information received by a local historical commission with respect to the location of sites and specimens, as defined in section twenty-six B of chapter nine, shall not be a public record." Furthermore, the Wendell MOU states, "It is presently understood that the details and locations of ceremonial stone features that shall be revealed to the Wendell Historical Commission representatives shall not be made public and shall remain in the permanent, confidential care and protection of the signatory THPO(s) and the Wendell Historical Commission... Only by specific Town/Tribe agreement shall any public information or other dissemination plan be instituted."

In the Brook Rd. Logging area, DCR has marked with day glow pink "do not cut" flagging tape, each individual CSL site within the large area of significant cultural resources, which Tribal Historic Preservation Officers have preliminarily identified.

If DCR had adhered correctly to its own guideline which, again, states that "large areas of sensitive resources ... will not be included in project prescriptions and will be effectively reserved or excluded from harvesting by their exclusion from the silvicultural prescription"<sup>1</sup>, these fragile cultural resources would not have been publicly exposed for anyone to find as they are now, marked out and flagged. This approach to management of the resource is in direct contradiction to all guidance for preservation of cultural resources, in local, state, and federal legal mandates, which indicate clearly that locations of sites "shall not be a public record."

#### **7. Resource Management Guidelines to be determined by the resource specialist who identified the resource:**

In the Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines "Significant Features Overlay" section, it states that where "resource features have been recognized through research and assessment by professional resource specialists", "specific management guidelines are provided by resource specialists and/or by the professional staff of the agency or NGO that assessed the significant resource feature or has a regulatory role for protection of the resource." [In this instance, Indian Tribes pursuant to 36 CFR 800.4(c)(1); "...Indian Tribes possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them."]

Pursuant to 36 CFR 800.4(c)(1), and the Wendell MOU, Doug Harris, Deputy Tribal Historic Preservation Officer, for the Narragansett Tribal Historic Preservation Office, and Preservationist for Ceremonial Stone Landscapes has outlined the following procedure for the preservation and protection of "sites of religious, and cultural significance to [tribes]" in the Brook Rd. Logging Project area.

Stage 1. Establish a formal Tribal Historic Preservation Mapping and Documentation of the features that

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<sup>1</sup> LD+MG pg s 42, 43

have been preliminarily identified as a significant ceremonial stone landscape, that creates a confirmation by Tribes of the presence or absence of a ceremonial stone landscape. The appropriate timing for such mapping is mid-October through early May, prior to the greening of the forest.

Stage 2. Once the formal Tribal Historic Preservation Mapping of the features has been completed, a formal report shall be created that confirms the presence or absence of a ceremonial stone landscape, pursuant to 36 CFR 800.4(c)(1). This Tribally guided process shall include historical and title research, photo documentation, global positioning system (gps) mapping, and celestial alignment identification, finalized in an illustrated report.

Stage 3. Creation of guidance for protection and preservation of the resource will then be based on findings of the formal Tribal Historic Preservation Report.

The Tribes have not been provided an appropriate and adequate time frame, to create the tribal historic preservation report that confirms the presence or absence of a ceremonial stone landscape that is pursuant to 36 CFR 800.4(c)(1).

#### **8. DCR shall provide for the stewardship of all known and potential cultural resources on DCR property:**

Appendix G of DCR's Cultural Resource Policy states: The Department of Conservation and Recreation shall provide for the stewardship of all known and potential cultural resources on DCR property through sensitive resource management and planning and compliance with local, state, and federal historic preservation regulations. DCR actions and activities shall promote and foster the preservation, protection, and appreciation of these resources.

APPLICABILITY: All Divisions, Departments, Bureaus, and Staff

“Site examinations reveal that astronomical observation and alignments were very important components of ceremonial stone landscape sites. ...finding that features align astronomically is a strong indicator that a place has ceremonial significance.” A “feature’s location may also provide an alignment link from one landscape site to another to form a district.” Our initial examinations have preliminarily revealed numerous such elements. These elements **MUST** be protected as part of the **potential resource** to be protected, until a formal, thorough Tribal Historic Preservation Mapping and Report can be performed. Flagging each individual site **DOES NOT** protect the potential resource. The potential meaning **WILL BE DESTROYED** by skidders.

“It was through ceremonial stone landscape sites and the various features within them that the Ancients acknowledged the spirit of the Earth Mother and sought to gain harmony and balance with Her. Their recognition of the dialogue between Earth Mother and Her celestial relatives (sun, moon, stars, constellations, comets, meteors, etc.), which we contemporarily refer to as astronomical alignments, can be perceived through the Ancients’ placement of additional stone features to join and enhance various natural features within these landscapes. When we acknowledge that the landscape speaks, we may identify these astronomical alignments.

Site examinations reveal that astronomical observation and alignments were very important components of ceremonial stone landscape sites. Hence, finding that features align astronomically is a strong indicator that a place has ceremonial significance.

Individual features can have multiple functions and relationships. For example, a structure may be a component of a short range alignment such as a Sky Watcher’s Seat that positions an individual to view one or more astronomical events. When alignments involve horizon features, e.g. hills or notches observed in the distance, the observation places are typically designated with ceremonial stones, e.g. quartz boulders, that mark the location. At the same time, the feature’s location may also provide an



alignment link from one landscape site to another to form a district.”<sup>2</sup>

The **Turners Falls Sacred Ceremonial Hill Site National Register DoE report**, states, "the ceremonial hill may be one of a group of traditional cultural places forming a rural historic landscape made up of natural features important in cultural beliefs and origin stories and sites related to sacred ceremonial rituals, including but not limited to astronomical observations, gathering of medicinal herbs, and funerary practices. Within the context of other related features, the ceremonial hill has the potential to yield important information to Native American tribes about their origins, relationship to spirits, and traditional sacred practices. ...**Ongoing research, which includes astronomical observations from the Turners Falls site and a survey of related stone features throughout the region, is contributing to the reaffirmation of traditional practices and sacred precepts and rituals related to this and other sites.**"<sup>3</sup>

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### **Forest Futures Visioning Process; Why did we do all this?**

The creation of the “Landscape Designations for DCR Parks & Forests” guideline was a multi-year process, beginning with the Forest Futures Visioning Process, in which the Inhabitants of Massachusetts provided clear guidance to our public servants in DCR, in the form of numerous carefully considered public comments. If DCR is now presuming to disregard the guidelines that were agreed upon, the hard won fruits of a statewide process, how then has our investment of time and energy accomplished the goal of restoring the public's trust in DCR - one of the most important stated goals in the Forest Futures Visioning Process? It is vital for DCR and the Executive Office of Energy and Environmental Affairs (EOEEA) to restore alignment and adherence to its own guidelines, policies, and mandates in order to restore public trust in their stewardship and trusteeship of our living assets in public lands.

John Adams designed the framework of the Constitution of the Commonwealth of Massachusetts to be a government of laws, not men. If DCR disregards these guidelines which represent the consent of the self governing sovereign Inhabitants of Massachusetts, then DCR, and EOEEA will have established, without our consent, and in contradiction to Our Clear Guidance, a government of men not laws.

For all of the above stated reasons, and to prevent irreparable damage to the important irreplaceable cultural resources in question, we, the Wendell Historical Commission, claim that a complete halt to the improperly conceived Brook Rd. Logging Project is warranted.

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### **First Do No Harm**

Attached References:

- Wendell Letter to DCR of 2-22-18
- Wendell MOU
- Chronology of Documentation of Wendell SF Brook Rd. Large Area of CSL Features
- Appendix G
- Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines: <https://www.mass.gov/media/1062551/download>
- Turners Falls Sacred Ceremonial Hill Site Declaration of Eligibility for Inclusion in the National Register Report (redacted)

2 Indigenous American Ceremonial Stone Landscapes of the Northeast Multiple Properties Cover, submitted to the National Register of Historic Places for review in 2015.

3 Turners Falls Sacred Ceremonial Hill Site, National Register DoE Report, 5

Wendell Historical Commission  
Town of Wendell  
P.O. Box 41  
Wendell, MA 01379  
February 22, 2018

Priscilla Geigis, Deputy Commissioner for Conservation and Resource Stewardship for DCR  
Department of Conservation and Recreation  
251 Causeway St., Ninth Floor, Suite 600  
Boston, MA 02114

cc: Peter Church, Director of Forest Stewardship for DCR  
cc: Ellen Berkland, DCR Archaeologist  
cc: William Hill, DCR Forests Land Manager

Dear Deputy Commissioner Geigis,

We are writing out of concern for preservation of significant cultural resources lying within the Wendell State Forest; Brook Rd. logging proposal area. We feel DCR's fulfillment of the guidelines as stated in the "Landscape Designation for DCR Parks & Forests : Selection Criteria and Management Guidelines" is incorrect and does not fulfill the intent of the guidelines. In particular, DCR has failed to appropriately address the fact that this a large area of sensitive, fragile, cultural resources in this parcel of land that do qualify as a Zone 1 "Significant Feature Overlay" classification. To wit: "Within Woodlands, large areas of sensitive resources as described above (to protect areas of historical and cultural significance) will be not be included in project prescriptions and will be effectively reserved or excluded from harvesting by their exclusion from the silvicultural prescription." (pg 43)

Furthermore, as outlined on pgs 84-85, Significant Feature Overlays:

Section C. Management Guidelines:

"Specific management guidelines are provided by resource specialists [in this instance, Indian Tribes pursuant to 36 C F R 800.4 (c ) (1)]\* and/or by the professional staff of the agency or NGO that assessed the significant resource feature or has a regulatory role for protection of the resource."

In the Brook Rd. logging area, the resource specialists were not allowed to provide the specific management guidelines for the large area of fragile, sensitive cultural resources (Ceremonial Stone Landscape Complex) in question. Specifically: they were not allowed the necessary time to identify the bounds of the large area of cultural resources located in the Brook Rd. area, to map the area, and to make recommendations for the protection of the resource.

Lastly, public notice of the Brook Rd. Auction was not posted in the DCR Logging Proposal webpage, and the offer section had still not been filled in as of February 20th, 2018, as per DCR internal guidelines, even though auction is 2 days from now, on Friday, February 23rd. The auction was issued on Feb. 8th. The Wendell Historical Commission had been told that we would be notified of the issuance of the auction. We only just learned of the auction on February 20th. (<https://www.mass.gov/guides/eastern-connecticut-valley-forest-management-projects>)

For all of the above stated reasons, and to prevent irreparable damage to the irreplaceable cultural resources in question, we, The Wendell Historical Commission, state that the Brook Rd. logging auction should be delayed until DCR's divergence from the intent of DCR's own guidelines can be reconciled and resolved, with the Wendell Historical Commission, the Wendell Selectboard, and the four New England USET Tribes with whom the town of Wendell has recently entered into a Memorandum of Understanding to protect Ceremonial Stone Landscapes within the bounds of Wendell, which have traditional religious and cultural significance to Tribes. (see attached MOU document).

The Wendell Historical Commission, and the Wendell Selectboard, represent the interests of the Inhabitants of the Commonwealth of Massachusetts, residing in the town of Wendell, who are most significantly impacted by

the lack of adherence to the stated mission and purpose of the specific guidelines mentioned above.

We further feel that the guidelines are incomplete, in that there is no public appeal process, within the guidelines, to provide and restore the appropriate level of protection recommended in the guidelines, for what are clearly significant historic cultural features, which are as yet "unidentified" and unmapped, and which are potentially unique in all of Massachusetts DCR lands. These are significant, fragile, sensitive cultural resources which reside on public lands belonging to the Inhabitants of Massachusetts. The public officials in DCR are our Constitutional substitutes and agents, charged with trusteeship of preserving our significant assets in perpetuity for the benefit of all living and future generations of Massachusetts Inhabitants. (see Massachusetts Constitution, Part the First, Articles 4 and 5)\*. We wish here to provide a gentle reminder of the sanctity of that trust, and although many have not read our Constitution, it is still the foundational framework which we, the People of Massachusetts, are all bound to adhere to.

Signed :

Wendell Historical Commission ..... *Lisa Hoag* ..... Date... *2/22/2018* .....

cc: Wendell Select Board

Town of Wendell

P.O. Box 41

Wendell, MA 01379

cc:

Bettina Washington, THPO: Wampanoag Tribe of Gay Head (Aquinnah)

Marissa Turnbull, THPO: Mashantucket Pequot Nation

James Quinn, THPO: Mohegan Tribe

Elaine Thomas, Deputy THPO: Mohegan Tribe

Doug Harris, Preservationist for Ceremonial Landscapes, Narragansett Tribe

cc: Attorney General Maura Healey

Office of the Attorney General

1 Ashburton Place

Boston, MA 02108

\* **36 C F R 800.4 (c) (1)**: "...Indian Tribes possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them."

\* **Massachusetts Constitution; Preamble:**

"The end of the institution, maintenance, and administration of government, is to secure the existence of the body politic, to protect it, and to furnish the individuals who compose it with the power of enjoying in safety and tranquility their natural rights, and the blessings of life: ...

The body politic is formed by a voluntary association of individuals: it is a social compact, by which the whole people covenants with each citizen, and each citizen with the whole people, that all shall be governed by certain laws for the common good. ... that every man may, at all times, find his security in them. ..."

**Art. IV.** The people of this commonwealth have the sole and exclusive right of governing themselves as a free, sovereign, and independent State, and do, and forever hereafter shall, exercise and enjoy every power, jurisdiction, and right which is not, or may not hereafter be, by them expressly delegated to the United States of America in Congress assembled.

**Art. V.** All power residing originally in the people, and being derived from them, the several magistrates and officers of government vested with authority, whether legislative, executive, or judicial, are the substitutes and agents, and are at all times accountable to them.

(<https://malegislature.gov/Laws/Constitution>)





## MEMORANDUM OF UNDERSTANDING (MOU)

### Wendell, MA Tribal Historic Preservation Ceremonial Stone Landscape Survey

For purposes of historic preservation, the Historical Commission of the Town of Wendell, MA, acting under Massachusetts General Law Chapter 40 8D, seeks to identify and protect ceremonial stone landscapes within the town's jurisdiction. Federally recognized Tribal Historic Preservation Offices are official bodies that are certified and authorized by the U.S. Department of the Interior to assist federal, state, and local agencies in carrying out their historic preservation responsibilities.

Pursuant to 36 CFR Part 800.4(c)1 of the National Historic Preservation Act, the federal government acknowledges that Indian tribes possess special expertise in assessing the National Register eligibility of historic properties that may be of religious and cultural significance to Tribes.

Collaboratively, the Tribal Historic Preservation Offices (THPOs) of the Wampanoag Tribe of Gay Head (Aquinnah), the Mohegan Tribe, the Mashantucket Pequot Tribal Nation and the Narragansett Indian Tribe offer a survey and certification service for the identification of, and avoidance planning to help ensure the protection and the preservation of Indigenous/Tribal ceremonial stone landscapes (CSLs) and other sites and features of Tribal significance.

This MOU shall activate a collaborative stewardship relationship between Wendell's Historical Commission and the THPOs for present and future task specific memorandums of agreement (MOAs). As required, these MOAs shall detail specific units of CSL identification and avoidance planning as the Town requires confirmation of the presence or absence of CSLs on land that is within the Town's jurisdiction. Aspects of this THPO guided process may be executed with the sub-contractual participation of mapping specialists who are trained in the Tribes' culturally sensitive survey methodology. This Tribally guided process shall include historical and title research, photo documentation, global positioning system (gps) mapping, and celestial alignment identification finalized in an illustrated report.

It is presently understood that the details and locations of ceremonial stone features that shall be revealed to the Wendell Historical Commission representatives shall not be made public and shall remain in the permanent, confidential care and protection of the signatory THPO(s) and the Wendell Historical Commission (or any statutory successor that has been given its authority and responsibility by the Commonwealth of Massachusetts and the Town Select Board to identify, protect, and preserve historic properties). Only by specific Town/Tribe agreement shall any public information or other dissemination plan be instituted.

WHEREAS representatives of the Tribes have preliminarily confirmed the presence of ceremonial stone landscape elements within Wendell,

NOW THEREFORE, by their signatures herein below, the Wendell Select Board, the Wendell Historical Commission, and the Tribal Historic Preservation Offices hereby agree to initiate negotiation of future Agreements under which to identify and share information for purposes of protection, preservation and avoidance planning pertaining to the locations of ceremonial stone landscapes and as per agreement to perform future CSL surveys.

Wendell Select Board:

Wendell Historical Commission:

Narragansett THPO:

Wampanoag Tribe of Gay Head (Aquinnah) THPO:

Mohegan THPO:

Mashantucket Pequot THPO:

*Christine Arred* Chair

*Joseph J. Coll, Jr.*

*Christopher M. Washington*

*James D. ...*

*Maria ...*

Date 10/19/17

Date 24 OCT 17

Date 13 NOV 2017

Date 12/1/17

Date 11/9/17

Date 11/11/17

**Chronology of Wendell State Forest, Wickett Pond Cultural Resource Area research, initial mapping, and documentation (Brook Rd. Logging Project Area) as of April 7, 2018**

2012: Creation, publication and adoption of *Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines*.

2016 Summer – severe drought.

8-29-16: Tour of Brook Rd. logging area with Rob Mills, Keith DiNardo, Ellen Berkland, of DCR, Sarah Kohler, Lisa Hoag residents, and other park staff. Sarah Kohler discovered large figure of arranged stones in the bottom of vernal pool which was completely dry, in upper CCC pine plantation logging area.

4-25-17: Tour potential cultural resources sites at Wendell State Forest with Bettina Washington, THPO Wampanoag of Gay Head (Aquinnah).

9-1-17 to Present: Initial mapping of features in Brook Rd. logging area from September through October with Eva Gibavic, Manager/GIS Specialist, Ceremonial Landscapes Research, LLC. Continued preliminary mapping, as snow melt, and weather have permitted.

10-4-17: First Selectboard meeting to discuss a potential Wendell MOU agreement with four federally recognized New England Tribes for protection of Ceremonial Stone Landscapes. Lisa Hoag, Wendell Historical Commission, Doug Harris, Narragansett, Narragansett Deputy Tribal Historic Preservation Officer (DHTPO), Eva Gibavic attended.

10-12-17: Initial ceremonial stone landscape feature identification walk through with Doug Harris DHTPO, Eva Gibavic, Lisa Hoag.

10-18-17: Doug Harris, DHTPO, gives Ceremonial Stone Landscape presentation to packed house in Wendell, “Let the Landscape Speak”. Ellen Berkland, DCR Archaeologist, Keith DiNardo, Eastern Connecticut Valley District Forester attend.

10-18-17: Wendell Selectboard agrees to create MOU with tribes.

10-26-17: Tour of Brook Rd. ceremonial stone landscape cultural features, with Ellen Berkland, Keith DiNardo, Bill Hill, Doug Harris, Eva Gibavic, Lisa Hoag.

10-26-17: Ellen Berkland states that Doug Harris shall be allowed to review the flagging. This has not yet been accomplished.

12-8-17: Completion of all signatories to Wendell MOU.

1-18: Conversation with Forester Keith DiNardo, DiNardo promised that Doug Harris DHTPO would go on the walk through with loggers, of the Brook Rd. logging area to point out areas of potential impact to cultural features. Neither Doug Harris, nor Lisa Hoag were notified or invited to the walk through.

1-27-18: LIDAR map of Wendell State Forest with initial cultural features mapped.

2-8-18: The logging auction is issued on Feb 8th. Wendell citizens, and Doug Harris, DHTPO were not notified.

2-19-18: Lisa Hoag learned of logging auction by chance in phone call from Bill Hill four days before the auction.

2-20-18: Auction offer not posted on DCR website as of Feb 20th. Two weeks public posting notice is established in DCR guidelines.

2-22-18: Wendell Historical Commission Letter to DCR protesting auction is faxed, emailed, and a hard copy mailed to Deputy Commissioner Prescilla Geigis, and others cc'e to the letter. Phone call later that day from Bill Hill (representing EOEEA), acknowledging receipt of letter, and informing Lisa Hoag that auction will go forward nevertheless.

2-23-18: Auction is conducted at DCR field office in Amherst. Lisa Hoag attends auction.

2-24-18 – 3-1-18: Initial CCC land use research and deed history research undertaken. Consultation with Sean Fisher, Archivist for DCR Plans Library, for records to start to establish land use.

## Appendix G. DCR Cultural Resources Policy.

**POLICY:** The Department of Conservation and Recreation shall provide for the stewardship of all known and potential cultural resources on DCR property through sensitive resource management and planning and compliance with local, state, and federal historic preservation regulations. DCR actions and activities shall promote and foster the preservation, protection, and appreciation of these resources.

**APPLICABILITY:** All Divisions, Departments, Bureaus, and Staff

### PROCEDURES:

#### I. Definitions

The following definitions explain terms used throughout this policy directive:

**Cultural Resource**—A district, site, building, structure, landscape, object or ethnographic resource that is at least fifty years old and has important historical, cultural, scientific, or technological associations. Cultural resources also include pre-historic or historic archaeological sites containing physical remains or indications of past human activity and/or any artifacts that have been constructed or manipulated by human influence and holding potential significance for understanding past, present, or future human behavior.

**Cultural Resources Inventory (CRI)**—A baseline inventory of cultural resources in the DCR system, consisting of location maps, related reports, and individual site inventory forms with background historical information.

**National Register**—The National Register of Historic Places is the official federal list of districts, sites, buildings, structures and objects significant in American history, architecture, archaeology, engineering and culture.

**Project**—Any action, activity, program, construction or land modification that is directly undertaken by DCR, receives any financial assistance from DCR, or requires the issuance of a license or permit by DCR.

**Project Notification Form**—The form that is completed by DCR or a private project proponent in order to notify the Massachusetts Historical Commission of a project requiring review under state or federal historic preservation regulations.

**Secretary of the Interior's Standards for the Treatment of Historic Properties**—General guidelines for the preservation, rehabilitation, restoration, and reconstruction of historic buildings, established by the National Park Service to encourage consistent preservation practices at the national, state, and local levels.

**Site**—The location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archaeological value regardless of the value of any existing structure.

**State Register**—The State Register of Historic Places includes the following properties:

- All districts, sites, buildings, or objects listed in the National Register of Historic Places or formally determined eligible for listing in the National Register of Historic Places by the Keeper of the Register, United States Department of the Interior;
- All local historic districts or landmarks designated under local ordinances or by-laws;
- All structures and sites subject to preservation restrictions approved or held by the MHC;
- All historical or archaeological landmarks certified or listed pursuant to MGL Ch. 9, Sec. 26D and 27.

## **II. Mission Statement—Office of Cultural Resources**

The Office of Cultural Resources (OCR) preserves the cultural heritage of Massachusetts through stewardship of DCR's historic buildings, structures, landscapes, archaeological sites, and archival resources; through training, public education, and advocacy; and through the development of innovative tools for protecting historic landscapes.

The OCR staff provides expertise, technical assistance, and project management skills in landscape preservation, historic preservation planning, archaeology, archival records management, and compliance with local, state and federal historic preservation laws. In addition to leading OCR initiatives and programs, OCR staff directly support activities undertaken by other bureaus and divisions within DCR.

## **III. Implementation**

The Commissioner shall designate a staff person to coordinate agency implementation of this policy.

The Commissioner shall ensure that an archaeologist is on staff who meets the professional qualifications and standards for investigation and reporting as outlined in 950 CMR 70.00 and retains DCR's state permit for archaeological investigations on public lands or lands in which the Commonwealth has an interest.

The agency shall provide training on all aspects of this policy to DCR planning, engineering, project management and operations staff.

## **IV. Regulatory Compliance—Project Planning**

During the project planning process DCR shall comply with historic preservation laws at the local, state, and federal levels, listed below. OCR serves as the Department's liaison with local historic district commissions and the Massachusetts Historical Commission (MHC) pertaining to project notifications and requests requiring assistance from and consultation with these commissions. All inquiries from MHC shall be directed to OCR.

### **A. Local Landmarks and Historic Districts**

Many municipalities within the Commonwealth have designated local historic landmarks and historic districts to protect the distinctive characteristics of important sites and districts and to encourage new structural designs that are compatible with their historic setting. Local Historic District Commissions review all applications for exterior changes to landmarks or properties within local districts to ensure that changes to properties will not detract from their historic character. Review criteria are determined by each municipality.

MGL Ch. 40C      <http://www.mass.gov/legis/laws/mgl/gl-40c-toc.htm>



## B. State Register Review

DCR must notify MHC, through filing of a Project Notification Form (PNF) or Environmental Notification Form (ENF), of any projects undertaken, funded, permitted, or licensed in whole or in part by the agency in order that MHC can make a Determination of Effect of the project on historic and archaeological resources listed in the State Register. DCR shall send copies of PNFs or ENFs to the local historical commissions in those communities that have received Certified Local Government status from MHC. It is the responsibility of the MHC to determine whether State Register properties exist within the project's area of potential impact. When MHC determines a proposed project will have an adverse effect on historic properties, DCR must consult with MHC and any interested parties to explore feasible and prudent alternatives that would eliminate, minimize, or mitigate the adverse effects and, following consultation, adopt such alternatives.

DCR may enter into a Programmatic Memorandum of Agreement (PMOA) with the MHC to streamline the state review process, including identifying possible activities that qualify as categorical exemptions. OCR is responsible for the coordination of any PMOA with the MHC and directly oversees implementation.

MGL Ch. 9, Sec. 26-27C <http://www.mass.gov/legis/laws/mgl/9-27c.htm>  
950 CMR 71

## C. Massachusetts Environmental Policy Act (MEPA)

Some DCR projects may require filing an ENF with MEPA in addition to the State Register Review. MHC reviews all ENFs and comments on those in which there are concerns that the project has the potential to affect significant historic or archaeological properties. MEPA regulations state that an ENF must be filed if a project involves: 1) demolition of all or any exterior part of any Historic Structure listed in or located in any Historic District listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth; or 2) destruction of all or any part of any Archaeological Site listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth unless the project is subject to a Determination of No Adverse Effect by MHC or is consistent with a Memorandum of Agreement with MHC that has been the subject of public notice and comment.

301 CMR 11.00 <http://www.mass.gov/envir/mepa/thirdlevelpages/meparegulations/meparegulations.htm>

## D. Section 106 Review

DCR is required to comply with Section 106 of the National Historic Preservation Act when undertaking projects that require a permit, funding, license, or approval from a federal agency. The federal agency (or, in many cases, the recipient of federal assistance or permits) is required to notify MHC of such projects and take into account the effects of the project on historic properties that are listed or eligible for listing in the National Register of Historic Places. When the federal agency, in consultation with the MHC as the Office of the State Historic Preservation Officer, determines that a project will result in an adverse effect to those properties, the federal agency must take prudent and feasible measures to avoid, minimize, or mitigate those effects. Other interested parties such as local historical commissions or Indian Tribes are also consulted as part of the process.

16 USC 470 et seq <http://www.cr.nps.gov/local-law/nhpa1966.htm>  
36 CFR 800 <http://www.achp.gov/regs-rev04.pdf>

**V. Regulatory Compliance—Other (See also Emergency Scenarios/Procedures below)**

Other DCR activities require compliance with additional state historic preservation laws:

A. Massachusetts Unmarked Burial Law

When human skeletal remains are discovered or if human remains are disturbed through construction or agricultural activity, DCR staff must immediately notify the Office of the Chief Medical Examiner (617-267-6767, ext. 176). The Medical Examiner shall conduct an inquiry to determine whether the remains are suspected of being 100 years old or more, and, if so determined, shall immediately notify the State Archaeologist at MHC. The State Archaeologist conducts an investigation to determine if the skeletal remains are Native American. If the remains are deemed likely to be Native American, the State Archaeologist shall immediately notify the Massachusetts Commission on Indian Affairs, which shall cause a site evaluation to be made to determine if the place where the remains were found is a Native American burial site. Consultation occurs to develop a written agreement to preserve the burials in situ or, if no other feasible alternative exists, to excavate the burials.

MGL Ch. 38, Sec. 6	<a href="http://www.mass.gov/legis/laws/mgl/38-6.htm">http://www.mass.gov/legis/laws/mgl/38-6.htm</a>
MGL Ch. 9, Sec. 26A and 27C	<a href="http://www.mass.gov/legis/laws/mgl/9-26a.htm">http://www.mass.gov/legis/laws/mgl/9-26a.htm</a>
	<a href="http://www.mass.gov/legis/laws/mgl/9-27a.htm">http://www.mass.gov/legis/laws/mgl/9-27a.htm</a>
MGL Ch. 7, Sec. 38A	<a href="http://www.mass.gov/legis/laws/mgl/7-38a.htm">http://www.mass.gov/legis/laws/mgl/7-38a.htm</a>

B. Preservation Restrictions

When DCR seeks to acquire a preservation restriction on a property, MHC must review and approve the language of the restriction before it is finalized. A preservation restriction means a right, whether or not stated in the form of a restriction, easement, covenant or condition, in any deed, will or other instrument executed by or on behalf of the owner of the land or in any order of taking, appropriate to preservation of a structure or site historically significant for its architecture, archaeology or associations, to forbid or limit any or all (a) alterations in exterior or interior features of the structure, (b) changes in appearance or condition of the site, (c) uses not historically appropriate, (d) archaeological field investigation without a permit, or (e) other acts or uses detrimental to appropriate preservation of the structure or site. Certain projects on properties with a preservation restriction require MHC approval.

MGL Ch. 184, Sec. 31-33	<a href="http://www.mass.gov/legis/laws/mgl/184-31.htm">http://www.mass.gov/legis/laws/mgl/184-31.htm</a>
	<a href="http://www.mass.gov/legis/laws/mgl/184-32.htm">http://www.mass.gov/legis/laws/mgl/184-32.htm</a>
	<a href="http://www.mass.gov/legis/laws/mgl/184-33.htm">http://www.mass.gov/legis/laws/mgl/184-33.htm</a>

C. Consultation with Massachusetts Native Americans

DCR must consult directly with Wampanoag (Gay Head and Mashpee) Tribal Councils and the Massachusetts Commission on Indian Affairs (MCIA) for management of the reservation in the Fall River-Freetown State Forest. DCR must consult with the Wampanoag and Nipmuc Tribal Councils on matters affecting each of those tribes. DCR must consult with the MCIA and with other tribal and intertribal councils on matters that affect all other tribes.

Executive Order 126	<a href="http://www.lawlib.state.ma.us/ExecOrders/eo126.txt">http://www.lawlib.state.ma.us/ExecOrders/eo126.txt</a>
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## **VI. Resource Management and Planning**

### **A. OCR Program of Inventory and Evaluation**

One of the primary objectives of OCR is to provide an ongoing program of inventory and evaluation of cultural resources on DCR property. This first and most critical step in cultural resource management entails identifying potentially significant cultural resources and discovering the significance or meaning of each resource within a local, statewide, and national context. To this end, OCR shall develop, maintain and oversee the use of its own statewide baseline inventory of cultural resources, known as the Cultural Resources Inventory (CRI). Information from the CRI shall be available for use by DCR staff, but it shall not be made available to the public without approval from the OCR Director, and particularly, the written approval of the State Archaeologist for requests of disclosure of archaeological site locations.

In order to recognize highly significant cultural resources, OCR shall identify those that appear to meet the criteria for the National Register of Historic Places and, in consultation with MHC, nominate them for listing on the National Register. OCR shall initiate and manage the nomination process in consultation with other DCR staff and the MHC.

OCR shall expand and update the CRI as necessary to supplement historical background and geographical information on currently inventoried cultural resources, add newly discovered cultural resources, and update baseline information on cultural resources on properties acquired or disposed by DCR, and provide information on newly inventoried cultural resources to the MHC to coordinate with MHC's Inventory of Historic and Archaeological Assets of the Commonwealth.

The CRI shall also be supplemented with other cultural resource-oriented data and publications, such as MHC inventory forms, historic structure reports, condition assessments, interpretive materials, maintenance/repair records, and archaeological impact studies.

OCR shall provide CRI information to district, regional and facility supervisors with the understanding that archaeological site locational information is confidential, not a "public record," and must be secured from inadvertent or unauthorized disclosure or from subsequent disclosure without written permission of the State Archaeologist (MGL Ch. 9, Sec 26A and 27C (950 CMR 70.13(7))). The CRI shall be used by DCR to enable informed preservation decisions as part of DCR's resource planning and management activities, including the prioritization of capital projects for stabilization, repair and adaptive reuse.

### **B. Procedures for Protecting Cultural Resources**

#### ***1. Acquisition of Land and Conservation/Preservation Restrictions***

OCR staff shall sit on the DCR Lands Committee and provide assistance and input into the protection of properties of significance to the state's cultural heritage through acquisition in fee, conservation restrictions, or preservation restrictions. Once an acquisition is complete, the OCR shall determine whether a baseline inventory should be undertaken on the property to identify cultural resources. Preservation restrictions must be reviewed and approved by MHC prior to DCR acquisition.

## 2. Resource Management Plan Development

OCR staff shall provide technical support toward the Resource Management Planning Program to insure that the protection of cultural resources is a core component of Resource Management Plans. Depending on the type of DCR facility and the scope of the RMP, this support may range from data collection and documentation to property analysis and treatment recommendations.

## 3. Project Planning

DCR shall make every effort to protect cultural resources on DCR property. For projects planned at any Department level, appropriate Department staff shall consult with OCR to consider potential project impacts on cultural resources. Consultation with OCR shall occur as early as possible in the planning process, but no later than the 25% design development phase. When a conflict between a project location and its impact on cultural resources is identified, cultural resource management strategies shall be brought into consideration to determine if the impact to the resource can be avoided, adverse impacts mitigated, or whether additional site investigation is necessary. OCR shall initiate and manage those activities that will minimize or mitigate adverse impacts to cultural resources.

When necessary, OCR shall conduct a coordinated program of basic and applied research to support planning for and management of cultural resources on DCR property. Repairs, rehabilitation, and other preservation activities shall follow the guidelines in the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Adequate research to support planning and compliance with MHC Review will precede any final decisions about the treatment of cultural resources or operational activities which may impact cultural resources.

For each DCR project, a Project Notification Form (PNF), including a project description, a site plan, and photographs, shall be provided to OCR. OCR shall forward the PNF to MHC and, where required, local historic district commissions. If outside consultants are preparing the PNF, then OCR staff shall be given an opportunity to review the draft PNF before it is submitted. The submission of an Environmental Notification Form (ENF) under the Massachusetts Environmental Policy Act (MEPA) satisfies MHC notification, and no PNF is needed for project undergoing MEPA review. Copies of ENFs shall be provided to OCR.

MHC has a maximum of 30 days to make a Determination of Effect on historic resources or request supplemental information in order to make a Determination of Effect. In the event that the MHC makes a determination of "no effect" or "no adverse effect" on historic resources, the project may proceed. If MHC determines that the proposed project will have an "adverse effect" on historic resources, DCR shall consult with MHC to explore options to avoid, minimize, or mitigate the adverse effect. If, after consultation, no feasible or prudent alternative exists that would avoid the adverse effect, a Memorandum of Agreement between DCR, MHC and any other interested parties is required to resolve the adverse effect and complete the consultation process.

Local historic district commission review will vary by municipality.

No physical work for projects shall occur until the review process has been completed with MHC and (if applicable) the local historic district commission.



#### *4. Emergency Scenarios/Procedures*

In the event an unanticipated site of archaeological or cultural significance is encountered during the project implementation stage, project work shall be halted and OCR shall be notified. OCR shall initiate the review process with MHC and make a recommendation to the Deputy Commissioner of Planning & Engineering whether or not to suspend all aspects of project implementation during consultation with MHC.

If human remains are discovered during project implementation, project work shall be halted, the area must be secured, the State Police must be notified, and the Medical Examiner (617-267-6767 ext, 176) and the DCR staff archaeologist must be contacted to determine if the remains are over 100 years old. No one should touch or remove the remains. If the remains are over 100 years old, the State Archaeologist at MHC must be notified and will consult with DCR (and the Massachusetts Commission on Indian Affairs if the remains are Native American) to avoid or mitigate impacts to the graves. In any such situation, DCR staff shall work with OCR to comply with the state's Unmarked Burial Law.

If DCR must take immediate action to avoid or eliminate an imminent threat to public health or safety or a serious and immediate threat to the environment, OCR shall be notified as soon as possible. OCR shall attempt to seek prior oral approval of the MHC for the project via telephone if written notice is not practicable, provide written notification of the emergency work within ten days, and commence full compliance with MHC review requirements within thirty days, under the terms of 950 CMR 71.10.

#### *5. Day-to-Day Operations*

Management of DCR's property shall be carried out with cultural resource protection in mind. Adverse impacts to cultural resources should be avoided and mitigated, where possible, with appropriate protection strategies. Cultural resources shall be adequately maintained, following recommended techniques where formal guidelines are in place. Cultural resource management decisions should be made with input from OCR.

Discovery of artifacts should be reported immediately to OCR, noting the exact location of the find. Be aware of sites that may be exposed or threatened by erosion or visitor impacts. Any vandalism, unauthorized digging, or removal of artifacts should be reported to the appropriate law enforcement personnel and OCR. Archaeological investigations on public lands require a permit from the State Archaeologist at MHC (MGL Ch. 9, Sec 26A and 27C (950 CMR 70)).

#### *6. Lease/Permit Programs*

The issuance of leases and permits by DCR for activities involving the physical alteration of a property must undergo MHC review with OCR and MHC, as outlined above.

The proposed issuance of DCR permits to investigate archaeological sites shall be reviewed by OCR. OCR shall coordinate the issuance of a special use permit with the State Archaeologist at MHC, who must also issue a concurrent State Archaeologist permit for any field investigations on DCR property (MGL Ch. 9, Sec 26A and 27C (950 CMR 70)).

*7. Disposition of Real Property*

The protection of cultural resources, including the preservation and continued use of significant historic buildings and structures, shall be accommodated as part of any disposition of DCR property. Under the State Register review regulations (950 CMR 71.05(e)), the transfer or sale of a State Register property without adequate conditions or restrictions regarding preservation, maintenance, or use will result in an “adverse effect” determination from MHC. DCR must consult with MHC and any interested parties to resolve the effect of the proposed transfer or sale of the State Register property.



# United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, N.W.  
Washington, D.C. 20240

IN REPLY REFER TO:

## DETERMINATION OF ELIGIBILITY NOTIFICATION

### National Register of Historic Places National Park Service

**Name of Property:** The Turners Falls Sacred Ceremonial Hill Site (Formerly, The Airport Improvement Project – Turners Falls Municipal Airport)

**Location:** Franklin County

**State:** Massachusetts

**Request submitted by:** John C. Silva, Manager, Environmental Programs, FAA, New England Division

**Date received:** 05/25/2007

**Additional information received** 11/07/2008

#### Opinion of the State Historic Preservation Officer:

☐ Eligible      ☒ Not Eligible      ☐ No Response      ☐ Need More Information

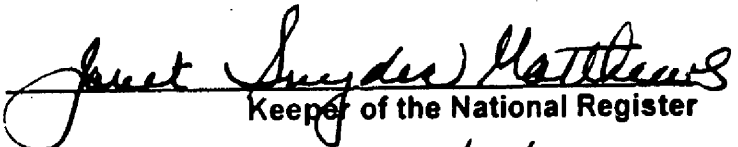
#### Comments:

The Secretary of the Interior has determined that this property is:

☒ Eligible      Applicable criteria: A, D      ☐ Not Eligible

**Comment:** See attached comments.

☐ Documentation insufficient  
(Please see accompanying sheet explaining additional materials required)

  
Keeper of the National Register

Date: 12/11/2008

**The United States Department of the Interior  
National Park Service**

**National Register of Historic Places  
Determination of Eligibility Comment Sheet**

Property Name: The Turners Falls Sacred Ceremonial Hill Site  
(Formerly, The Airport Improvement Project-  
Turners Falls Municipal Airport)  
Franklin County, Massachusetts

Secretary of the Interior Findings: Eligible, Criteria A and D

Comments:

**INTRODUCTION**

On May 21, 2007, the Federal Aviation Administration (FAA) submitted a request for a formal determination of eligibility (DOE) to the National Register of Historic Places, pursuant to federal regulations 36 CFR 63. This request was in response to a disagreement between the FAA and two official consulting parties, the Narragansett Tribe and the Wampanoag Tribe of Gay Head (Aquinnah), over the identification and potential significance of stone features located at Turners Falls Municipal Airport (the Airport). The FAA maintained that the four stone piles are features associated with the remains of a nineteenth-century rock wall construction project; the Tribes maintain that the stone features are components of a traditional cultural place (TCP), known as a "sacred ceremonial hill," and include the four visible stone piles and an extended row of stacked stones; further research may reveal additional features.

In June 2007, Paul Loether, Chief of the National Register of Historic Places and the National Historic Landmarks Programs, made a site visit, accompanied by members of the Narragansett Tribe. In July 2007, the National Register found that the documentation submitted by the FAA was insufficient to determine the eligibility of the stone piles as a TCP or any type of historic or precontact property under any of the National Register Criteria. We provided comments to the FAA that detailed the information that was needed to make a decision and encouraged FAA to work with any interested Tribes and/or parties to provide that information to us.

On April 24, 2008, members of the Narragansett tribe met with Paul Loether and National Register staff in Washington D.C. to discuss the determination of eligibility and show National Register staff an independent film entitled, *Hidden Landscapes*<sup>1</sup>, that records, through the medium of film, an oral history with the tribes about the sacred ceremonial hill and a larger ethnographic and cultural landscape of sacred significance.

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<sup>1</sup> *Hidden Landscapes* is now the name of the film series.



On November 11, 2008, the Massachusetts State Historic Preservation Office submitted a written copy of their opinion that explained why they believe the property is not eligible for the National Register.

#### 1) CRITERIA A AND D

The Turners Falls sacred ceremonial hill site at the Turners Falls Airport is a traditional cultural place that is eligible for the National Register of Historic Places under Criteria A and D. The property is associated with events that have made a significant contribution to the broad patterns of Narragansett, Aquinnah-Wampanoag, and Mashpee-Wampanoag history. The property may also be significant to other tribes of the northeastern United States. Located in the middle Connecticut River region of New England, this site also possesses the potential to yield important information about traditional Native American practices, beliefs, and sacred rituals.

The Turners Falls sacred ceremonial hill site meets the characteristics of a traditional cultural place as defined in the National Register Bulletin, *Guidelines for Evaluating and Documenting Traditional Cultural Properties*. Specifically, the property is associated with several living, traditional groups that existed historically and have continued to practice traditional ways up to the present. These groups share cultural practices, customs, and beliefs rooted in their history. Those practices, customs, and beliefs continue to be practiced today and are important in maintaining the groups' continuing cultural identities. Additionally, these groups transmit and pass down the shared cultural practices, customs, and beliefs that are associated with this place. It is also important to note here that the long period of disuse due to forced abandonment, with use beginning again just recently, does not make the property ineligible for the National Register. The *National Register Bulletin, Guidelines for Evaluating and Registering Traditional Cultural Properties*, notes that the fact that a property has little continuous time depth does not make the property ineligible; the property's association with the traditional activity reflected in its contemporary use is what must be considered in determining eligibility. This includes recent revitalization of traditional sacred practices at a place that may have been abandoned in the past for various reasons (Parker and King 1998, p. 18).

The site is a highly significant "prayer hill" containing stone features, and is referred to by the tribes as a "sacred ceremonial hill." The site is central to the cosmology of the combined tribes and the traditions that have marked Native American sacred and ceremonial practices for numerous generations. This site directly links modern-day tribes, most of whom share similar Algonquin-based language and culture, with their ancestral origins and long-standing cultural traditions. The tribes named above are direct descendants of those who traditionally gathered at the site of Wissatinnewag-Peskeompscut/Turners Falls for sacred ceremonial purposes, as well as seasonal subsistence activities (fishing, hunting, and farming). In addition the site may have sacred meaning to other tribes of the northeastern United States, including the Western Abenaki, Nipmuck, Wabenaki, and Mahican, who in part are believed to have common ancestry with the tribes of the Pocumtuck Confederacy (including the Pocumtucks, Nonotucks, and Norrotucks) who occupied the middle Connecticut River Valley at the

time of first contact and Anglo-American settlement. Representatives of all of these tribes had gathered at Wissatinnewag-Peskeompscut and nearby Squaqheag/Northfield at the time of the Turners Falls Massacre/Falls Fight of May 19, 1676. This event signified an important turning point in the conflicts between Indian tribes and Anglo-American settlers in the New World and brought an end to what seems to have been a long period of Native American settlement, farming, and seasonal encampment in the middle Connecticut River Valley.

The dispersal of Indian tribes to other parts of New England, Canada, and New York, was followed by an era of cultural suppression in which Indians not only were denied access to traditional hunting and fishing grounds but also became disconnected from their sacred ceremonial places. As Tribal Chairwoman and past THPO of the Wampanoag Tribe of Gay Head (Aquinnah), Cheryl Andrews-Maltais, explained: "The traditions and the ceremonies started to subside. We were not allowed to go to these places. There were prohibitions written on the books (laws) to stop us from going to these places. Additionally, if the people would not adopt and accept Christianity and still continued the practices, those practitioners were usually taken away. And if they kept going to the site, even without the leadership or practitioners or the holy people or the spiritual leaders, then the places were destroyed... to eradicate them from current day memory." (interview: *The Great Falls* 2008).

The stone features are shown through oral traditions (both Native and Anglo-American), documentary history, and recent verification activities by the Narragansett, Wampanoag, and affiliated tribes, to be interrelated, constructed features utilized by Native American tribes for ceremonial purposes in conjunction with calendar observations based on the positions of the sun and a cosmology that has assigned sacred meaning to the natural environment, astronomical events, traditional medicinal practices, and spirits, including the all powerful spirit Cautantowwit, who is considered both the source of life and guardian of all beings in the afterlife and has his home in the Southwest (Bragdon, 1996; *The Great Falls* 2008 ). Surviving present-day, federally recognized tribes acknowledge that the grouping of stone features here is the central component of a ceremonial landscape, which is defined by the "viewscope" visible from this observation point and interrelated points to the south and west, [REDACTED]

[REDACTED] (D. Harris 2008; *The Great Falls* 2008). Celestial observations made by tribal members, tribal representatives, scientific analysts, and field researchers, in August 2007 revealed that the observation point marked by the stone features was aligned with the setting sun [REDACTED] during the height of the Perseid meteorite shower. The passage of the meteorite shower from northeast to southwest during this astronomical event is of great importance in the cosmology of Eastern tribes (Scope of Work 2008; *The Great Falls* 2008). These observations coincided with the mid-August Celebration, which has been an annual event of the Narragansett tribe for more than three hundred recorded years (332, according to the colonial calendar).

The sacred ceremonial hill at Turners Falls Airport is eligible for listing in the National Register of Historic Places because:

1) It is one of an undetermined number of traditional cultural places in the middle Connecticut Valley that can be documented through oral history, historical record, archeological data, and ongoing research to be associated with the sacred practices and beliefs of the various Native American tribes that either lived in the middle Connecticut River Valley or that traveled to the area to partake in seasonal activities and traditional rituals. The National Register eligibility of member sites can be evaluated individually as part of a multiple property group or through a district nomination.

2) It is an archeological site that contributes to a National Register eligible expansion of the Riverside Archeological District (NR 1975); this expansion encompasses a significant concentration of precontact archeological sites on the south/east side of the Connecticut River in the town of Montague, [REDACTED]

[REDACTED], and portions of Montague Plain that were traversed by the north to south Indian Trail. In addition to its location on the Connecticut River, a major transportation corridor for Native Americans, this enlarged district also includes the confluence of the Millers River, a major waterway that provided east and west movement across the northern tier of Massachusetts.

3) In addition, the ceremonial hill may be one of a group of traditional cultural places forming a rural historic landscape made up of natural features important in cultural beliefs and origin stories and sites related to sacred ceremonial rituals, including but not limited to astronomical observations, gathering of medicinal herbs, and funerary practices. Within the context of other related features, the ceremonial hill has the potential to yield important information to Native American tribes about their origins, relationship to spirits, and traditional sacred practices. Many of the sacred connections to this pauwau (medicine) district may have been severely stressed, and some may have been lost due to cultural suppression during and after King Philip's War of 1675-76 in the mid-seventeenth century.<sup>2</sup> Ongoing research, which includes astronomical observations from the Turners Falls site and a survey of related stone features throughout the region, is contributing to the reaffirmation of traditional practices and sacred precepts and rituals related to this and other sites.

This determination of eligibility is based on a review of the documents provided by the FAA and the consulting tribes, as well as a review of historical accounts; related National Register nominations; oral history by elders, Tribal Historic Preservation Offices, and tribal spokespersons; recent scholarship in history, anthropology, and archeology; an independent film (*The Great Falls* 2008); and websites relating to Connecticut River history, Native American history and traditions, and the typology of stone features associated with Native American ceremonial practices.

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<sup>2</sup> The Wampanoag chief sachem Metacomb was known to the colonists as King Philip.

## 2) A CONTEXT FOR CEREMONIAL LANDSCAPE FEATURES IN THE CONNECTICUT RIVER VALLEY

### General

Verified by the archeological record, the area along the middle Connecticut/Quinneticott River, extending from Ashuelot/Hinsdale, New Hampshire, and Brattleboro, Vermont, south to Northampton and Hadley, Massachusetts, is associated with more than 12,000 years of human use and activity centered on the River as a source of sustenance, transportation, commerce, communication, and spiritual fulfillment. The tribes believe they have used the area from time immemorial. This area can be seen as a large, connected, cultural landscape that includes related historic sites, traditional cultural places, and archeological sites. Stone features, such as the ones evaluated here, may be integral parts of these properties. Historical accounts, Native American oral history, and archeological data support the long-standing value of this region for its abundance of fish, fertile meadows and bottomlands for farming, and forest resources for hunting. These sources also corroborate the Native American reverence for the region's distinctive topography of river, hills, streams, and cataracts, as well as the use of the land and river in the vicinity of Wissatinnewag-Peskeompscut/Turners Falls for sacred ceremonial purposes.

Much of the diverse cultural heritage of this area is related to nationally important themes of American precontact history and history as defined by the National Park Service's Thematic Framework, including Peopling Places, Expressing Cultural Values, and Transforming the Environment. A number of previously recognized National Register eligible archeological sites in the area document the continuity of human occupation of the area from the Paleoindian and other eras.

1) Documentation of Paleoindian sites of importance in understanding the lifeways and patterns of the Earliest Americans can be found in The Earliest Americans Theme Study, NHL Program, 2004. (See also: <http://www.nps.gov/history/archeology/EAM/index.htm>). These include the Dedic Site (NR) in South Deerfield and the Hanneman Site (Nassaney 1999) [REDACTED]

2) Continuum of Native American occupation and use from the Paleoindian period up until 1676—the date marking the dominance of Anglo-American settlement in the region and the dispersal of Native American groups (north to Vermont, New Hampshire, Maine, and Canada or west to the Hudson River Valley). This continuum is demonstrated in the stratification of sites (from Paleoindian to Late Woodland) making up the Riverside Archeological District (NR 1975), which covers a 674-acre area on the north and west banks of the Connecticut River in the towns of Gill and Greenfield and includes Wissatinnewag and the now-submerged area known as Barton's Cove (Nassaney 1999). Wissatinnewag, known as the place of the shining or slippery rocks, is located atop the bluffs in Greenfield; an Indian fishing station, the site is linked to the water's edge by a series of trails (D. Harris, conference call, October 27, 2008; Dudek et al. 2002).

Stratified sites also exist on the opposite river bank [REDACTED]

3) The Pocumtuck Confederacy occupied the lands in the middle Connecticut River Valley in the 1660s. According to Sheldon (1895), the confederation included the following tribes, each acting as an autonomous community: the Pocumtucks who occupied the land in the present-day towns of Deerfield, Montague, and Greenfield; Nonotucks in the vicinity of current day Hadley and Northampton, the Podunks at Windsor (Conn.), the Warranokes (also spelled Woronoco) along the Westfield River, Tunxis at Farmington (Conn.), and the Squaheags at Northfield (Sheldon, p. 48). According to one scholar, the seventeenth century was a period of socio-political instability for the member tribes: "Patterns of alliance sometimes shifted rapidly....Ties between communities were forged, strengthened, weakened and/or ruptured under the pressures, constraints and opportunities that arose from the fur and wampum trade, epidemics, European settlement, and wars (E. Johnson 1999, p.158)." According to another ethnohistorian, these tribes shared an "underlying cosmology, similar languages, and a long history," this included a common search for connectedness with spirits, called "manitou" and defined as "the impersonal force that permeated the world, observable in anything marvelous, beautiful, or dangerous" (Bragdon 1996).

4) Both Native American oral history and Anglo-American literature of the nineteenth century (based in large part on "pioneer" oral tradition) substantiate that the portion of the river above the rapids, particularly the area surrounding Wissatinnewag-Peskeompscut and the area above and below the falls were known as abundant fishing grounds and intertribal gathering places in the Spring when the shad and salmon came upriver to spawn. Hosted by the Pocumtuck, tribes from many parts of New England gathered here at this time to harvest fish and for related ceremonies and celebrations (Nussaney 1999; Bruchau 2006; D. Harris 2008; Scope of Work 2008; *The Great Falls*, 2008). The return of the anadromous fish each year signified to the tribes the cyclic renewal of nature and a connectedness with the earth mother. The area west of the river, also called Pocumtuck, was settled by Anglo-Americans in 1669 and renamed Deerfield; for many years, Indians returned to the area in hopes of reclaiming it.

The Pocumtuck tribe was known for its successful use of the broad meadows at Deerfield, Greenfield and Northfield for cultivating corn, squash, and beans, and for its storage of food in underground granaries many of which were found by settlers in the surrounding landscape (Sheldon 1895, pp. 76-77; Thomas 1976; Bruchac 2006; Bragdon 1996; Melvoin 1989). Sheldon explains the bounty offered by the river, arable fields, berry thickets, and wild forests as the primary reason Peskeompscut was selected by Indian leaders for what appears to have been intended as a permanent settlement in 1675-1676; he wrote "Nowhere else could provisions for the summer and stores for the winter be so easily procured (Sheldon 1895, p.145)." In May 1676, the Indians who gathered at

Wissatinnewag-Peskeompscut had already cultivated and planted the fields and were preparing for the annual fishing harvest.

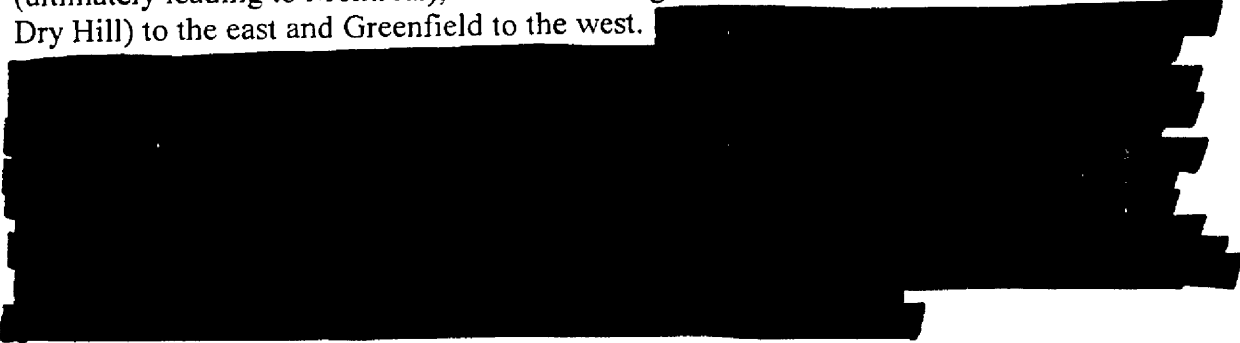
Much, but by no means all historical scholarship and literature, relates to the importance of this area, known in Anglo-American literature as the "Pioneer Valley," as a contested landscape - one which figured importantly in the early interaction of Native American tribes and Anglo-American traders and became the setting of highly significant events in colonial history. Of particular interest to current day historians and ethnohistorians is the century-long transition of the middle Connecticut River Valley from a region dominated by Native American culture (fishing, hunting, farming, ceremonial activities, and burials) to one organized in the form of small New England towns settled by yeoman farmers and enterprising tradesmen. The Anglo-American settlement of the area is represented by the Old Deerfield Historic District (NHL) and a number of National Register districts. This transition began with the events challenging the unity and power of the Pocumtuck Confederacy and presaging the hostilities of 1675-76 (called King Philip's War or Metacom's War). Conflicts continued intermittently between Anglo-American settlers and displaced Native Americans, who having migrated to New York, Vermont, and Canada, remained hopeful that they would be able to return to the middle Connecticut Valley. Hostilities between Indian tribes and colonists ended with the close of the French and Indian War in 1763. About this time Montague, which had been called "Hunting Hills," was settled as an extension of Sunderland ("Swampfield.")

5) Important events surrounded the interaction of Native American groups and Anglo-American traders and settlers in the period ca. 1600 to 1763. These relate to legal matters (e.g. deeds of land, alliances, etc.) as well as military conflicts. The recording of five deeds for a total of 8000 acres of land, much of it prime agricultural land, in the middle Connecticut Valley (within present-day Deerfield) in the late 1660s and early 1670s marked the beginnings of valley fur-trader John Pynchon's efforts to make Indian land a commodity that could be bought and sold (replacing the declining trade in beaver pelts); such transactions and the attempts to form settlements that followed stemmed from questionable motivations and engendered conflicting understandings about the meaning of land ownership, thereby becoming a source for rising tensions between native groups and colonists (Melvoin 1989, pp. 56-57; Thomas 1976). Anglo-American history chronicling the events indicates the presence of Metacom (a.k.a. King Philip), the chief sachem of the Wampanoag (formerly called the Pokanoket), in the region in the winter of 1675-76 (possibly at Northfield/Squaheag) when tribal leaders are known to have gathered at a council site north of the river in Northfield. At least one interpretation explains his presence here as indicative of his strategy of laying claim to the region as the center of the unified Indian empire (Sheldon 1895, pp. 138-145). The Narragansett oral tradition and Sheldon's account (p. 145) confirm that the encampment at the falls in 1676 had been established by Canonchet, the Narragansett's chief sachem, as a refuge for the Native American families who had been displaced by conflicts with the Massachusetts Bay, Plymouth, and Connecticut colonies and their militias (Bruchau 2006; D. Harris, oral interview, August 10, 2008; *The Great Falls* 2008).

6) Many Native American families were present in the area and were camped on both sides of the falls on May 19, 1676 when Capt. William Turner and a militia made up mostly of men from the Hadley, Northampton, and Springfield settlements launched the surprise attack known as the Falls Fight/Turners Falls Massacre (Judd 1908; Pressey 1910; Sheldon 1895). Based on the accounts provided by colonist Thomas Reed who escaped from captivity at Wissatinnewag-Peskeompscut/Turners Falls and alerted the Hadley settlement of a great gathering and festivity of Indian tribes, as well as the accounts of members of the militia who participated in the raid, Sheldon reported:

"Their principal camp [was] at the head of the rapids on the right bank of the river at Peskeompscut, another was at some distance above it, a third nearly opposite on the left bank, while a fourth was on Smead's Island, a short distance below, and still another at Cheapside guarded the ford of the Pocumtuck River. Besides these, every fishing place on the Connecticut as high up as the Ashuelot [River near Hinsdale] had its camp." (Sheldon 1895, p. 151)

7) Two important long-distance Indian trails converged on Montague Plain, one a south to north route that followed the Connecticut River between New Haven and Canada (ultimately leading to Montreal), another running east and west through Shutesbury (past Dry Hill) to the east and Greenfield to the west.




#### A Native American Cultural Landscape

The interest of the Gay Head (Aquinnah) and Mianpee Wampanoag and Narragansett tribes in this area suggests that 1) the sacred meaning of this place extends to many tribes of the northeastern United States, and that 2) the well-documented fishing, hunting, and farming activities that defined the Native American lifeways in this region during the pre- and post-contact periods were accompanied by a strong spiritual attachment to the native landscape and a sacred ceremonial tradition based on astronomical observations.

The proximity of the ceremonial hill to the abundant fishing grounds at Wissatinnewag-Peskeompscut/Turners Falls is of major importance and suggests that ceremonial activities accompanied the gathering of many tribes at the falls during the spring shad and salmon runs. Sacred ritual surrounded the planting and harvesting of corn, which bore a sacred relationship to Cautantowwit (Bragdon 1996). Oral history also tells us that the familiar gathering place drew special tribal members and clans at other times for rituals associated with healing and other sacred practices. Great importance is attached to water in Native American cosmology, drawing attention to the importance of "Deep Hole,"

(Bragdon 1996). Oral





tradition, as well as other evidence, demonstrates that this area was reserved for ceremonial events.

Of particular note is the Narragansett tribe's acknowledgement that the ceremonial hill is significant for its use in making astronomical observations that figure importantly in the tribe's sacred rituals (Scope of Work 2008; *The Great Falls* 2008). In an effort to understand the extent of such ceremonial use, observations by tribal members, tribal representatives, scientific analysts, and field researchers, were made in mid-August 2007 during the time of the Perseid meteorite shower. [REDACTED]

[REDACTED] on the evening when the Perseid meteorite shower was most visible (D. Harris 2008; *The Great Falls* 2008). It appears such astronomical observations were related to celestial events, the daily and seasonal movement of the sun, and the relationship of the sun to natural features within what the documentation calls the "viewscape" (Scope of Work 2008). As early as 1643, colonial leader Roger Williams, in *Key into the Language of the Indians of New England*, referenced Native American interest in the constellations: "By occasion of their frequent lying in the fields and woods, they much observe the stars; and their very children can give names to many of them, and observe their motions...." (Reprinted [www.nativestones.com/fell](http://www.nativestones.com/fell)). The ceremonial practices that accompanied such observations involve, for the Narragansett, their connectedness to the spirit Cautantowwit (NR nomination, DOE 2007). Some of the details about these rituals cannot be disclosed. The hearth feature at the Hanneman Site (Paleo-Indian) and a hearth feature (with an associated small mammal burial) [REDACTED] (UMass Archeological Management Memorandum 2005, 2006) may also be associated with ceremonial practices that were carried out at some time during the area's long history of human use and occupation.

The ceremonial use of this area is indicated by the National Register documentation given to the National Park Service as part of the DOE of 2007 which notes that the absence of Native American lithic chipping debris and projectiles around the stone pile features supports the interpretation of the site as ceremonial, "in that they occupied a sacred space where the discard of refuse (such as lithic chipping debris and projectile points) would have been considered inappropriate." This pattern of use can be seen in the archeological record of sacred spaces at some traditional cultural sites across the country, where domestic sites were located on one side of a geographic feature such as a mountain, lake, river, or butte, and ceremonial sites that lacked artifacts were found on another side (see, for instance, Medicine Wheel/Medicine Mountain, NR and NHL draft documentation on file 2003).

Additionally, the high number of burials and burial sites in the Turners Falls area is one important element among others that is suggestive of a ceremonial and/or sacred relationship. Previous DOE documentation (the NR nomination that is part of the DOE of 2007) notes that the spirit Cautantowwit, which is related to the ceremonial hill site, holds dominion over creation and death. The discovery of inhumations during agricultural and development activities in the historic record in the vicinity of

Wissatinnewag-Peskeompscut/Turners Falls was not only noted by European American settlers, but recorded to such a degree that local historians in the nineteenth century wrote authoritatively about distinct modes of burials in the area. The modes identified included extended and flexed burial patterns, as well as one highly distinctive circular pattern comprised of twelve graves (Nassaney 1999, p. 223; Pressey 1910; Sheldon 1895). Native American cremations have also been found in the area.

The following entry from the catalogue for Memorial Hall museum at Deerfield conveys nineteenth century ideas about the significance of the circular or spokes burial found in the village of Gill at Wissatinnewag-Peskeompscut:

"Twelve bodies buried with their feet resting in a circle about five feet in diameter, the heads radiating out like the spokes of a wheel... The abundance of charcoal gave evidence of the presence of fire at the burial...It is a significant fact that among the bones and charcoal were fragments [of implements] broken by fire." (George Sheldon, *Catalog of the Collection of Relics in Memorial Hall*, 2<sup>nd</sup> ed., Deerfield, Mass. Pocumtuck Valley Memorial Association 1908, reprinted books.google.com/books, July 28, 2008).

The spokes burial is an important element to modern tribes within the larger cultural landscape. Reported by both George Sheldon (1895, p. 78-79) and Edward Pressey (1910, p. 63), the circular burial was one of the most significant and enigmatic finds of the late nineteenth century.

Pressey attached significance to the number twelve and commented that it "being the extremely ancient number connected with sun worship leads one to conjecture a mystical religious significance in the scheme"(Pressey 1910, p. 63).

Furthermore, artifact collecting during the historic era, and collection through modern archeological excavation, have recovered artifacts, both from burials, and in other contexts, that may be ceremonial in nature. These include stone weapons, smooth rattle stones, a carved stone pipe of a hooded figure (Nassaney 1999), Manitou stones (site observation/personal communication, Paul Loether 2008; *The Great Falls* 2008), and a soft pebble with scratch marks and drilled stone beads that are possibly talismanic at the Dedic/Sugarloaf Site (Earliest Americans Theme Study 2004).

The viewscape from the top of the ceremonial hill reveals a number of natural features said to have sacred meaning in tribal cosmology. These features are believed to take on special meaning when they are viewed from the ceremonial hill in relationship to the stone features and astronomical or celestial events. The importance attached to such features is supported by early Anglo-American knowledge of Indian place names and recording of Indian legends.

The sacred meaning of several natural features which prominently appear in the viewscape across Montague Plain [REDACTED] was referenced in Edward Pressey's *History of Montague* (1910). These include Lake Pleasant and Grassy Lake, [REDACTED] which he noted for the "power of its fascinating beauty (251)"; Kunckwadchu/Mt. Toby, which with cataracts and caves was the legendary home of "Wittum" in Abenaki folklore; and the Wequamps/Sugar Loaf Mts., which was formed in the image of a beaver by "Hobmock," the spirit giant of Abenaki lore. According to Pressey (1910), what is known about sacred features such as Lake Pleasant, Mt. Toby, Mt. Sugarloaf, and the rivers and streams, appears to have come from the legends of the Abenaki (Algonquian-based language). Many of the place names attributed to Native American familiarity with this area of the Connecticut River can be found in recorded deeds; in many cases these names persisted in local usage and were recorded in the local histories written ca. 1900 by George Sheldon, Edward Pressey and Sylvester Judd. The film, *The Great Falls*, draws special attention to the importance of Wequamps in the origin stories of New England tribes and their relationship to the geological events that created glacial Lake Hitchcock (*The Great Falls* 2008).

Although a substantial amount of information is known by anthropologists about subsistence, food storage, fishing, and farming (corn, squash, beans, and tobacco), little is known by anthropologists about the spiritual beliefs and ceremonial practices of the Pocumtuck, their ancestors, intertribal relatives, and other regional tribes. Recorded observations and the collection/interpretation of physical artifacts at the end of the nineteenth century by Anglo-American historians and amateur archeologists corroborate the claims made by Native American tribes that the general area where the stone features are located was central to traditional ceremonial practices of several New England tribes. Such observations include the discovery of a circle on Montague Plain believed to have "ceremonial" purpose and the finding of several Manitou stones within this circle (Pressey 1910). The collections of Historic Deerfield and the Turners Falls library are repositories of some of the artifacts collected along the Connecticut River, on the Montague Plains, and surrounding hills (Sheldon 1908; Nassancy 1999).

### 3) STONE FEATURES AS A PROPERTY TYPE

For at least the past two decades some types of stone features in New England have increasingly been recognized by non-traditional groups, as well as historic preservation professionals, as a highly significant property type related to traditional cultural practices, including ceremonial, sacred, and medicinal practices (*The Great Falls* 2008: see especially the interviews with archeologists: Dr. James Petersen, University of Vermont and Dr. Paul Robinson, State Archaeologist, Rhode Island; Ballard 2000). However, it should be noted that not all historic preservation professionals agree that some stone features are traditional cultural places. Some professionals argue that most, if not all, stone features date to the historic period and are related to historic wall construction (Simon 2008; Massachusetts Department of Cultural Resources, "Stones that Speak: Forgotten Features of the Landscape," *Terra Firma* 5, 2007). In response to those who insist that the region's stone features can be attributed only to farm clearing or land

division by non-Indian settlers, Dr. Ella Sekatau, the tribal ethnohistorian and medicine woman for the Narragansett Tribe, has stated: "Those of us who know our oral traditions and originations know that's not correct....there is evidence, if they look. It is there." (interview: *The Great Falls* 2008).

There are many references to the sacred meaning of stone features and to Native American tribes in the northeastern United States in early Anglo-American literature to support the finding that such stone features can possess traditional and/or sacred significance. Such sources as the following support the association of tribes at first contact with these features and suggest their sacred importance, especially in regards to effigy-making and burial practices.

Ezra Stiles, a Congregationalist minister who served as President of Yale College, spent his early adult years as a missionary among the native tribes of New England, where he began to make detailed observations of the spiritual rituals of tribal members. He drew attention to the presence of effigy or god stones in the New England landscape (*The Great Falls* 2008). In his entry for September 19, 1794 (*The Literary Diary of Ezra Stiles*), Ezra Stiles noted observing on top of West Rock at New Haven: "a carved or wrought stone which I know to be one of the Indian Gods, of which I have found about or above twenty in different places from Boston to Hudson River, and particularly between New Milford on West and Medfield Massachusetts on East." (Reprinted [www.nativestones.com/effigy](http://www.nativestones.com/effigy)).

In *Travels in New England and New York* (1821) Timothy Dwight, a later Yale president, commented on the Indian mode of erecting stone monuments under "extraordinary" circumstances (as compared with routine burials) to mark the consecrated ground where burials had taken place. He notes Monument Mountain in Stockbridge, Massachusetts, Sacrifice Rock on Cape Cod, and another site near New Milford, Connecticut. He also observes the recent desecration of several of these sites. "I ought, in my account of that, to have added, that this mode of erecting monuments was adopted on peculiar occasions [for example, the grave of an Indian sachem]. The common manner of Indian burial had nothing in it of this nature. The remains of the dead, who died at home, were lodged in a common cemetery, belonging to the village, in which they had lived. Sometimes they were laid horizontally, and sometimes they were interred in a sitting posture.... These monuments were plainly erected under the sanctions of Religion: for every Indian felt himself religiously obliged, when he passed by, to cast a stone upon them." (Timothy Dwight, *Travels in New England and New York*, 1821, Vol. 3, p. 408, reprinted [www.nativestones.com/cairns](http://www.nativestones.com/cairns))

Dwight also observed: "They also formed images of stone and paid them religious homage. One of these idols is now in the museum at Hartford. Sacred stones exist still in several places; one particularly, at Middletown, to which every Indian who passes by makes a religious obeisance." (1821, Vol. 1, p. 85, reprinted [www.nativestones.com/effigy](http://www.nativestones.com/effigy)).

E.G. Squier, in *Antiquities of the State of New York* (1851) noted that such a stone effigy of white granite, measuring 31 inches high and 17 wide, had been found in East Hartford 1788 and was displayed at the Yale College museum. Squier observed: "The superstition of the Indians extended to remarkable objects in nature. A tree or stone of singular form seldom failed to command their reverence. A stone, which, from the action of natural causes, has assumed the general form of a man or an animal, is especially an object of regard, and the fancied resemblance is often heightened by artificial means, as by daubs of paint, indicating the eyes, mouth, and other features." (*Antiquities of the State of New York*, Smithsonian Contributions to Knowledge, Vol. 11, 1851, p. 170-2, reprinted [www.nativestones.com/effigy](http://www.nativestones.com/effigy)).

Noah Webster, in a letter of 1788 to Ezra Stiles, commented on Indian burials:

"The Indians seem to have two methods of burying the dead—one was, to deposit one body (or at most but a small number of bodies), in a place, and cover it with stones, thrown together in a careless manner. The pile thus formed would naturally be nearly circular, but those piles that are discovered, are sometimes oval. In the neighborhood of my father's house, and about 7 miles from Hartford, on the public road to Farmington, there is one of these Carnedds [cairns] or heaps of stone. I often passed by it in the early part of my youth, but never measured its circumference or examined its contexts. My present opinion is that its circumference is about 25 feet. The inhabitants in the neighborhood report, as a tradition received from the natives, that an Indian was buried there, and that it is the custom for every Indian that passes by, to cast a stone upon the heap. This custom I have never seen practiced; but have no doubt of its existence, as it is confirmed by the general testimony of the first American settlers....The other mode of burying the dead was to deposit a vast number of bodies, or the bones which were taken from the single scattered graves, in a common cemetery, and over them raise vast tumuli or barrows; such as the mount at Muskingham, which is 390 feet in circumference, and 50 feet high. The best of these cemeteries may be found in Mr. Jefferson's *Notes on Virginia*, which will appear the most satisfactory to the reader in his own words."

Thomas Jefferson makes specific reference to stone piles or "barrows," in his *Notes on the State of Virginia* (1743-1846). He says, "...the Barrows, of which many are to be found all over this country. These are of different sizes, some of them constructed of earth, and some of loose stones. That they were repositories of the dead, has been obvious to all: but on what particular occasion constructed, was matter of doubt. Some have thought they covered the bones of those who have fallen in battles fought on the spot of interment. Some ascribed them to the custom, said to prevail among the Indians, of collecting, at certain periods, the bones of all their dead, wheresoever deposited at the time of death" (p. 223); and, "But on whatever occasion they may have been made, they are of considerable notoriety among the Indians: for a party passing, about thirty years ago, through the part of the country where this barrow is, went through the woods directly to it, without any instructions or enquiry, and having staid about it some time, with expressions which were construed to be those of sorrow, they returned to the high road, which they had left about half a dozen miles to pay this visit, and pursued their journey. There is another barrow, much resembling this in the low grounds of the South

branch of Shenandoah, where it is crossed by the road leading from the Rock-fish gap to Staunton. Both of these have, within these dozen years, been cleared of their trees and put under cultivation, are much reduced in their height, and spread in width, by the plough, and will probably disappear in time. There is another on a hill in the Blue ridge of mountains, a few miles North of Wood's gap, which is made up of small stones thrown together. This has been opened and found to contain human bones, as the others do. There are also many others in other parts of the country" (pp. 225, 226).

Noah Webster also noted evidence that the burning of bones was also practiced in Indian burials and he noted the presence of ising glass (a sample of which Stiles had previously shown Webster), formed of pure clay, and or shells and cement hardened by fire, without glazing, which was often found in the meadows of the Connecticut River Valley. These observations are presented in the context of the then-current intellectual dispute about the relationship of North American Indian practices and pre-Columbian European influences. In the third of his letters to Stiles, Webster refuted his earlier opinion that the Muskingham mounds on the Ohio River between West Virginia and Ohio were created by DeSoto. (G. Hubert Smith, "Noah Webster, The Archaeologist," *American Anthropologist* 33, no.4, (Oct.-Dec, 1931), pp. 620-624, reprinted [www.jstor.org/stable/661015?seq=1](http://www.jstor.org/stable/661015?seq=1). Also reprinted [www.nativestones.com/cairns](http://www.nativestones.com/cairns)).

Recently, archeologists, historic preservation professionals, and others have begun to work with tribes to document and record the traditional and/or ceremonial meanings and the importance of such places. For instance, Edwin C. Ballard has been investigating the uses of specific "U" shaped structures since the late 1980s and hypothesizes that these features are viewing platforms. Such structures would have been used to view astronomical events (Ballard 2000; see also *The Great Falls* 2008).

Through this research, tribes and others have identified several types of stone features including, but not limited to: cairns, rock piles, stone rows, and stone row complexes, linking rows, fish weirs, enclosures, stone chambers, standing stones, pedestals, niches, portals, and effigy stones (*The Great Falls* 2008, see also [www.stonestructures.org](http://www.stonestructures.org), Reference Materials). Each of these types of stone features may have been used for multiple purposes temporally and by different tribes. Some of the uses of these features include, but are not limited to: burial markers, for subsistence related activities, as prayers and/or for ceremonial purposes, as celestial markers, and as viewing platforms (D. Harris 2008; [www.stonestructures.org](http://www.stonestructures.org), *The Great Falls* 2008, NR nomination, DOE 2007; Scope of Work 2008). These features are often related to other stone features and other types of markers and sites across a larger cultural landscape (Scope of Work 2008).

#### 4) TURNERS FALLS SACRED CEREMONIAL HILL

The tribes maintain that this property is an example of a prayer hill that includes rock piles and stone row features that are believed to have been used for ceremonial purposes and as viewing stations for celestial events. Rock piles and stone rows often include godstones and/or Manitou stones, several of which are recorded at this site (Loether 2007). They can be large or small. They are often used as ceremonial directional

markers and components of ceremonial calendars (D. Harris 2008; *The Great Falls* 2008; Scope of Work 2008).

However, while the FAA, initially disagreed and the Massachusetts SHPO continues to disagree with the tribes's assertion that this property is a traditional cultural place used as a prayer hill, it should be noted that the use of the stone row and existing piles in conjunction with the annual Perseid meteorite shower (mid-August) is credible and consistent with the practices of the tribes in the northeastern United States and eastern Canada, some of whom referred to their home land as "Dawnland" or the land of the first light. The use of wheels in ceremonial rituals and healing practices is common to a number of North American tribes and has been associated with native cosmologies in which astronomical observations figure prominently (see, for example, the Medicine Wheel/Medicine Mountain NHL and NR draft documentation on file 2003). Manitou stones are a common marker of Native American practices (Mavor and Dix 1989; *The Great Falls* 2008; D. Harris 2008).

Tribal oral tradition provides further evidence of the connection between sacred ceremonies and places such as the prayer hill and their continuing importance to tribal identity. John B. Brown III, a hereditary medicine man-in-training and THPO of the Narragansett Indian Tribe, has stated, "Remember, these ceremonies were our science. We had a way of delving into the places of other existences, other realities without necessarily intruding upon them. It was more of an attempt to understand our place in the universe and our place in existence. . . . The ceremonies that were performed there would have been performed simultaneously in other places. That area was one simple locus of many loci in which simultaneous ceremonies would have been held." (interview: *The Great Falls* 2008).

Corroborating the Native American claims that the area is associated with traditional ceremonial practices, Edward Pressey in *History of Montague: A Typical Puritan Town* (1910), reported the finding of two sacred ("Manitou") stones at a site on Montague Plain within several hundred feet of the ceremonial hill:

"William Marsh has shown me two Indian sacred symbol stones, figuring seemingly the spread wings of the "thunder bird," the war god, one very rare with eye pierced for standard, the other slightly carved to suggest feathers, both beautiful. These relics were found at different times within the same circle of ground which seems to have been made softer and clearer of stones than the surrounding gravel, . . . in the middle of Montague Plain, at the point where Kunckwadchu [Mt. Toby], the sacred mountain most impressively punctuates a wide horizon of hills when the August sun or the February moon is highest in the heavens. We guess that this was an important ceremonial place" (Pressey 1910).

The stone features are noted by tribes to be the central component of a ceremonial landscape that can be defined by a "viewscape" and relates to locations where other stone features have been confirmed. An ongoing survey has to date located a number of stone features (believed to have sacred meaning) [REDACTED]



[REDACTED]

This roughly circular area corresponds to a possible multiple property study area having as its thematic focus traditional land uses and ceremonial practices associated with the region's Native American cultural groups. Within this context, the ceremonial hill with its component stone features at Turners Falls Airport has been determined individually eligible under Criteria A and D.

In addition, the ceremonial hill with its component stone features is considered a contributing property within an expanded National Register eligible historic/archeological district [REDACTED]

[REDACTED]

Although the final boundaries of such a Turners Falls Cultural Landscape District are presently undetermined, [REDACTED]

[REDACTED]

## 5) SOURCES

### National Register and National Historic Landmarks Documentation

Dedic Site (80000504) NR 7/16/1980 Significance (State-level significance under the The Earliest Americans Theme Study)

The Earliest Americans Theme Study [www.nps.gov/archeology/PUBS/NHLEAM/F-Introduction](http://www.nps.gov/archeology/PUBS/NHLEAM/F-Introduction)

Riverside Archeological District (75000256) NR 7/09/1975

Old Deerfield Village Historic District (66000774) NHL 10/15/66

Montague Center H.D. (01001236) NR 11/16/2001

New Salem Common H.D. (78000443) NR 4/12/1978

Northfield Main Street H.D. (82004965) NR 7/08/82

Sunderland Center H.D. (02000157) NR 3/15/2002

Wendell Town Common Historic District (92000580) NR 5/21/1992

West Whatley H.D. (03001018) NR 10/10/2003

Whatley Center Historic District (03000920) NR 9/11/2003

Turner Falls H.D. (82004966) NR 5/02/1982

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