

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 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.

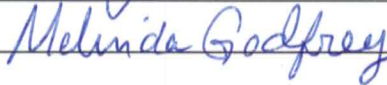

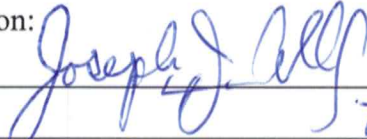
For all of the above stated reasons, and to prevent irreparable damage to the important irreplaceable cultural resources in question, we, The Wendell Historical Commission, claim that a complete halt to the improperly conceived Brook Rd. Logging Project is warranted.

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.