APPENDIX A

Project Area Photographs & Figures
Figure 1 Annotated photo of Project area looking from southeast (GSE 2014).

Figure 2 Primary spillway of Millie Turner Dam (Source: DER).
Figure 3 Looking upstream to impoundment from Turner Dam (GSE 2014).

Figure 4 Looking up raceway to east auxiliary spillway (GSE 2014).

Figure 5 View of headpond with east auxiliary spillway in background (Stantec 2010).
Figure 6 Looking upstream from Hollis Street Bridge to Turner Dam (GSE 2014).

Figure 7 Looking upstream at backwatered Nissitissit approximately 2,800 ln. ft. upstream of dam (GSE 2014).

Figure 8 Looking northwest from parking lot across pond to Turner Dam (GSE 2014).
Figure 9 Comparison of Existing vs. Proposed 100-yr Floodplain under the Proposed Action (GSE 2014).
Figure 10 Existing wetland boundaries within Project vicinity (GSE 2014).
Figure 11: Anticipated wetland boundary from implementation of the Proposed Action (GSE 2014).
APPENDIX B

Rare, Threatened, & Endangered
Species Consultation
INTRA-SERVICE SECTION 7 BIOLOGICAL EVALUATION

Originating Person(s): Bill Bennett, Partners for Fish and Wildlife Program
New England Field Office, Concord, NH

Telephone Number(s): (603) 223-2541

Date: June 16, 2015

I. Service Program(s) and Proposed Activity: Partners for Fish and Wildlife Program.

The proposed Turner Dam Removal Project will breach the Millie Turner/Blake Mill Dam, a 256-ft long gravity structure constructed of earthen fill and masonry, spanning the mainstem Nissitissit River in Pepperell, Massachusetts. The dam blocks all fish passage, impedes natural stream process, and is considered a “High” hazard and in “Poor” and “Unsafe” condition according to the Massachusetts Office of Dam Safety. The project is a partnership between the US Fish and Wildlife Service (Service), Massachusetts Division of Ecological Restoration (DER), Massachusetts Division of Fisheries and Wildlife (MA DFW), Trout Unlimited, the Nashua River Watershed Association, the private dam owner, and the Nashoba Conservation Trust. The Project is expected to have a net ecological benefit by restoring natural stream processes to the watershed and reconnecting 20 miles of high quality coldwater habitat for native Eastern brook trout (Salvelinus fontinalis), American eel (Elliottio complanata), and other aquatic organisms within the Nissitissit River. Public safety will also be enhanced by removing the risk of a potential catastrophic failure of the dam.

The preferred approach will remove 100 feet of Turner Dam’s primary spillway. The breach will have a minimum bottom width of 70 feet with side slopes along the breach face of 1.5H:1V or steeper. The full vertical height of the structure would be removed to eliminate any potential barrier to fish passage, and pass without limitation the modeled 500-year storm event.

The impoundment will be drawn down in a controlled manner prior to demolition of the spillway to minimize in-water work. In-water work would also occur during seasonal low flows between September 1 and October 15 to minimize turbidity and potential impacts to state-listed mussels. Prior to and during construction, the MA DFW Natural Heritage and Endangered Species Program will conduct mussel surveys and translocate all state-listed mussels out of the project action area.

Construction activity will be limited to the dam structure and an access area from an unpaved parking lot and drive. Swamp mats will be laid along the upstream face of the dam spillway after the impoundment is dewatered to facilitate access. No trees or forest habitat will be cleared during construction. Once breached, the river will be allowed to naturally form a meandering channel through the impoundment that will transport the accumulated sediments downstream.
II. Pertinent Species within the Area

Northern Long-eared Bat
Effective May 4, 2015, the northern long-eared bat (*Myotis septentrionalis*) was federally listed as a threatened species under the Endangered Species Act (80 FR 17974). Although the northern long-eared bat may be present in the action area, we are not aware of any recent records confirming their presence. During the summer, northern long-eared bats roost singly or in colonies in forested habitat underneath bark, in cavities or in crevices of both live trees and snags (dead trees). Northern long-eared bats seem to be flexible in selecting roosts, choosing roost trees based on suitability to retain bark or provide cavities or crevices. During the evening, northern long-eared bats can be found foraging in a variety of forested and non-forested habitats, including wetlands. During winter, northern long-eared bats hibernate in caves and mines (hibernacula) with constant temperatures, high humidity, and no air currents. Factors affecting the species include modifications to bat hibernacula, disturbance of hibernating bats, and loss of forest habitat including forest fragmentation.

Small Whorled Pogonia
Effective October 19, 1993, the plant small whorled pogonia (*Isotria medeoloides*) was reclassified from being federally listed as endangered to threatened under the Endangered Species Act (58 FR 53904). Although the species may be present in the action area, we are not aware of any recent records confirming their presence. A member of the orchid family, the small whorled pogonia is an herbaceous perennial occurring in young and maturing mixed-deciduous or mixed deciduous/coniferous forests that have sparse to moderate ground cover and an open understory canopy. The plant usually has a single grayish-green stem with a whorl of five or six leaves near the top of the stem and below the flower. The plant flowers between May and June with a single or pair of greenish-yellow flowers, which are self-pollinated by mechanical means. Once pollinated, a capsule forms containing several thousand seeds. The primary threats to the small whorled pogonia include habitat loss and degradation as well as collection for commercial or personal use.

III. Station Name and Action:

Station: New England Field Office, Concord, NH
Action: Funding from Disaster Relief Appropriations Act of 2013 provided through the Department of Interior and National Fish and Wildlife Foundation and Technical Assistance from the Service’s Partners for Fish and Wildlife Program

IV. Location

The Millie Turner/Blake Mill Dam (Turner Dam) impounds the Nissitissit River in the Town of Pepperell, Massachusetts approximately one mile upstream of its confluence with the Nashua River. The dam’s coordinates are 42.674856, -71.581874 and is located just upstream of the Hollis Street Bridge/Route 111. The dam also occurs within the Nissitissit River Wildlife Management Area, which is a 340-acre property composed of three parcels along the Nissitissit.
V. Determination of Effects

A. **Explanation of effects of action on species and critical habitats listed in II**

**Northern Long-eared Bat**
The project area is within the mapped range of the northern long-eared bat (80 FR 17974). No known hibernacula or maternity roost trees occur within the project area; however, foraging individuals from the adjacent forest may utilize the riparian corridor within the project area. Because no trees will be cut or removed during the project, we do not expect the project to have any effect upon the northern long-eared bat.

**Small Whorled Pogonia**
The project area is within the mapped range of the small whorled pogonia (58 FR 53904). No individuals are known to occur within the project area and habitat is not suitable within the areas of ground disturbance. We do not expect the project to have any effect upon the small whorled pogonia.

B. **Explanations of actions to be implemented to reduce adverse effects**

**Northern Long-eared Bat**
Adverse effects are not anticipated, therefore, no measures to reduce effects are needed.

**Small Whorled Pogonia**
Adverse effects are not anticipated, therefore, no measures to reduce effects are needed.

VI. Effect Determination and Response Requested

A. **Listed Species Determination:**

**Northern Long-eared Bat**
As previously described, the Turner Dam Removal Project will have no effect on the northern long-eared bat or its habitat.

**Small Whorled Pogonia**
As previously described, the Turner Dam Removal Project will have no effect on the northern long-eared bat or its habitat.

B. **Response Requested: None required**
VII. Reviewing Ecological Services Office Evaluation

A. Concurrence: Concur

B. Formal Consultation Required: No

C. Conference Required: No

D. Nonconcurrence: N/A

Remarks: This consultation was reviewed by Susi vonOettingen, Endangered Species Specialist, with the New England Field Office.

Bill Bennett, Fish and Wildlife Biologist
Originating Official

6/18/15 Date

Thomas R. Chapman, Supervisor
New England Field Office
Reviewing Official

6/18/15 Date
Millie Turner/Blake Mill Dam Removal Project
Locator Map
Pepperell, MA

Legend

Millie Turner Dam

USGS Quad Pepperell
ESRI BaseMaps
By BB_012315

Figure 1 USGS Topo Quad of Pepperell showing location of Dam
Habitat Management Plan for Freshwater Mussels and the Millie Turner Dam Removal, Pepperell, MA

Background:

The Millie Turner Dam in Pepperell, Massachusetts is proposed for removal in efforts to restore fish passage and habitat connectivity along the Nissitissit River. The Massachusetts Division of Fisheries and Wildlife (MDFW) is an abutting landowner on the project area and a partner in the restoration effort. The project area includes habitat of species of freshwater mussels protected under the Massachusetts Endangered Species Act (MESA). The Natural Heritage and Endangered Species Program (NHESP) of MDFW is the regulatory and management agency for species protected under MESA, and will be implementing onsite protective measures to manage potential risks to MESA listed mussels in the project area.

Task 1: Survey of Mussel Distribution in Nissitissit River

- Preliminary searches of 1.4 km river upstream of the Millie Turner Dam to a point beyond the influence of the dam impoundment were conducted in September 2013 and September 2014 by MDFW Staff under the supervision of NHESP Aquatic Ecologist.

- Preliminary searches of 2 km of river downstream of the Millie Turner Dam to the confluence of the Nashua River were conducted between August 2014 and July 2015.

- All suitable habitats for *Alasmidonta varicosa*, *Alasmidonta undulata*, *Margaritifera margaritifera*, and *Strophitus undulatus*, (i.e. “Target Species”) were searched visually using a combination of snorkel and view buckets.

- Coordinates of each mussel occurrence were mapped and the surrounding reaches (up to 100 m) were identified as targets for semi-quantitative census, and semi-quantitative sampling using the random placement of 1 m² quadrats covering 1.5% of the stream bed.

  - **Semi-quantitative Census:** Each reach was sampled using view buckets and snorkeling by a team of 1-4 observers. Locations of each individual of the Target Species were marked with a surveyor’s flag. Upon completion of the census, a 1 m² quadrat was placed on the substrate centered on the target mussel. The quadrat was thoroughly searched both visually and tactile for additional mussels. One quarter of the quadrat was randomly chosen for excavation to 10 cm, and all sediments were sifted through a 6 mm mesh screen. Mussels were identified to species, measured (shell length and height), and given a condition score (1 through 5, where 1 = minimal erosion, 5 = highly eroded). All individuals of the Target Species were tagged with a plastic, individually numbered tag (Floy-tag; 3 x 5 mm), mounted with cyanoacrylate cement. Total area covered by quadrats is variable depending on the number of Target Species individuals found in the timed census. Mussels were held in the water in a mesh bag to minimize exposure and stress prior to and after processing. Once all mussels in the quadrat were processed, mussels were returned to the sediment and bedded anteriorly into the substrate, posterior end up.

  - **Semi-quantitative Sampling:** Following the Semi-quantitative census, each 100 m reach was divided into five 20 m sections, and a single cross-stream transect was randomly placed within each section. Along each transect, three 1 m² quadrats were randomly placed and searched using tactile and visual searching. If a randomly placed quadrat overlapped the location of a quadrat from the Semi-quantitative Census, the location of the randomly placed quadrat was adjusted 1 m in either direction and this was noted in the final analysis. One
0.25 m² of the quadrat was excavated to 10 cm and all sediments were sifted through a 6 mm mesh screen. All targeted mussels were measured and tagged as above. Mussels were held in the water in a mesh bag to minimize exposure and stress prior to and after processing. Once all the mussels in the quadrat were processed, mussels were returned to the sediment and bedded anteriorly into the substrate, posterior end up.

- This approach of double sampling incorporates an increased detection probability at finding rare species, while still utilizing a random distribution of samples for excavation. Relative abundance of targeted and common species (Catch per Unit Effort) will be calculated from Census counts. Final species densities will be calculated from counts of targeted species from quadrats placed during the Census and random Sampling Efforts.

- During 2014 Census and Sampling efforts, no animals were translocated. Each site will be revisited and Census and Sampling efforts will be repeated once during May – July 2015. Excavated area during May-July 2015 efforts will increase in size to 1 m² to incorporate subsurface sampling area of greater than 1.5% of the total substrate within each sample reach.

Task 2: Selection of Translocation Sites

- Translocation sites (i.e. where animals will be moved to) will be chosen in May 2015, in areas greater than 1.5 km upstream from the Millie Turner Dam, and upstream of the extent of the impoundment.

- Sites will be chosen using preliminary searches to define similar suitable habitat, or reaches where the targeted species is documented.

- A control site, consisting of similar habitat to the translocation site will be selected from the same reach, and within 500 m of the translocation site. The site will be monitored at the same schedule as the translocation site, and useful in comparison of any effects of translocation on the resident mussels.

- Prior to translocation efforts, translocation and control sites will be surveyed using the same Semi-quantitative Census and Sampling approach as donor sites. All individuals of targeted mussel species native to the Translocation site will be assessed, tagged and returned to their original location in the same manner as their translocated counterparts.

Task 3: Translocation of Targeted Mussel Species

- Targeted mussel species will be translocated during two phases. First, during the semi-quantitative census and sampling events in May-July 2015. Second, mussels found within the drawdown zone of the impoundment during dam removal.

- Mussels found during 2015 sampling events in the targeted survey reaches will be translocated to the designated translocation site upon completion of that site, or the end of the work day.

- Prior to the initiation of dam removal, areas of suitable habitat outside of the designated survey reaches will be searched again for any additional targeted mussels. If found, individuals will be tagged (as above) and translocated to the designated translocation site.

- During the dam removal and associated impoundment drawdown, volunteers and MA DFW staff will walk the banks of the river and visually search for mussels in the dewatered area, retreating to deeper water, and for targeted mussels within the wetted stream channel. All mussels will be collected and identified to species by a MA DFW biologist. The common and abundant Eastern
Elliptio (*Elliptio complanata*) may be replaced back into the wetted stream channel in the affected reach, rather than translocated upstream. All individuals of four targeted species will be tagged, measured and translocated to the designated translocation site.

- To minimize stress from translocation, all mussels will be held in mesh bags in the stream, coolers of stream water, or wrapped in wet towels in the shade, and held for no longer than 6 hours prior to translocation.

**Task 4: Monitoring of Translocated Mussels**

- Translocation and control sites will be monitored once within 30 days of the translocation using a semi-quantitative Census approach. No excavation will be conducted. If mussels appear to be in distress or the habitat patch appears to be unstable or unsuitable, mussels may be moved to another location or temporary refugium.

- Translocation and control sites will be monitored once in the calendar year following translocation and dam removal and again 3-5 years following dam removal. Surveys and monitoring will be conducted using the same 2-part methodology that was used in the initial surveys.

- Translocation and control sites will be incorporated into the long-term monitoring schedule of the MA DFW mussel program. Survey methods and periodicity are subject to change depending on the availability of resources and adaptive management as new methods and/or technologies are developed. Activities within and along the Nissitissit may also necessitate shifting of methods or periodicity to ensure maximum survival of translocated individuals.

**Data Reporting and Consistency with Previous Habitat Management Plans:**

- The methods described here are consistent with, but exceed, those required by MA NHESP when appropriate for projects leading to Habitat Management Exemptions or Conservation Management Permits, and meet the Program's standards for surveys and translocations of freshwater mussels listed under the Massachusetts Endangered Species Act (MESA).

- All data collected will be submitted to NHESP databases, and reports will be submitted for internal review and used to inform conservation and management planning of the Division.
**EFH Data Notice:** Essential Fish Habitat (EFH) is defined by textual descriptions contained in the fishery management plans developed by the regional Fishery Management Councils. In most cases mapping data can not fully represent the complexity of the habitats that make up EFH. This report should be used for general interest queries only and should not be interpreted as a definitive evaluation of EFH at this location. A location-specific evaluation of EFH for any official purposes must be performed by a regional expert. Please refer to the following links for the appropriate regional resources.

![Map of query results](image)

**Query Results**

Map Scale = 1:72,224  
Degrees, Minutes, Seconds: Latitude = 42°40'8" N, Longitude = 72°25'27" W  
Decimal Degrees: Latitude = 42.67, Longitude = -71.58

The query location intersects with spatial data representing EFH and/or HAPCs for the following species/management units.

**HAPCs**
No Habitat Areas of Particular Concern (HAPC) were identified at the report location.

**EFH Areas Protected from Fishing**
No EFH Areas Protected from Fishing (EFHA) were identified at the report location.
APPENDIX C

Section 106 Consultation
United States Department of the Interior

FISH AND WILDLIFE SERVICE

New England Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5087
http://www.fws.gov/newengland

Ref: Millie Turner/Blake Mill Dam Removal (MHC # RC.52467)
Nissitissit River, Hollis Street, Pepperell, MA

Brona Simon, Director
State Historic Preservation Officer
Massachusetts Historic Commission
The Massachusetts Archives Bldg.
220 Morrissey Boulevard
Boston, MA 02125

Dear Dr. Simon:

The U.S. Fish and Wildlife Service (Service), as lead Federal agency, and its project partner, the Massachusetts Division of Ecological Restoration is pleased to present to you the final technical report, Archaeological Reconnaissance Survey at the Millie Turner/Blake Mill Dam Removal Project Pepperell, Massachusetts, prepared by Barbara Donahue. The Historical and Archaeological Site Avoidance and Protection Plan (Plan) has also been updated as requested in your letter sent to Barbara Donahue on May 19, 2015, and is included in the Reconnaissance Survey’s Appendix. Enclosed with this letter you will find two copies of the final Plan and a CD with the technical report abstract and bibliographic information, so the Massachusetts Historical Commission (MHC) can incorporate this information into their Inventory.

The Service has determined that the project will have “no adverse effect” (36 CFR 800.5(b)) on historic resources, as recommended in your letter to Karen Kirk Adams of the U.S. Army Corps of Engineers, dated August 11, 2014. The project designs and specifications are now being revised to incorporate recommendations in the Plan that avoid impacts to archaeological and historic resources contributing to the Blake’s Machine Shop Complex and the Lawrence/Blake/Turner House. We have enclosed the draft Existing Conditions Site Plan Sheet for your review, which shows the sensitive archaeological resources within the project area. A project Cultural Resource Consultant will be on site to assist with monitoring activities and insuring archaeological and historic resources are protected throughout the Preconstruction, Construction, and Post-Construction Phases.
Interpretive panels for the Blake Machine Shop Complex will be developed with the assistance of the project's Cultural Resource Consultant, in consultation with the Pepperell Historical Commission and Pepperell Historical Society. The final content and placement of the interpretive panels will be submitted to the MHC for review and comment before installation.

If you have any questions, or require additional information, please contact Bill Bennett of this office at 603-227-6422, or by email at william_bennett@fws.gov.

Sincerely yours,

Thomas R. Chapman
Supervisor
New England Field Office

Enclosures
cc:  (without enclosure)
    Lindsey Lefebvre, USACOE-New England District
    Alex Hackman, MA Division of Ecological Restoration
    Diane Cronin, Pepperell Historical Commission
    Susan Smith, Pepperell Historical Society
    Paula Terrasi, Pepperell Conservation Commission
    Barbara Donohue, Cultural Resource Consultant
ES:  WBennett:7-2-15:603-223-2541
May 19, 2015

The Commonwealth of Massachusetts
Barbara Donohue William Francis Galvin, Secretary of the Commonwealth
51 Warwick Road Massachusetts Historical Commission
West Newton, MA 02465

RE: Millie Turner/ Blake Mill Dam Removal, Nissitissit River, Hollis Street, Pepperell, MA.
MHC # RC.52467.

Dear Barbara:

Staff of the Massachusetts Historical Commission have reviewed the draft Historical and Archaeological Site
Avoidance and Protection Plan for the Millie Turner/Blake Mill Dam Removal, received May 12, 2015, for
the project referenced above.

Please submit the final avoidance and protection plan to the MHC that incorporates the following comments.

Please include an additional figure that shows the locations of proposed protective fencing and signage at
historic features and sensitive resource areas in relation to the proposed project impact areas. Plan figure #2
may be used as the base map for the additional figure.

Please add an additional sentence to the end of the first stipulation in B. Preconstruction Phase on page 7 that
reads: “The installation and removal of protective fencing and signage shall be conducted at the direction of
the project Cultural Resource Consultant.”

Please add the following additional stipulation to Section C. Construction Phase on page 3: The installation
and removal of all construction fills and/or matting required for construction, access, equipment and
materials storage and/or staging for the project shall be monitored by the project Cultural Resource
Consultant.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation
Act of 1966, as amended (36 CFR 800), the Secretary of Interior’s Standards and Guidelines for Archeology
and Historic Preservation (48 Fed. Reg. 190(1983)), and Massachusetts General Laws, Chapter 9, Sections
26A-27C (950 CMR 70). If you have any questions or need further information, please contact Jonathan K.
Patton of my staff.

Sincerely,

Brona Simon
State Historic Preservation Officer
Executive Director
State Archaeologist
Massachusetts Historical Commission

xc: Alex Hackman, Division of Ecological Restoration, MA DFG
Bill Bennett, USFW
Karen Kirk Adams, USACE-New England District
Kate Atwood, USACE-New England District

220 Morrissey Boulevard, Boston, Massachusetts 02125
(617) 727-8470 • Fax: (617) 727-5128
www.sec.state.ma.us/mhc
August 11, 2014

Barbara Donohue
51 Warwick Road
West Newton, MA 02465

RE: Millie Turner/Blake Mill Dam Removal, Nissitissit River, Hollis Street, Pepperell, MA.
MHC # RC.52467.

Dear Barbara:

Staff of the Massachusetts Historical Commission have reviewed the draft technical report, Archaeological Reconnaissance Survey at the Millie Turner/Blake Mill Dam Removal Project, Pepperell, Massachusetts, for the project referenced above.

Please submit two copies of the final technical report that incorporate final archaeological site avoidance and protection plans for the Blake Machine Shop site, and a CD with the technical report abstract and bibliographic information, to the MHC so that the results of the survey can be incorporated into the MHC’s Inventory.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), the Secretary of Interior’s Standards and Guidelines for Archeology and Historic Preservation (48 Fed. Reg. 190(1983)), and Massachusetts General Laws, Chapter 9, Sections 26A-27C (950 CMR 70). If you have any questions or need further information, please contact Jonathan K. Patton of my staff.

Sincerely,

Brona Simon
State Historic Preservation Officer
Executive Director
State Archaeologist
Massachusetts Historical Commission

xc: Alex Hackman, Division of Ecological Restoration, MA DFG
Karen Kirk Adams, USACOE-New England District
Kate Atwood, USACOE-New England District
August 11, 2014

Karen Kirk Adams  
Chief, Permits and Enforcement Branch  
US Army Corps of Engineers  
New England District  
696 Virginia Road  
Concord, MA 01742-2751  

RE: Millie Turner/Blake Mill Dam Removal, Nissitissit River, Hollis Street, Pepperell, MA.  
MHC # RC.52467. EEA # 15209.

Dear Ms. Adams:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the draft technical report, *Archaeological Reconnaissance Survey at the Millie Turner/Blake Mill Dam Removal Project, Pepperell, Massachusetts*, received July 30, 2014, for the project referenced above. The MHC has also received the Environmental Notification Form (ENF) for the project.

The project requires review and permitting by the US Army Corps of Engineers. MHC will review the project under Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800) and looks forward to consultation and a determination of effect by the Corps for the project.

Results of the archaeological reconnaissance survey identified multiple historic archaeological features associated with the 19th century Blake’s Machine Shop Complex. These historic archaeological resources retain integrity within a 19th century historic industrial and rural landscape at this location, important to the development of Pepperell during the Industrial Revolution period and therefore in MHC’s staff opinion, are eligible under Criteria A and D at the local level of significance. However, the MHC Form F completed for the Millie Turner/Blake Dam indicates that the existing dam is a reconstruction circa 1956, constructed by members of the Paugus Rod & Gun Club after the former dam was washed out in 1954. Since the dam was never used as a power source for industrial use, it is the MHC’s opinion that the dam is noncontributing to the Blake Machine Shop Complex.

The technical report includes multiple recommendations for historic archaeological site avoidance and protection measures and additional identification and interpretation efforts (pp. 63 and 64) for the project. The MHC recommends that the placement and content of proposed interpretive panels for the Blake Machine Shop Complex be done in consultation with the Pepperell Historical Commission. Evaluation of the upstream mill pond for archaeological sensitivity after dam removal should be conducted in consultation with the MHC and the Massachusetts Board of Underwater Archaeological Resources (MBUAR).
Information included in ENF Dam Removal Plan #4 indicates that the dam removal has been designed to avoid and minimize impact to extant historic features on the property and will include only full vertical removal of the existing dam structure with preservation of the abutments. Heavy equipment access is proposed along a temporary gravel/geotextile access road from the existing parking lot.

The MHC requests that a written archaeological site avoidance and protection plan be developed and implemented for the project that incorporates the management recommendations noted in Section 5.2 Recommendations (pp. 63, 64) of the technical report, information included in ENF Dam Removal Plan #4 and technical report Figure 5-9 (pg. 62). The draft avoidance and protection plan should be submitted to the MHC and the Corps for review and comment.

In the MHC’s opinion the Corps could make a determination of “no adverse effect” (36 CFR 800.5(b); 950 CMR 71.07(2)(b)(2)) for the project as proposed, on the condition that a final archaeological site avoidance and protection plan for the Blake Machine Shop Complex, that incorporates the MHC and Corps’ comments on the draft plan, is implemented for the project as proposed.

The MHC looks forward to reviewing the information requested above, and to consultation to avoid adverse effects to significant historic and archaeological resources.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), M.G.L. c. 9, ss. 26-27C (950 CMR 70-71), MEPA (301 CMR 11) and 301 CMR 2. If you have any questions or require additional information, please contact Jonathan K. Patton at this office.

Sincerely,

Brona Simon
State Historic Preservation Officer
Executive Director
State Archaeologist
Massachusetts Historical Commission

xc: Alex Hackman, Division of Ecological Restoration, MA DFG
Kate Atwood, USACOE-New England District
Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)
Ramona Peters, Mashpee Wampanoag Tribe
Maevé Vallely Bartlett, EEA, Attn: Holly Johnson, MEPA Unit
DEP- CERO, Waterways
Victor Mastone, MBUAR
Pepperell Historical Commission
Barbara Donohue
Jill Griffiths, Gomez and Sullivan Engineers, PC
CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ref: Millie Turner/Blake Mill Dam Removal
Nissitissit River, Hollis Street, Pepperell, MA
Cultural Resource Investigations MHC # RC.52467

Bettina Washington
Wampanoag Tribal Historic Preservation Officer
Wampanoag Tribe of Gay Head (Aquinnah)
20 Black Brook Road
Aquinnah, MA 02535

Dear Ms. Washington:

The U.S. Fish and Wildlife Service (Service), as lead Federal agency, and its project partner, the Massachusetts Division of Ecological Restoration (DER), have proposed completion of the Millie Turner/Blake Mill Dam Removal Project (Project) in Pepperell, Massachusetts. As the lead Federal agency for the cultural resource assessment of the Project, we are inviting you to participate as a consulting party in the section 106 review of the Project, in accordance with 36 CFR 800.2 of the National Historic Preservation Act.

The proposed Project will involve the removal of the Millie Turner/Blake Mill Dam to restore watershed function, improve water quality, and provide fish passage to the Nissitissit River (see enclosed location map and photographs). The Project will remove the Dam’s spillway in its entirety down to the natural streambed (bedrock) between the stone abutments. The Project design and implementation would mitigate any adverse impacts to historical/archaeological resources. These include preserving the Dam’s stone abutments and raceways, creating interpretive materials (e.g., signage for the site), and developing an Archaeological Site Avoidance and Protection Plan that details protective measures to be taken during construction. The Project is currently in the design and permitting phase, with Dam removal expected to occur in late summer 2015.

Barbara Donohue, a Registered Professional Archaeologist under contract with the DER, has completed a Reconnaissance Survey (Phase 1A) for the Project. This includes a technical report, Archaeological Reconnaissance Survey at the Millie Turner/Blake Mill Dam Removal Project, Pepperell, Massachusetts; and a Massachusetts Historical Commission (MHC) Inventory Form
February 27, 2015

F, documenting the Millie Turner/Blake Mill Dam. We are now in the process of developing the Archaeological Site Avoidance and Protection Plan for the Project.

If you indicate that you would like to become a consulting party, we will provide additional project information and copies of the Project’s cultural resource documentation for your review. Should you wish to provide us with any additional information or want to review any of the Project documents, please feel free to contact the Service. We will also keep you informed of our communications with the MHC as the Project progresses.

Your timely response will assist us in incorporating your comments and concerns into Project planning. If you have any questions, or require additional information, please contact Bill Bennett of this office at 603-223-2541, extension 23, or by email at william_bennett@fws.gov. If you are interested in participating in the section 106 review process, please respond in writing or by email within 30 days of receiving this letter.

Sincerely yours,

[Signature]

Thomas R. Chapman
Supervisor
New England Field Office

Enclosures
cc: (without enclosure)
Brona Simon, MHC
Alex Hackman, MA Division of Ecological Restoration
Paula Terrasi, Pepperell Conservation Commission
D.J. Monette, USFWS, Hadley, MA
CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ref: Millie Turner/Blake Mill Dam Removal
     Nissitissit River, Hollis Street, Pepperell, MA
     Cultural Resource Investigations MHC # RC.52467

February 27, 2015

Ramona Peters
Tribal Historic Preservation Officer
Mashpee Wampanoag Indian Tribal Council, Inc.
483 Great Neck Road South
Mashpee, Massachusetts 02649

Dear Dr. Peters:

The U.S. Fish and Wildlife Service (Service), as lead Federal agency, and its project partner, the Massachusetts Division of Ecological Restoration (DER), have proposed completion of the Millie Turner/Blake Mill Dam Removal Project (Project) in Pepperell, Massachusetts. As the lead Federal agency for the cultural resource assessment of the Project, we are inviting you to participate as a consulting party in the section 106 review of the Project, in accordance with 36 CFR 800.2 of the National Historic Preservation Act.

The proposed Project will involve the removal of the Millie Turner/Blake Mill Dam to restore watershed function, improve water quality, and provide fish passage to the Nissitissit River (see enclosed location map and photographs). The Project will remove the Dam’s spillway in its entirety down to the natural streambed (bedrock) between the stone abutments. The Project design and implementation would mitigate any adverse impacts to historical/archaeological resources. These include preserving the Dam’s stone abutments and raceways, creating interpretive materials (e.g., signage for the site), and developing an Archaeological Site Avoidance and Protection Plan that details protective measures to be taken during construction. The Project is currently in the design and permitting phase, with Dam removal expected to occur in late summer 2015.

Barbara Donohue, a Registered Professional Archaeologist under contract with the DER, has completed a Reconnaissance Survey (Phase 1A) for the Project. This includes a technical report, Archaeological Reconnaissance Survey at the Millie Turner/Blake Mill Dam Removal Project, Pepperell, Massachusetts; and a Massachusetts Historical Commission (MHC) Inventory Form
February 27, 2015

F, documenting the Millie Turner/Blake Mill Dam. We are now in the process of developing the Archaeological Site Avoidance and Protection Plan for the Project.

If you indicate that you would like to become a consulting party, we will provide additional project information and copies of the Project’s cultural resource documentation for your review. Should you wish to provide us with any additional information or want to review any of the Project documents, please feel free to contact the Service. We will also keep you informed of our communications with the MHC as the Project progresses.

Your timely response will assist us in incorporating your comments and concerns into Project planning. If you have any questions, or require additional information, please contact Bill Bennett of this office at 603-223-2541, extension 23, or by email at william_bennett@fws.gov. If you are interested in participating in the section 106 review process, please respond in writing or by email within 30 days of receiving this letter.

Sincerely yours,


[Signature]

Thomas R. Chapman
Supervisor
New England Field Office

Enclosures
cc: (without enclosure)
   Brona Simon, MHC
   Alex Hackman, MA Division of Ecological Restoration
   Paula Terrasi, Pepperell Conservation Commission
   D.J. Monette, USFWS, Hadley, MA
Ref: Millie Turner/Blake Mill Dam Removal  
Nissitissit River, Hollis Street, Pepperell, MA  
Cultural Resource Investigations MHC # RC.52467  

February 27, 2015

Victor Mastone, Director  
Massachusetts Board of Underwater Archaeological Resources  
251 Causeway Street, Suite 800  
Boston, MA 02114

Dear Mr. Mastone:

The U.S. Fish and Wildlife Service (Service), as lead Federal agency, and its project partner, the Massachusetts Division of Ecological Restoration (DER), have proposed completion of the Millie Turner/Blake Mill Dam Removal Project (Project) in Pepperell, Massachusetts. As the lead Federal agency for the cultural resource assessment of the Project, we are inviting you to participate as a consulting party in the section 106 review of the Project, in accordance with 36 CFR 800.2 of the National Historic Preservation Act.

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February 27, 2015

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Sincerely yours,

[Signature]

Thomas R. Chapman
Supervisor
New England Field Office

Enclosures
cc:  (without enclosure)
    Brona Simon, MHC
    Alex Hackman, MA Division of Ecological Restoration
    Paula Terrasi, Pepperell Conservation Commission
United States Department of the Interior

FISH AND WILDLIFE SERVICE

New England Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5087
http://www.fws.gov/newengland

Ref: Millie Turner/Blake Mill Dam Removal
Nissitissit River, Hollis Street, Pepperell, MA
Cultural Resource Investigations MHC # RC.52467

February 27, 2015

Diane Cronin
Pepperell Historical Commission
Town Hall
1 Main Street
Pepperell, MA 01463-1644

Dear Ms. Cronin:

The U.S. Fish and Wildlife Service (Service), as lead Federal agency, and its project partner, the Massachusetts Division of Ecological Restoration (DER), have proposed completion of the Millie Turner/Blake Mill Dam Removal Project (Project) in Pepperell, Massachusetts. As the lead Federal agency for the cultural resource assessment of the Project, we are inviting you to participate as a consulting party in the section 106 review of the Project, in accordance with 36 CFR 800.2 of the National Historic Preservation Act.

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[Signature]

Thomas R. Chaphnen
Supervisor
New England Field Office

Enclosures
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    Alex Hackman, MA Division of Ecological Restoration
    Paula Terrasi, Pepperell Conservation Commission
United States Department of the Interior
FISH AND WILDLIFE SERVICE
New England Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5087
http://www.fws.gov/newengland

Ref: Millie Turner/Blake Mill Dam Removal
Nissitissit River, Hollis Street, Pepperell, MA
Cultural Resource Investigations MHC # RC.52467

February 27, 2015

Susan J. Smith
Pepperell Historical Society
50 Shattuck Street
Post Office Box 573
Pepperell, Massachusetts 01463

Dear Ms. Smith:

The U.S. Fish and Wildlife Service (Service), as lead Federal agency, and its project partner, the Massachusetts Division of Ecological Restoration (DER), have proposed completion of the Millie Turner/Blake Mill Dam Removal Project (Project) in Pepperell, Massachusetts. As the lead Federal agency for the cultural resource assessment of the Project, we are inviting you to participate as a consulting party in the section 106 review of the Project, in accordance with 36 CFR 800.2 of the National Historic Preservation Act.

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[Signature]

Thomas R. Chapmen
Supervisor
New England Field Office

Enclosures
cc: (without enclosure)
Brona Simon, MHC
Alex Hackman, MA Division of Ecological Restoration
Paula Terrasi, Pepperell Conservation Commission
Figure 1 View of Millie Turner Dam looking upstream

Figure 2 Looking easterly at dam from location of stone wall (EF12) and stone abutment (EF9)
APPENDIX D

Project Draft Designs
MILLIE TURNER DAM REMOVAL
PEPPERRELL, MA

DIVISION OF ECOLOGICAL RESTORATION
MASSACHUSETTS DEPT. OF FISH & GAME
251 CAUSEWAY STREET
BOSTON, MA  02114

DIVISION OF FISHERIES AND WILDLIFE
NORTHEAST DISTRICT
85 FITCHBURG ROAD
AYER, MA  01432

SUPPORTED BY PROJECT PARTNERS:
NASHUA RIVER WATERSHED ASSOCIATION
TROUT UNLIMITED
NASHOBA CONSERVATION TRUST
US FISH AND WILDLIFE SERVICE
MASSACHUSETTS OUTDOOR HERITAGE FOUNDATION

DRAFT FINAL DRAWINGS - 100% COMPLETE DESIGN
NOT TO BE USED FOR CONSTRUCTION

DRAWING NO.   TITLE
1              COVER SHEET
2              GENERAL NOTES
3              EXISTING SITE PLAN
4              EXISTING ELEVATIONS AND SECTIONS
5              EXISTING SITE PLAN - SENSITIVE CULTURAL RESOURCES
6              ACCESS AND EROSION/WATER CONTROL PLAN
7              ACCESS AND EROSION/WATER CONTROL DETAILS
8              PROPOSED SITE PLAN
9              PROPOSED RACEWAY ACCESS PATH DETAILS
10             PROPOSED ELEVATIONS AND SECTIONS

ANY ERRORS OR OMISSIONS SHALL BE REPORTED TO THE ENGINEER WITHOUT DELAY.
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SULLIVAN ENGINEERS, DPC. REPRODUCTION OR USE FOR ANY PURPOSE OTHER THAN
THAT AUTHORIZED BY GOMEZ AND SULLIVAN ENGINEERS, DPC IS FORBIDDEN.
### AREA (ACRES)

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### GENERAL NOTES

1. CONTRACTOR SHALL NOTIFY THE MIDDLESEX COUNTY ENGINEER OF ALL WORKS INITIATED OR CONTINUED IN THE AREA OF THE PROJECT.
2. CONTRACTOR SHALL COMPLETE ALL WORKS CONTEMPORANEOUS WITH THE EXISTING PROJECT.
3. ALL WORKS SHALL BE PERFORMED IN ACCORDANCE WITH THE PLANS AND SPECIFICATIONS PROVIDED.
4. CONTRACTOR SHALL NOTIFY THE MIDDLESEX COUNTY ENGINEER OF ALL WORKS INITIATED OR CONTINUED IN THE AREA OF THE PROJECT.
5. CONTRACTOR SHALL COMPLETE ALL WORKS CONTEMPORANEOUS WITH THE EXISTING PROJECT.
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### WATER CONTROL

1. GMIRE'S CONSTRUCTION PERIOD IS 15 OCTOBER TO 15 OCTOBER TO TAKE ADVANCE OF LOW FLOWS AND ACCOMMODATE MOURNING PERIODS. DURING OCTOBER 15 TO 15 OCTOBER 15, THE MINIMUM FLOW IS 32 CFS, AND A FLOW OF 91 CFS IS EXCEEDED 10% OF THE TIME.
2. DURING CONSTRUCTION, THE AUXILIARY SPOILS SHALL BE CLEANED OF ANY DISTURBED SOIL OR DRAINAGE PIPELINE AS REQUIRED TO MAINTAIN FLOW. GMIRE'S RESPONSE TIMES ARE 24/7.
3. GMIRE'S DRAINAGE PIPELINE WILL BE CLEANED TO MAINTAIN FLOW. GMIRE'S RESPONSE TIMES ARE 24/7.

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### DRAFT NOTOR CONSTRUCTION

| PROJECT SIZE AND RESOURCE AREA CHANGES
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<th>DESCRIPTION</th>
<th>VOLUME CHANGE</th>
<th>DIFFERENCE</th>
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<tr>
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<tr>
<td>UPLANDS</td>
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<tr>
<td>INFRASTRUCTURE</td>
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<td>DESIGN</td>
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<td>CONSTRUCTION</td>
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<tr>
<td>REMOVAL PROJECT</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| MILLIE TURNER REMOVAL PROJECT

### MILLIE TURNER REMOVAL PROJECT

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Historic Features Identified in the Project Area

<table>
<thead>
<tr>
<th>Feature ID</th>
<th>Name</th>
<th>Date</th>
<th>Comments/Association</th>
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</thead>
<tbody>
<tr>
<td>EF1</td>
<td>Paved drive</td>
<td>Late 19th - 20th C</td>
<td>Asphalt drive appears to have been created for access to gravel parking area</td>
</tr>
<tr>
<td>EF2</td>
<td>Gravel parking area</td>
<td>2007 C</td>
<td>Hard-packed gravel intended for visitors</td>
</tr>
<tr>
<td>EF3</td>
<td>Pond</td>
<td>Mid 19th C</td>
<td>Mill pond created to power grist and saw mills to the south of Hollis Street; features of the pond modified during early 1980s reconstruction</td>
</tr>
<tr>
<td>EF4</td>
<td>1' diameter culvert</td>
<td>Mid 19th C</td>
<td>Diversionary millrace to convey water from Moat 2 (F11) in river to the pond (EF3)</td>
</tr>
<tr>
<td>EF5</td>
<td>Earth dam</td>
<td>Mid 19th C</td>
<td>Located to hold Mill 3 (EF1)'s upstream pond; may be location of 1838 machine shop dam due to identification of bricks (F10)</td>
</tr>
<tr>
<td>EF6</td>
<td>East auxiliary spillway</td>
<td>Mid 19th C</td>
<td>Associated with expansion of machine shop and may reflect infrastructure created for the pond; also appears to be at the exit of the pond's sluiceway area and is likely connected to the 1956 reconstruction area filled with gravel fillings in 1956</td>
</tr>
<tr>
<td>EF7</td>
<td>West auxiliary spillway</td>
<td>Early to mid 19th C</td>
<td>Possibly associated with 1838 mill site; spillway perhaps removed in 1956</td>
</tr>
<tr>
<td>EF8</td>
<td>Gravel parking area</td>
<td>Mid 19th C</td>
<td>Possibly likely associated with 2 periods of development for the machine shop, where a gravel parking area could have been created and the gravel area cleared out and reconstructed in 1986</td>
</tr>
<tr>
<td>EPF8</td>
<td>Bin abutments</td>
<td>Mid 19th C</td>
<td>Possibly associated with stone abutments of high-wedge variety; dam created across the fenced area is constructed on east side of the river (EPF8); dam may be reconstructed in 1986 after upstream dam of the river (EPF2) does not appear to have been reconstructed in 1986</td>
</tr>
<tr>
<td>EF10</td>
<td>Bin roadway</td>
<td>Mid 19th C</td>
<td>Located on 1987 site plan, exit roadway is reconstructed in 1956</td>
</tr>
<tr>
<td>F10a, b, c</td>
<td>Bin road</td>
<td>Mid 19th C</td>
<td>Appears as extension of gravel spillway (EPF10); possibly property boundary wall</td>
</tr>
<tr>
<td>F11</td>
<td>Fence</td>
<td>Mid 19th C</td>
<td>Define external property boundaries by historic Hollis Street and internal property features (pond)</td>
</tr>
<tr>
<td>F12</td>
<td>Stone Wall</td>
<td>18th-19th C</td>
<td>Appears as extension of stone abutment (EF9b), possibly property boundary wall</td>
</tr>
</tbody>
</table>

Features labeled with an "*" were identified on the Preliminary Existing Conditions plan; features labeled with an "x" were identified during a walkover of the project area.

Legend:
- [Feature ID] [Name] [Date] [Comments/Association]

Scale: 1" = 50'

Existing Site Plan - Sensitive Cultural Resources

Millie Turner Dam Removal Project

Note: Refer to Drawing 2 for full legend.
SEE DRAWINGS 9 AND 10 FOR DETAILS

MILLIE TURNER DAM
REMOVAL PROJECT

41 Liberty Hill Road
PO Box 2179
Henniker, NH  03242

SCALE: 1" = 50'

PROPOSED SITE PLAN

DRAFT
NOT FOR
CONSTRUCTION

SEE DRAWINGS 9 AND 10 FOR DETAILS