



Former Strathmore Mill Abatement, Demolition
and Restoration Project

Turners Fall, Montague, Massachusetts

Notice of Intent

Town of Montague

April 2026



M-5003-0012

April 29, 2026

Montague Conservation Commission
One Avenue A
Turners Falls, MA 01376

**Re: Notice of Intent
Former Strathmore Mill Abatement, Demolition and Restoration Project
Turners Falls (Montague), Massachusetts**

Dear Members of the Commission:

On behalf of the Town of Montague (Town), Tighe & Bond is submitting this Notice of Intent (NOI) for the Former Strathmore Mill Abatement, Demolition and Restoration Project at 20 and 8 Canal Road in the Village of Turners Falls, Town of Montague, Massachusetts. This submittal describes activities for the asbestos abatement and demolition of up to nine (9) buildings and ancillary structures associated with the Historic Mill Complex. Buildings #1, #2, #3, #4, #5/5A, #6/6A, #7, #8, and #11, Smokestack located in the courtyard, and Loading Dock attached to Building #3 are scheduled for demolition. Tailrace #3 beneath Building #3 is also scheduled for capping and closure *in situ*. Depending on the bids received, Buildings #1, #2, #4, and #11 may remain.

An Order of Conditions (OOC) is required as work will occur within Bordering Land Subject to Flooding (BLSF) and the 100-foot buffer zone to inland Bank of the Connecticut River and Power Canal. The proposed project will also occur within the 200-foot Riverfront Area of the Connecticut River; however, per the Massachusetts Wetland Protection Act (MAWPA) regulations set forth at 310 CMR 10.58(6)(k), activities within an Historic Mill Complex are exempt from requirements for Riverfront Area. In addition, per the MAWPA regulations set forth at 310 CMR 10.58(2)(a)(1)(g), human-made canals (including but not limited to the adjacent Power Canal) do not have riverfront areas. Therefore, the proposed activities are exempt from the requirements for Riverfront Area. A previous NOI was submitted to the Montague Conservation Commission on April 1, 2019 and an OOC was issued on May 13, 2019 (DEP File No: 229-0253). We note that this OOC is no longer valid and the work authorized thereunder was not commenced.

We look forward to discussing this project with the Commission at the May 14, 2026, public hearing. Should you have any questions regarding this NOI or require additional information, please contact Lucas Acaba by phone at (413) 572-3254 or by email at LAcaba@tighebond.com, or me by phone at (413) 572-3224 or by email at MPCoady@tighebond.com.

Respectfully yours,
Tighe & Bond, Inc.

A handwritten signature in black ink, appearing to read "Melissa Coady".

Melissa Coady
Senior Project Manager

Copy: MassDEP WERO
Natural Heritage and Endangered Species Program
Town of Montague Planning and Conservation Department

53 Southampton Road
Westfield, MA 01085
T 413.562.1600

TIGHEBOND.COM



Contents

Table of Contents

WPA Form 3

NOI Wetland Fee Transmittal Form

Narrative

SECTION 1 Introduction	1-1
1.1 Project Location	1-1
1.2 Project Summary and Purpose	1-1
SECTION 2 Existing Conditions	2-1
2.1 General	2-1
2.1.1 Historic Districts	2-1
2.1.2 Historic Mill Complex	2-1
2.1.3 Mill Buildings and Ancillary Structures within the Project Site	2-2
2.1.4 Asbestos and Hazardous Materials	2-6
2.2 Wetland Resource Areas	2-6
2.2.1 Methodology of Wetland Resource Area Investigation	2-6
2.2.2 Description of Wetland Resource Areas	2-7
2.2.3 Inland Bank and Land Under Water and Waterbodies	2-7
2.2.4 Bordering Land Subject to Flooding	2-7
2.2.5 Riverfront Area	2-7
2.3 Rare Species	2-7
SECTION 3 Project Description	3-1
3.1 Proposed Activities	3-1
3.1.1 Woody Vegetation Removal	3-3
3.1.2 Asbestos and Hazardous Materials Abatement	3-3
3.1.3 Demolition	3-3
3.1.4 Material Utilization, Backfilling, and Grading	3-3
3.1.5 Tailrace #3 Closure	3-4
3.1.6 Construction Access	3-5
3.2 Construction Period Protective Measures	3-5
3.2.1 Erosion Control Barrier	3-5
3.2.2 Debris Collection Netting	3-6
3.2.3 Power Canal Protection	3-6
3.2.4 Proposed Handling and Best Management Practices of Beneficial Reuse Material	3-6
3.3 Sequence of Construction	3-6

3.3.1	Site Restoration	3-7
SECTION 4 Regulatory Compliance.....		4-1
4.1	Massachusetts Wetlands Protection Act	4-1
4.1.1	Riverfront Area Exemption.....	4-1
4.1.2	Summary of MAWPA Jurisdictional Alterations.....	4-2
4.1.3	Performance Standards Compliance.....	4-2
4.1.4	Stormwater Management.....	4-3
4.1.5	Abutter Notification.....	4-4
4.2	Other Regulatory Programs	4-4
4.2.1	Massachusetts Historical Commission.....	4-4
4.2.2	Beneficial Use Determination.....	4-4

Appendices

Appendix A: Site Figures

Figure 1: Site Location

Figure 2: Priority Resources

Figure 3: Aerial

Figure 4: Wetland Resource Areas and Rare Species Habitat

Appendix B: Project Drawings

Appendix C: Historic Mill Complex Documentation

Massachusetts State Register of Historic Places

Massachusetts Cultural Resource Information System Report

National Register of Historic Places

Sanborn Fire Insurance Maps

Appendix D: Site Photographs

Appendix E: Rare Species Information

NHESP State-Listed Species Information (IR-88579; October 29, 2024)

NHESP MESA Determination (NHESP File No. 18-38083; May 2, 2018)

MESA Filing Fee (copy of check #9950)

Appendix F: Abutter Notification Information

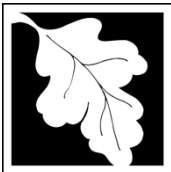
Assessors Maps and Certified Lists of Abutters

Abutter Notification Form

Appendix G: Simplified Wildlife Habitat Evaluation



WPA Form 3



Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Provided by MassDEP:

MassDEP File Number

Document Transaction Number

Montague

City/Town

Important:

When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



Note: Before completing this form consult your local Conservation Commission regarding any municipal bylaw or ordinance.

A. General Information

1. Project Location (**Note:** electronic filers will click on button to locate project site):

<u>8 and 20 Canal Road</u>	<u>Turners Falls / Montague</u>	<u>01376</u>
a. Street Address	b. City/Town	c. Zip Code
Latitude and Longitude:		
<u>Map 2</u>	<u>42.610347</u>	<u>-72.558318</u>
f. Assessors Map/Plat Number	d. Latitude	e. Longitude
	<u>Lots 01 and 06</u>	
	g. Parcel /Lot Number	

2. Applicant:

<u>Walter</u>	<u>Ramsey</u>	
a. First Name	b. Last Name	
<u>Town of Montague</u>		
c. Organization		
<u>1 Avenue A</u>		
d. Street Address		
<u>Turners Falls</u>	<u>MA</u>	<u>01376</u>
e. City/Town	f. State	g. Zip Code
<u>413-863-3200 Ext. 110</u>	<u>WalterR@montague-ma.gov</u>	
i. Fax Number	j. Email Address	

3. Property owner (required if different from applicant): Check if more than one owner

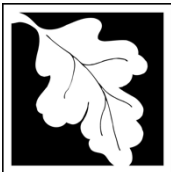
<u></u>	<u></u>	
a. First Name	b. Last Name	
<u></u>		
c. Organization		
<u></u>		
d. Street Address		
<u></u>	<u></u>	<u></u>
e. City/Town	f. State	g. Zip Code
<u></u>	<u></u>	<u></u>
h. Phone Number	i. Fax Number	j. Email address

4. Representative (if any):

<u>Melissa</u>	<u>Coady</u>	
a. First Name	b. Last Name	
<u>Tighe & Bond, Inc.</u>		
c. Company		
<u>53 Southampton Road</u>		
d. Street Address		
<u>Westfield</u>	<u>MA</u>	<u>01085</u>
e. City/Town	f. State	g. Zip Code
<u>413-572-3224</u>	<u>MPCoady@tighebond.com</u>	
h. Phone Number	j. Email address	

5. Total WPA Fee Paid (from NOI Wetland Fee Transmittal Form):

<u>Fee Exempt - Municipal Project</u>	<u>N/A</u>	<u>N/A</u>
a. Total Fee Paid	b. State Fee Paid	c. City/Town Fee Paid



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WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

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Montague

City/Town

A. General Information (continued)

6. General Project Description:

Asbestos abatement and demolition of up to nine (9) buildings and ancillary structures including Buildings #1, #2, #3, #4, #5/5A, #6/6A, #7, #8, and #11, Smokestack located in the courtyard, and Loading Dock attached to Building #3. Tailrace #3 beneath Building #3 is also scheduled for capping and closure in situ. Depending on the bids received, Buildings #1, # 2, #4, and #11 may remain.

7a. Project Type Checklist: (Limited Project Types see Section A. 7b.)

- 1. Single Family Home
- 2. Residential Subdivision
- 3. Commercial/Industrial
- 4. Dock/Pier
- 5. Utilities
- 6. Coastal engineering Structure
- 7. Agriculture (e.g., cranberries, forestry)
- 8. Transportation
- 9. Other

7b. Is any portion of the proposed activity eligible to be treated as a limited project (including Ecological Restoration Limited Project) subject to 310 CMR 10.24 (coastal) or 310 CMR 10.53 (inland)?

- 1. Yes No If yes, describe which limited project applies to this project. (See 310 CMR 10.24 and 10.53 for a complete list and description of limited project types)

2. Limited Project Type

If the proposed activity is eligible to be treated as an Ecological Restoration Limited Project (310 CMR10.24(8), 310 CMR 10.53(4)), complete and attach Appendix A: Ecological Restoration Limited Project Checklist and Signed Certification.

8. Property recorded at the Registry of Deeds for:

Franklin

a. County

4972

c. Book

b. Certificate # (if registered land)

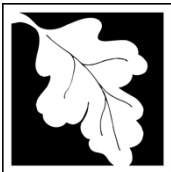
251

d. Page Number

B. Buffer Zone & Resource Area Impacts (temporary & permanent)

- 1. Buffer Zone Only – Check if the project is located only in the Buffer Zone of a Bordering Vegetated Wetland, Inland Bank, or Coastal Resource Area.
- 2. Inland Resource Areas (see 310 CMR 10.54-10.58; if not applicable, go to Section B.3, Coastal Resource Areas).

Check all that apply below. Attach narrative and any supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.



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WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

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Document Transaction Number

Montague

City/Town

B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)

For all projects affecting other Resource Areas, please attach a narrative explaining how the resource area was delineated.

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
a. <input type="checkbox"/> Bank	1. linear feet	2. linear feet
b. <input type="checkbox"/> Bordering Vegetated Wetland	1. square feet	2. square feet
c. <input type="checkbox"/> Land Under Waterbodies and Waterways	1. square feet	2. square feet
	3. cubic yards dredged	

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
d. <input checked="" type="checkbox"/> Bordering Land Subject to Flooding	22,000	22,000 (in situ)
	1. square feet	2. square feet
	0	N/A
e. <input type="checkbox"/> Isolated Land Subject to Flooding	3. cubic feet of flood storage lost	4. cubic feet replaced

f. <input checked="" type="checkbox"/> Riverfront Area	1. square feet	
	2. cubic feet of flood storage lost	3. cubic feet replaced

Connecticut River (inland)

1. Name of Waterway (if available) - specify coastal or inland

2. Width of Riverfront Area (check one):

- 25 ft. - Designated Densely Developed Areas only
- 100 ft. - New agricultural projects only
- 200 ft. - All other projects

3. Total area of Riverfront Area on the site of the proposed project: 218,117 square feet

4. Proposed alteration of the Riverfront Area:

<u>100,100</u>	<u>42,700</u>	<u>57,400</u>
a. total square feet	b. square feet within 100 ft.	c. square feet between 100 ft. and 200 ft.

5. Has an alternatives analysis been done and is it attached to this NOI? Yes No

6. Was the lot where the activity is proposed created prior to August 1, 1996? Yes No

3. Coastal Resource Areas: (See 310 CMR 10.25-10.35)

Note: for coastal riverfront areas, please complete Section B.2.f. above.



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Bureau of Resource Protection - Wetlands

WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Provided by MassDEP:
MassDEP File Number
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Montague
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B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)

Check all that apply below. Attach narrative and supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.

Online Users: Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

<u>Resource Area</u>	<u>Size of Proposed Alteration</u>	<u>Proposed Replacement (if any)</u>
a. <input type="checkbox"/> Designated Port Areas	Indicate size under Land Under the Ocean, below	
b. <input type="checkbox"/> Land Under the Ocean	_____	
	1. square feet	

	2. cubic yards dredged	
c. <input type="checkbox"/> Barrier Beach	Indicate size under Coastal Beaches and/or Coastal Dunes below	
d. <input type="checkbox"/> Coastal Beaches	_____	_____
	1. square feet	2. cubic yards beach nourishment
e. <input type="checkbox"/> Coastal Dunes	_____	_____
	1. square feet	2. cubic yards dune nourishment

	<u>Size of Proposed Alteration</u>	<u>Proposed Replacement (if any)</u>
f. <input type="checkbox"/> Coastal Banks	_____	
	1. linear feet	
g. <input type="checkbox"/> Rocky Intertidal Shores	_____	
	1. square feet	
h. <input type="checkbox"/> Salt Marshes	_____	_____
	1. square feet	2. sq ft restoration, rehab., creation
i. <input type="checkbox"/> Land Under Salt Ponds	_____	
	1. square feet	

	2. cubic yards dredged	
j. <input type="checkbox"/> Land Containing Shellfish	_____	
	1. square feet	
k. <input type="checkbox"/> Fish Runs	Indicate size under Coastal Banks, inland Bank, Land Under the Ocean, and/or inland Land Under Waterbodies and Waterways, above	

	1. cubic yards dredged	
l. <input type="checkbox"/> Land Subject to Coastal Storm Flowage	_____	
	1. square feet	

4. Restoration/Enhancement
If the project is for the purpose of restoring or enhancing a wetland resource area in addition to the square footage that has been entered in Section B.2.b or B.3.h above, please enter the additional amount here.

_____	_____
a. square feet of BVW	b. square feet of Salt Marsh

5. Project Involves Stream Crossings

_____	_____
a. number of new stream crossings	b. number of replacement stream crossings



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Bureau of Resource Protection - Wetlands

WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Provided by MassDEP:

MassDEP File Number

Document Transaction Number

Montague

City/Town

C. Other Applicable Standards and Requirements

- This is a proposal for an Ecological Restoration Limited Project. Skip Section C and complete Appendix A: Ecological Restoration Limited Project Checklists – Required Actions (310 CMR 10.11).

Streamlined Massachusetts Endangered Species Act/Wetlands Protection Act Review

- Is any portion of the proposed project located in **Estimated Habitat of Rare Wildlife** as indicated on the most recent Estimated Habitat Map of State-Listed Rare Wetland Wildlife published by the Natural Heritage and Endangered Species Program (NHESP)? To view habitat maps, see the *Massachusetts Natural Heritage Atlas* or go to http://maps.massgis.state.ma.us/PRI_EST_HAB/viewer.htm.

- a. Yes No

If yes, include proof of mailing or hand delivery of NOI to:

**Natural Heritage and Endangered Species Program
Division of Fisheries and Wildlife
1 Rabbit Hill Road
Westborough, MA 01581**

August 2021

b. Date of map

If yes, the project is also subject to Massachusetts Endangered Species Act (MESA) review (321 CMR 10.18). To qualify for a streamlined, 30-day, MESA/Wetlands Protection Act review, please complete Section C.1.c, and include requested materials with this Notice of Intent (NOI); *OR* complete Section C.2.f, if applicable. *If MESA supplemental information is not included with the NOI, by completing Section 1 of this form, the NHESP will require a separate MESA filing which may take up to 90 days to review (unless noted exceptions in Section 2 apply, see below).*

- c. Submit Supplemental Information for Endangered Species Review*

- Percentage/acreage of property to be altered:

(a) within wetland Resource Area	<u>46% / 2.3 acres</u> percentage/acreage
(b) outside Resource Area	<u>0.4% / 0.02</u> percentage/acreage

- Assessor's Map or right-of-way plan of site

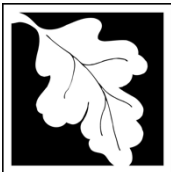
- Project plans for entire project site, including wetland resource areas and areas outside of wetlands jurisdiction, showing existing and proposed conditions, existing and proposed tree/vegetation clearing line, and clearly demarcated limits of work **

- Project description (including description of impacts outside of wetland resource area & buffer zone)
- Photographs representative of the site

* Some projects **not** in Estimated Habitat may be located in Priority Habitat, and require NHESP review (see <https://www.mass.gov/endangered-species-act-mesa-regulatory-review>).

Priority Habitat includes habitat for state-listed plants and strictly upland species not protected by the Wetlands Protection Act.

** MESA projects may not be segmented (321 CMR 10.16). The applicant must disclose full development plans even if such plans are not required as part of the Notice of Intent process.



Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

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C. Other Applicable Standards and Requirements (cont'd)

(c) MESA filing fee (fee information available at <https://www.mass.gov/how-to/how-to-file-for-a-mesa-project-review>).

Make check payable to “Commonwealth of Massachusetts - NHESP” and **mail to NHESP** at above address

Projects altering 10 or more acres of land, also submit:

(d) Vegetation cover type map of site

(e) Project plans showing Priority & Estimated Habitat boundaries

(f) OR Check One of the Following

1. Project is exempt from MESA review.
Attach applicant letter indicating which MESA exemption applies. (See 321 CMR 10.14, <https://www.mass.gov/service-details/exemptions-from-review-for-projectsactivities-in-priority-habitat>; the NOI must still be sent to NHESP if the project is within estimated habitat pursuant to 310 CMR 10.37 and 10.59.)

2. Separate MESA review ongoing. a. NHESP Tracking # _____ b. Date submitted to NHESP _____

3. Separate MESA review completed.
Include copy of NHESP “no Take” determination or valid Conservation & Management Permit with approved plan.

3. For coastal projects only, is any portion of the proposed project located below the mean high water line or in a fish run?

a. Not applicable – project is in inland resource area only b. Yes No

If yes, include proof of mailing, hand delivery, or electronic delivery of NOI to either:

South Shore - Bourne to Rhode Island border, and the Cape & Islands:

North Shore - Plymouth to New Hampshire border:

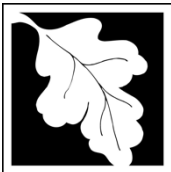
Division of Marine Fisheries -
Southeast Marine Fisheries Station
Attn: Environmental Reviewer
836 South Rodney French Blvd.
New Bedford, MA 02744
Email: dmf.envreview-south@mass.gov

Division of Marine Fisheries -
North Shore Office
Attn: Environmental Reviewer
30 Emerson Avenue
Gloucester, MA 01930
Email: dmf.envreview-north@mass.gov

Also if yes, the project may require a Chapter 91 license. For coastal towns in the Northeast Region, please contact MassDEP’s Boston Office. For coastal towns in the Southeast Region, please contact MassDEP’s Southeast Regional Office.

c. Is this an aquaculture project? d. Yes No

If yes, include a copy of the Division of Marine Fisheries Certification Letter (M.G.L. c. 130, § 57).



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Bureau of Resource Protection - Wetlands

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MassDEP File Number

Document Transaction Number

Montague

City/Town

Online Users:
Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

C. Other Applicable Standards and Requirements (cont'd)

- 4. Is any portion of the proposed project within an Area of Critical Environmental Concern (ACEC)?
 - a. Yes No If yes, provide name of ACEC (see instructions to WPA Form 3 or MassDEP Website for ACEC locations). **Note:** electronic filers click on Website.
 - b. ACEC

- 5. Is any portion of the proposed project within an area designated as an Outstanding Resource Water (ORW) as designated in the Massachusetts Surface Water Quality Standards, 314 CMR 4.00?
 - a. Yes No
- 6. Is any portion of the site subject to a Wetlands Restriction Order under the Inland Wetlands Restriction Act (M.G.L. c. 131, § 40A) or the Coastal Wetlands Restriction Act (M.G.L. c. 130, § 105)?
 - a. Yes No
- 7. Is this project subject to provisions of the MassDEP Stormwater Management Standards?
 - a. Yes. Attach a copy of the Stormwater Report as required by the Stormwater Management Standards per 310 CMR 10.05(6)(k)-(q) and check if:
 - 1. Applying for Low Impact Development (LID) site design credits (as described in Stormwater Management Handbook Vol. 2, Chapter 3)
 - 2. A portion of the site constitutes redevelopment
 - 3. Proprietary BMPs are included in the Stormwater Management System.
 - b. No. Check why the project is exempt:
 - 1. Single-family house
 - 2. Emergency road repair
 - 3. Small Residential Subdivision (less than or equal to 4 single-family houses or less than or equal to 4 units in multi-family housing project) with no discharge to Critical Areas.

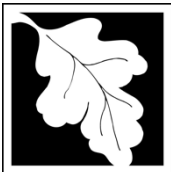
D. Additional Information

- This is a proposal for an Ecological Restoration Limited Project. Skip Section D and complete Appendix A: Ecological Restoration Notice of Intent – Minimum Required Documents (310 CMR 10.12).

Applicants must include the following with this Notice of Intent (NOI). See instructions for details.

Online Users: Attach the document transaction number (provided on your receipt page) for any of the following information you submit to the Department.

- 1. USGS or other map of the area (along with a narrative description, if necessary) containing sufficient information for the Conservation Commission and the Department to locate the site. (Electronic filers may omit this item.)
- 2. Plans identifying the location of proposed activities (including activities proposed to serve as a Bordering Vegetated Wetland [BVW] replication area or other mitigating measure) relative to the boundaries of each affected resource area.



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Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

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City/Town

D. Additional Information (cont'd)

3. Identify the method for BVW and other resource area boundary delineations (MassDEP BVW Field Data Form(s), Determination of Applicability, Order of Resource Area Delineation, etc.), and attach documentation of the methodology.

4. List the titles and dates for all plans and other materials submitted with this NOI.

Former Strathmore Mill Abatement, Demolition and Restoration Project

a. Plan Title

Tighe & Bond, Inc.

b. Prepared By

April 2026

d. Final Revision Date

c. Signed and Stamped by

Varies

e. Scale

f. Additional Plan or Document Title

g. Date

5. If there is more than one property owner, please attach a list of these property owners not listed on this form.

6. Attach proof of mailing for Natural Heritage and Endangered Species Program, if needed.

7. Attach proof of mailing for Massachusetts Division of Marine Fisheries, if needed.

8. Attach NOI Wetland Fee Transmittal Form

9. Attach Stormwater Report, if needed.

E. Fees

1. Fee Exempt: No filing fee shall be assessed for projects of any city, town, county, or district of the Commonwealth, federally recognized Indian tribe housing authority, municipal housing authority, or the Massachusetts Bay Transportation Authority.

Applicants must submit the following information (in addition to pages 1 and 2 of the NOI Wetland Fee Transmittal Form) to confirm fee payment:

Fee-Exempt - Municipal Project

N/A

2. Municipal Check Number

3. Check date

Fee Exempt - Municipal Project

N/A

4. State Check Number

5. Check date

N/A

N/A

6. Payor name on check: First Name

7. Payor name on check: Last Name



WPA Form 3 – Notice of Intent

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MassDEP File Number

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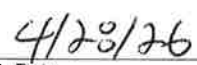
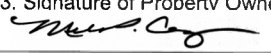
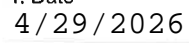
Montague

City/Town

F. Signatures and Submittal Requirements

I hereby certify under the penalties of perjury that the foregoing Notice of Intent and accompanying plans, documents, and supporting data are true and complete to the best of my knowledge. I understand that the Conservation Commission will place notification of this Notice in a local newspaper at the expense of the applicant in accordance with the wetlands regulations, 310 CMR 10.05(5)(a).

I further certify under penalties of perjury that all abutters were notified of this application, pursuant to the requirements of M.G.L. c. 131, § 40. Notice must be made by Certificate of Mailing or in writing by hand delivery or certified mail (return receipt requested) to all abutters within 100 feet of the property line of the project location.

 _____ 1. Signature of Applicant	 _____ 2. Date
_____ 3. Signature of Property Owner (if different)	_____ 4. Date
 _____ 5. Signature of Representative (if any)	 _____ 6. Date

For Conservation Commission:

Two copies of the completed Notice of Intent (Form 3), including supporting plans and documents, two copies of the NOI Wetland Fee Transmittal Form, and the city/town fee payment, to the Conservation Commission by certified mail or hand delivery.

For MassDEP:

One copy of the completed Notice of Intent (Form 3), including supporting plans and documents, one copy of the NOI Wetland Fee Transmittal Form, and a **copy** of the state fee payment to the MassDEP Regional Office (see Instructions) by certified mail or hand delivery.

Other:

If the applicant has checked the "yes" box in any part of Section C, Item 3, above, refer to that section and the Instructions for additional submittal requirements.

The original and copies must be sent simultaneously. Failure by the applicant to send copies in a timely manner may result in dismissal of the Notice of Intent.



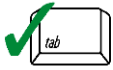
Wetland Fee Transmittal Form





Massachusetts Department of Environmental Protection
 Bureau of Resource Protection - Wetlands
NOI Wetland Fee Transmittal Form
 Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



A. Applicant Information

1. Location of Project:

8 and 20 Canal Road Turners Falls / Montague
 a. Street Address b. City/Town
 Fee Exempt - Municipal Project N/A
 c. Check number d. Fee amount

2. Applicant Mailing Address:

Walter Ramsey
 a. First Name b. Last Name
 Town of Montague
 c. Organization
 1 Avenue A
 d. Mailing Address
 Turners Falls MA 01376
 e. City/Town f. State g. Zip Code
 413-863-3200 Ext WalterR@montague-ma.gov
 207 i. Fax Number j. Email Address

3. Property Owner (if different):

a. First Name b. Last Name
 c. Organization
 d. Mailing Address
 e. City/Town f. State g. Zip Code
 h. Phone Number i. Fax Number j. Email Address

B. Fees

Fee should be calculated using the following process & worksheet. **Please see Instructions before filling out worksheet.**

Step 1/Type of Activity: Describe each type of activity that will occur in wetland resource area and buffer zone.

Step 2/Number of Activities: Identify the number of each type of activity.

Step 3/Individual Activity Fee: Identify each activity fee from the six project categories listed in the instructions.

Step 4/Subtotal Activity Fee: Multiply the number of activities (identified in Step 2) times the fee per category (identified in Step 3) to reach a subtotal fee amount. Note: If any of these activities are in a Riverfront Area in addition to another Resource Area or the Buffer Zone, the fee per activity should be multiplied by 1.5 and then added to the subtotal amount.

Step 5/Total Project Fee: Determine the total project fee by adding the subtotal amounts from Step 4.

Step 6/Fee Payments: To calculate the state share of the fee, divide the total fee in half and subtract \$12.50. To calculate the city/town share of the fee, divide the total fee in half and add \$12.50.

To calculate filing fees, refer to the category fee list and examples in the instructions for filling out WPA Form 3 (Notice of Intent).



Massachusetts Department of Environmental Protection
 Bureau of Resource Protection - Wetlands
NOI Wetland Fee Transmittal Form
 Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

B. Fees (continued)

Step 1/Type of Activity	Step 2/Number of Activities	Step 3/Individual Activity Fee	Step 4/Subtotal Activity Fee
Fee Exempt - Municipal Project	N/A	N/A	N/A
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
Step 5/Total Project Fee:			N/A
Step 6/Fee Payments:			
Total Project Fee:			N/A
			a. Total Fee from Step 5
State share of filing Fee:			N/A
			b. 1/2 Total Fee less \$12.50
City/Town share of filing Fee:			N/A
			c. 1/2 Total Fee plus \$12.50

C. Submittal Requirements

- a.) Complete pages 1 and 2 and send with a check or money order for the state share of the fee, payable to the Commonwealth of Massachusetts.

Department of Environmental Protection
 Box 4062
 Boston, MA 02211

- b.) **To the Conservation Commission:** Send the Notice of Intent or Abbreviated Notice of Intent; a **copy** of this form; and the city/town fee payment.

To MassDEP Regional Office (see Instructions): Send a copy of the Notice of Intent or Abbreviated Notice of Intent; a **copy** of this form; and a **copy** of the state fee payment. (E-filers of Notices of Intent may submit these electronically.)



Project Narrative

Section 1



SECTION 1 | Introduction

1.1 Project Location

Project Name: Former Strathmore Mill Demolition, Abatement and Restoration Project
Project Location: #8 Canal Road, Turners Falls (Parcel 02-0-06)
#20 Canal Road, Turners Falls (Parcel 02-0-01)
Project Applicant: Town of Montague

The proposed project is located within the Strathmore Mill Complex (Mill Complex) at 8 and 20 Canal Road in the Village of Turners Falls (Town of Montague; Town), Franklin County, Massachusetts. The proposed project will occur within the limits of two lots (Parcels: 02-0-01 and 02-0-06) owned by the Town; these parcels comprise the Project Locus. The majority of the Mill Complex is located at #20 Canal Road. For reference, a USGS Site Location Map (Figure 1), a Priority Resources Map (Figure 2), an Aerial (Figure 3), and Wetland Resource and Rare Species Habitat Map (Figure 4) are provided in Appendix A. Project Drawings are provided at half scale in Appendix B. Full size copies have been provided under a separate cover.

1.2 Project Summary and Purpose

The proposed project entails proper abatement of asbestos and other hazardous building materials, and demolition of up to nine (9) buildings and ancillary structures associated with the Mill Complex. Buildings #1, #2, #3, #4, #5/5A, #6/6A, #7, #8, and #11, remaining Smokestack base located in the Courtyard, and Loading Dock attached to Building #3 are scheduled for demolition. An abandoned Tailrace #3 beneath Building #3 is also scheduled for capping and closure *in situ*. Depending on the contractor bids received, Buildings #1, #2, #4, and #11 may remain.

At the present time, the Town aims to complete design and bid-ready design drawings, specifications and regulatory authorizations (e.g. permits) for the demolition of the Mill Complex as the first step towards redevelopment of the site. The majority of the Mill Complex has been vacant since 2007 when an arson fire damaged multiple buildings, including the complete destruction of Building #10. The Town took ownership of the Mill Complex in 2010 as a result of a lapse in tax payments by the former owner at that time¹. Vacant and unused, the Mill Complex is subject to trespass and vandalism, an issue the Town has spent thousands of dollars combatting².

In a "Site Development Assessment Report" dated August 12, 2008, and prepared by Fuss & O'Neill, structural deficiencies in each building within the Mill Complex were identified. Descriptions of each building scheduled for demolition, including a summary of deficiencies noted in 2008, are described in Section 2.1.3. There have been several studies over the years regarding the viability of, and the challenges associated with, renovating the former Mill building complex (or portions thereof) for reuse, including a "Visioning Phase Report for the Canal District Master Plan" prepared by Dietz & Company Architects, Inc. (Dietz), with SLR Consulting as civil engineer, in March 2023. With no potential plans moving over the years due to lack of interest from developers and/or project costs issues, and with the dilapidated state of the abandoned buildings as further documented in Dietz's 2023 report, the demolition of the Town-owned buildings and the restoration of the Site to future naturalized parkland use was considered the most suitable redevelopment option.

¹ https://www.montague-ma.gov/files/Strathmore_Redevelopment_Strategy_-_Report_from_Urban_Land_Institute_2011.pdf

² <https://www.recorder.com/Strathmore-Demolition-Design-Project-changes-scope-22795658>

Section 2



SECTION 2 | Existing Conditions

This section provides a description of the Project Locus and surrounding area, site history, and characterization of the jurisdictional wetland resource areas present at and in close proximity to the Project Site. Land use in the general vicinity of the project area was determined based on direct observations made during site visits and a review of information available through the Massachusetts Geographic Information System (MassGIS) and other published sources of information.

2.1 General

The Mill Complex is primarily located at 20 Canal Road (Parcel: 02-0-01; 1.9 acres) on an island bordered to the north by the Connecticut River, to the south by an active hydroelectric power canal, to the west by Southworth Company (a paper company), and to east by property owned by FirstLight Hydro Generating Company. A portion of the project will also be located at 8 Canal Road (Parcel: 02-0-06; 3.19 acres). The Mill Complex is located within the eastern section of the island which is primarily, and historically, used for industrial purposes.

The Mill Complex consists of nine interconnected buildings that are depicted on various historical plans as Buildings #1 through #9, and another separate building referred to as Building #11, ranging in height from two to seven stories with a total floor area of 245,000 gross square feet. A loading dock connected to the east/northeastern portion of Building #3, that runs immediately adjacent to Building #7 to Canal Road, is located on an adjacent parcel (Parcel 02-0-06;) to the east at 8 Canal Road [Note: the "off-site" Building #9 is not scheduled for demolition as part of this project as reviewed herein]. Parcel 02-0-06 is bordered to the east by property owned by FirstLight Hydro Generating Company. An orthophotograph detailing the Mill Complex building numbers and associated areas is provided as Figure 3 in Appendix A. It should be noted that the Connecticut River side of the Mill Complex will be referred to as 'Project North'.

2.1.1 Historic Districts

Strathmore Mill is located within both the Turner Falls Historic District (National Register of Historic Places; Reference No. 82004966, MNT.H) and the Riverside Historic Area (Massachusetts Historical Commission (MHC); Inventory No. MNT.G). The former Strathmore Mill Complex is an MHC-inventoried property (Inventory No. MNT.131) due to its architectural, engineering, and industrial significance. Copies of the MACRIS reports for the Riverside Historic Area and Strathmore Mill Complex (a.k.a. Keith Paper Mill) are provided in Appendix C. The history of the Mill Complex is further discussed in Section 2.1.2 below.

2.1.2 Historic Mill Complex

According to the MACRIS Inventory Form, the existing buildings of the Strathmore Mill Complex were constructed between 1877 and the early 1900s for the Keith Paper Company. The complex was originally known as the Keith Paper Mill. Industrial use of the Project Locus (and surrounding area) pre-dates 1877, when the Keith Paper Mill Complex was destroyed by fire, but was rebuilt soon thereafter.

According to the 1884 and 1889 Sanborn Fire Insurance Maps, copies of which are provided in Appendix C, the structures currently identified as Buildings #1, #2, #4, #5/5A, #6/6A, #8, and #9, were owned by the Keith Paper Company. The land to the east (within the area of current Building #7, the Loading Dock, and the remainder of Parcel 02-0-06) contained buildings owned by the Montague Paper Company and John Russel Cutlery Company.

Expansions of the Mill Complex occurred between 1893 and 1896, doubling the manufacturing production output. The original power plant and associated structures were replaced with a more efficient hydroelectric plant in 1916. The Sanborn Fire Insurance Map for 1914, also provided in Appendix C, shows the expanded footprint of the Keith Paper Company as compared to 1889. The success of the Keith Paper Mill was attributed to availability of access to the following: railroad line, canal for raw material transport, canal water intakes for power generation, municipal water lines in Canal Road, and the pedestrian bridge for workers.

Between 1935 and 1953, more upgrades were installed. In 1953, the Keith Paper Company sold the complex to the Strathmore Paper Company of West Springfield, Massachusetts which continued in operation until 1994. Between 1994 and 2007, the Mill Complex had multiple owners. In May 2007, an arson fire spread through several buildings within the Mill Complex. The fire led to the collapse of Building #10 and resulted in damage to adjacent Buildings #1 and #11. The developed area of the Project Site qualifies as an Historic Mill Complex as the structures and ancillary development were in place prior to 1946 and after August 7, 1996.

2.1.3 Mill Buildings and Ancillary Structures within the Project Site

The following sections describe the buildings and areas scheduled for demolition and abandonment as part of this project. This section provides summaries of the conditions assessed in the Site Development Assessment Report conducted by Fuss & O'Neill in August 2008 and the Strathmore Feasibility Study prepared in May 2005 by Finegold Alexander + Associates, Inc, FXM Associates, Tighe & Bond, et al. The conditions at the Project Site have continued to fall further into disrepair over the past twenty years due to limited maintenance and the infeasibility of redevelopment at the Project Site. The locations of each building are identified on Figure 3 in Appendix A. Representative site photographs are provided in Appendix D.

BUILDING #1

Building #1 was constructed in 1877 and consists of a 5-story structure approximately 105 feet long by 43 feet wide. The building exterior is constructed of load-bearing brick masonry walls. The building floors are constructed of wood and are supported by wood beams, tension rods, and the exterior masonry walls, which include a combination of steel and wood framing and interior wood columns.

As part of the Site Development Assessment Report, a structural assessment of Building #1 was conducted to evaluate the fire damage caused to the building. The assessment indicates that the building is in fair condition, but identified several deficiencies in the west end of the building that may compromise the structural integrity of the building. The 5th floor received the most fire damage, followed by the 4th and 3rd floors. Additionally, this assessment found that the loadbearing walls in the southwest corner of the building have large cracks and that the wall sections around the cracks are moving outward, indicating severe structural damage.

The Site Development Assessment Report also identified two main deficiencies within Building #1 including: fire damage to the wood members within the building resulting in reduced structural integrity, and the mortar on the masonry joints is friable and easily scraped away. The Feasibility Study identified that the mortar joints on the exterior face of the building were deteriorating in many locations, and the moss growing on the brick in some areas indicated water was infiltrating the walls. This building is scheduled for demolition under Bid Alternative No. 1.

COURTYARD (WEST)

The Courtyard (West) area measures roughly 83 feet by 73 feet and is surrounded by Buildings #1, #4, #11, and former Building #10. The Courtyard consists of primarily previously managed greenspace with a paved walkway that extends from Building #1 to the site of former Building #10. The Courtyard will be part of the demolition area; the concrete and pavement features are slated to remain.

BUILDING #2

Building #2 was constructed in 1873 and consists of a 5-story structure approximately 160 feet long by 43 feet wide. The building exterior is constructed of load-bearing brick masonry walls. The building floors are constructed of wood and several are finished with a concrete surface. The floors are supported by the exterior masonry walls, which include a combination of steel and wood framing and interior steel lally columns.

The Site Development Assessment Report identified three main deficiencies within Building #2 including: weak story (a portion of the wall between building #2 and #3 was removed), deterioration of wood (the roof framing had fire damage), and mass (some floors consisted of wood planks, while others of concrete slabs).

The Feasibility Study identified that the mortar joints on the exterior face of the building were deteriorating in many locations and disintegrated to dust upon contact. In addition, evidence of water damage was documented in the wood ceilings of the third floor and roof beams. This building is scheduled for demolition under Bid Alternative No. 3.

BUILDING #3

Building #3 was constructed in 1892 and consists of a 5-story structure approximately 176 feet long by 43 feet wide. The building exterior is constructed of load-bearing brick masonry walls. The building floors are constructed of wood and several are finished with a concrete surface. The floors are supported by the exterior masonry walls, which include a combination of steel and wood framing and interior steel lally columns. Building #3 contains empty concrete tanks, believed to historically hold water, and piping infrastructure.

The Site Development Assessment Report identified four main deficiencies within Building #3 including: interior mezzanine lacked bracing and adequate anchoring to the main structure, weak story (portions of the wall between Buildings #2 and #9 have been removed to create door openings over the years), soft story (the 1st floor was about twice as high as the remaining floors), and mass (some floors consisted of wood planks, while others of concrete slabs).

The Feasibility Study identified that the mortar joints on the exterior face of the building were deteriorating in many locations and disintegrated to dust upon contact. Moss observed growing on the brick in some areas indicated water was infiltrating the walls. In addition, evidence of water damage was documented in the wood ceilings of the third floor and roof beams. This building is scheduled for demolition under the Base Bid.

LOADING DOCK

The Loading Dock is located to the east of Buildings #3 and #7, and is elevated from the ground and supported by steel columns. An entrance between the Loading Dock and Building #3 connects these buildings. Neither the Site Development Assessment Report nor the Feasibility Study identified any deficiencies with this structure. This structure is scheduled for demolition under the Base Bid.

BUILDING #4

Building #4 was constructed in 1873 and consists of a 4-story structure approximately 95 feet long by 51 feet wide. The building exterior is constructed of load-bearing brick masonry walls, and the south exterior wall features covered walkways that span across the third and fourth floor of the building to Building #1 from ground level. The building floors are constructed of wood and several are finished with a concrete surface. The floors on the 3rd floor are supported by the masonry walls, a combination of steel/wood framing and interior steel lally columns. The first and second floors are supported by steel beams encased in brick arches.

The Site Development Assessment Report identified four main deficiencies within Building #4 including: masonry joints (the mortar is soft, friable, and easily scraped away), deterioration (some of the wood framing

Section 2 | Existing Conditions

was decayed or otherwise deteriorated), soft story (the 1st floor was about twice as high as the remaining floors), and mass (some floors consisted of wood planks, while others of concrete slabs). This building is scheduled for demolition under Bid Alternative No. 3.

BUILDING #5/5A

Building #5/5A is a 5-story structure approximately 50 feet long by 38 feet wide. This building is among the oldest existing buildings within the Mill Complex and was constructed in the 1870s. The building walls consist of load-bearing brick masonry. The 1st floor of the building, which is located two stories below Canal Road, houses the boilers. The boilers extend from the 1st floor up to the 3rd floor. Catwalks located above the 1st floor provide access between the boilers. The building does not have a 2nd floor.

The building floors are constructed of wood and several are finished with a concrete surface. Steel beams encased in brick masonry arches support the 3rd floor. Masonry walls, a combination of steel and wood framing and interior steel lally columns support the 4th floor. The 5th floor is supported by the masonry walls and wood framing. The 5th floor has additional floor supports consisting of tension rods that are evenly spaced throughout the length of the building. The rods on the 5th floor provide support for the floor and extend into the attic where they are attached to timber roof trusses. The Site Development Assessment Report identified one main deficiency within Building #5/5A: deterioration of wood. The Feasibility Study identified that the brick mortar joints were deteriorating and soft in many locations. This building is scheduled for demolition under the Base Bid.

BUILDING #6/6A

Building #6/6A was constructed in 1892 and consists of a 4-story building approximately 50 feet long by 50 feet wide. The building walls consist of load-bearing brick masonry. The building floors are constructed of wood and are finished with a concrete surface. Steel beams encased in brick masonry arches support the 3rd floor. Masonry walls, a combination of steel and wood framing, and interior steel lally columns support the third floor. Building #6A also contains two 15,000-gallon oil tanks.

The Site Development Assessment Report identified two main deficiencies within Building #6/6A: deterioration of wood and deterioration of masonry joints. The Feasibility Study identified that the brick mortar joints were deteriorating and soft in many locations. This building is scheduled for demolition under the Base Bid.

BUILDING #7

Building #7 was constructed in 1892 and consists of a 4-story building approximately 116 feet long by 56 feet wide. The building exterior is constructed of load-bearing brick masonry walls. The building floors are constructed of wood and are finished with a concrete surface. Steel beams encased in brick masonry arches support the 2nd and 3rd floors. Brick piers provide additional support for the third floor. The 4th floor is supported by the masonry walls, steel framing and interior steel lally columns. Building #7 contains multiple levels of concrete tanks, believed to historically hold water, and piping infrastructure.

The Site Development Assessment Report identified two main deficiencies within Building #7: the interior mezzanine was not braced or adequately anchored to the main structure, and masonry joints were deteriorated. The Feasibility Study identified that the brick mortar joints were deteriorating and soft on the north exterior wall and in the interior of the building. This building is scheduled for demolition under the Base Bid.

BUILDING #8

Building #8 was constructed in 1873 and consists of a 2-story building approximately 74 feet long by 51 feet wide. Foundation walls along the east side of the building adjacent to the Power Canal were constructed of

Section 2 | Existing Conditions

fieldstone masonry. The building floors are constructed of wood and wood topped with concrete. A combination of wood and steel trusses support the 2nd floor. Steel cables are attached to the tops of the columns below the 2nd floor along the west side of the building and are also attached to the 1st floor to provide structural support. This building also contains a below grade concrete water storage tank believed to historically hold water.

The Site Development Assessment Report identified two main deficiencies within Building #8: weak story (one side of the building has a concrete foundation wall resisting the lateral forces, and the other side of the building contains a brick exterior wall), and soft story (the floor heights vary). The Feasibility Study identified that Building #8 was in poor condition due to structural instability, water damage, and deterioration. It appeared steel cables were installed within the 1st floor to prevent the building from separating towards the Courtyard (East). The wood floor of the second floor was warped, likely from water damage, and the exterior brick mortar joints were deteriorating and soft in many locations. This building is scheduled for demolition under the Base Bid.

BUILDING #9 (OFF-SITE)

Building #9 was constructed in 1909 and consists of a 4-story structure that is approximately 3,850 square feet. The building is located between and shares a wall with Buildings #2, #4, and #5/5A along Canal Road, on a separate parcel of land identified as Parcel 02-0-01C (0.09 acres). This property is listed at 16 Canal Road and is currently owned by Turners Falls Creek Renewable Energy (dba Eagle Creek Renewable Energy). This occupied off-site building contains a sub-base level water wheel on the lowest floor with connecting penstock off the canal, with associated power generating equipment on the 2nd floor. The street-front 3rd floor level of this building contains the “power-house” and turbine, and this open floor spans up to the 2nd floor level. Beneath the 1st floor level is the tailrace that crosses beneath Building #2 and discharges to the Connecticut River. This building is scheduled to remain.

BUILDING #10 (FORMER)

Building #10 was constructed in 1894 and consisted of a 4-story structure that was approximately 5,200 square feet. This former building was destroyed by a fire in 2007, with fire-damaged debris cleanup completed in 2013. The lowest floor level of this former building, which was only on the rear/northern portion of this building, was previously used for storage. The upper three floor areas of this former building were generally used for storage.

BUILDING #11

Building #11 was constructed circa 1900 and consists of a 7-story building approximately 105 feet long by 48 feet wide. Foundation walls along the east side of the building adjacent to the Power Canal were constructed of brick and fieldstone masonry. The exterior is constructed with multi-wythe brick masonry walls with windows spanning each facade across six stories. The building floors are constructed of wood or wood topped with concrete, supported by the masonry walls, wood beams, and/or brick columns.

The Site Development Assessment Report identified multiple deficiencies within Building #11: soft story (the floor heights vary) and masonry joints (mortar is soft and friable). The Feasibility Study identified that Building #11 was in poor condition due to structural instability, water damage, and deterioration. The wood flooring on the second floor had visible water damage, and the wood ceiling was visibly deteriorated in multiple locations. This building is scheduled for demolition under Bid Alternative No. 2.

COURTYARD (EAST)

The Courtyard (East) area is surrounded by Buildings #3, #6, #7, and #8 and contains the base of the Smokestack that was removed in 2020. The base of the former Smokestack is deteriorating with brick masonry

falling off the base. The Courtyard also contains a 9,000-gallon underground concrete tank believed to historically hold water. The tank is currently empty. The below grade concrete tank is scheduled to be filled in with flowable concrete fill under the Base Bid.

TAILRACE #3

Tailrace #3, located beneath Building #3, originates at the Power Canal and terminates at the riverside foundation wall along the Connecticut River. The Tailrace has an arch opening approximately 20 feet wide and 10 feet high; the area inside Tailrace #3 is approximately 20 feet across and 30 feet deep with 13-foot ceilings. Tailrace #3 has masonry and concrete construction with pipe penetrations on the back wall. Steel supports are in place for further structural stability. Debris (e.g., brick, driftwood) and silt have accumulated on the floor of the tailrace near the outlet due to water backing up from the Connecticut River. Steel I-beams on the ceiling are approximately three (3) feet on center.

Historically, water from the Power Canal flowed through the raceway, through the tailrace, and discharged to the Connecticut River. The inlet (penstock) was capped by the Town during the summer of 2018. The outlet remains open.

Under the Base Bid, the tailrace is scheduled to be sealed at the outlet archway with a concrete wall and filled with flowable concrete fill beneath Building #3 and the East Courtyard.

2.1.4 Asbestos and Hazardous Materials

Between 2014 and 2026, Tighe & Bond completed hazardous building material assessment (HBMA) surveys through the Mill complex buildings as part of earlier (limited) asbestos and hazardous building materials abatement work, and now in preparation for full building demolition.

Regulated asbestos-containing materials (RACMs) were identified in several different materials throughout each building. Materials containing asbestos include but are not limited to: pipe and boiler insulations, boiler packing and gaskets, pipe gaskets, transite cement panels and electrical boards, floor tiles, mastics, adhesives, window and door glazing and caulking, and built-up roofing materials. Most of the safely accessible materials were removed from the interior portions of several of the buildings in 2020.

Hazardous materials identified within buildings include but are not limited to: fluorescent light tubes light, oil-filled ballasts, mercury containing switches and thermostats, emergency light batteries, fire extinguishers, containers of gear oils, containers of cleaning fluids, paints and solvents, and some areas of oil stained concrete surfaces. Some of these materials were removed from the interior portions of several of the buildings in 2020. Lastly, lead paint was identified in the buildings. If the Mill Complex were to catch fire or otherwise collapse, uncontrolled releases of hazardous material to the environment would occur.

2.2 Wetland Resource Areas

2.2.1 Methodology of Wetland Resource Area Investigation

The limits of wetland resource areas within the vicinity of the Project Locus were determined based on a combination of site reconnaissance and review of available mapping, including USGS topographic maps, the Federal Emergency Management Agency (FEMA) Flood Insurance Study (FIS) and Flood Insurance Rate Map (FIRM).

2.2.2 Description of Wetland Resource Areas

The following wetland resource areas have been identified within or near the project area:

- Inland Bank
- Land Under Water and Waterbodies (LUWW)
- Bordering Land Subject to Flooding (BLSF)
- 200-foot Riverfront Area

All resource areas are associated with the Connecticut River and Power Canal.

2.2.3 Inland Bank and Land Under Water and Waterbodies

Inland Bank and LUWW within the vicinity of Project Site are associated with the Power Canal and the Connecticut River. Bank was identified by visual observations and is generally defined by a change in slope and a change in vegetation. The Bank and Mean Annual High Water (MAHW) of the Connecticut River are coincident as shown on Figure 4 in Appendix A. Vegetation observed along and near the Bank includes silver maple (*Acer saccharinum*), American elm (*Ulmus americana*), Oriental bittersweet (*Celastrus orbiculatus*), grape vines (*Vitis spp.*), marsh blue violet (*Viola cucullata*), goldenrods (*Solidago spp.*), and other herbaceous vegetation.

2.2.4 Bordering Land Subject to Flooding

According to the FEMA FIS (Community Number 250122, Map 02P, revised February 1982) and FIRM (Community Panel Number 250122 001 C, effective February 12, 1982), portions of the Mill Complex are within the mapped limits of 100-year flooding at FEMA-determined base flood elevations (BFE) ranging between 153 and 155 feet. Base flood elevation on Figure 4 is conservatively shown at an elevation of 155 feet.

2.2.5 Riverfront Area

Within the Project Locus, Riverfront Area is associated with the Connecticut River and accounts for approximately 145,633 square feet (sf), or 67 percent of the Project Locus. As mentioned above, the Bank and MAHW of the Connecticut River are vertically coincident along the waterward face of the Mill Complex structures. The Riverfront Area primarily consists of the existing Mill Complex Buildings. To the east of the Loading Dock, the Riverfront Area consists of an area of unmanaged vegetation, the footprint and remnant debris of a previously demolished building, and other areas historically utilized for manufacturing purposes.

2.3 Rare Species

The Massachusetts Natural Heritage and Endangered Species Program (NHESP) Atlas, 15th Edition, dated August 2021, and MassGIS online mapping were consulted during the preparation of this NOI. According to these sources, portions of the proposed work is within the limits of mapped Estimated Habitat (EH 1319) and Priority Habitat (PH 2084). Correspondence with NHESP is provided in Appendix E. Figure 4 in Appendix A identifies the extent of mapped Estimated and Priority Habitat within the vicinity of the Project Locus.

According to information provided by NHESP in their October 29, 2024 response to a request for information, five state-listed species have been documented within the vicinity of the site. These species are listed in Table 2-1 below.

TABLE 2-1 Summary of state listed rare species within the vicinity of the Project Site

Scientific Name	Common Name	Taxonomic Group	State Status
<i>Acipenser brevirostrum</i>	Shortnose Sturgeon	Fish	Endangered ¹
<i>Deschampsia cespitosa ssp. glauca</i>	Tussock Hairgrass	Plant	Endangered
<i>Lota lota</i>	Burbot	Fish	Special Concern
<i>Stylurus amnicola</i>	Riverine Clubtail	Dragonfly	Endangered
<i>Symphotrichum tradescantii</i>	Tradescant's aster	Plant	Threatened

¹ Federally listed endangered species.

Based on the MESA Determination (NHESP File No: 18-38083) from the previous NOI submission for this project, a botanical field survey was required to delineate the extent of tussock hairgrass (*Deschampsia cespitosa ssp. glauca*) along the Connecticut River side of the Project Site. This survey was recommended to be completed in June to successfully identify the target species. A botanical survey for listed plant species will be completed in this timeframe prior to start of demolition.

Section 3



SECTION 3 | Project Description

This section provides a description of the proposed demolition and associated activities, as well as protective measures, and site restoration.

3.1 Proposed Activities

As Building #9 is scheduled to remain, the demolition of abutting buildings requires construction of reinforced concrete masonry unit (CMU) walls below the subsurface grade of the exposed lower walls of Building #9 to resist the lateral soil loads anticipated from the sloped backfill in this lower level area. This “fill” will include coated materials in some areas, as further reviewed herein.

To provide the Town with a feasible solution to demolish numerous buildings within the Project Site using the available Project funding (with the possibility that additional funding may become available as the project advances to construction), a tiered approach of building demolition was established that progressively increases the number of buildings to be demolished. Table 3-1 summarizes the demolition alternates in the progressive order of occurrence for bidding.

TABLE 3-1 Proposed Demolition Alternates

Demolition Alternates	Scheduled to be Demolished	Scheduled to Remain	New Construction Needed	Other Repair Work Needed
Base Bid	<p>Building #s: 3, 5/5a, 6/6a, 7, and 8;</p> <p>Remaining base of Smokestack in East Courtyard; and</p> <p>Loading Dock attached to Building #3.</p>	<p>Buildings #s: 1, 2, 4, and 11;</p> <p>Tailrace system beneath Building #2; and</p> <p>Concrete Walled Tank west of Building #1.</p>	<p>Reinforced concrete retaining wall below street level grade, and new CMU wall with brick veneer along eastern side of Building #9; and</p> <p>For tailrace beneath Building #3, seal with concrete wall at property line and fill in with flowable concrete fill.</p>	<p>Fill in doorway openings, etc. along existing walls at the newly exposed southern and eastern sides of Building #2; and</p> <p>Fill in subsurface clearwater holding tank in Courtyard East with flowable concrete fill.</p>
Bid Alternate No. 1	<p>Building #s: 1, 3, 5/5a, 6/6a, 7, and 8;</p> <p>Remaining base of Smokestack in East Courtyard; and</p> <p>Loading Dock attached to Building #3.</p>	<p>Building #s: 2, 4, and 11; and</p> <p>Tailrace system beneath Building #2.</p>	<p>Reinforced concrete retaining walls below street level grade, and new CMU walls with brick veneer along eastern and northern sides of Building #9;</p> <p>A new stair tower system at the rear (north side) of Building #9 to supplement the required egress out of the building; and</p> <p>For tailrace beneath Building #3, seal with concrete wall at property line and fill in with flowable concrete fill.</p>	<p>Fill in doorway openings, etc. along existing walls at the newly exposed northern side of Building #4; and</p> <p>Fill in subsurface clearwater holding tank in Courtyard East with flowable concrete fill.</p>

Section 3 | Project Description

Demolition Alternates	Scheduled to be Demolished	Scheduled to Remain	New Construction Needed	Other Repair Work Needed
Bid Alternate No. 2	<p>Building #s: 1, 3, 5/5a, 6/6a, 7, 8, and 11;</p> <p>Remaining base of Smokestack in East Courtyard; and</p> <p>Loading Dock attached to Building #3.</p>	<p>Building #s: 2 and 4; and</p> <p>Tailrace system beneath Building #2.</p>	<p>Reinforced concrete retaining walls below street level grade, and new CMU walls with brick veneer along eastern and northern sides of Building #9;</p> <p>A new stair tower system at the rear (north side) of Building #9 to supplement the required egress out of the building; and</p> <p>For tailrace beneath Building #3, seal with concrete wall at property line and fill in with flowable fill.</p>	<p>Fill in doorway openings, etc. along existing walls at the newly exposed northern side of Building #4; and</p> <p>Fill in subsurface clearwater holding tank in Courtyard East with flowable concrete fill.</p>
Bid Alternate No. 3	<p>Building #s: 1, 2, 3, 4, 5/5a, 6/6a, 7, 8, and 11;</p> <p>Remaining base of Smokestack in East Courtyard; and</p> <p>Loading Dock attached to Building #3.</p>	<p>Tailrace system beneath Building #2.</p>	<p>Reinforced concrete retaining walls below street level grade, and new CMU walls with brick veneer along eastern, northern, and western sides of Building #9;</p> <p>A new stair tower system at the rear (north side) of Building #9 to supplement the required egress out of the building; and</p> <p>For tailrace beneath Building #3, seal with concrete wall at property line and fill in with flowable concrete fill.</p>	<p>Fill in subsurface clearwater holding tank in Courtyard East with flowable concrete fill.</p>

The demolition approach under the base bid and the subsequent building demolition alternates are depicted on Plan Sheet 4 provided in Appendix B. Also included in the Permit Set of Project Drawings are the details showing the sealing of the underground Tailrace # 3 near the exit point and filling of the abandoned tailrace with flowable concrete fill (see Sheet 7). The demolition plans will also include utility cutoffs to the Site buildings, which will also include cutting and capping drain lines in the lower 1st floor levels of the applicable building areas, and the filling in of larger openings/voids beneath the demolished buildings' concrete slabs with flowable concrete fill.

No excavation is anticipated to occur at or below the lowest building slab elevation. Further details for the proposed building demolition, tailrace system abandonment, and backfilling are provided in the sections below.

The demolition of the Mill Complex will include the recycling of as much material as possible. This will include the reuse of painted/coated brick and concrete materials as backfill under a Beneficial Use Determination (BUD) application to the Massachusetts Department of Environmental Protection (MassDEP). Due to the depths of building areas "below grade" along the steeply sloped parcel and because the hydroelectric generating plant (Building #9 to remain) and the abutting Power Canal wall both require backfill for structural support, the project requires a substantial quantity of post-demolition fill material.

3.1.1 Woody Vegetation Removal

Approximately 10,500 sf of vegetation removal is proposed within the vicinity of the Loading Dock area to facilitate access for demolition activities. Mechanical vegetation removal methods will be used for this task. Vegetation will be removed from the site for proper disposal. Note that a significant portion of this area is currently armored with rip rap. The final ground treatment in these areas will remain rip rap.

3.1.2 Asbestos and Hazardous Materials Abatement

As mentioned in Section 2.1.4, asbestos-containing materials and hazardous materials have been identified within buildings scheduled for demolition. Regulated asbestos-containing materials will be abated prior to or during demolition. Hazardous materials will be abated prior to demolition and areas of oil-stained concrete surfaces will be segregated for separate disposal during demolition.

Lead paint management is subject to OSHA 1926.62 Lead in Construction regulations, which require the contractor to adequately protect their workers from exposure to airborne lead. It is expected that employee exposure to lead will be minimal as the majority of demolition work will involve the use of mechanical equipment. However, in the event selective demolition procedures include the use of torches or reciprocation saws and paint is present, those surfaces would be abated prior to the disturbance to reduce any potential worker exposure.

3.1.3 Demolition

Demolition will include Buildings #3, #5/5A, #6/6A, #7, #8, the Smokestack base, and Loading Dock attached to Building #3, as well as Buildings #1, #2, #4, and #11 depending on the bids received. Above-grade portions of buildings will be demolished to the lowest slab elevation; the slab and foundation walls adjacent to Canal Street and the Connecticut River will remain intact.

Demolition is proposed to the lowest slab elevation; the remaining slabs will be perforated for drainage and foundation walls will remain intact. Within the Courtyard, the Smokestack will be demolished, and the 9,000-gallon holding tank slab will be filled-in with flowable concrete fill. Utilities serving the buildings to be demolished will be terminated, cut, plugged and/or capped. Any grading will be restored to existing elevation with clean off-site borrow as necessary. The area will then be restored with loam and seed.

It is anticipated that work will be undertaken with the use of typical construction equipment including cranes, excavators, grapplers, front-end loaders, waste-trailers, and dump trucks. Demolition debris will be temporarily stockpiled as it is generated, placed on the first-floor concrete slabs, and segregated for proper off-site disposal. Dust from construction activities will be controlled via the use of water sprayers or spray guns.

Based on site constraints, it is anticipated that demolition will occur from east to west starting at the Loading Dock. The buildings/areas will generally be demolished/abandoned in the following order: Loading Dock, Building #7, Building #8, Courtyard smokestack, Courtyard holding tank (to be abandoned in place), Building #6/6A, Building #3, Tailrace #3 (capping and fill), and Building #5/5A, followed by the potential demolition of Buildings #1, #2, #4, and #11. Stockpiling details are discussed below in Section 3.1.4.

3.1.4 Material Utilization, Backfilling, and Grading

Due to the depths of the lowest building slabs, the project will entail backfilling to create a slope from Canal Road to the lowest elevation of the lowest slab. This will serve to stabilize the remaining building foundation walls along Canal Street, and along the east side (and west, if Building #4 is demolished) of Building #9 to remain. Areas will be graded as shown in the Project Drawings in Appendix B.

The processed (crushed to less than 3 inches) brick/concrete debris generated during the building demolition will be reused as structural backfill material and will account for a significant percentage of material required for post-demolition backfill and grading. Since portions of the brick are coated with paint, MassDEP will review and approve the BUD permit application prior to reuse of these materials on-site. Therefore, the re-use of these materials on-site will significantly limit the amount of materials to be disposed off-site and the volume of backfill needed. Correspondingly, it will reduce construction-related traffic to and from the Project Site.

The difference in elevation between Canal Road and the first-floor level of the Mill Complex is approximately 24 feet. Backfill will be placed at a 3:1 slope (or less) toward the foundations of Buildings #1, #2, and #3 as shown on Sheet 5 of the Project Drawings. The proposed area for the beneficial use of the processed materials is at the lower levels within this sloped area, beginning against the fieldstone masonry walls to remain intact along/abutting the Canal Road. The approximate footprints where the processed materials will be placed is shown on Sheet 5 of the Project Drawings. As shown, the "primary" area for backfilling is in the footprints of demolished Buildings #5/5A, #6/6A, #7 and #8, and the East Courtyard area, with "secondary" areas for backfilling is in the footprints of Building #11 and Building #4, if demolished. Further proposed details are summarized below:

- The first floor slabs will be punctured for drainage purposes and a geotextile filter fabric will be placed atop the punctured floor. Processed material will be stockpiled on geotextile filter fabric.
- The stockpiled processed materials will be placed in uniform horizontal layers not to exceed 12 inches in thickness and compacted with heavy self-propelled vibratory compaction equipment (e.g., vibratory rollers).
- The processed materials will be placed at a 3:1 (or less) slope as shown on Sheet 5 of the Project Drawings.
- Following the completion of placing the processed materials, a geotextile filter fabric layer will be placed atop these materials along with a visual warning barrier (e.g., orange snow fence material). A minimum of three (3) feet of clean, off-site borrow will then be placed over these areas.
 - For the primary area, the surface treatment of the sloped area shown on Sheet 5 will consist of 2.5 feet of clean off-site borrow and 0.5 feet of loam to be broadcast with grass seed to establish vegetative cover.
- For the secondary backfilled/sloped areas, the surface of the 3-foot cover will be riprap material

STOCKPILING

Demolition debris will be stockpiled initially on the first-floor concrete foundations for segregation and subsequent transport from the site. Longer-term designated stocking areas will be established for materials to be salvaged (e.g. timber). Materials that are scheduled to be crushed and re-used on-site will also be stockpiled on concrete foundations and within the designated stockpiling location as depicted on Sheet 3 of the Project Drawings. Stockpiles that are not on concrete foundations will be surrounded by perimeter controls as to protect materials from migrating off-site. Material that will not be re-used on-site will be stockpiled on concrete foundations and loaded for transport.

3.1.5 Tailrace #3 Closure

Closure of Tailrace #3 will be achieved through the construction of an engineered barrier (referred to herein as the cap) at the tailrace outlet, flush with the exterior face of the riverside foundation wall. As previously mentioned, the inlet (penstock) was capped by the Town during the summer of 2018. In order to cap the tailrace with minimal impact to the nearby Bank of the Connecticut River, access will be gained through the remaining floor of Building #3 following demolition of the upper portions of the building. This will

likely be accomplished by the use of a “snooper” type truck with a boom lift to lower laborers and equipment into the tailrace for debris removal and concrete formwork.

Tailrace #3 closure will include the following activities.

- Loose bricks, driftwood, and other debris will be removed from within the tailrace and at the outlet.
- Silt fence and erosion control barriers will be placed just outside the outlet of the Tailrace.
- Debris will be stockpiled on the building foundation for offsite disposal.
 - No debris will be placed or stockpiled within the Connecticut River or its Bank.
- Silt deposits will be removed down to sound soil to reduce the chance of cap settlement.
- Silt debris will be placed in the interior of the tailrace.

The engineered cap will be constructed of reinforced concrete followed by filling the remaining voids with controlled density fill finished flush with the top of the tailrace Tailrace closure details are shown on Sheet 7 of the Project Drawings in Appendix B.

3.1.6 Construction Access

Access to the Project Site is limited to a single roadway, Canal Road. The site will be accessed from the Turners Falls Road bridge over the Connecticut River. Contractors will be required to abide by height, weight, and width restrictions for Canal Road as detailed in the Project Specifications and as summarized below.

ACCESS RESTRICTIONS

A letter to the Town of Montague from the FirstLight Hydro Generating Company dated June 14, 2012 detailed restrictions along the FirstLight Travel Way, a 10-foot-wide portion of Canal Road as measured from the vertical waterline, adjacent to the Power Canal. These restrictions are as follows:

“No vehicle having maximum wheel loading in excess of six thousand (6,000) pounds with minimum axle spacing of at least four and one-half feet (4.5’) shall be permitted passage along the FirstLight Travel Way; and, if the canal is dewatered, (as determined by FirstLight in its sole discretion), no vehicle having maximum wheel loading in excess of four thousand (4,000) pounds shall be permitted passage along the FirstLight Travel Way.”

During construction, these weight and axle restrictions will be followed and enforced for any vehicles and equipment traversing Canal Road.

3.2 Construction Period Protective Measures

The following protective measures will be implemented during construction to minimize the potential for erosion and sedimentation. There are no visible stormwater collection structures noted within the limits of the work. If identified, inlet structures will be protected with silt sacks.

3.2.1 Erosion Control Barrier

The Connecticut River will be protected by a row of erosion control barriers at the limits of work near the Loading Dock. The erosion control barriers will consist of silt fencing, or other similarly effective devices depending on the location. In addition:

Section 3 | Project Description

- The Contractor will be required to maintain a reserve supply of erosion control barriers on-site to make repairs, as necessary.
- Protective measures will be inspected after significant precipitation events. Maintenance and repairs will be conducted, as necessary.

At the conclusion of the project, the erosion control barriers will be removed and properly disposed off-site following the stabilization of disturbed areas and Conservation Commission authorization.

3.2.2 Debris Collection Netting

The demolition of Buildings #1, #2, and #3 is the only work proposed immediately adjacent to the Connecticut River. Additional protective measures consisting of netting to help catch debris will be implemented to minimize the potential of incidental deposition into the river. Prior to Building #1, #2, and #3 demolition, a netting system will be designed, installed and maintained by the demolition contractor.

It is expected that the barrier system will consist of a series of steel beams secured horizontally to the building walls. The steel beams will extend through lower window openings of the north building wall, approximately 10 feet or more from the building. Strong netting or similar material will then be draped over and secured to the beams. Careful demolition is planned in this area and the north building wall will be pulled inward in a southerly direction, away from the river. The demolition will proceed using a bay-by-bay method, starting from the east and moving to the west. This netting is intended to catch loose bricks or concrete pieces that may fall in the direction of the Connecticut River (to the north). This type of system has been effectively implemented on similar projects. Although unlikely, in the event that loose material falls into the shoreline of the Connecticut River, the contractors will be required to remove the material.

3.2.3 Power Canal Protection

The top of the concrete wall of the Power Canal adjacent to Canal Road provides a vertical, impervious barrier that protects the Power Canal. No additional measures are proposed at this location.

3.2.4 Proposed Handling and Best Management Practices of Beneficial Reuse Material

The following Best Management Practices (BMPs) will be implemented during the handling and processing of the beneficial reuse material:

- During building demolition, materials with significant oil-staining of the coated and uncoated surfaces will be segregated for proper off-site disposal.
- During building demolition, the coated and uncoated materials, as defined herein, will be segregated and stockpiled separately, to the extent feasible, at one or more locations on-site.
- Dust from the demolition activities, stockpiled brick/concrete rubble, crushing operations and crushed material will be monitored through a visual standard of "no visible dust emissions" and controlled with water sprayers. Following crushing, the materials will be used as backfill and compacted in a pre-determined location, as further described below.

3.3 Sequence of Construction

The following anticipated construction sequence described below is based on experience with similar projects. The actual construction sequence will be determined by the selected contractor. The selected

Section 3 | Project Description

contractor will provide, as part of their pre-work submittals, a sequencing plan of demolition from commencement to completion. This submittal will be reviewed by the engineer for content.

Below is a list of anticipated project phases:

Phase 1 - Contract Award

- Notice to Proceed
- Preparation - Submission and review of pre-work submittals

Phase 2 - Site Preparation and Abatement of Hazardous Building Materials

- Install erosion control barriers as shown on the Project Drawings, and as necessary
- Commence interior asbestos and hazardous materials abatement
- Selectively trim and remove vegetation along the eastern side around the Loading Dock for access and staging

Phase 3 -Building Demolition and Site Restoration

- Finish interior and hazardous waste abatement
- Demolish generally from east to west, starting at the Loading Dock
 - The buildings/areas will generally be demolished in the following order: Loading Dock, Building #7, Building #8, Smokestack, Courtyard holding tank (to be abandoned in place), Building #6/6A, Building, Building #3, Tailrace #3 (capping and fill), and Building #5/5A, followed by the potential demolition of Buildings #1, #2, #4, and #11.
 - Stockpile demolition debris for transport from the site or for re-use onsite. Reuse material will be crushed on-site.
- Backfill and grade of reuse material as specified on Sheet 5 of the Project Drawings
- Restore disturbed areas by loaming and seeding
- Remove erosion control barriers

3.3.1 Site Restoration

Since the majority of the project is located within previously developed areas (i.e. the Mill Complex), site restoration is limited to the area of vegetation removal. Site restoration will include loaming and seeding of disturbed previously vegetated areas, where current rip rap materials do not exist.

Section 4



SECTION 4 | Regulatory Compliance

4.1 Massachusetts Wetlands Protection Act

The proposed activities fall within areas subject to protection and jurisdiction under the Massachusetts Wetlands Protection Act (MAWPA; M.G.L. c. 131 § 40) and its implementing regulations set forth at 310 CMR 10.00 as administered by the Montague Conservation Commission. Portions of the proposed work will occur within BLSF, Riverfront Area, and the 100-foot Buffer Zone to inland Bank associated with the Connecticut River and the Power Canal.

The project has been designed to avoid environmental impacts when possible and minimize unavoidable impacts when practicable. Descriptions of the project's compliance with the regulatory requirements of the MAWPA are provided in the following sections.

4.1.1 Riverfront Area Exemption

Per the MAWPA regulations set forth at 310 CMR 10.58(6)(k), activities within Historic Mill Complexes are exempt from requirements for Riverfront Area.

'Historic Mill Complex means the mill complexes in, but not limited to, Holyoke, Taunton, Fitchburg, Haverhill, Methuen, and Medford in existence prior to 1946 and situated landward of the waterside facade of a retaining wall, building, sluiceway, or other structure existing on August 7, 1996. An historic mill complex also means any historic mill included on the Massachusetts Register of Historic Places. An historic mill complex includes only the footprint of the area that is or was occupied by interrelated buildings (manufacturing buildings, housing, utilities, parking areas, and driveways) constructed before and existing after 1946, used for any type of manufacturing or mechanical processing and including associated structures to provide water for processing, to generate water power, or for water transportation.'

In the case, In the Matter of James M. Knott, Sr. (DEP Docket No. 2001-048), the Administrative Law Judge (ALJ), Mark Silverstein issued the adjudicatory ruling expanding the exemption for Historic Mill Complexes Riverfront Area beyond what is explicitly stated at 310 CMR 10.58(6)(k). In 2002, the ALD determined the statutory exemption was more of a "land based" exemption and that "the Riverfront Area should not include land now or formally associated with historic mill complexes..." Therefore, all proposed activities, including vegetation removal, qualify as exempt from the requirements for Riverfront Area as all activities are located within the limits of an Historic Mill Complex and areas associated therewith.

As summarized in Section 2.1.2 and according to the Sanborn Fire Insurance Maps of the Project Locus dated between 1884 and 1940, all proposed activities including building demolition and vegetation removal, are located within the footprint of an Historic Mill Complex and associated areas. The approximate area of vegetation removal and building labels were added to the Sanborn Maps provided in Appendix C. According to the 1902 map of the easternmost portion of buildings scheduled for demolition, the approximate area of vegetation removal was developed with buildings, a storage area, and other facilities associated with an Historic Mill Complex. In addition, the Mill Complex buildings scheduled for demolition are identified in red font in multiple Sanborn Maps of the Project Locus from 1884, 1889, 1902, prior to 1914, 1914, and 1940.

According to the historic Sanborn Maps, all proposed activities qualify as exempt from requirements for Riverfront Area as they are located within the Historic Mill Complex per 310 CMR 10.58(6)(k) and the 2012 adjudicatory ruling by Mark Silverstein (DEP Docket No. 2001-048).

In addition, per the MAWPA regulations set forth at 310 CMR 10.58(2)(a)(1)(g), human-made canals (e.g. the Cape Cod Canal and canals diverted from rivers in Lowell and Holyoke) and mosquito ditches associated with coastal rivers do not have Riverfront Areas. Therefore, all proposed activities are exempt from the requirements for Riverfront Area.

4.1.2 Summary of MAWPA Jurisdictional Alterations

The proposed project will result in alterations to BLSF and the 100-foot Buffer Zone to inland Bank. A summary of alterations by activity is presented in Table 4-1 below. It should be noted that alterations located within the limits of BLSF overlap with alterations to the 100-foot Buffer Zone. Refer to Figure 4 in Appendix A for an overview of resource areas within the Project Site.

TABLE 4-1 Summary of MAWPA Jurisdictional Alterations

Activity	Bordering Land Subject to Flooding (sf)	200-foot Riverfront Area (sf)	100-foot Buffer Zone (sf)
Vegetation Removal	5,700	NA- Exempt	7,500
Staging and Access	15,000	NA- Exempt	37,000
Base Bid Building Demolition and Tailrace Abandonment	800	NA- Exempt	31,000
Bid Alternate No. 1 Additional Demolition	500	NA- Exempt	5,500
Bid Alternate No. 2 Additional Demolition	0	NA- Exempt	6,500
Bid Alternate No. 3 Additional Demolition	0	NA- Exempt	12,500
Total	22,000	NA- Exempt	100,000

4.1.3 Performance Standards Compliance

The proposed project includes work within BLSF. The MAWPA performance standards are provided below in *Italics*, while a discussion of the project’s compliance with each of the performance standards follows in plain font. The proposed project meets all the performance standards.

BORDERING LAND SUBJECT TO FLOODING

The proposed project will result in approximately 22,000 sf of alterations to BLSF associated with the Connecticut River. The proposed activities will not result in a change in flood storage capacity within the Project Site. The Performance Standards for Bordering Land Subject to Flooding are set forth at 310 CMR 10.57(4)(a).

- Compensatory flood storage shall be provided for all flood storage volume that will be lost as the result of a proposed project within Bordering Land Subject to Flooding, when in the judgment of the issuing authority said loss will cause an increase or will contribute incrementally to an increase in the horizontal extent and level of flood water during peak flows.*

Compensatory flood storage shall mean a volume not previously used for flood storage and shall be incrementally equal to the theoretical volume of flood water at each elevation, up to and including the 100-year flood elevation, which would be displaced by the proposed project. Such compensatory volume shall have an unrestricted hydraulic connection to the same waterway or water body. Further, with respect to waterways, such compensatory volume shall be provided within the same reach of the river, stream or creek.

The proposed project will not result in any fill in BLSF or other changes to flood storage capacity within the Project Site. Therefore, compensatory flood storage is not required, and this standard has been met.

2. *Work within Bordering Land Subject to Flooding, including work required to provide the above-specified compensatory flood storage, shall not restrict flows so as to cause an increase in flood stage or velocity.*

The proposed demolition of buildings and areas will not result in a change in flood storage capacity and therefore will not increase flood stage or velocity. As such, this standard has been met.

3. *Work in those portions of bordering land subject to flooding found to be significant to the protection of wildlife habitat shall not impair its capacity to provide important wildlife habitat functions. Except for work which would adversely affect vernal pool habitat, a project or projects on a single lot, for which Notice(s) of Intent is filed on or after November 1, 1987, that (cumulatively) alter(s) up to 10% or 5,000 square feet (whichever is less) of land in this resource area found to be significant to the protection of wildlife habitat, shall not be deemed to impair its capacity to provide important wildlife habitat functions. Additional alterations beyond the threshold, or altering vernal pool habitat, may be permitted if they will have no adverse effects on wildlife habitat, as determined by procedures contained in 310 CMR 10.60.*

Per 310 CMR 10.57(1)(a)(3), areas significant to the protection of wildlife habitat include "all areas on the ten year floodplain or within 100 feet of the bank or bordering vegetated wetland (whichever is further from the water body or waterway, so long as such area is contained within the 100 year floodplain)... except for those portions of which have been so extensively altered by human activity that their important wildlife habitat functions have been effectively eliminated (such "altered" areas include paved and graveled areas, golf courses... and similar areas lawfully existing on November 1, 1987 and maintained as such since that time."

The Mill Complex is considered an area so extensively altered by human activity that the important wildlife habitat functions are negligible. The 22,000 sf of vegetation removal proposed within BLSF accounts for approximately 49% of the total BLSF within the Project Locus (45,199 sf). Therefore, an "Appendix A: Simplified Wildlife Habitat Evaluation" (WHE) was completed for the area of proposed vegetation removal. According to the WHE, a copy of which is provided in Appendix G, only one important habitat feature is present within the Project Site: Habitat for state-listed species. The five state-listed species documented within the vicinity of the site include two fish species, one dragonfly species, and two plant species as discussed in Section 2.3 of this narrative. No work, including vegetation removal, will occur within the Connecticut River or along its Bank, and therefore the project is not expected to impact any state-listed species and this standard is satisfied. A botanical survey will be conducted prior to demolition in coordination with NHESP.

4.1.4 Stormwater Management

Per the Recommended Final Decision issued July 29, 2016 in the Matter of Berkshire Community College Docket No. WET-2015-023 from the MassDEP Office of Appeals and Dispute Resolution, it was ruled that 310 CMR 10.05(6) (k) through (q) do not apply to a project that does not propose a “point source” or “stormwater discharge” within Resource Areas or their Buffer Zones.

4.1.5 Abutter Notification

Abutters were notified in accordance with the MAWPA. Notifications were sent by USPS Certificates of Mailing. Copies of the certified lists and the abutter notification form are provided in Appendix F.

4.2 Other Regulatory Programs

4.2.1 Massachusetts Historical Commission

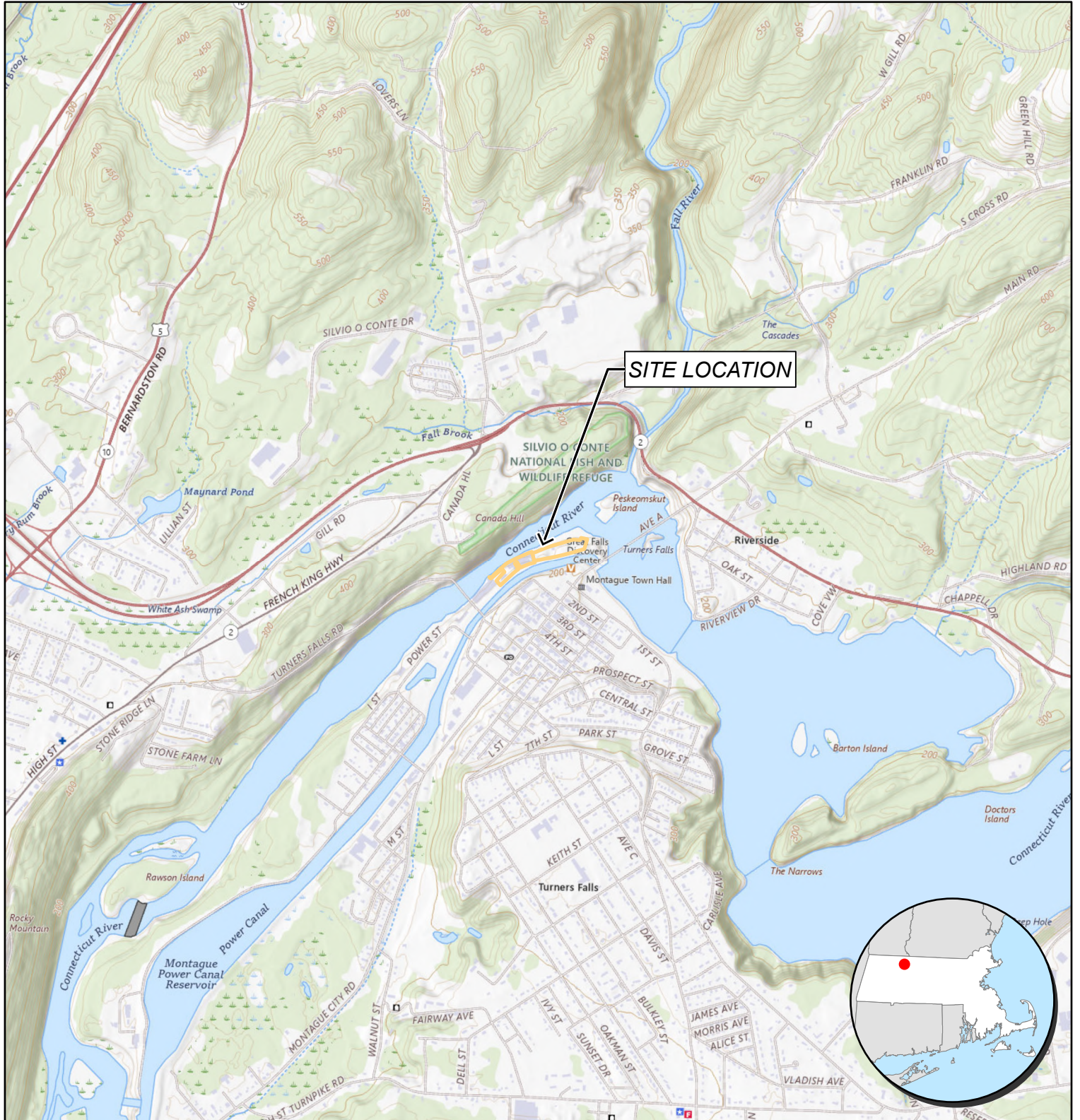
A Project Notification Form (PNF) is being prepared for review by the Massachusetts Historical Commission (MHC). The Proponent will continue to coordinate with MHC, the Montague Historical Commission, and other agencies, as appropriate, as the project progresses.

4.2.2 Beneficial Use Determination

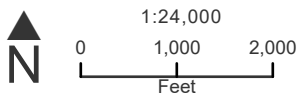
A Beneficial Use Determination (BUD) Permit Application (BWP SW 41-Restricted Applications) for the reuse of painted/coated brick and concrete from the former Strathmore Mill Complex will be submitted to MassDEP in accordance with 310 CMR 19.060 for Beneficial Use of Solid Wastes.



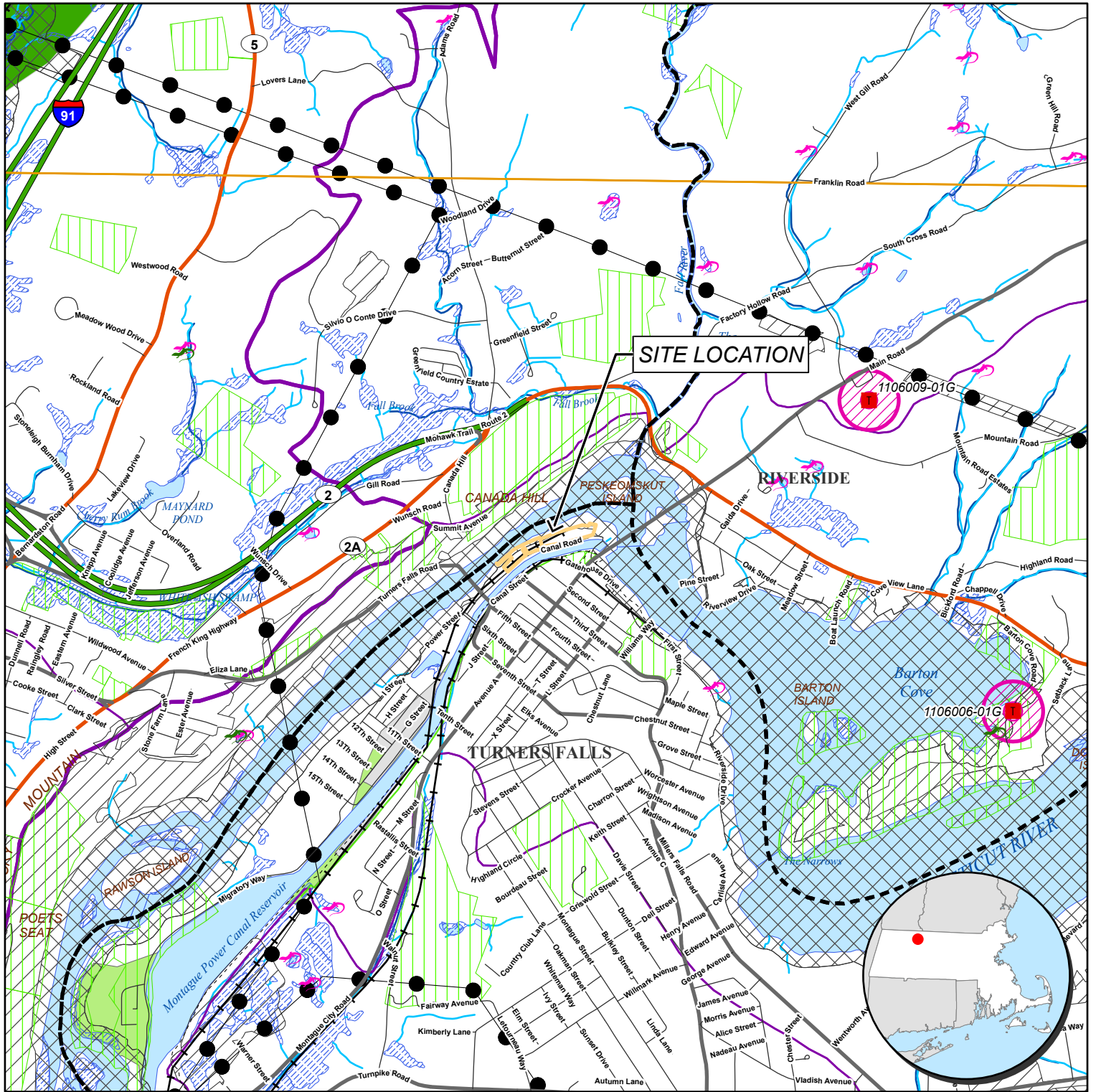
Appendix A



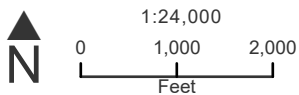
— Project Locus



Based on USGS The National Map Topo Basemap.
Contour Interval Equals 10 Feet.

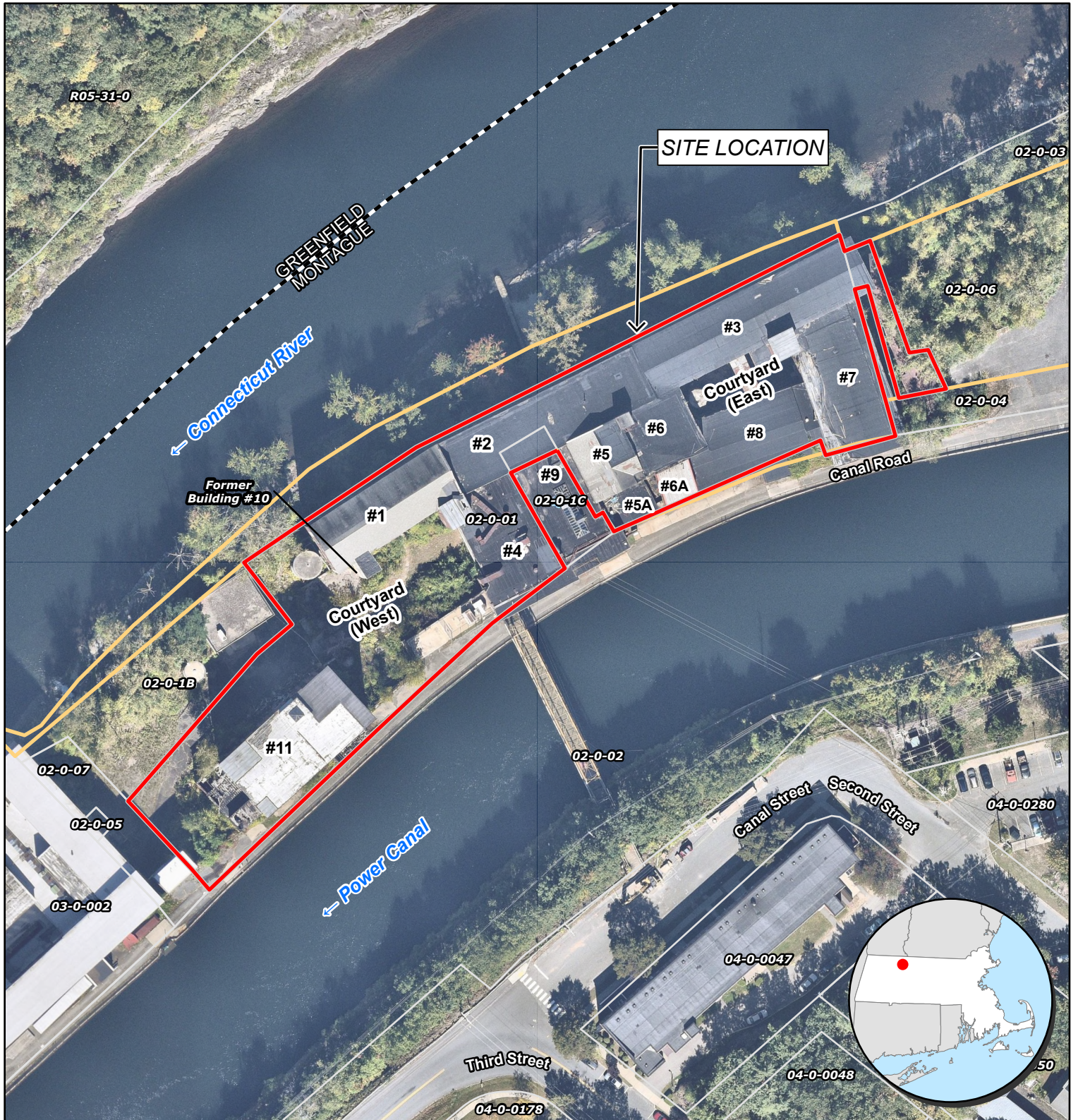


- | | | | | |
|---|---|--|---|---|
| NHESP Certified Vernal Pool | Non-Community Non-Transient Public Water Supply | Stream/Intermittent Stream | Protected and Recreational Open Space | MassDEP Not Interpreted Wetland |
| NHESP Potential Vernal Pool | Non-Community Transient Public Water Supply | Pipeline | Solid Waste Landfill | Public Surface Water Supply (PSWS) |
| Non-Landfill Solid Waste Site | Limited Access Highway | Track or Trail | Area of Critical Environmental Concern (ACEC) | Water Body |
| Proposed Well | Multi-Lane Highway, NOT Limited Access | Railroad | NHESP Priority Habitat for Rare Species | Non-Potential Drinking Water Source Area - High Yield |
| Emergency Surface Water | Other Numbered Route | Project Locust | NHESP Estimated Habitat for Rare Wildlife | Non-Potential Drinking Water Source Area - Medium Yield |
| Community Public Water Supply - Surface Water | Major Road - Arterials and Collectors | Public Surface Water Supply Protection Area (Zone A) | EPA Designated Sole Source Aquifer | Potentially Productive Medium Yield Aquifer |
| Community Public Water Supply - Groundwater | Minor Street or Road | DEP Approved Wellhead Protection Area (Zone I) | Major Drainage Basin | Potentially Productive High Yield Aquifer |
| | Aqueduct | DEP Approved Wellhead Protection Area (Zone II) | Sub Drainage Basin | County Boundary |
| | Hydrologic Connection | DEP Interim Wellhead Protection Area (IWPA) | MassDEP Inland Wetland | Municipal Boundary |
| | | | MassDEP Coastal Wetland | USGS Quadrangle Sheet Boundary |

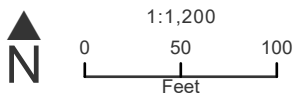


Data source: Bureau of Geographic Information (MassGIS), Commonwealth of Massachusetts, Executive Office of Technology.
 Data valid as of February 2026.

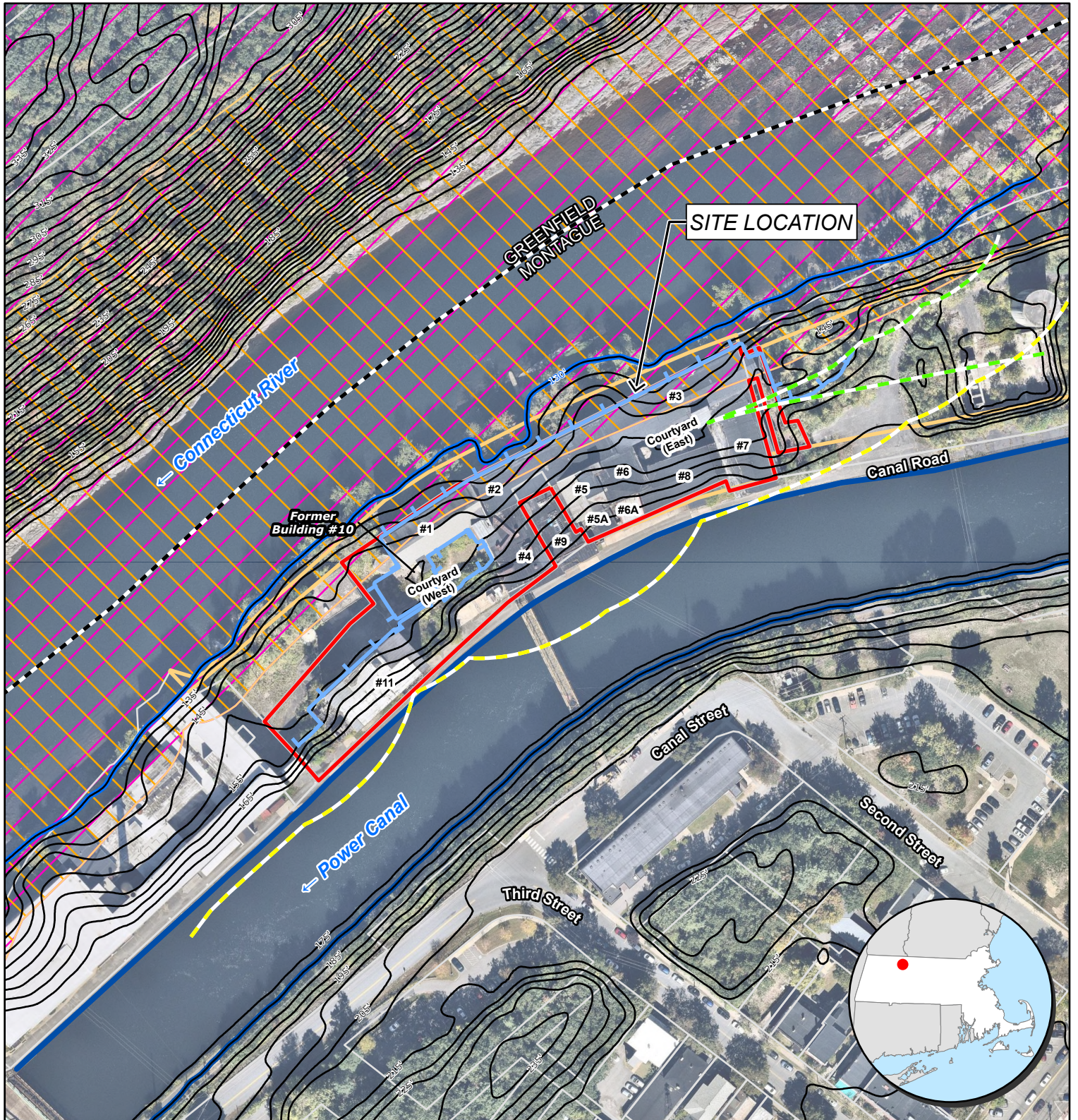




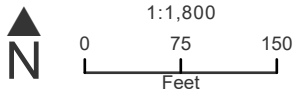
- Project Locus Municipal Boundary
- Limit of Demolition Approximate Parcel Boundary



Based on latest Nearmap Imagery (September 20, 2025).
 Parcel boundaries were provided by MassGIS and are approximate.



- Project Locus
- Limit of Demolition
- Contour (5')
- Bank (Approx.)
- Bank/MAHW (Approx.)
- Limit of BLSF
- 100-Foot Buffer Zone
- 200-Foot Riverfront Area
- Municipal Boundary
- NHESP Priority Habitats for Rare Species
- NHESP Estimated Habitats for Rare Wildlife
- Approximate Parcel Boundary



Based on latest Nearmap Imagery (September 20, 2025).
 Data source: Bureau of Geographic Information (MassGIS), Commonwealth of Massachusetts, Executive Office of Technology.
 Data valid as of April 2026.
 Parcel boundaries were provided by MassGIS and are approximate.



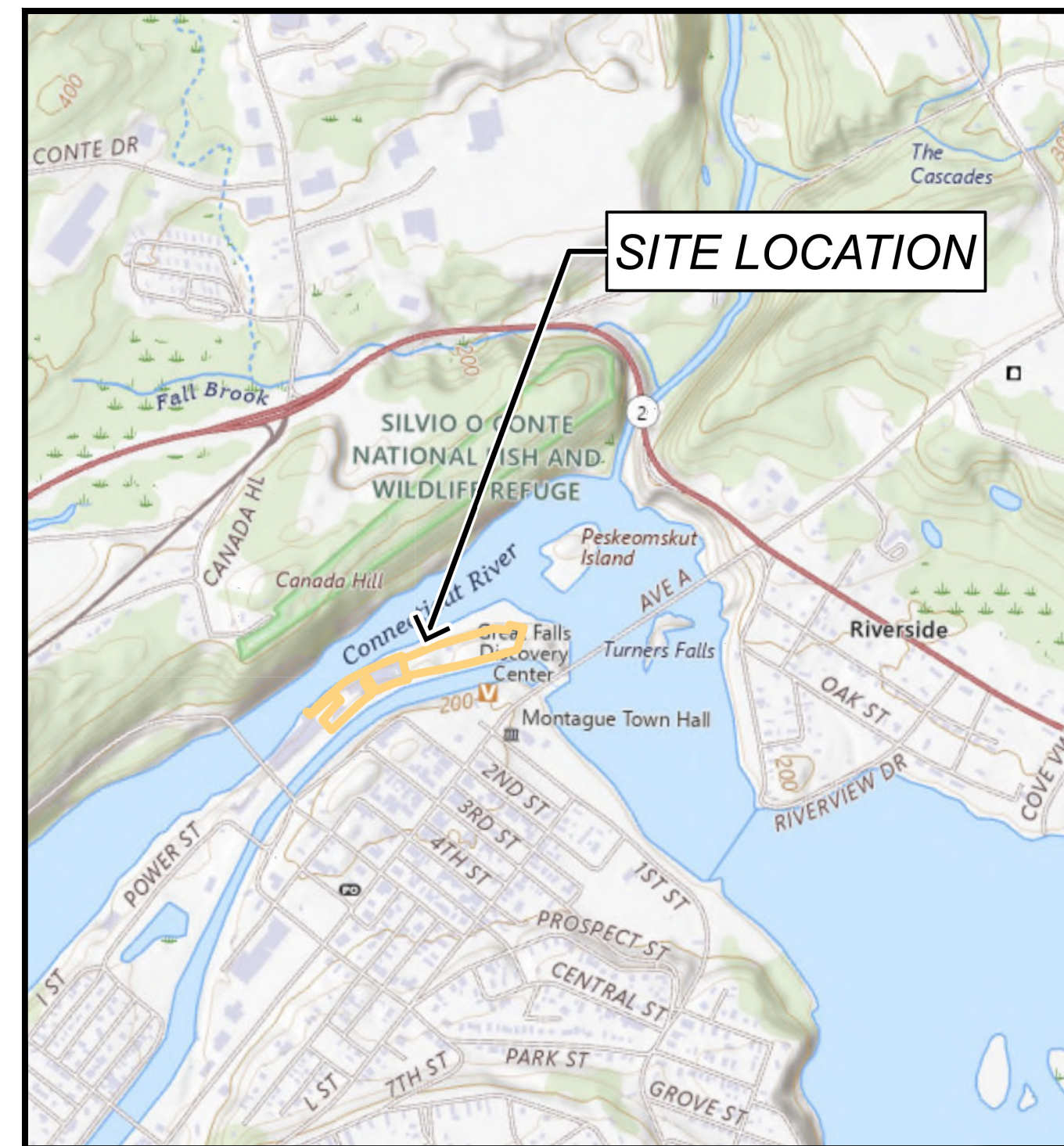


Appendix B

FORMER STRATHMORE MILL ABATEMENT, DEMOLITION AND RESTORATION PROJECT TURNER FALLS, MASSACHUSETTS

PERMIT SET APRIL 2026

LIST OF DRAWINGS		
SHEET NO.	DRAWING NO.	DRAWING TITLE
GENERAL		
1	G-001	COVER SHEET
2	G-002	GENERAL NOTES & LEGEND
CIVIL		
3	C-100	EXISTING CONDITIONS & LIMITS OF WORK AREA PLAN
4	C-200	DEMOLITION PLAN
5	C-300	SITE RESTORATION & GRADING PLAN
6	C-500	SITE DETAILS
STRUCTURAL		
7	S-100	TAILRACE #3 CLOSURE DETAILS



SITE LOCATION MAP
SCALE: 1" = 1000'

PREPARED BY:



PREPARED FOR:

CLIENT/MUNICIPALITY
THE TOWN OF MONTAGUE

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TEMPORARILY FOR PROGRESS REVIEW ONLY.
IT IS NOT INTENDED FOR BIDDING OR
CONSTRUCTION PURPOSES.

COMPLETE SET 7 SHEETS

GENERAL UTILITY NOTES (PERMIT LEVEL):

1. NOTIFY "DIG SAFE" AT 1-888-344-7233 OR 811 TO ARRANGE FOR MARKING OUT EXISTING UNDERGROUND UTILITIES AT LEAST 72 HOURS IN ADVANCE OF MAKING EXCAVATION AT ANY GIVEN LOCATION. UNDER NO CIRCUMSTANCES SHALL THE CONTRACTOR BE ALLOWED TO START ANY KIND OF EXCAVATION WORK PRIOR TO HIS OBTAINING ALL THE NECESSARY INFORMATION REGARDING THE LOCATION OF UNDERGROUND UTILITIES AT THE SITE.
2. THE LOCATION OF THE UTILITIES AS SHOWN HEREON HAVE BEEN COMPILED FROM VISIBLE STRUCTURES AND INFORMATION OBTAINED FROM VARIOUS SOURCES. THE ACTUAL LOCATION OF ALL UTILITIES AND UNDERGROUND STRUCTURES SHALL BE CONSIDERED APPROXIMATE AND SHALL BE VERIFIED BY THE UTILITY OWNER PRIOR TO ANY CONSTRUCTION. THE ENGINEER MAKES NO GUARANTEES THAT THE UNDERGROUND UTILITIES SHOWN COMPRISE ALL SUCH UTILITIES IN THE AREA, EITHER IN SERVICES OR ABANDONED. THE ENGINEER EITHER DOES NOT WARRANT THAT THE UNDERGROUND UTILITIES SHOWN ARE IN THE EXACT LOCATION INDICATED.
3. FIELD MEASURE TO VERIFY EXISTING AND CONTRACT INTERFACE DIMENSIONS, LOCATIONS, AND OTHER CONDITIONS.
4. ACCOMPLISH ALL EXCAVATION SO THAT UNDERGROUND UTILITIES OR STRUCTURES ARE NOT DAMAGED. BE RESPONSIBLE FOR ANY DAMAGE INCURRED DURING EXCAVATION OPERATIONS. REPAIR ANY EXISTING PIPE OR UTILITY DAMAGED DURING CONSTRUCTION AT NO COST TO THE OWNER.
5. TAKE ALL NECESSARY MEASURES AND PROVIDE ALL NECESSARY CONTINUOUS BARRIERS OF SUFFICIENT TYPE, SIZE, AND STRENGTH TO PREVENT ACCESS TO ALL OPEN EXCAVATIONS AT THE COMPLETION OF EACH DAY'S WORK.
6. NOTIFY THE OWNER AND THE ENGINEER OF ANY STORM, SANITARY, OR OTHER PIPE DISCOVERED DURING CONSTRUCTION THAT IS NOT SHOWN ON THE DRAWINGS.

ENVIRONMENTAL REQUIREMENTS (PERMIT LEVEL):

1. PROVIDE AND MAINTAIN PROPER SEDIMENT AND SOIL EROSION CONTROL DEVICES AROUND ALL CONSTRUCTION ACTIVITIES THROUGHOUT THE DURATION OF THE ENTIRE PROJECT, AS REQUIRED BY THESE CONTRACT DOCUMENTS AND SHOWN ON CONTRACT DRAWINGS.
2. PROVIDE DUST CONTROL USING WATER DURING CRUSHING OPERATIONS AND FOR ALL RAW SLOPES, ALL EARTH STOCKPILES, ANY EARTH PILED ALONG EXCAVATIONS, AND SURFACES OF REFILLED TRENCHES. IN NO CASE SHALL EXCAVATED MATERIAL BE STOCKPILED AT SUCH LOCATIONS WHERE THE MATERIAL CAN RUNOFF INTO WETLAND AREAS, WATERWAYS, OR ADJACENT PROPERTIES.
3. RESTORE AREAS DISTURBED BY CONSTRUCTION TO PRE-CONSTRUCTION CONDITIONS.
4. PROVIDE FILTER FABRIC WRAP EROSION PROTECTION AROUND ALL CATCH BASINS WITHIN THE WORK AREA AND AS OTHERWISE SHOWN ON THE DRAWINGS. SEDIMENT TRAPPING DEVICES SHALL BE SILTSACK®, DANDY BAG II®, OR EQUAL.
5. CLEAN ALL ROADWAY AND ADJOINING AREAS AFFECTED BY THE PROPOSED WORK TO AVOID SEDIMENT BUILD-UP AND TO MINIMIZE DUST GENERATION.
6. STORE FUEL, OIL, PAINT, OR OTHER HAZARDOUS MATERIALS IN A SECONDARY CONTAINER AND REMOVE FROM THE SITE TO A LOCKED INDOOR AREA WITH AN IMPERVIOUS FLOOR DURING NON-WORK HOURS.
7. PROVIDE A SUPPLY OF ABSORBENT SPILL RESPONSE MATERIALS, SUCH AS BOOMS OR BLANKETS, AT THE CONSTRUCTION SITES AT ALL TIMES TO CLEAN UP POTENTIAL SPILLS OF HAZARDOUS MATERIALS.
8. IMMEDIATELY REPORT SPILLS OF OIL AND/OR HAZARDOUS MATERIALS (OHM) TO THE MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION.

ASBESTOS ABATEMENT NOTES (PERMIT LEVEL):

1. REFER TO SPECIFICATION SECTION 13281 AND ABATEMENT SCHEDULE FOR COMPLETE DETAILS AND QUANTITIES TO BE REMOVED.
2. ASBESTOS CONTAINING MATERIALS ARE NOT IDENTIFIED ON DRAWINGS.
3. BUILDINGS SUBJECT TO VANDALISM AND WATER DAMAGE AND MAY BE STRUCTURALLY UNSOUND.

OIL/HAZARDOUS MATERIAL NOTES (PERMIT LEVEL):

1. REFER TO SPECIFICATION SECTION 13283 FOR GENERAL IDENTIFICATION AND APPROXIMATE QUANTITIES OF HAZARDOUS MATERIALS TO BE REMOVED.

DEMOLITION NOTES (PERMIT LEVEL):

1. DRAWINGS WERE DEVELOPED FROM RECORD DRAWINGS AND SITE OBSERVATIONS. ALL FEATURES SHOWN ARE APPROXIMATE INCLUDING INTERIOR PARTITIONS/WALLS, LOCATIONS OF SUB-SLAB PITS AND OTHER BUILDING FEATURES. CONTRACTOR IS RESPONSIBLE FOR VERIFYING ALL PROPOSED WORK.
2. BUILDING FOUNDATION COMPONENTS WILL REMAIN IN PLACE AND BE PERFORATED FOR DRAINAGE UNLESS NOTED OTHERWISE.
3. INSTALL A SIX-FOOT TALL TEMPORARY FENCE AROUND THE BUILDINGS DURING ABATEMENT AND DEMOLITION. REMOVE TEMPORARY FENCE AT COMPLETION.
4. REFER TO CONTRACT SPECIFICATIONS FOR ASBESTOS AND OIL/HAZARDOUS MATERIAL ABATEMENT REQUIREMENTS.
5. CONTRACTOR SHALL BE RESPONSIBLE FOR COORDINATING WITH THE TOWN TO OBTAIN ANY NECESSARY PERMITS/POLICE DETAILS. CONTRACTOR SHALL BEAR COSTS ASSOCIATED WITH ANY NECESSARY PERMITS/POLICE DETAILS.
6. ALL EXISTING PAVED SURFACES AND CONCRETE PADS WITHIN THE LIMITS OF WORK AREA ON THE EXTERIOR PORTIONS OF THE BUILDING SCHEDULED TO BE DEMOLISHED SHALL REMAIN AND BE PROTECTED.
7. ALL EXISTING CONCRETE OR PAVED SURFACES OUTSIDE WORK LIMITS SHALL BE PROTECTED AND REPAIRED IF DAMAGED FOLLOWING DEMOLITION.
8. ALL PUBLIC ROADS MUST REMAIN OPEN TO TRAFFIC THROUGHOUT CONSTRUCTION.
9. REMOVE ALL MISCELLANEOUS SITE DEBRIS LOCATED WITHIN WORK LIMITS.
10. CERTAIN PAINTED BRICK AND CONCRETE MATERIALS ARE SCHEDULED FOR CRUSHING AND RE-USE.

UTILITY DEMOLITION NOTES (PERMIT LEVEL):

1. TERMINATE, CUT AND CAP ALL UNDERGROUND UTILITIES SERVING THE BUILDINGS SCHEDULED TO BE DEMOLISHED (LOCATE VIA TEST PIT, IF NECESSARY), UNLESS OTHERWISE INDICATED.
2. IF REQUIRED, COORDINATE WITH ELECTRIC COMPANY FOR TERMINATION OF ELECTRIC SERVICE. COORDINATE WITH PHONE COMPANY FOR TERMINATION OF PHONE SERVICE. PAY ALL ASSOCIATED FEES.
3. IF REQUIRED, COORDINATE WITH GAS COMPANY FOR TERMINATION OF ALL BUILDING GAS SERVICES. DEMOLITION CONTRACTOR SHALL OBTAIN CLEARANCE FROM GAS COMPANY PRIOR TO BEGINNING ABATEMENT AND DEMOLITION WORK.
4. INSTALL CONCRETE PLUGS IN GRAVITY LINES OUTSIDE THE FOUNDATION OF THE BUILDINGS. UTILITIES DESIGNATED TO REMAIN SHALL BE PROTECTED AND REPAIRED AT CONTRACTOR'S EXPENSE IF DAMAGED BY CONTRACTOR.
5. IF REQUIRED, TERMINATE ALL WATER SERVICES TO THE BUILDINGS TO BE DEMOLISHED. COMPLETE TERMINATION IN ACCORDANCE WITH THE TOWN STANDARDS.
6. IF REQUIRED, TERMINATE ALL SEWER AND DRAIN CONNECTIONS IN ACCORDANCE WITH TOWN REQUIREMENTS.

ACCESS RESTRICTIONS:

1. NO VEHICLE HAVING MAXIMUM WHEEL LOADING IN EXCESS OF SIX THOUSAND (6,000) POUNDS WITH MIMIMUM AXLE SPACING OF AT LEAST FOUR AND ONE-HALF FEET (4.5') SHALL BE PERMITTED PASSAGE ALONG THE FIRSTLIGHT TRAVEL WAY; AND IF THE CANAL IS DEWATERED, (AS DETERMINED BY FIRSTLIGHT IN ITS SOLE DISCRETION), NO VEHICLE HAVING MAXIMUM WHEEL LOADING IN EXCESS OF FOUR THOUSAND (4,000) POUNDS SHALL BE PERMITTED PASSAGE ALONG THE FIRSTLIGHT TRAVEL WAY.

LEGEND

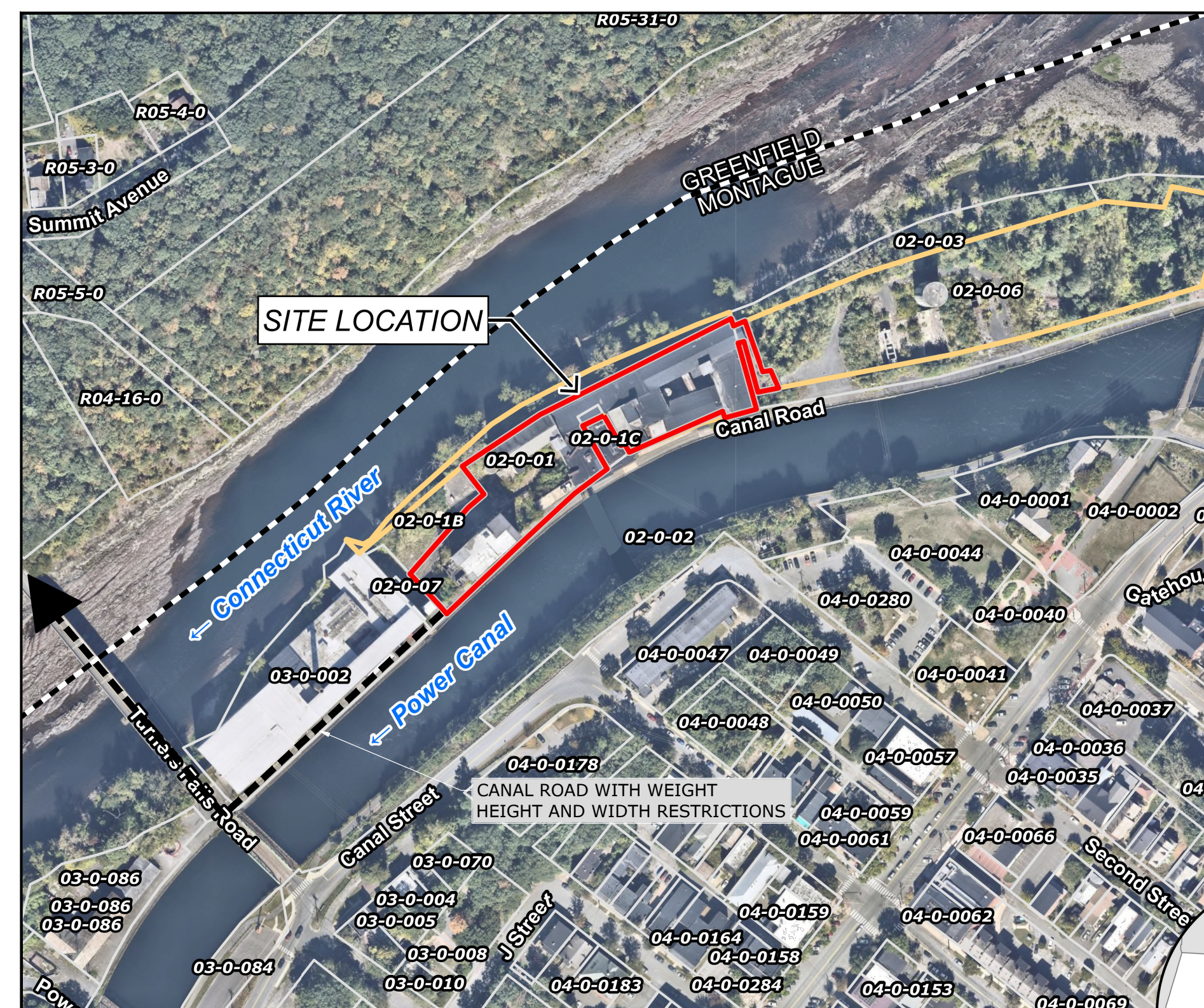
DESCRIPTION	EXISTING	PROPOSED
PROPERTY LINE	---	---
PROPERTY LINE ADJACENT	---	---
RIGHT-OF-WAY LINE	---	---
EASEMENT LINE	---	---
LIMITS OF WORK	---	---
INTERMEDIATE CONTOURS	---	---
INDEX CONTOURS	--- 25 ---	--- 25 ---
SPOT GRADE	X 141.2	+ 32.0
MAGNITUDE & DIRECTION OF SLOPE		← 0.0%
STORM DRAIN	SD SD	
GRAVITY SANITARY SEWER	SS SS	
WATER SERVICE	W W	
OVERHEAD ELECTRIC	OE OE	
CURB	=====	
EDGE OF PAVEMENT	-----	
FENCE - CHAIN LINK	-----	
GUARDRAIL	-----	
STORM DRAIN STRUCTURES	MANHOLE (D) CATCH BASIN (C)	
SANITARY SEWER STRUCTURES	MANHOLE (S)	
WATER SERVICE STRUCTURES	HYDRANT (H) MANHOLE (W) VALVE (V)	
TREELINE	~~~~~	

LEGEND

RESOURCE AREAS	
TOP OF BANK	-----
100-FOOT BUFFER ZONE	-----
200-FOOT RIVERFRONT AREA	-----

LEGEND

DEMOLITION / GEOTECHNICAL	
EROSION & SEDIMENT CONTROL	-----



SITE LOCATION AND REQUIRED TRUCK ACCESS
SCALE: 1" = 200'

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FORMER STRATHMORE MILL COMPLEX ABATEMENT, DEMOLITION, AND RESTORATION PROJECT

Town of Montague

Montague, Massachusetts

MARK	DATE	DESCRIPTION
PROJECT NO:	M5003-012A	
DATE:	APRIL 2026	
FILE:	M5003-012A-General Notes.dwg	
DRAWN BY:	A.LAPATIN	
DESIGNED BY:	D.BOULAIS	
CHECKED BY:	D.BOULAIS	
APPROVED BY:	T.KIRTON	

GENERAL NOTES & LEGEND

SCALE: NO SCALE

G-002
SHEET 2 OF 7

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FORMER STRATHMORE MILL COMPLEX ABATEMENT, DEMOLITION, AND RESTORATION PROJECT

Town of Montague

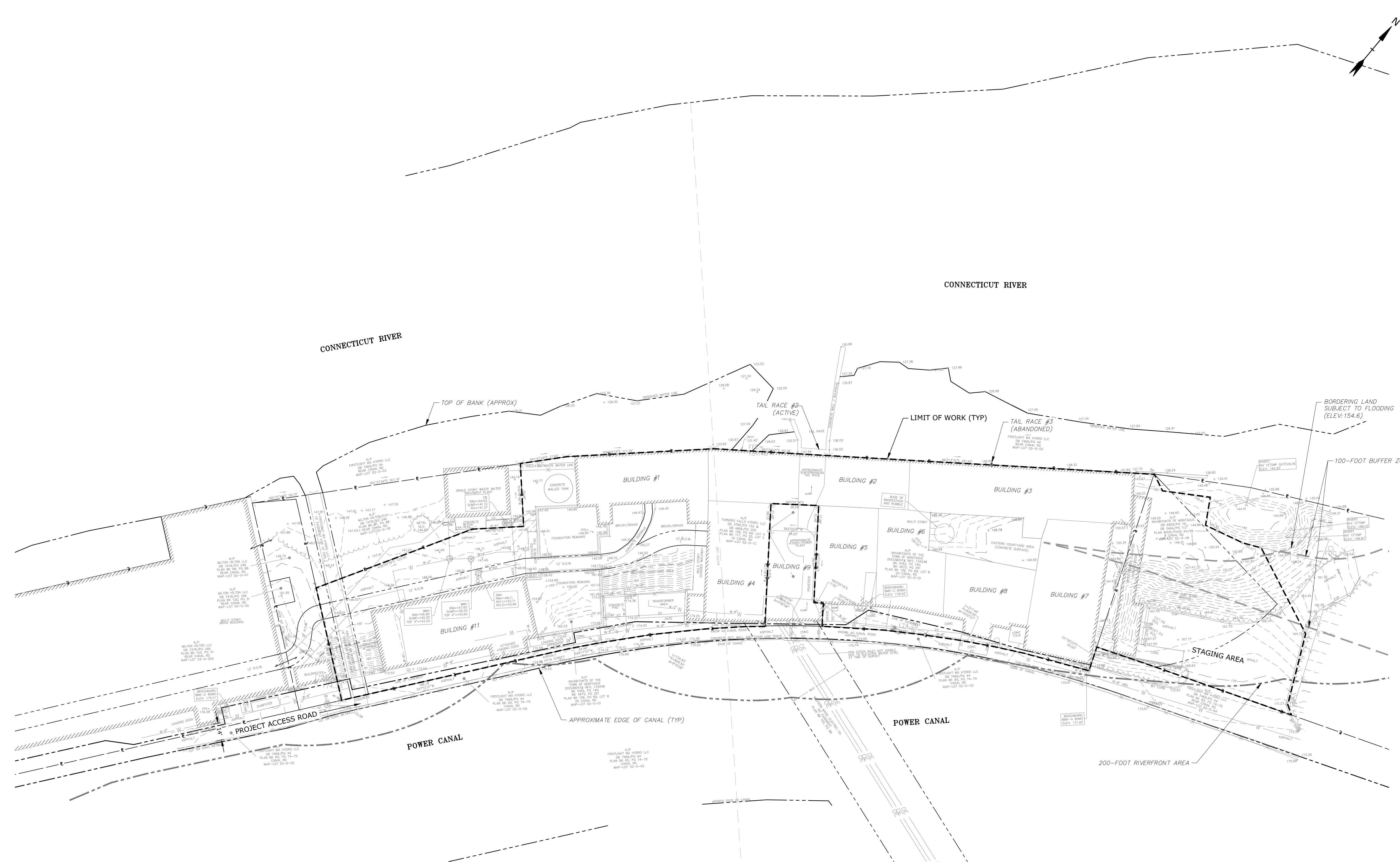
Montague, Massachusetts

MARK	DATE	DESCRIPTION
PROJECT NO:	M5003-012A	
DATE:	APRIL 2026	
FILE:	M5003-012A-C-Existing Conditions.dwg	
DRAWN BY:	A.LAPATIN	
DESIGNED BY:	D.BOULAIS	
CHECKED BY:	D.BOULAIS	
APPROVED BY:	T.KIRTON	

EXISTING CONDITIONS & LIMITS OF WORK AREA PLAN

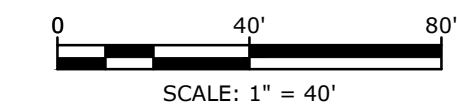
SCALE: 1" = 40'

C-100
SHEET 3 OF 7

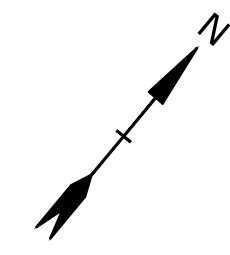


LEGEND:

SITE BUILDING #1 - FIVE TOTAL STORIES/FLOORS, WITH BASE/1ST FLOOR SLAB ELEVATION APPROX. 149±
 SITE BUILDING #2 - FIVE TOTAL STORIES/FLOORS, WITH BASE/1ST FLOOR SLAB ELEVATION APPROX. 149±
 SITE BUILDING #3 - FIVE TOTAL STORIES/FLOORS, WITH BASE/1ST FLOOR SLAB ELEVATION APPROX. 149±
 SITE BUILDING #4 - FOUR TOTAL STORIES/FLOORS, WITH BASE/1ST FLOOR SLAB ELEVATION APPROX. 149±
 SITE BUILDING #5/5A - FOUR TOTAL STORIES/FLOORS, WITH BASE/1ST FLOOR SLAB ELEVATION APPROX. 149±
 SITE BUILDING #6/6A - FOUR TO FIVE TOTAL STORIES/FLOORS, WITH BASE/1ST FLOOR SLAB ELEVATION APPROX. 149±
 SITE BUILDING #7 - FOUR TOTAL STORIES/FLOORS, WITH BASE/1ST FLOOR SLAB ELEVATION APPROX. 146± AND OPEN VOID BENEATH SLAB (MOSTLY EARTHEN BASE) W/ BOTTOM ELEVATION 142±
 SITE BUILDING #8 - TWO TOTAL STORIES/FLOORS (2ND AND 3RD FLOORS OF BUILDING COMPLEX), WITH OPEN VOID BENEATH 2ND FLOOR (MOSTLY EARTHEN BASE) W/BOTTOM ELEVATION 142±
 SITE BUILDING #11 - SEVEN TOTAL STORIES/FLOORS, WITH BASE/1ST FLOOR SLAB ELEVATION APPROX. 149± (WESTERN END ADDITION OF BUILDING IS OPEN ROOM, 2 TO 3 STORIES IN HEIGHT)
 (OFF-SITE BUILDING #9 - FOUR TOTAL STORIES/FLOORS, WITH BASE/1ST FLOOR SLAB ELEVATION APPROX. 149±)



Last Saved: 4/28/2026 9:38am By: Alapatin
 Plotted On: Apr 29, 2026 9:38am By: Alapatin
 Tighe & Bond\3\155003\Montague\012A-Strathmore Demo Design Phase\Drawings\AutoCAD\Sheet\Permit Drawings\M5003-012A-C-Existing Conditions.dwg



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FORMER STRATHMORE MILL COMPLEX ABATEMENT, DEMOLITION, AND RESTORATION PROJECT

Town of Montague

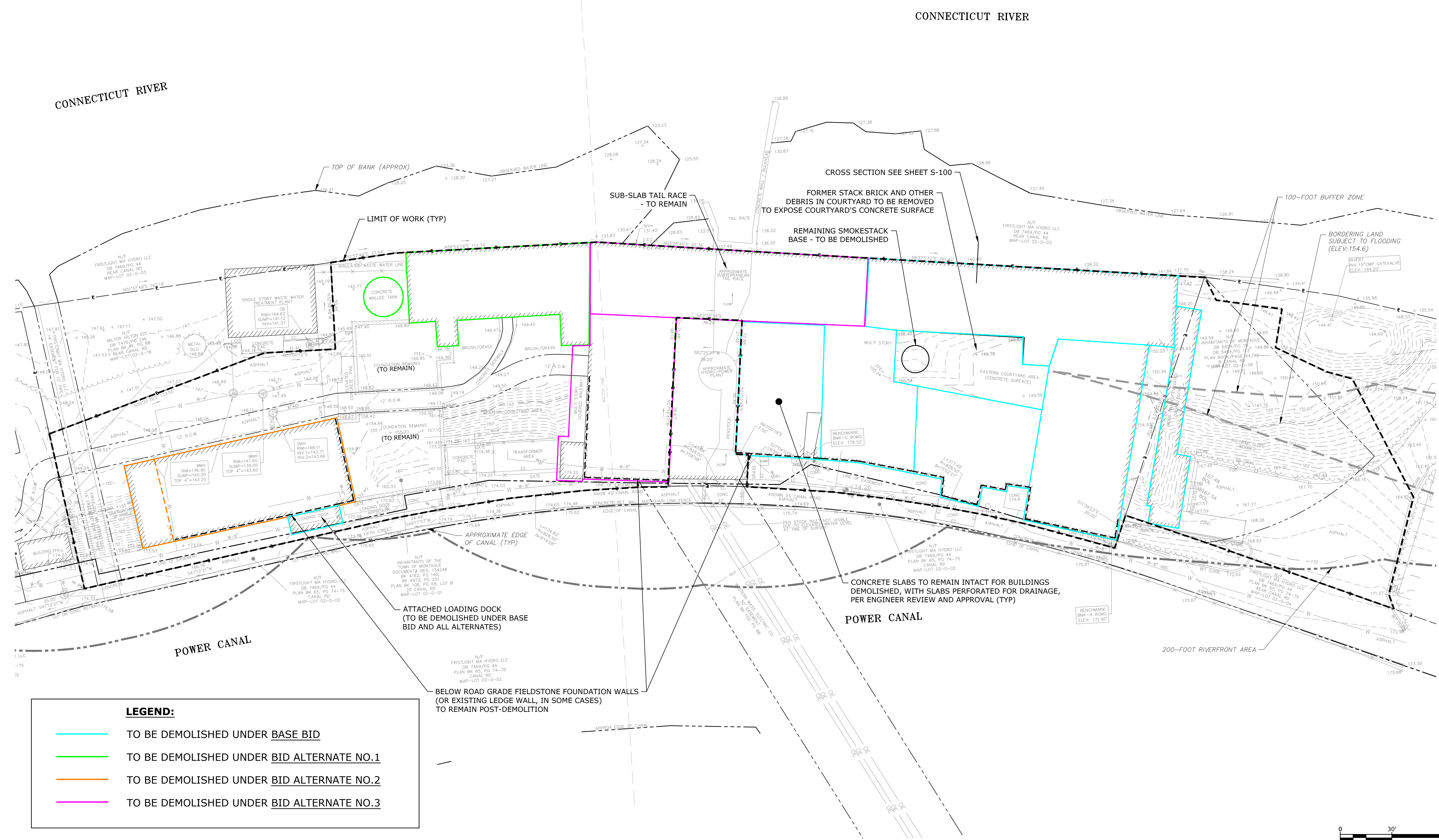
Montague, Massachusetts

MARK	DATE	DESCRIPTION
PROJECT NO:	M5003-012A	
DATE:	APRIL 2026	
FILE:	M5003-012A-C-Demo.dwg	
DRAWN BY:	A.LAPATIN	
DESIGNED BY:	D.BOULAIS	
CHECKED BY:	D.BOULAIS	
APPROVED BY:	T.KIRTON	

DEMOLITION PLAN

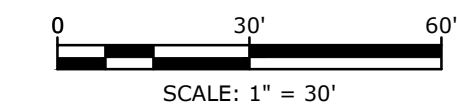
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C-200
SHEET 4 OF 7

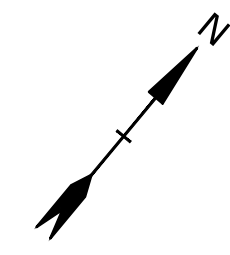


LEGEND:

- TO BE DEMOLISHED UNDER BASE BID
- TO BE DEMOLISHED UNDER BID ALTERNATE NO.1
- TO BE DEMOLISHED UNDER BID ALTERNATE NO.2
- TO BE DEMOLISHED UNDER BID ALTERNATE NO.3



Last Saved: 4/29/2026 9:45am By: Alapatin
 Plotted On: Apr 29, 2026 9:45am By: Alapatin
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FORMER STRATHMORE MILL COMPLEX ABATEMENT, DEMOLITION, AND RESTORATION PROJECT

Town of Montague

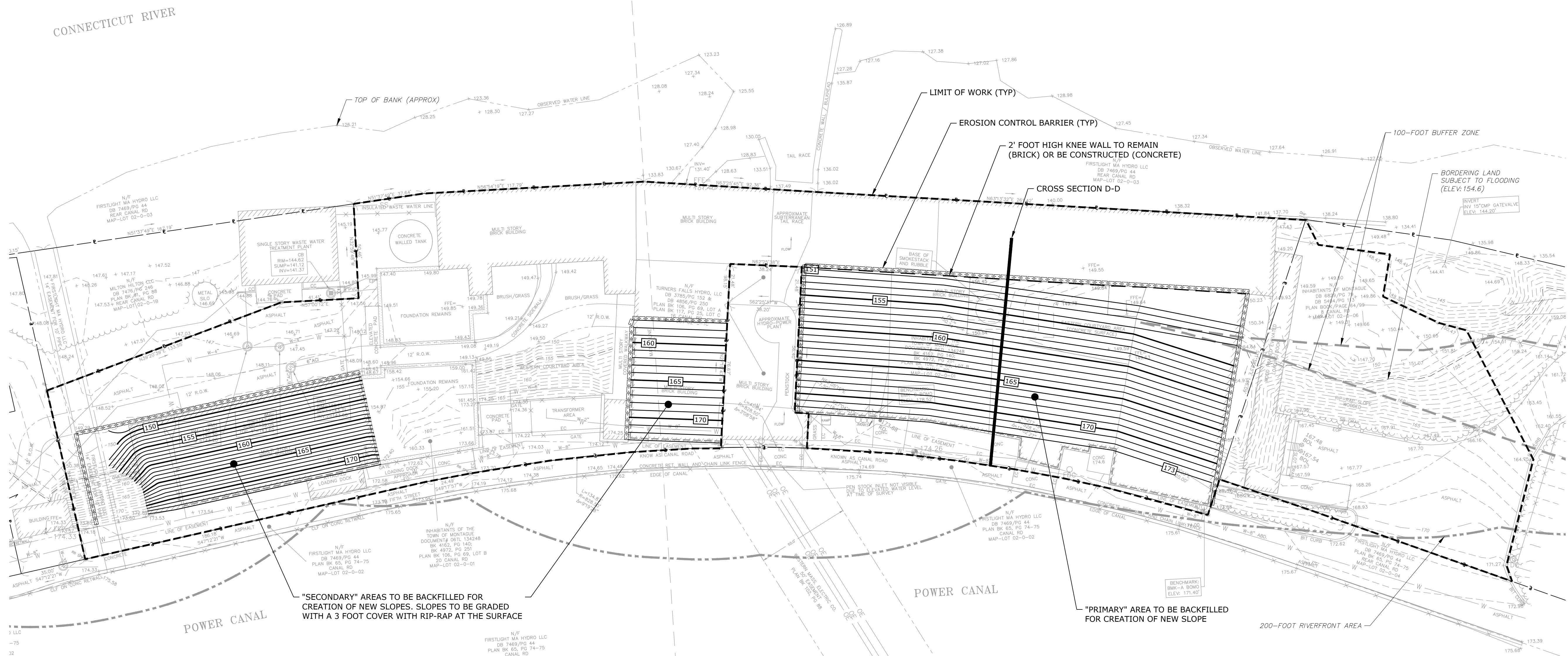
Montague, Massachusetts

MARK	DATE	DESCRIPTION
PROJECT NO:	M5003-012A	
DATE:	APRIL 2026	
FILE:	M5003-012A-C-Restoration.dwg	
DRAWN BY:	A.LAPATIN	
DESIGNED BY:	D.BOULAIS	
CHECKED BY:	D.BOULAIS	
APPROVED BY:	T.KIRTON	

SITE RESTORATION & GRADING PLAN

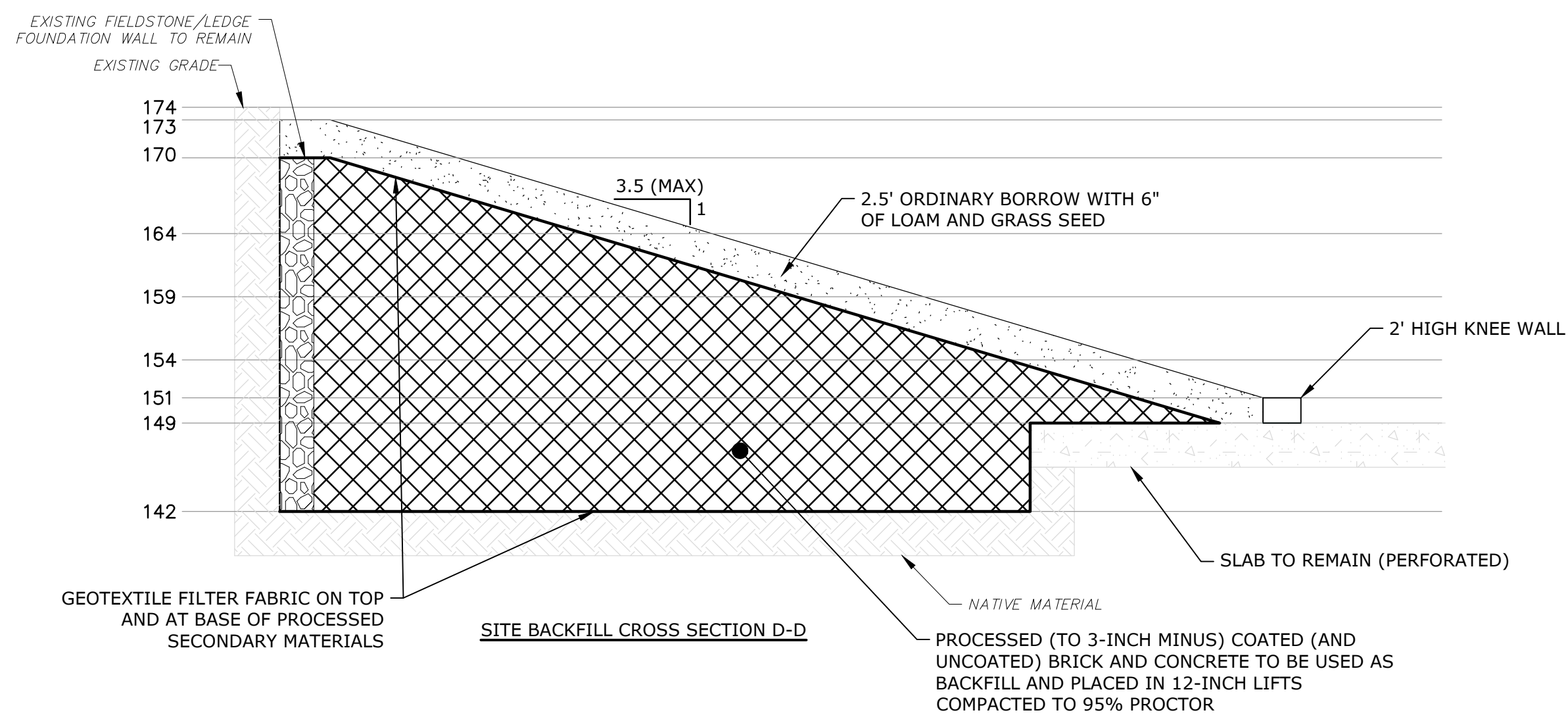
SCALE: 1" = 30'

C-300
SHEET 5 OF 7

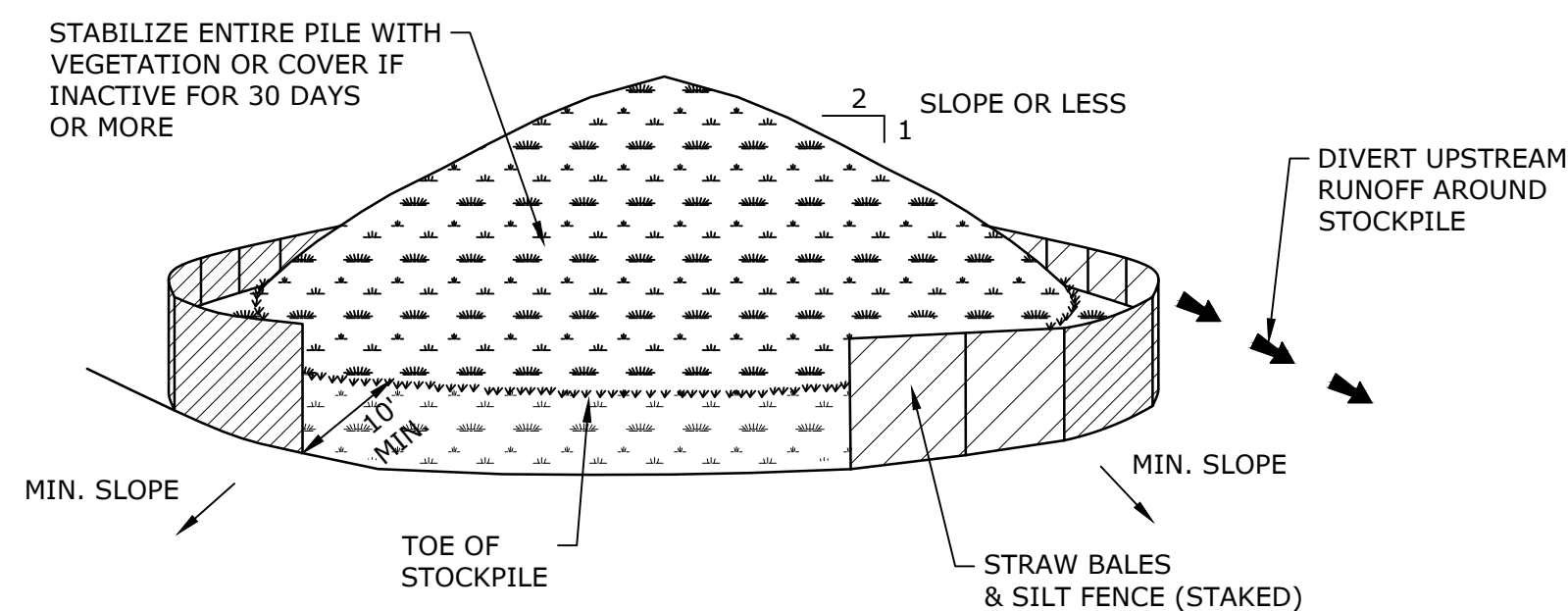


"SECONDARY" AREAS TO BE BACKFILLED FOR CREATION OF NEW SLOPES. SLOPES TO BE GRADED WITH A 3 FOOT COVER WITH RIP-RAP AT THE SURFACE

"PRIMARY" AREA TO BE BACKFILLED FOR CREATION OF NEW SLOPE



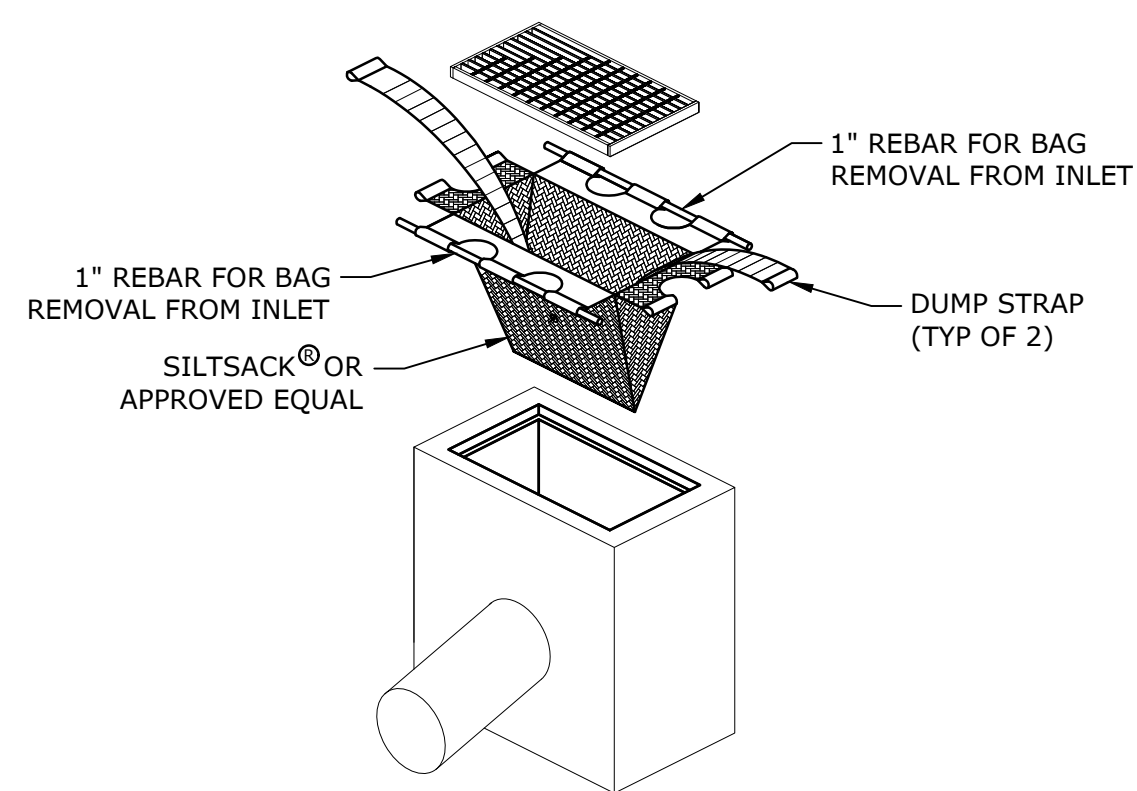
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Plotted On: Apr 29, 2026 9:38am By: Alapatin
Tighe & Bond\3\15503\Montague\012A-Strathmore Demo Design Phase\Drawings\AutoCAD\Sheet\Permit Drawings\M5003-012A-C-Restoration.dwg



INSTALLATION NOTES:

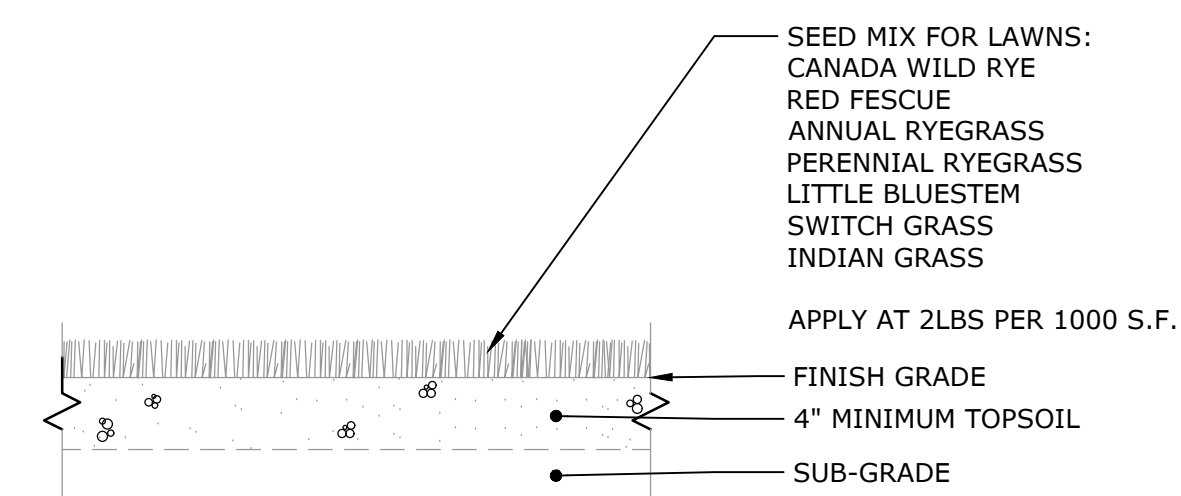
1. AREA CHOSEN FOR STOCKPILING OPERATIONS SHALL BE DRY AND STABLE.
2. MAXIMUM SLOPE OF STOCKPILE SHALL BE 2H:1V.
3. UPON COMPLETION OF SOIL STOCKPILING, EACH PILE SHALL BE SURROUNDED WITH EITHER SILT FENCING OR STRAW BALES, THEN STABILIZED WITH VEGETATION OR COVERED.

SOIL STOCKPILING
NO SCALE

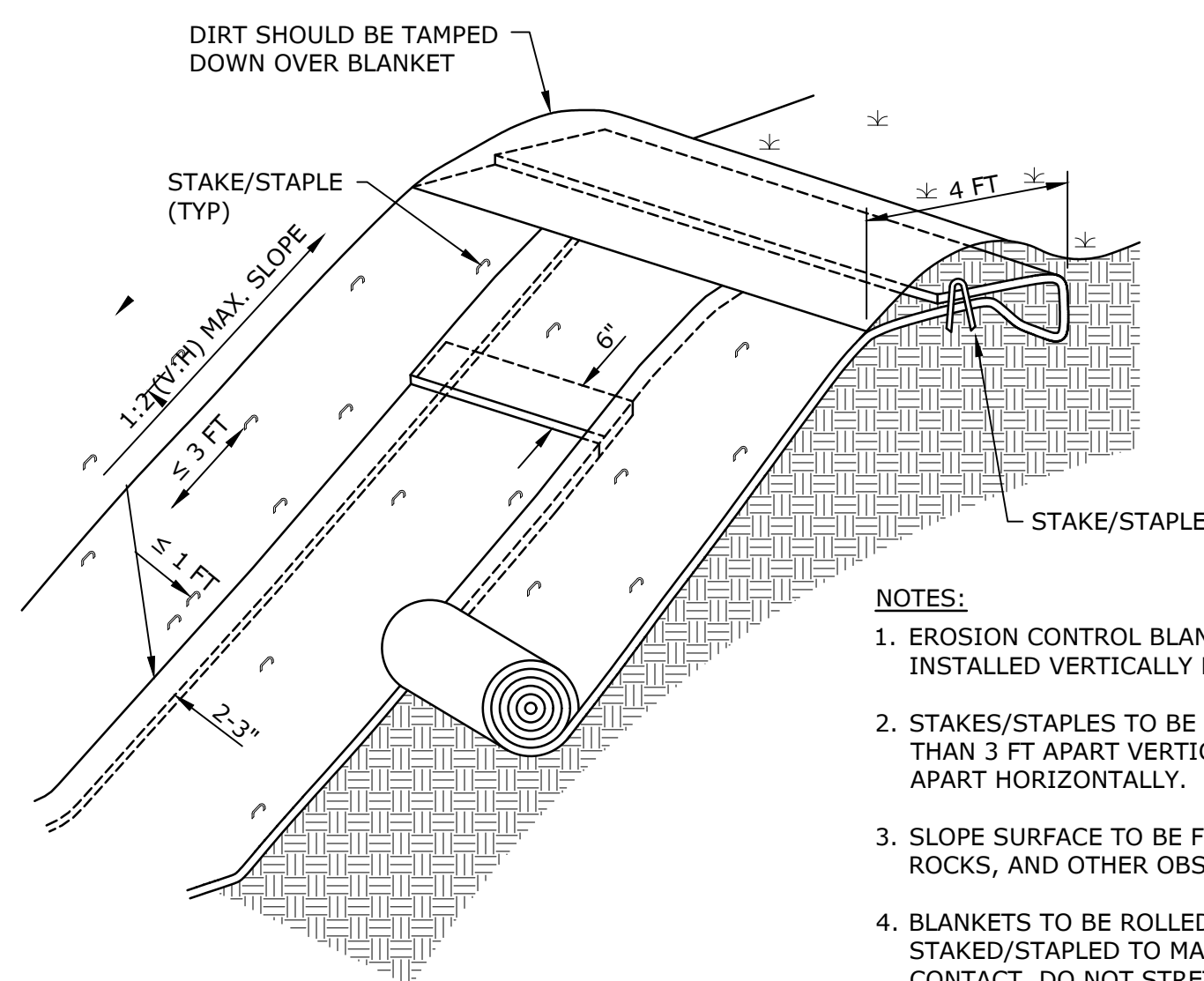


SILTSACK MANUFACTURED BY:
ACF ENVIRONMENTAL
2831 CARDWELL ROAD
RICHMOND, VIRGINIA 23237

SILTSACK® OR APPROVED EQUAL
NO SCALE



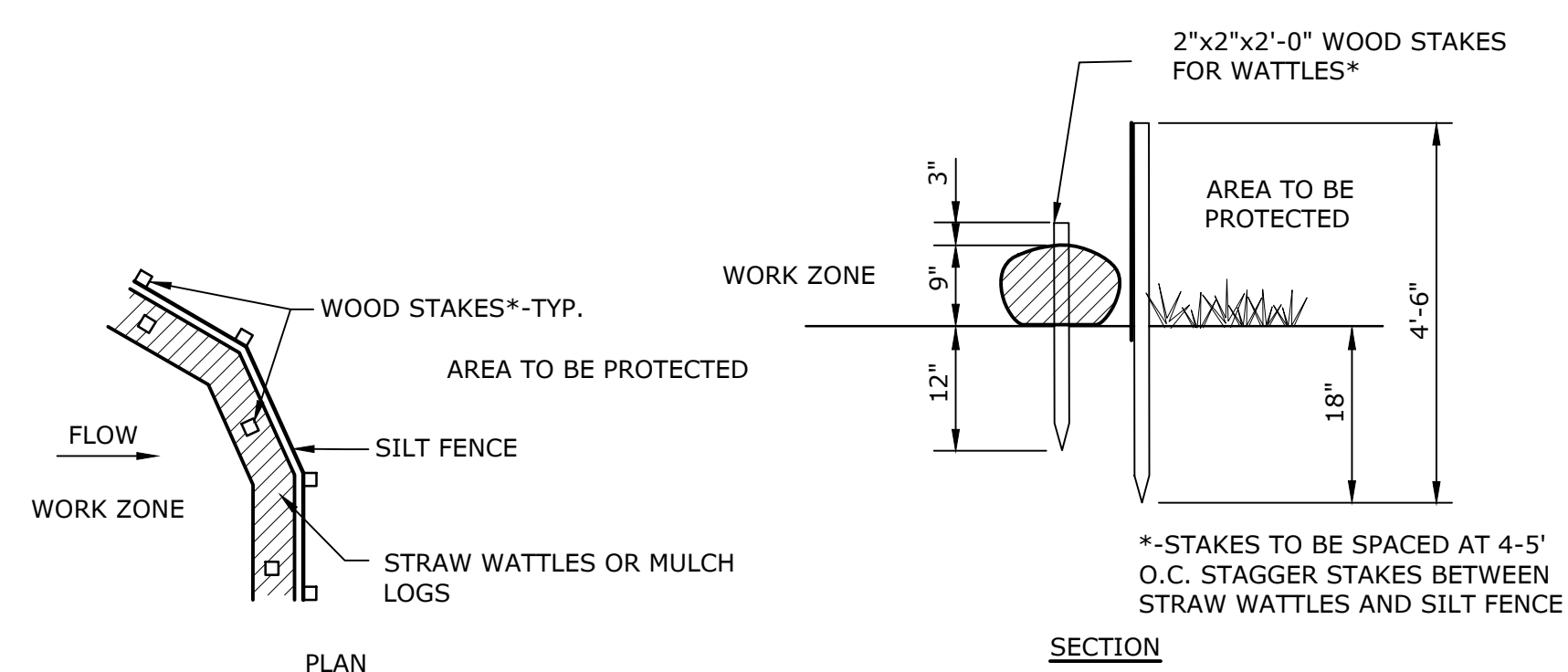
LAWN AREAS
NO SCALE



NOTES:

1. EROSION CONTROL BLANKET TO BE INSTALLED VERTICALLY DOWNSLOPE.
2. STAKES/STAPLES TO BE PLACED NO MORE THAN 3 FT APART VERTICALLY, AND 1 FT APART HORIZONTALLY.
3. SLOPE SURFACE TO BE FREE OF STICKS, ROCKS, AND OTHER OBSTRUCTIONS.
4. BLANKETS TO BE ROLLED OUT LOOSELY AND STAKED/STAPLED TO MAINTAIN DIRECT SOIL CONTACT. DO NOT STRETCH THE BLANKETS.
5. AREA TO BE SEEDED WITH SLOPE RESTORATION SEED MIX.

EROSION CONTROL BLANKET
NO SCALE



EROSION CONTROL BARRIER
NO SCALE

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FORMER STRATHMORE MILL COMPLEX ABATEMENT, DEMOLITION, AND RESTORATION PROJECT

Town of Montague

Montague, Massachusetts

MARK	DATE	DESCRIPTION
PROJECT NO: M5003-012A		
DATE: APRIL 2026		
FILE: M5003-012A-Details.dwg		
DRAWN BY: A.LAPATIN		
DESIGNED BY: D.BOULAIS		
CHECKED BY: D.BOULAIS		
APPROVED BY: T.KIRTON		

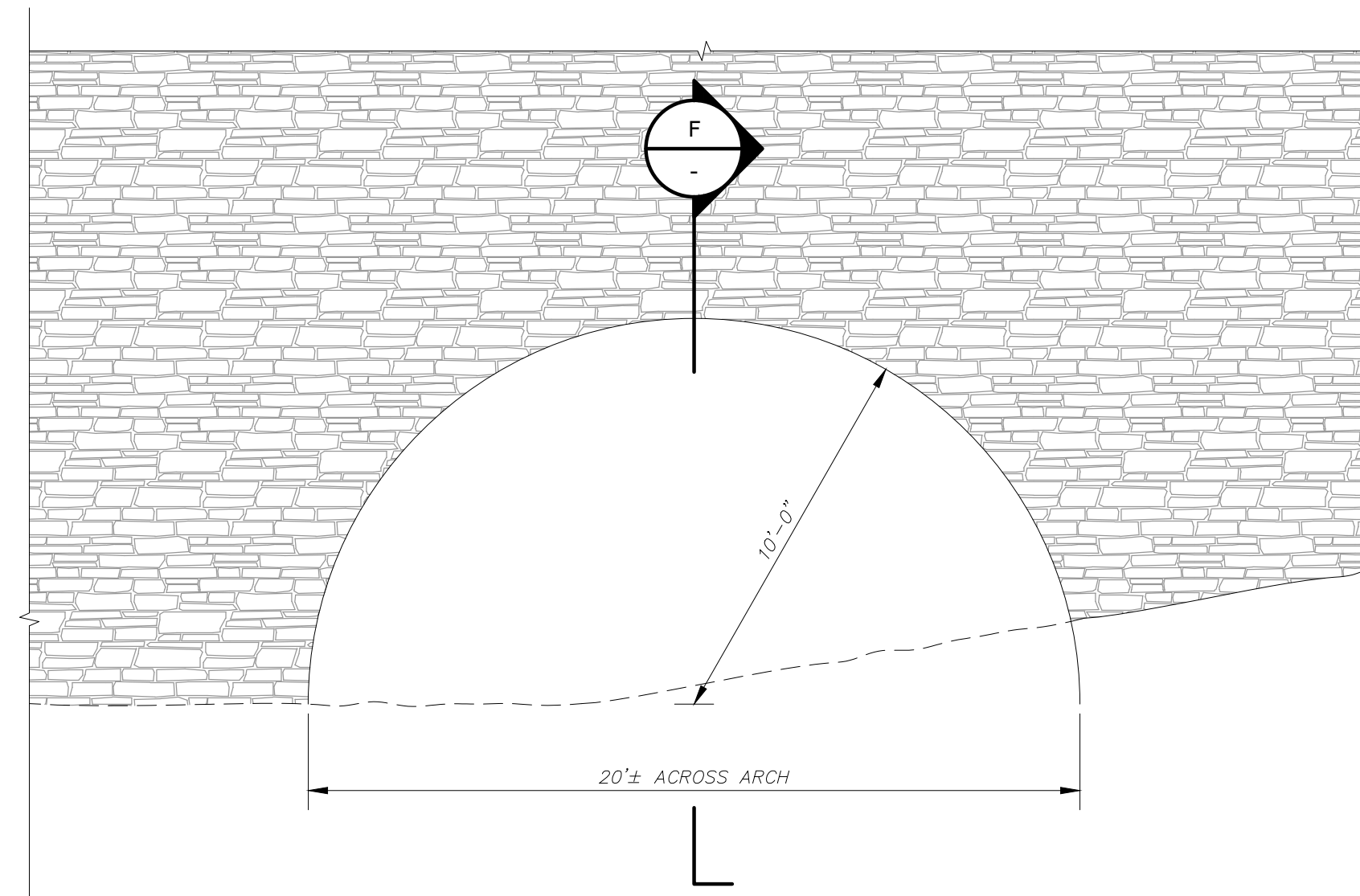
SITE DETAILS

SCALE: NO SCALE

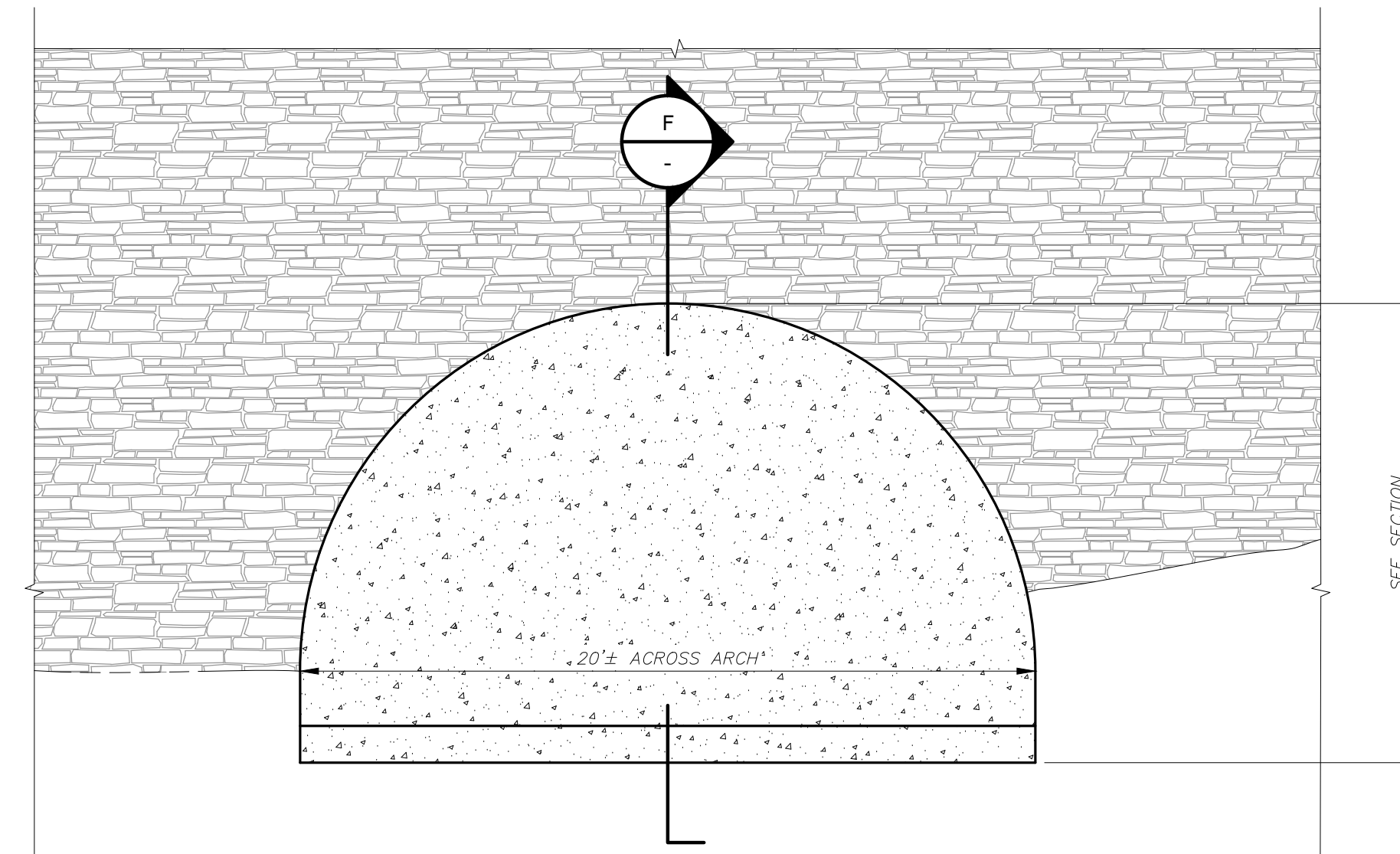
C-500
SHEET 6 OF 7



PHOTO #1



EXISTING TAILRACE #3

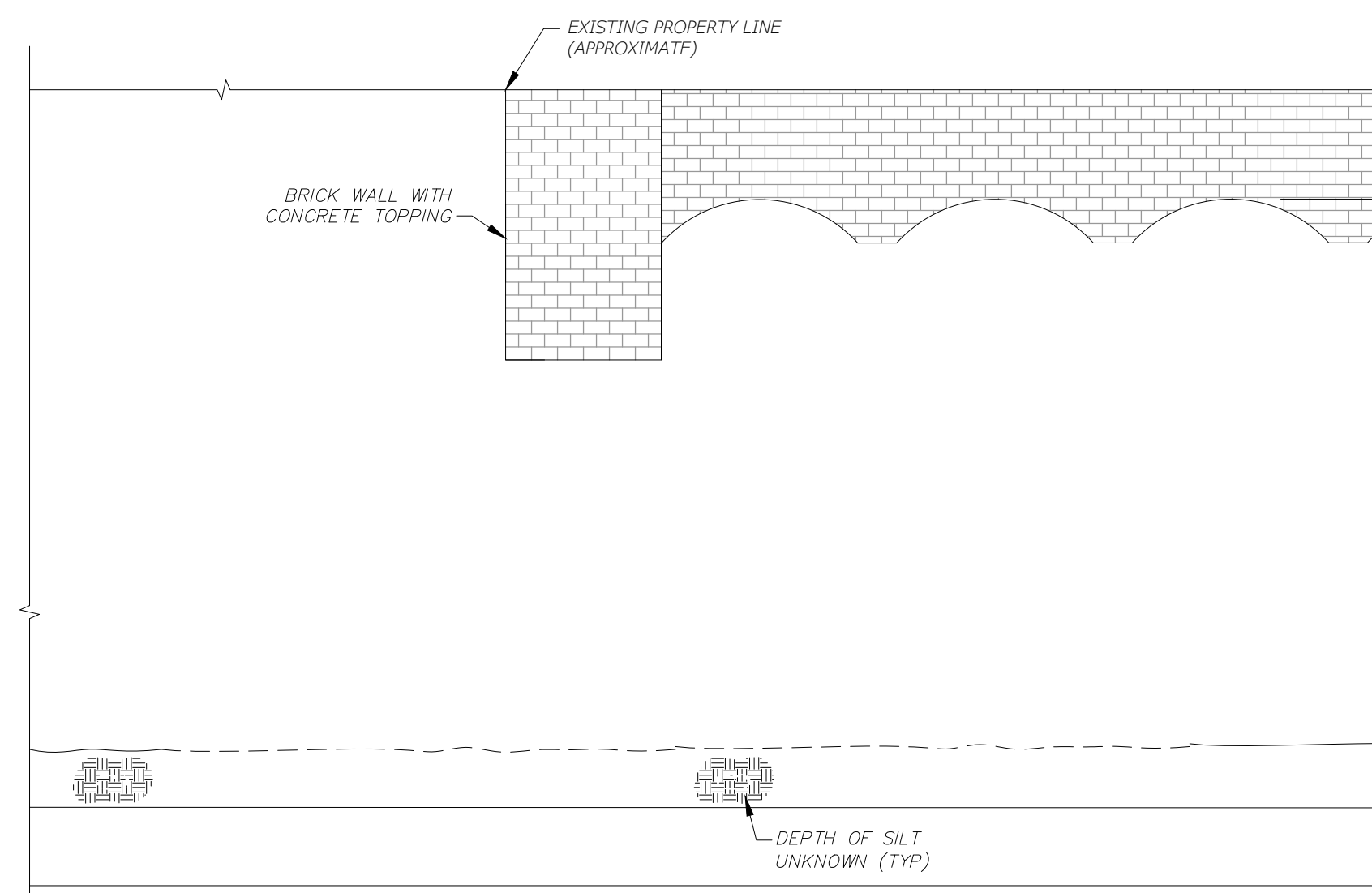


PROPOSED TAILRACE CAP

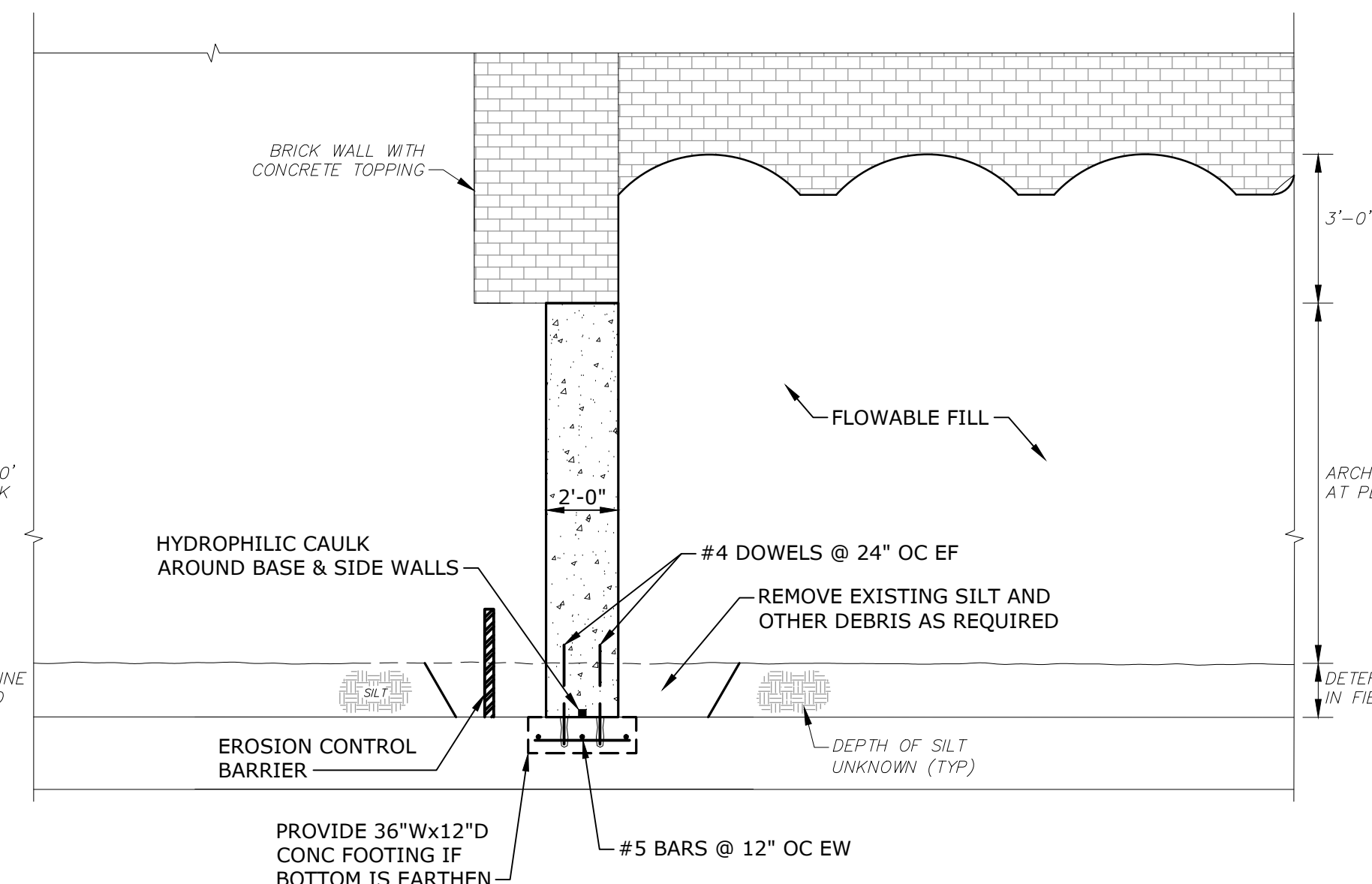
SECTION E
1/4" = 1'-0"



PHOTO #2



EXISTING TAILRACE SECTION



PROPOSED TAILRACE CAP SECTION

SECTION F
1/4" = 1'-0"

ISSUED FOR PERMIT - NOT FOR CONSTRUCTION

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FORMER STRATHMORE MILL COMPLEX ABATEMENT, DEMOLITION, AND RESTORATION PROJECT

Town of Montague

Montague, Massachusetts

MARK	DATE	DESCRIPTION
PROJECT NO:	M5003-012A	
DATE:	APRIL 2026	
FILE:	M5003-012A-S-100.dwg	
DRAWN BY:	A.LAPATIN	
DESIGNED BY:	D.BOULAIS	
CHECKED BY:	D.BOULAIS	
APPROVED BY:	T.KIRTON	

TAILRACE #3 CLOSURE DETAILS

SCALE: NO SCALE

S-100
SHEET 7 OF 7



Appendix C

STATE REGISTER OF HISTORIC PLACES 2011



MASSACHUSETTS
HISTORICAL COMMISSION

William Francis Galvin
Secretary of the Commonwealth

HISTORIC PLACES REGISTER
HISTORICPLACESR



100412

\$30.60

State Register of Historic Places

Established by M.G.L. Ch. 9, ss. 26-27C
as amended by
Chapter 152 of the Acts of 1982 and Chapter 254 of the Acts of 1988.
Regulations promulgated on August 4, 1989 (950 CMR 71.00).

The **State Register of Historic Places 2011** has been financed in part with Federal funds from the National Park Service, U.S. Department of the Interior. However, the contents and opinions do not necessarily reflect the views or policies of the Department of the Interior.

This program receives Federal financial assistance for identification and protection of historic properties. Under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975, as amended, the U.S. Department of the Interior prohibits discrimination on the basis of race, color, national origin, disability or age in its federally assisted programs. If you believe you have been discriminated against in any program, activity or facility as described above, or if you desire further information please write to:

Office for Equal Opportunity
National Park Service
1849 C Street, NW
Washington, D. C. 20240

This publication is available at the State House Bookstore, Room 116, State House, Boston, MA 02133.

On the cover: The Homestead, Hassanamisco Reservation, Grafton. The Hassanamisco Reservation, owned by the Nipmuc Nation, has seen over 282 years of continuous use by Nipmuc people. First settled as a domestic site, the reservation later became a tribal center, in addition to continuing to be a home of some of the principal figures in the tribe's cultural survival. The property has long been the primary place where members of the Nipmuc community have convened to carry out cultural practices important in maintaining their historical and contemporary culture. The most significant of these has been the Hassanamisco Indian Fair, held every July. A number of ceremonial areas and several structures are located within the reservation. Most significant among the structures is the building known as The Homestead, originally constructed in 1801 and subsequently expanded and modified, which has been home to the Cisco family, a family prominent in the political and cultural activities of the tribe. Members of the Nipmuc tribe have continuously occupied and managed the Hassanamisco Reservation since the earliest contact with non-Natives. The reservation has been the property of the Nipmuc tribe since before written history, and is considered a traditional cultural property. The Hassanamisco Reservation was listed in the National and State Registers of Historic Places in 2011. To see the full National Register nomination for this district, search the MACRIS database on the Massachusetts Historical Commission web site at www.sec.state.ma.us/mhc.

Town/Name/Address -----	Designation -----	Date -----	# Props -----
Monson (cont.)			
Monson Center Historic District Junction of Main and Cushman Sts	NRDIS	05/06/1991	12
Monson Developmental Center Mass. State Hospitals and State Schools MPS, 200 State Ave	NRMPS NRDIS	01/21/1994	87 87
Norcross, William House 14 Cushman St	NRIND	03/29/1984	1
Montague			
Alvah Stone Mill 400 Greenfield Rd	NRIND NRDIS	06/30/1997	20 20
Carnegie Public Library Avenue A	NRDIS PR	05/10/1982 06/30/1985	1 1
	Exp:		
Crocker Bank Block 52-54 Avenue A	NRDIS PR	05/10/1982 11/23/1998	1 1
	Exp:		
Montague Center Historic District Center, Main, North, School and Union Sts	NRDIS	11/06/2001	234
Opera House Block 85 Avenue A	NRDIS PR	05/10/1982 01/04/2000	1 1
	Exp:		
Turner's Falls Historic District (Montague/Gill) Turner's Falls, Roughly bounded by L, Ninth, Seventh and J Sts, the Connecticut River, Avenue A and First St	NRDIS	05/10/1982	280
Monterey			
Bidwell, Rev. Adonijah House 100 Art School Rd	NRIND PR	08/26/1982 09/26/1997	1 1
	Exp:		
Brewer, Capt. John House Rt 23	NRIND	03/29/1984	1
Monterey Congregational Church 449 Main Rd	PR	09/28/1998	1
	Exp:		

Massachusetts Cultural Resource Information System

Scanned Record Cover Page

Inventory No:	MNT.G
Historic Name:	Riverside
Common Name:	
Address:	
City/Town:	Montague
Village/Neighborhood:	Turner's Falls
Local No:	R
Year Constructed:	
Architect(s):	
Architectural Style(s):	
Use(s):	Industrial Complex or District; Other Engineering
Significance:	Architecture; Community Planning; Engineering; Industry; Transportation
Area(s):	
Designation(s):	
Building Materials(s):	



The Massachusetts Historical Commission (MHC) has converted this paper record to digital format as part of ongoing projects to scan records of the Inventory of Historic Assets of the Commonwealth and National Register of Historic Places nominations for Massachusetts. Efforts are ongoing and not all inventory or National Register records related to this resource may be available in digital format at this time.

The MACRIS database and scanned files are highly dynamic; new information is added daily and both database records and related scanned files may be updated as new information is incorporated into MHC files. Users should note that there may be a considerable lag time between the receipt of new or updated records by MHC and the appearance of related information in MACRIS. Users should also note that not all source materials for the MACRIS database are made available as scanned images. Users may consult the records, files and maps available in MHC's public research area at its offices at the State Archives Building, 220 Morrissey Boulevard, Boston, open M-F, 9-5.

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Commonwealth of Massachusetts
Massachusetts Historical Commission
220 Morrissey Boulevard, Boston, Massachusetts 02125
www.sec.state.ma.us/mhc

This file was accessed on: Wednesday, February 6, 2019 at 1:25: PM

FORM A - AREA SURVEY

MASSACHUSETTS HISTORICAL COMMISSION
Office of the Secretary, State House, Boston

MNT. G

Form numbers in this area <u>166-174</u>	Area no. <u>R 6</u>
---	------------------------

2. Photo (3x3" or 3x5")
Staple to left side of form
Photo number _____

1. Town MONTAGUE (TURNERS FALLS)

Name of area (if any) RIVERSIDE

3. General date or period 1870's to c. 1900

4. Is area uniform (explain):

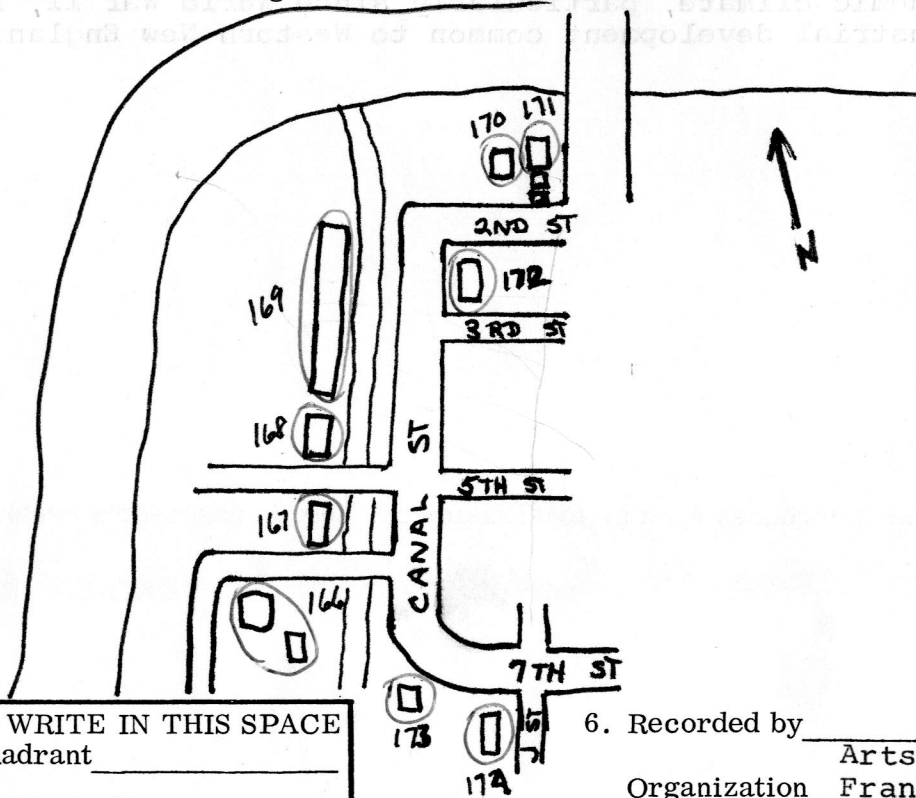
in style? mostly brick industrial

in condition? fair to good

in type of ownership? private

in use? industrial, residential

5. Map. Use space below to draw a general map of the area involved. Indicate any historic properties for which individual reports are completed on Forms B thru F, using corresponding numbers. Show street names (including route numbers, if any) and indicate north. Indicate with an "x" existing houses not inventoried on Form B.



DO NOT WRITE IN THIS SPACE
USGS Quadrant _____
MHC Photo no. _____

6. Recorded by _____
Organization Arts Council of Franklin County
Date 10/78

(over)

7. Historical data. Explain the historical/architectural importance of this area.

In 1867 the Turners Falls Co., founded by Alvah Crocker, began the industrial development of Turners Falls. A leader in developing the Boston to Fitchburg railroad, Crocker envisioned a transportation line westward. As commissioner of the construction of the Hoosac Tunnel facilitating the westward expansion of railroad service, Crocker became associated with Wendell T. Davis, secretary and treasurer of the virtually defunct Locks and Canal Co. of Turners Falls. Opened in 1798, the Locks and Canal had by the mid-nineteenth century fallen into decline as the passing mode of transportation shifted from inland workings to railroads. In 1866 a new company was founded by Crocker, and construction of a dam and headquarters began shortly thereafter under the auspices of engineer Charles Franci. Crocker, familiar with the development of water power in Lowell, and Holyoke, intended to tap the similar resources available at Turners Falls with an eye to selling the power generated to potential industrial users. By 1868 Crocker's Turners Falls Co. could provide low price power, and in the decade immediately following, a cotton mill, 3 paper mills and the John Russell Cutlery Co., all located along the Riverside Canal area to tap this raw resource.

By the 1880s, dwellings had been built, the railroad had been extended to include Turners Falls, and commercial enterprise had sprung up along Avenue A contributing to the industrial expansion along the Riverside/Canal area. Development went slowly due to the economic depression following the Civil War and the financial crisis of 1874.

Today, only two small paper mills remain standing in this area. Changes in the material economic climate, particularly since World War II, have reversed the industrial development common to Western New England river towns.

8. Bibliography and/or references such as local histories, deeds, assessor's records, early maps, etc.

MHC STAFF OPINION: ELIGIBILITY FOR NATIONAL REGISTER

OK by me
file

DATE: 8/1/83 *Montague* DATE REVIEW DUE: 8/5
 PROPERTY: Turners Falls Power Canal (south of historic district)
 STAFF IN CHARGE OF REVIEW: B Simon
 ACTION: Combined Sewer + Storm Drainage System AGENCY: EPA/DWPC

Does this property meet the NR criteria?

Opinion:	Yes	<input checked="" type="radio"/> No	More information	
Criteria:	A	B	C	D
Level:	Local	State	National	

Statement of Significance by CJ (staff)

the upper part of the canal is included in the district
the lower portion appears to have lost integrity.

Find necessary
did commissioner
vote for
eligible

Information required to form opinion:

Result:

Agreed Eligible:	Date:
DOE by SOI:	Date:
Determined Not Eligible:	Date:

Massachusetts Cultural Resource Information System

Scanned Record Cover Page

Inventory No:	MNT.131
Historic Name:	Keith Paper Mill
Common Name:	Hammermill Paper Company
Address:	Canal St
City/Town:	Montague
Village/Neighborhood:	Turner's Falls
Local No:	100, 169
Year Constructed:	1877
Architect(s):	Hardy, George F.
Architectural Style(s):	Victorian Eclectic
Use(s):	Cutlery Or Edged Tool Factory; Industrial Complex or District; Paper Mill; Abandoned or Vacant
Significance:	Architecture; Engineering; Industry
Area(s):	MNT.G: Riverside MNT.H: Turner's Falls Historic District
Designation(s):	Nat'l Register District (05/10/1982)
Building Materials(s):	Roof: Asphalt Shingle; Metal, Undetermined Wall: Brick; Granite; Stone, Cut Foundation: Stone, Uncut



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Commonwealth of Massachusetts
Massachusetts Historical Commission
220 Morrissey Boulevard, Boston, Massachusetts 02125
www.sec.state.ma.us/mhc

This file was accessed on: Monday, February 4, 2019 at 11:33 AM

FORM B – BUILDING

MASSACHUSETTS HISTORICAL COMMISSION
MASSACHUSETTS ARCHIVES BUILDING
220 MORRISSEY BOULEVARD
BOSTON, MASSACHUSETTS 02125

Assessor's Number USGS Quad Area(s) Form Number

02-0-01 Greenfield MNT.G, MNT.H MNT.131

NRDIS 5/10/82

Town/City: Montague

Place: (*neighborhood or village*):
Turners Falls

Address: West Side of Turners Falls Power Canal

Historic Name: Keith Paper Company

Uses: Present: Vacant

Original: Industrial

Date of Construction: 1877; 1893-1896

Source: Sanborn Maps, Written sources

Style/Form: Industrial

Architect/Builder: George F. Hardy

Exterior Material:

Foundation: Stone

Wall/Trim: Brick

Roof: Asphalt, Metal

Outbuildings/Secondary Structures:
Boiler Stack, Connected Paper Mill Complex

Major Alterations (*with dates*):
Windows and doors, additions and demolitions

Condition: Fair

Moved: no yes **Date:**

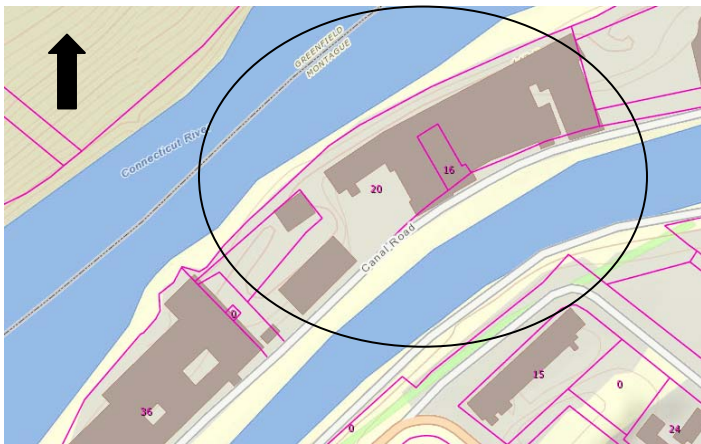
Acreage: <1 acre

Setting: Urban/Industrial

Photograph



Locus Map



Recorded by: G. Henry/E. Rankin

Organization: TRC Environmental for FirstLight

Date (*month / year*): March 2014

RECEIVED
JAN 02 2015

MASS. HIST. COMM.

INVENTORY FORM B CONTINUATION SHEET

MONTAGUE

W. SIDE OF POWER CANAL

MASSACHUSETTS HISTORICAL COMMISSION

Area(s) Form No.

220 MORRISSEY BOULEVARD, BOSTON, MASSACHUSETTS 02125

MNT.G / MNT.H

MNT.131

 Recommended for listing in the National Register of Historic Places.*If checked, you must attach a completed National Register Criteria Statement form.*

Use as much space as necessary to complete the following entries, allowing text to flow onto additional continuation sheets.

ARCHITECTURAL DESCRIPTION:

Describe architectural features. Evaluate the characteristics of this building in terms of other buildings within the community.

The Keith Paper Mill complex is a grouping of connected brick industrial buildings dating from 1877 and designed by George F. Hardy. The main buildings, sited directly along the Connecticut River, are 4 stories in height and have asphalt-shingled gable roofs with dentilled brick cornices. The windows are 9/9 sash with segmental arch lintels and stone sills. Two square towers with flat roofs are located toward the east and west ends of these three buildings. Originally housing the bleachery, a 3-story brick building with front-gable roof projects from the center of the buildings along the river. The buildings have similar architectural features including a dentilled cornice. The gable dormers have been removed. Several 1- and 2-story brick buildings as well as a brick boiler stack reading "K. P. Co." are also located on the southern portion of the parcel. The southern-most building on the site was constructed to store finished products and rag storage. The 4-story building has brick pilasters with movable glass panels running in between and can cover the segmental arched windows.

HISTORICAL NARRATIVE

Discuss the history of the building. Explain its associations with local (or state) history. Include uses of the building, and the role(s) the owners/occupants played within the community.

John Keith, founder of the company and mill that bore his name, was a paper salesman from Worcester, MA who later was affiliated with the Valley Paper Company of Holyoke. Lacking capital of his own, he obtained \$250,000 in backing for a paper mill to be built in Turners Falls from by Turners Falls founder and chief driving force, Colonel Alvah Crocker. Keith became first president and treasurer of the firm on August 29, 1871 (Montague Bicentennial Committee 1954: 125).

After the John Russell Cutlery Company (1868) and Montague Paper Mill (1870), the Keith Mill was the third major industrial complex built along the power canal, where it purchased power from Crocker's Turners Falls Company. The original mill building was destroyed by fire on November 7, 1877, but was reconstructed soon after. "Spring water so essential to the manufacture of fine paper is brought to the mill through a 12-inch pipe from a spring at Deep Hole, two miles up the river" (Greenfield Gazette 1892: 4). In 1893-1896 the plant was expanded to house two additional machines, nearly doubling output (Montague Bicentennial Committee 1954: 125). The Keith Block, a block-long row of brick apartments on Canal Street and joined to the paper mill by a metal pedestrian bridge over the power canal, was built by the Keith Paper Company to house its workers. Rent was deducted from workers' pay and the Keith Block housed both families and single workers (Jenkins 1980: 8.4).

In 1916, the original power plant, seven flumes, and water wheels were removed and replaced with a more efficient hydroelectric plant. Further modernization was accomplished in 1935 and again in 1953, when several new machines were installed. The Keith Paper Company was known for its high-grade ledger, index, and bond papers and in the 1940s provided employment for about 200 people. On November 4, 1953 the company was sold by the last Keith Paper Company president to the Strathmore Paper Company of West Springfield, MA (Montague Bicentennial Committee 1954: 125). The plant closed in 1994 and the building is currently vacant.

INVENTORY FORM B CONTINUATION SHEET

MASSACHUSETTS HISTORICAL COMMISSION

220 MORRISSEY BOULEVARD, BOSTON, MASSACHUSETTS 02125

MONTAGUE

W. SIDE OF POWER CANAL

Area(s) Form No.

MNT.G / MNT.H

MNT.131

BIBLIOGRAPHY and/or REFERENCES

Jenkins, Candace

1980 "Turners Falls Historic District," National Register of Historic Places Nomination Form, Massachusetts Historical Commission, Boston, MA.

Montague Bicentennial Committee

1954 *Montague: 1754-1954*. Private publisher, Montague, MA.

Sanborn Map Company

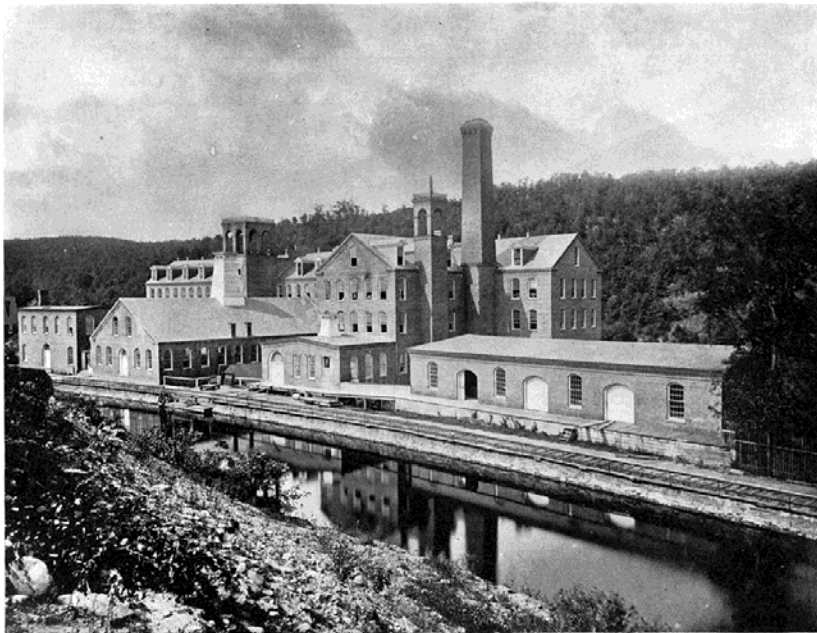
September 1902 "Turners Falls, Mass." Sanborn Map Company, Broadway, NY.

December 1909 "Turners Falls, Mass." Sanborn Map Company, Broadway, NY.

August 1914 "Turners Falls, Mass." Sanborn Map Company, Broadway, NY.

Wade, Warner & Company

1891 "Picturesque Franklin." Northampton, MA.



MILL OF THE KEITH PAPER COMPANY, TURNERS FALLS.

Ca. 1891 View of Keith Paper Mill (Source: Wade, Warner & Company).

INVENTORY FORM B CONTINUATION SHEET

MONTAGUE

W. SIDE OF POWER CANAL

MASSACHUSETTS HISTORICAL COMMISSION

Area(s) Form No.

220 MORRISSEY BOULEVARD, BOSTON, MASSACHUSETTS 02125

MNT.G / MNT.H

MNT.131



2014 View of South Elevations (Source: TRC)



2014 View of Southern Storage Building (Source: TRC)

INVENTORY FORM B CONTINUATION SHEET

MONTAGUE

W. SIDE OF POWER CANAL

MASSACHUSETTS HISTORICAL COMMISSION

Area(s) Form No.

220 MORRISSEY BOULEVARD, BOSTON, MASSACHUSETTS 02125

MNT.G / MNT.H

MNT.131



2012 Low-level oblique image of Keith Paper Company (Bing Maps)

INVENTORY FORM B CONTINUATION SHEET

MONTAGUE

W. SIDE OF POWER CANAL

MASSACHUSETTS HISTORICAL COMMISSION

Area(s) Form No.

220 MORRISSEY BOULEVARD, BOSTON, MASSACHUSETTS 02125

MNT.G / MNT.H	MNT.131
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National Register of Historic Places Criteria Statement Form

Check all that apply:

- Individually eligible Eligible **only** in a historic district
 Contributing to a historic district Potential historic district

Criteria: **A** **B** **C** **D**

Criteria Considerations: **A** **B** **C** **D** **E** **F** **G**

Statement of Significance by G. Henry/E.Rankin (TRC Environmental for FirstLight)
The criteria that are checked in the above sections must be justified here.

Contributing Resource in Turners Falls Historic District

The Keith Paper Company Complex is a contributing resource in the NRHP-listed Turners Falls Historic District listed in the National Register in 1983 under Criteria A and C. The district is associated with events that have made a direct contribution to the industrial development of Massachusetts and the nation and embodies distinctive characteristics of the type, period, and methods of construction typical of late-nineteenth-century industrial communities of Massachusetts, and particularly of the Connecticut River Valley.

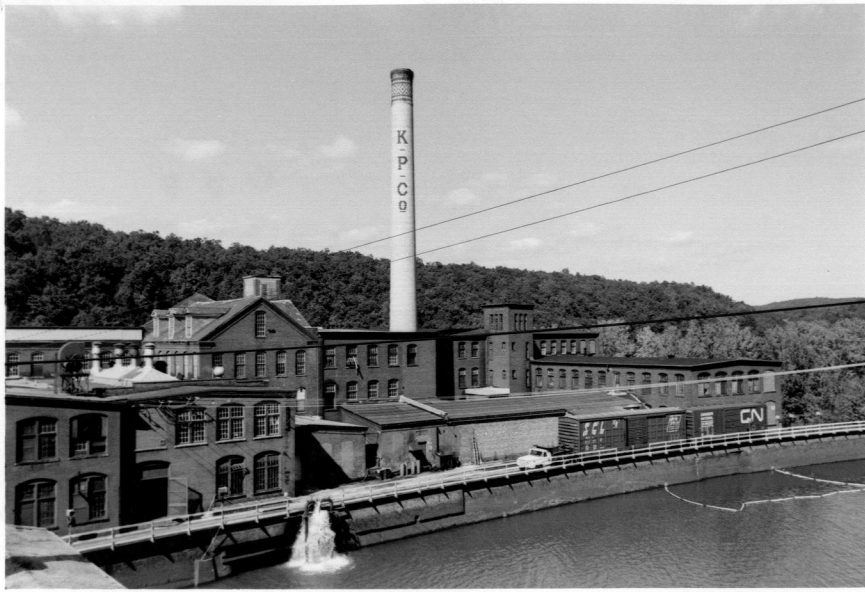
FORM B - BUILDING

MASSACHUSETTS HISTORICAL COMMISSION
Office of the Secretary, State House, Boston

NROSS. 5110182
PI. TURN
SUBS. GREEN
SUSTA

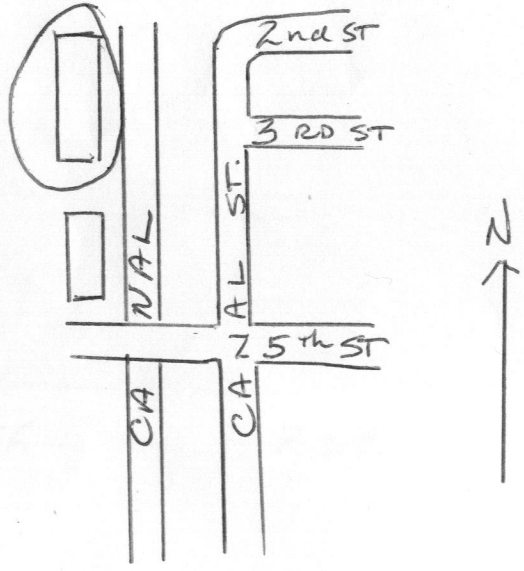
MNT. 131

In Area no. G, H R	Form no. 131 169
--------------------------	------------------------



Location Montague (Turners Falls)
 Address Off Canal St.
 Name KEITH PAPER mill
 Present use Paper Mill
 Present owner Hammermill Mass. Paper Corp.
 Description:
2, 3, and 4 story brick industrial complex.

4. Map. Draw sketch of building location in relation to nearest cross streets and other buildings. Indicate north.



Architect George F. Healy
 Exterior wall fabric brick

Outbuildings (describe) _____
arched windows, doorways
 Other features and surrounds; granite sills, engaged brick columns; flat and pitched roofs; dormers; cornice detail; smokestack; footbridge entrance.

Altered _____ Date _____
 Moved _____ Date _____

5. Lot size:
 One acre or less _____ Over one acre _____
 Approximate frontage 1000'
 Approximate distance of building from street 400'

6. Recorded by _____
 Organization Arts Council of Franklin County
 Date 10/78

Reg. Ref. map 2, parcel 1
 Book 1134, p. 281

(over)

7. Original owner (if known) _____

Original use _____

Subsequent uses (if any) and dates _____

8. Themes (check as many as applicable)

- | | | | | | |
|-----------------------|-------|----------------------------|-------|-------------------------|-------|
| Aboriginal | _____ | Conservation | _____ | Recreation | _____ |
| Agricultural | _____ | Education | _____ | Religion | _____ |
| Architectural | x | Exploration/
settlement | _____ | Science/
invention | _____ |
| The Arts | _____ | Industry | x | Social/
humanitarian | _____ |
| Commerce | _____ | Military | _____ | Transportation | _____ |
| Communication | _____ | Political | _____ | | |
| Community development | x | | | | |

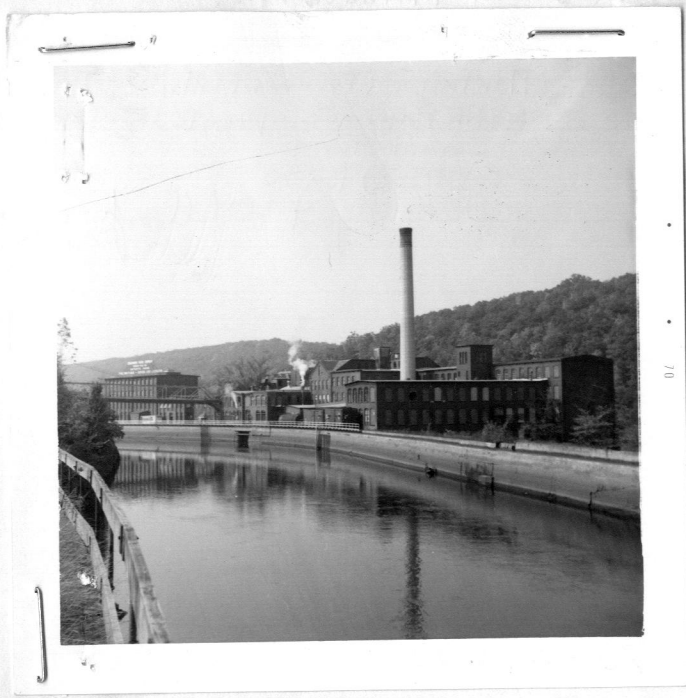
9. Historical significance (include explanation of themes checked above)

See area form

10. Bibliography and/or reference early maps, etc.)



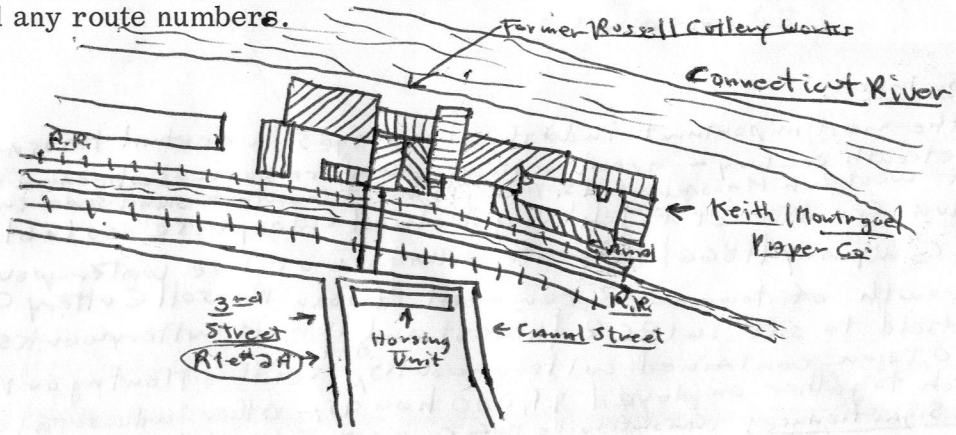
FORM A - AREA AND SITE SURVEY
MASSACHUSETTS HISTORICAL COMMISSION
Office of the Secretary, State House, Boston



1. Town Montague (Turner's Falls) / Franklin
2. Name of area or section Swathmore Paper Company (Turner's Falls Mill) Area (Canal and 3rd Streets) (Keith Paper Company)
3. General Date or Period 1870s-1910's (Montague Paper Mills)
4. Is the area uniform? For the most part
 In style Yes. (Industrial variations)
 In condition Yes. (Fair to Good)
 In type of ownership Yes. (single company)
 In use (Explain) Yes. (Industrial)
5. Is area potentially threatened? No, not really.
 By Zoning No.
 By Roads No.
 By Developers No.
 By Deterioration Somewhat.

Survey Considerations: A:3; A:4;
A:5; A:6; A:7;
A:8.

7. Draw a general map of the area involved. Please indicate in red any known historic sites on which individual reports are contemplated on Form B. Indicate street boundaries of area and any route numbers.



- 70-2862
- 70-2863
- 70-2887
- 70-2888
- 70-2889
- 70-2890

Recorder Bryant LaSalle, Jr. - Special Consultant

For M.H.C. (9/30/70)
(Name of Organization)

NOTE: Recorder should obtain written permission from Commission or sponsoring organization before using this form.

Bibliography:

1. History of the Connecticut Valley in Massachusetts. 2 vols. Philadelphia: Louis A. Events, 1879 (II, pp. 625-670, and views) 670
2. Leading Manufacturers and Merchants of Central and Western Massachusetts. New York: International Publishing Company, 1887. (pp. 329-330).
3. Lockwood, John D., et Al. Western Massachusetts: A History, 1536-1925. New York, and Chicago: Lewis Historical Publishing Company, 1925. (II, pp. 756-58)
4. Stone, Orra L. History of Massachusetts Industries. 4 vols. Boston and Chicago: The S. J. Clarke Publishing Company, 1930. (I, pp. 456-466)

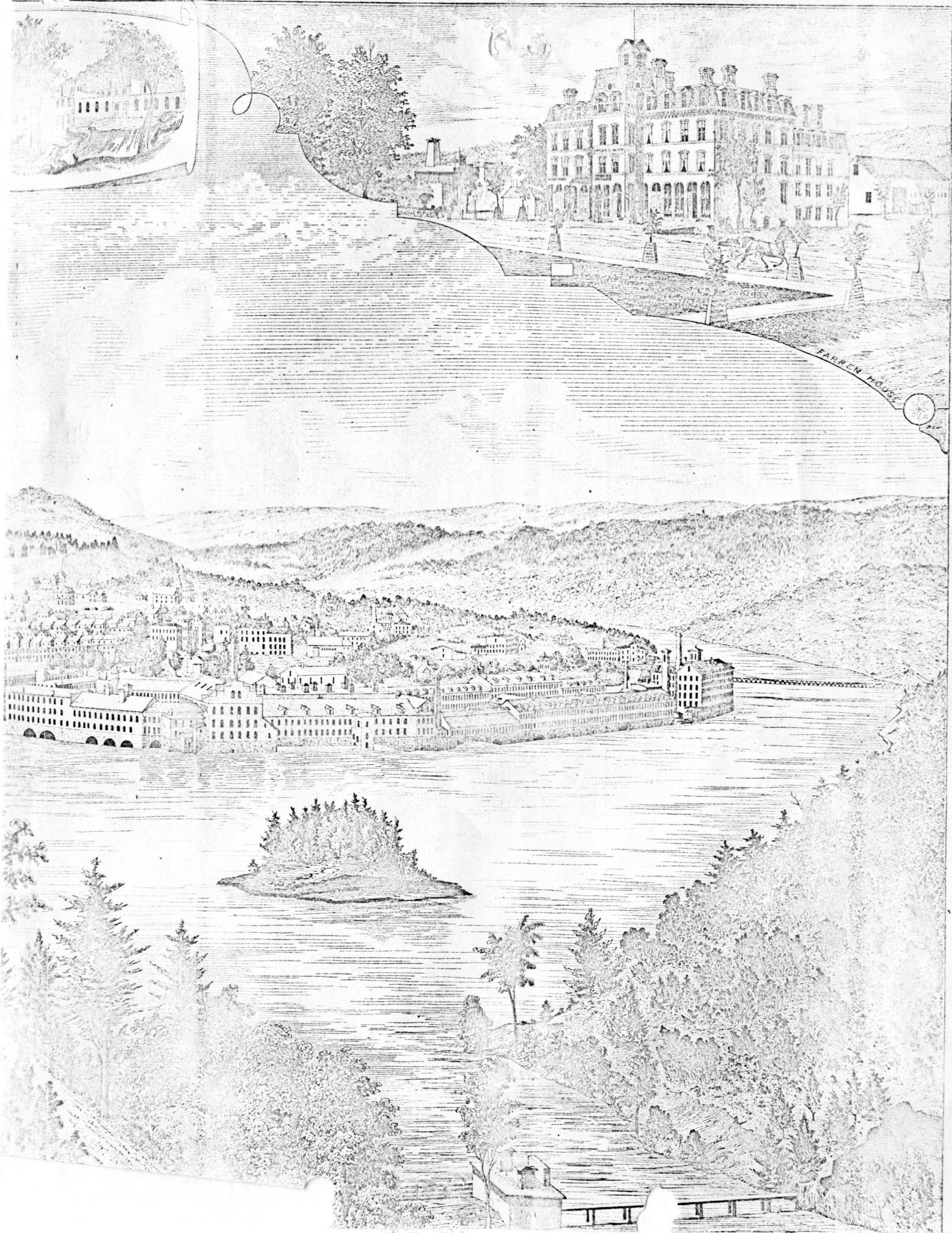


Historic Importance:

1. One of the most important industrial villages in central Massachusetts of the mid-nineteenth century - great water-power resources - became the electrical power center of western Massachusetts, and its most important small-scale industrial town.
2. Col. Alva Crocker of Fitchburg behind enterprise - established Turner's Falls Company (1866) to create village & utilize water-power - key factor in growth of town with removal of John Russell Cutlery Company from Greenfield to site in 1868 (oldest and largest cutlery works in country in 1880)
3. In 1880, town contained cutlery works, Keith & Montague Paper Companies, and which together employed 91,000 hands - other industrial concerns added

Architectural Significance:

1. Somewhat confusing complex of buildings, many of which are altered from their 1870 appearances - two original pitched-roofed, dormer-windowed wings remain (excellent brickwork)
2. Site, one of the more scenic in New England - canal constructed parallel to Connecticut River.
3. Supplemented by black-length brick with units separated by step-gabled firewalls (unique in state in this respect) - one of most outstanding in state



FARRER HOUSE

INVENTORY FORM CONTINUATION SHEET

Town

Property Address

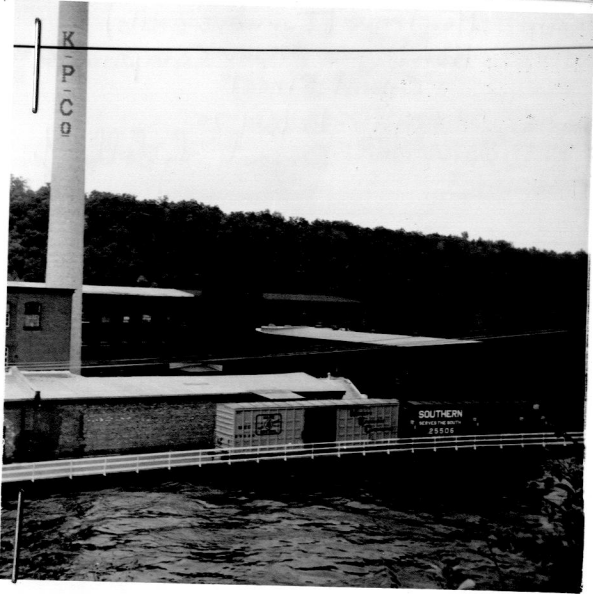
MNT. 131

MASSACHUSETTS HISTORICAL COMMISSION
MASSACHUSETTS ARCHIVES BUILDING
220 MORRISSEY BOULEVARD
BOSTON, MASSACHUSETTS 02125

Area(s)

Form No.

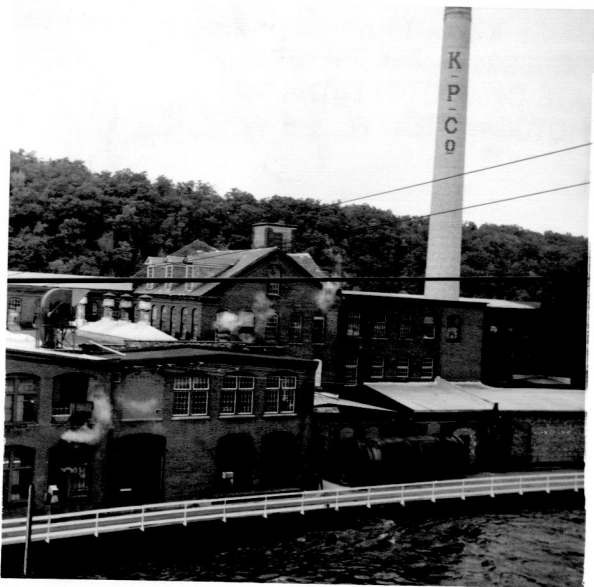
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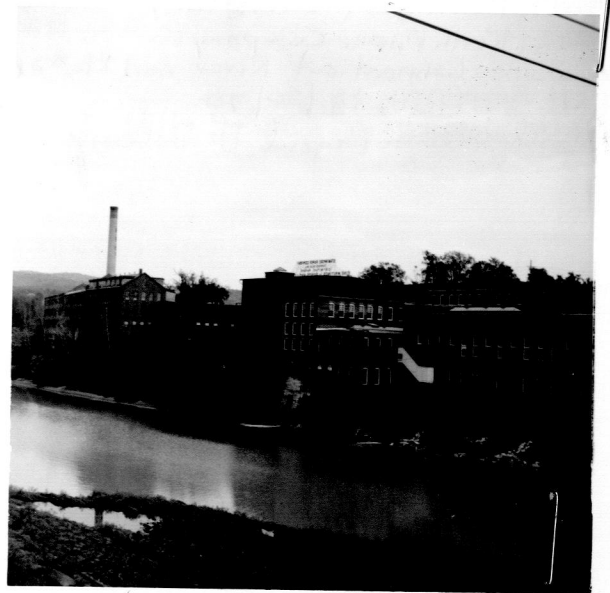
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BUILDING INSPECTION DEPARTMENT—DISTRICT POLICE
PLAN RECORD

CASE **B** RACK **6** APART. **9** NO. **12366**
 BUILDING **Keith Paper Co.** STORIES **1B**
 CITY OR TOWN **Montague** STREET **Turners Falls**
 TO BE USED FOR **Manufacturing Purposes** CLASS **Indus**
 OWNER **Keith Paper Co.** **Brick**
 ARCHITECT **Geo. F. Hardy**

CERTIFICATE APPROVAL — SPECIFICATION REQUIREMENTS — REFERRED

DATE **Jan 16 1917**

INSPECTOR **Roach**

National Register of Historic Places

National Park Service
U.S. Department of the Interior



Public, non-restricted data depicting National Register spatial data processed by the Cultural Resources GIS fa...

20 canal road, turners falls, ma

NPS Light

Turner Falls Historic District

Reference Number: 82004966

Resource Type: District

Address: Roughly bounded by Connecticut River, Power Canal, 9th and L St.

City: Turner Falls

County: Franklin

State: MASSACHUSETTS

Certification Date: 19820502

Multi Resource Name:

of Contributing Buildings: 250

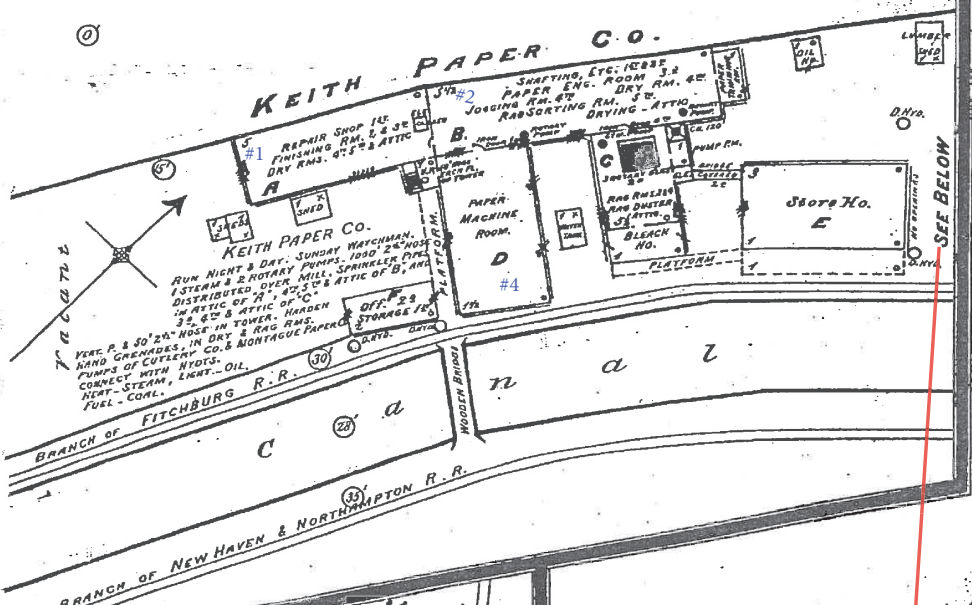
of Contributing:

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1000 ft

Disclaimer | Geocoding by Esri | © Mapbox © OpenStreetMap contributors

Connecticut River

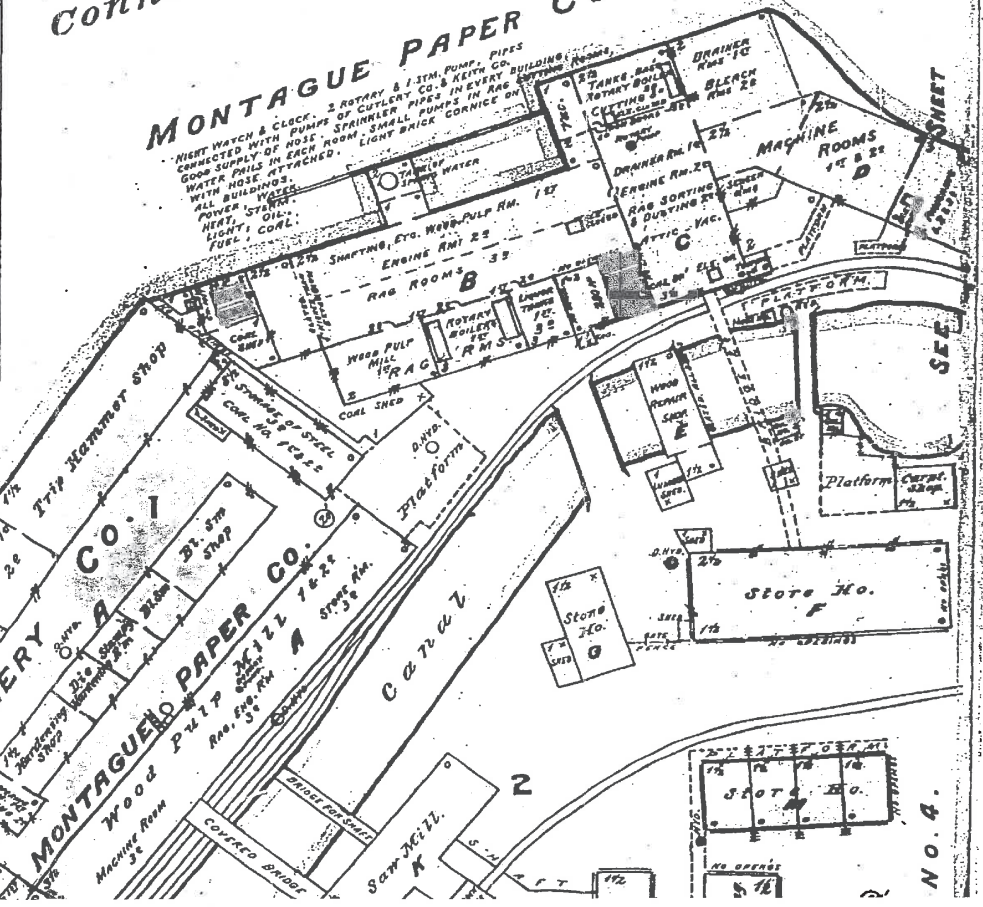


NOTICE.—The SANBORN MAP & PUBLISHING CO. (Limited) will Loan, to parties purchasing one copy of this map, a Duplicate, with the mutual understanding and agreement that it is to be used exclusively by their General or Local Agent, and with the further agreement that, if not so used, one of the two copies will be returned to said Company.

JUNE 1884
TURNER'S FALLS
MASS.

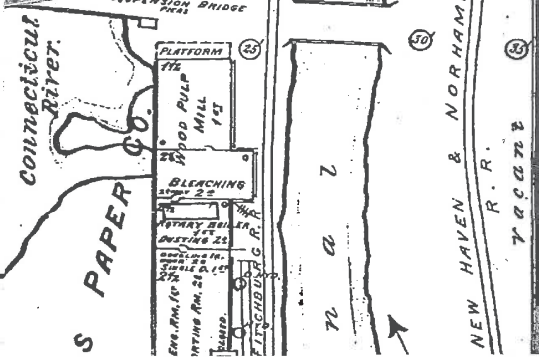
Connecticut River

MONTAGUE PAPER CO.



JOHN RUSSELL CUTLERY CO.

2 NIGHTWATCHMEN AND ELECTRIC CLOCK.
GOOD SUPPLY OF HOSE DISTRIBUTED OVER WORKS.
ROTARY PUMP IN 'A', USE IN COMMON WITH PAPER CO.
WATER PIPES CONNECTED WITH PUMPS OF KEITH & MONTAGUE PAPER CO. SPRINKLER PIPES AND CASKS & PAILS IN ATTIC OF 'B'. PAILS IN NEARLY ALL ROOMS. 2 OUTSIDE VENT. PIPES & HOSE EACH FLOOR & TOWER. V.P. WITH HOSE EACH FLOOR.
LIGHT BRICK CORNICE ON ALL BUILDING.
POWER, WATER, HEAT, STEAM, LIGHT, GAS (MADE ON PREMISES) FUEL, COAL.



No. 4.

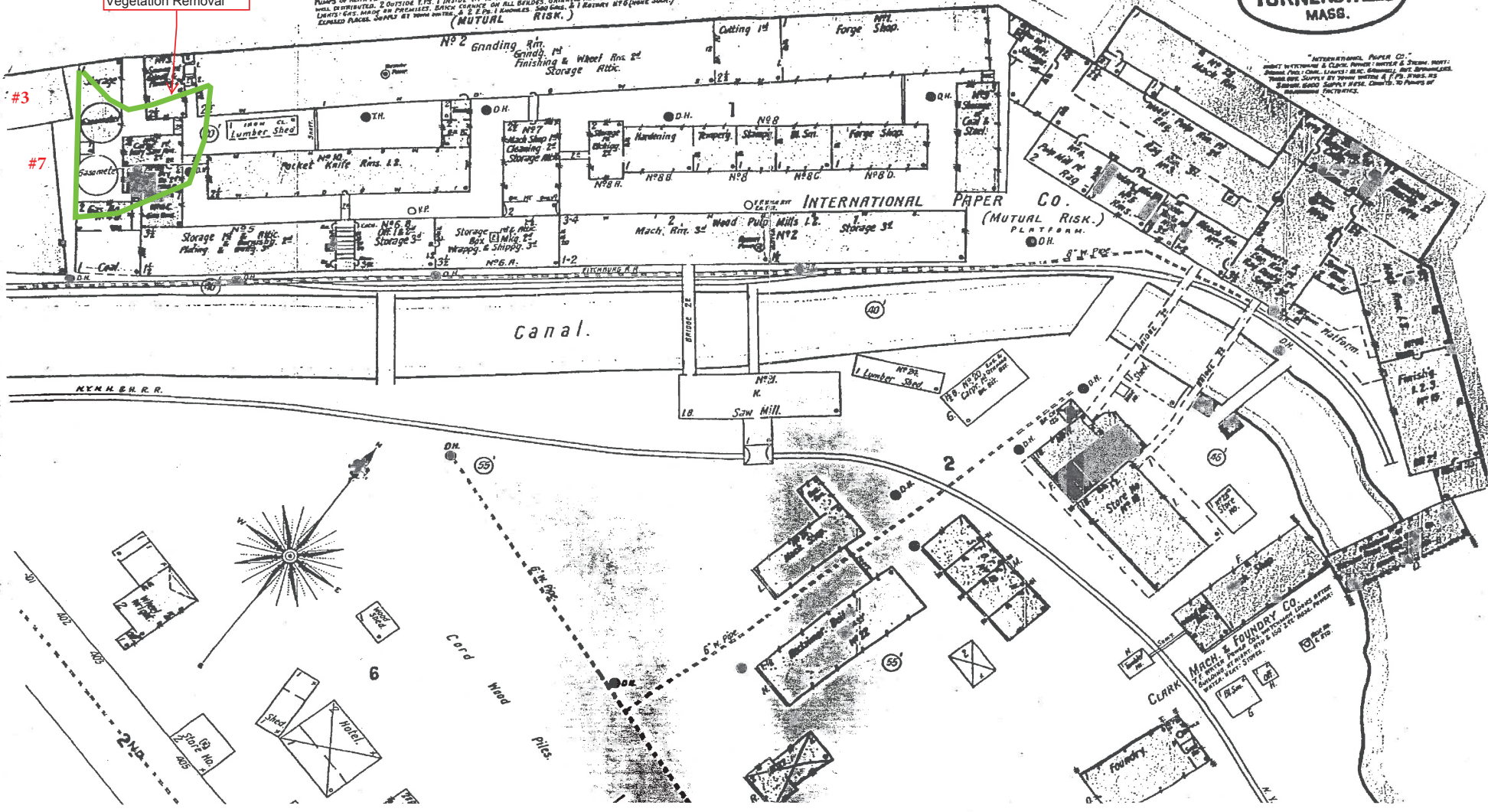
No. 4.

SEP. 1902
TURNERSFALLS
MASS.

Connecticut
JOHN RUSSELL CUTLERY CO.

2 RIGHT WITCHAMEN & ELAC CLOCK, ABOUT 1500 TONS DISMOUNTED TRUSS WLS. WATER PAPER COMBOS, WITH
PLUMES OF HEATH PAPER CO. & INTERNATIONAL PAPER CO. BY 8" MAIN 1" STRAIN & 1" ROTARY, FIVE TONNAGE & PILES
WILL BE DISTRIBUTED, 2 OUTSIDE, 1 IN 1" INSIDE V IN TOWER, WITH 20 1/2" HOLES SETS, IN THE POWER WATER HEAT STEAM
LIGHTS, 400, MADE BY PRELIMET, BATCH COUSAGE ON ALL SERVICES, GRINDING MILL SPRINGWATER, TRUSS BUT ONE SYSTEM IN
EXPANDED PAPER, SUPPLY BY WOOD WORTH & S. E. P. 1 KNOWLES, 200 GALS. & 1 BATTERY WTS. (NONE SUCH.)
(MUTUAL RISK.)

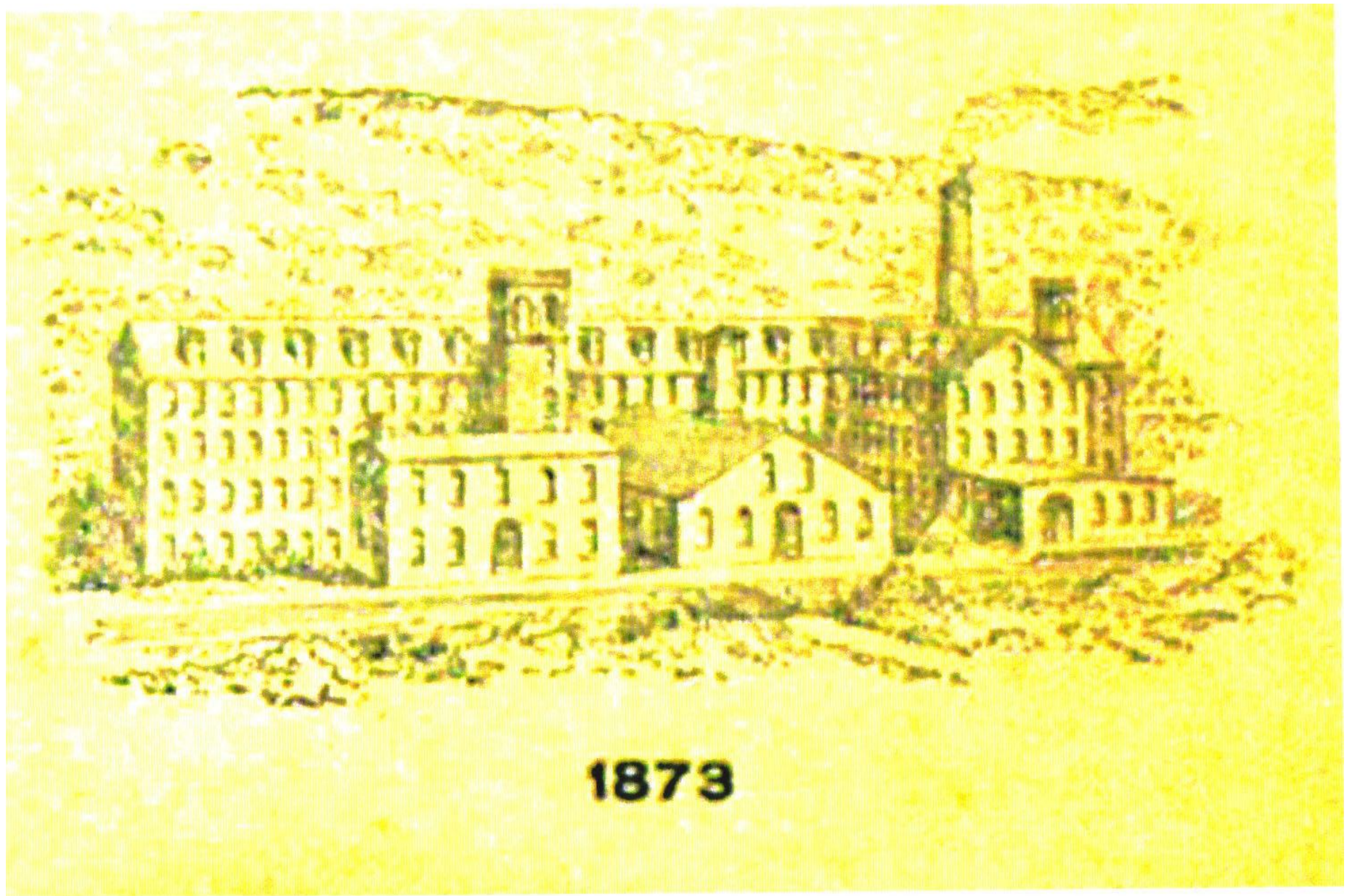
Approximate Area of
Vegetation Removal



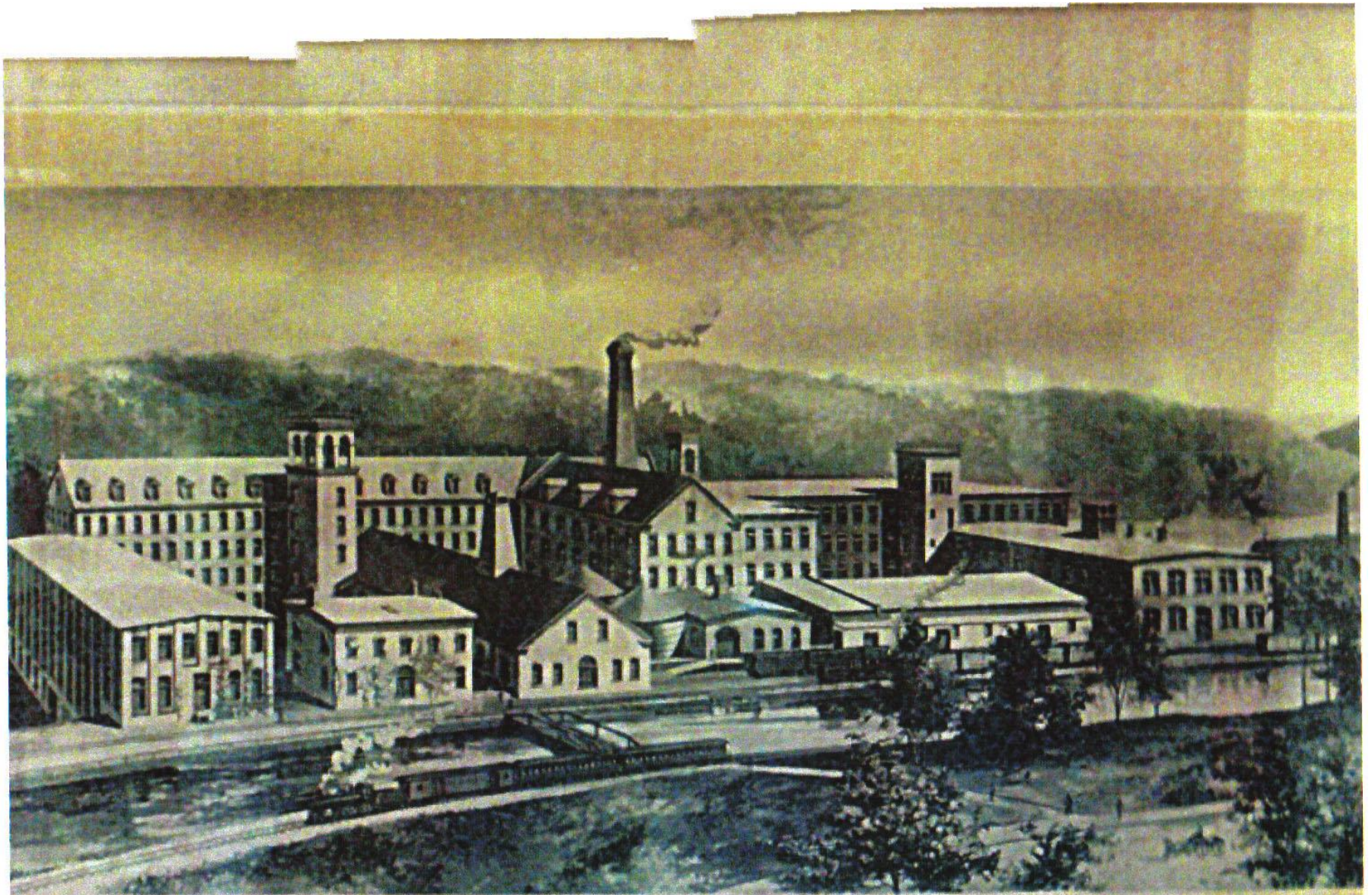
INTERNATIONAL PAPER CO.
FACTORY WITCHAMEN & CLARK RIVERS, WITCHAMEN & STREAN, MASS.
PAPER, PULP, CHEM., LUMBER, ELAC, GRINDING, BUT SPRINGWATER,
TRUSS BUT SUPPLY BY WOOD WORTH & S. E. P. 1 KNOWLES,
200 GALS. & 1 BATTERY WTS. (NONE SUCH.)
EXPANDED PAPER, SUPPLY BY WOOD WORTH & S. E. P. 1 KNOWLES,
200 GALS. & 1 BATTERY WTS. (NONE SUCH.)

INTERNATIONAL PAPER CO.
(MUTUAL RISK.)
PLATFORM.

MACH & FOUNDRY CO.
PAPER, PULP, CHEM., LUMBER, ELAC, GRINDING, BUT SPRINGWATER,
TRUSS BUT SUPPLY BY WOOD WORTH & S. E. P. 1 KNOWLES,
200 GALS. & 1 BATTERY WTS. (NONE SUCH.)
EXPANDED PAPER, SUPPLY BY WOOD WORTH & S. E. P. 1 KNOWLES,
200 GALS. & 1 BATTERY WTS. (NONE SUCH.)



1873

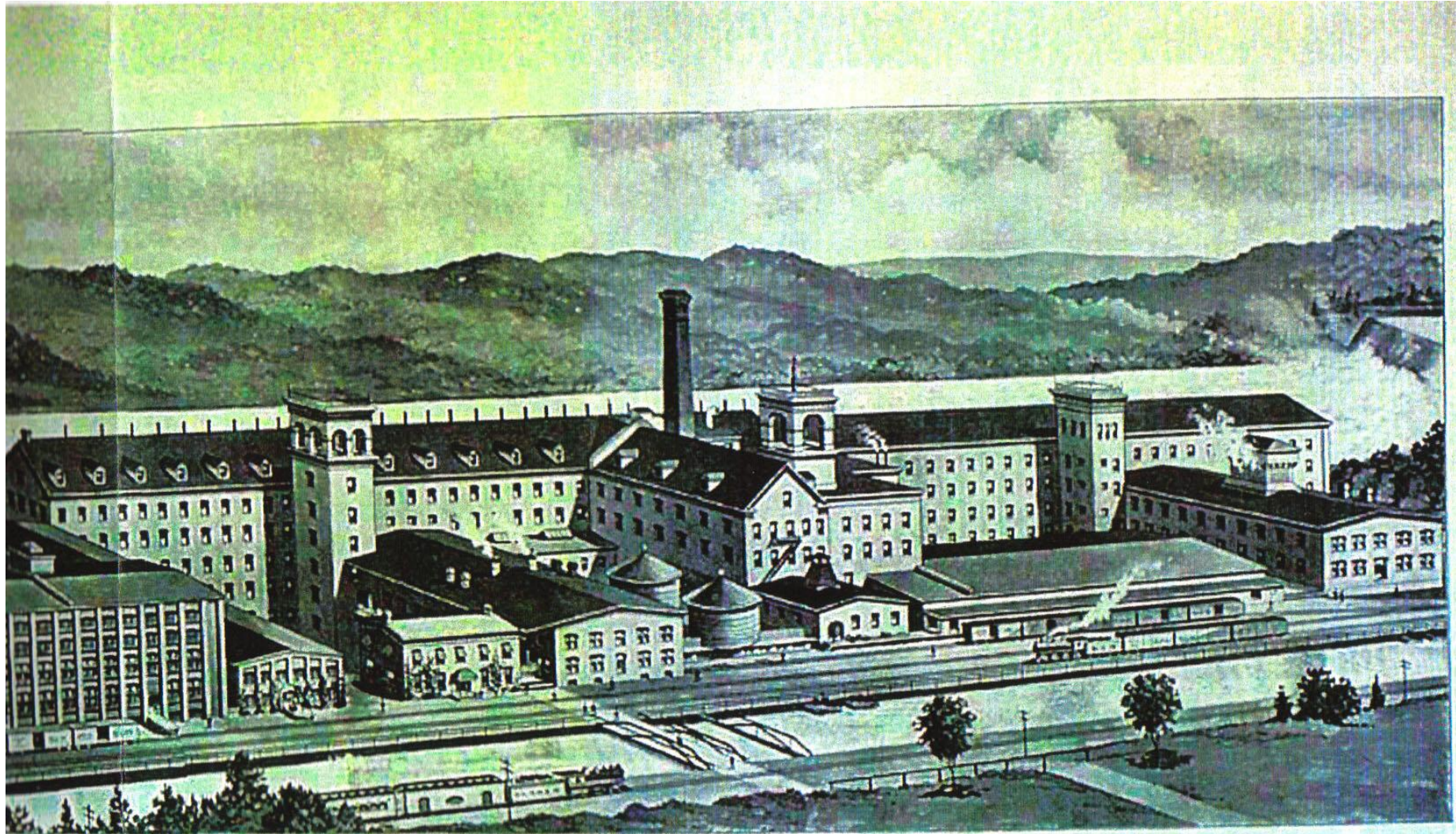


KEITH PAPER COMPANY.

TURNERS FALLS, MASS.

1902.





MILLS OF THE KEITH PAPER COMPANY

1911

TURNERS FALLS, MASS., U. S. A.

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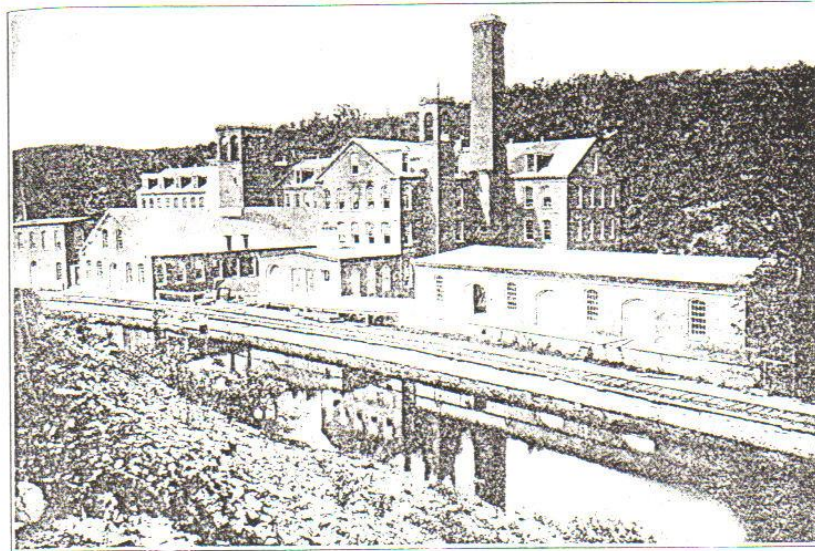
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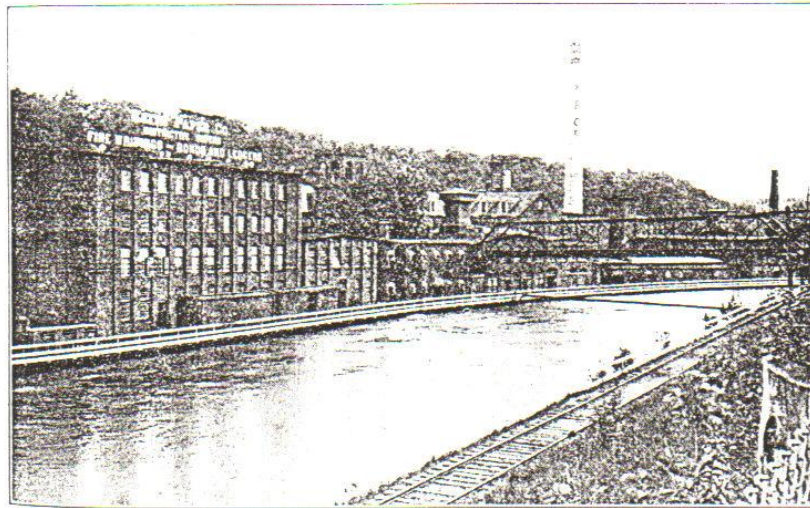
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ORIGINAL PLANT, KEITH PAPER COMPANY, TURNERS FALLS



KEITH PAPER COMPANY, TURNERS FALLS, 1928



Appendix D

Project: Former Strathmore Mill Complex Demolition, Abatement and Restoration **Job Number:** M-5003-012

Client: Town of Montague **Location:** Montague, MA

Photograph No.: 3	Date: 9/21/18	Direction Taken: South
Description: Riverside façade of the former Strathmore Mill Complex, Building #3.		

Photograph No.: 4	Date: 9/21/18	Direction Taken: Northeast
Description: Aerial view of the Smokestack and surrounding Buildings #3, #7, #8, and #6. Power canal (at right) drawn down for routine maintenance (by Others).		

Project: Former Strathmore Mill Complex Demolition, Abatement and Restoration **Job Number:** M-5003-012

Client: Town of Montague **Location:** Montague, MA

Photograph No.: 7	Date: 6/19/18	Direction Taken: West
Description: View of the Courtyard area with the Smokestack and underground water holding tank cover and walls to removed, slab perforated, and area backfilled.		
<p style="text-align: center;">Smokestack</p> <p style="text-align: center;">Concrete water tank top with vegetation on top.</p>		

Photograph No.: 8	Date: 6/19/18	Direction Taken: West
Description: Typical conditions between the Bank/MAHW line and the Mill Complex foundation walls.		

Project: Former Strathmore Mill Complex Demolition, Abatement and Restoration **Job Number:** M-5003-012

Client: Town of Montague **Location:** Montague, MA

Photograph No.: 9	Date: 10/12/18	Direction Taken: Northeast
Description: Typical conditions between the Bank/MAHW line and the Mill Complex foundation walls.		

Photograph No.: 10	Date: 9/27/18	Direction Taken: South
Description: Tailrace #3 scheduled to be abandoned in place.		



Appendix E



MASSWILDLIFE

DIVISION OF FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
[MASS.GOV/MASSWILDLIFE](https://www.mass.gov/masswildlife)

October 29, 2024

Lucas Acaba
53 Southampton Road
Westfield, MA 01085

RE: Project Location: 8 and 20 Canal Road, Turners Falls/Montague Map 2, Lots 01 and 06
Town: Montague
Heritage Hub Form ID: IR-88579
NHESP Tracking No.: -

To Whom It May Concern:

Thank you for contacting the Natural Heritage and Endangered Species Program (NHESP) of the MA Division of Fisheries & Wildlife (the "Division") for information regarding state-listed species in the vicinity of the above referenced site. Based on the information provided, this project site or a portion thereof is located **within** the current *Massachusetts Natural Heritage Atlas*. The following state-listed species are mapped for either *Priority Habitat (PH)* alone, or for both *Priority Habitat (PH)* and *Estimated Habitat (EH)*, as indicated in the following table:

<u>Scientific Name</u>	<u>Common Name</u>	<u>Taxonomic Group</u>	<u>State Status</u>	<u>EH</u>	<u>PH</u>
<i>Acipenser brevirostrum</i>	Shortnose Sturgeon	Fish	Endangered	1319	2084
<i>Deschampsia cespitosa</i> <i>ssp. glauca</i>	Tussock Hairgrass	Plant	Endangered	1319	2084
<i>Lota lota</i>	Burbot	Fish	Special Concern	1319	2084
<i>Stylurus amnicola</i>	Riverine Clubtail	Dragonfly/Damselfly	Endangered	1319	2084
<i>Symphotrichum tradescantii</i>	Tradescant's Aster	Plant	Threatened	1319	2084

The species listed above are protected under the Massachusetts Endangered Species Act (MESA) (M.G.L. c. 131A) and its implementing regulations (321 CMR 10.00). State-listed wildlife are also protected under the Massachusetts Wetlands Protection Act (WPA) (M.G.L. c. 131, s. 40) and its implementing regulations (310 CMR 10.00). Fact sheets for most state-listed species can be found on our website (www.mass.gov/nhesp).

Please note that projects and activities located within Priority and/or Estimated Habitat must be reviewed by the Division for compliance with the state-listed species protection provisions of MESA (321 CMR 10.00) and/or the

MASSWILDLIFE

WPA (310 CMR 10.00).

Wetlands Protection Act (WPA)

If the project site is within Estimated Habitat and a Notice of Intent (NOI) is required, then a copy of the NOI must be submitted to the Division so that it is received at the same time as the local conservation commission. If the Division determines that the proposed project will adversely affect the actual Resource Area habitat of state-protected wildlife, then the proposed project may not be permitted (310 CMR 10.37, 10.58(4)(b) & 10.59). In such a case, the project proponent may request a consultation with the Division to discuss potential project design modifications that would avoid adverse effects to state-listed wildlife habitat.

A streamlined joint MESA/WPA review process is available. When filing an NOI, the applicant may file concurrently under the MESA and qualify for a 30-day streamlined joint review. Please visit our website for filing instructions: www.mass.gov/regulatory-review.

MA Endangered Species Act (MESA)

If the proposed project is located within Priority Habitat and is not exempt from review (see 321 CMR 10.14), then project plans, a fee, and other required materials must be submitted to the Division to determine whether a Take under the MA Endangered Species Act would occur (321 CMR 10.18). Please note that all proposed and anticipated development must be disclosed, as MESA does not allow project segmentation (321 CMR 10.16). Please visit our website for filing instructions: www.mass.gov/regulatory-review.

We recommend that state-listed species habitat concerns be addressed during the project design phase prior to submission of a formal MESA filing, as avoidance and minimization of impacts to state-listed species and their habitats is likely to expedite regulatory review. Please visit our website for more information on how to request a pre-filing consultation with the Division: www.mass.gov/how-to/request-a-pre-filing-consultation

This evaluation is based on the most recent information available in the NHESP database, which is constantly being expanded and updated through ongoing research and inventory. If the purpose of your inquiry is to generate a species list to fulfill the federal Endangered Species Act (16 U.S.C. 1531 et seq.) information requirements for a permit, proposal, or authorization of any kind from a federal agency, we recommend that you use the NOAA Fisheries Greater Atlantic Region ESA Section 7 Mapper (<https://noaa.maps.arcgis.com/apps/webappviewer/index.html?id=1bc332edc5204e03b250ac11f9914a27>) and the U.S. Fish and Wildlife Service's Information for Planning and Conservation website (<https://ecos.fws.gov/ipac>). If you have any questions regarding this letter please contact Melany Cheeseman, Endangered Species Review Assistant, at Melany.Cheeseman@mass.gov.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a trailing end.

Jesse Leddick
Assistant Director



MASSWILDLIFE

DIVISION OF FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
MASS.GOV/MASSWILDLIFE

May 2, 2018

Montague Conservation Commission
One Avenue A
Turners Falls, MA 01376

Steven Ellis
Town of Montague
1 Avenue A
Turner's Falls, MA 01376

RE: Applicant: Town of Montague
 Project Location: 8 & 20 Canal Road
 Project Description: Asbestos abatement and demolition of five buildings and ancillary structures within the Strathmore Mill Complex.

 Wetland File No.: 229-0253
 NHESP File No.: **18-38083**

To Whom it May Concern:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the "Division") received a NOTICE OF INTENT with plans entitled "STRATHMORE MILL COMPLEX DEMOLITION AND ABATEMENT DESIGN TURNERS FALLS, MASSACHUSETTS" (dated April 2019 – Permitting Submission, Prepared by Tighe & Bond, 13 sheets) in compliance with the rare wildlife species section of the Massachusetts Wetlands Protection Act Regulations (310 CMR 10.58(4)(b), 10.59). The Division also received the MESA Review Checklist and supporting documentation for review pursuant to the MA Endangered Species Act Regulations (321 CMR 10.18, MESA).

The Connecticut River within the Turner's Falls bypass reach is located within Priority and Estimated Habitat for a large number of state-listed species. The following state-listed species are of relevance to the proposed work areas of the Project:

Scientific Name	Common Name	State Status	Federal ESA Status	Taxonomic Group
<i>Acipenser brevirostrum</i>	Shortnose Sturgeon	Endangered	Endangered	Vertebrate Animal
<i>Deschampsia cespitosa ssp. glauca</i>	Tufted Hairgrass	Endangered		Vascular Plant

MASSWILDLIFE

These species and their habitats are protected pursuant to the MESA and WPA. Fact sheets for these species can be found on our website, www.mass.gov/nhosp. The Shortnose Sturgeon is also listed as Endangered, pursuant to the federal Endangered Species Act of 1973 (16 USCA§§1531-1544) and regulations (50 CFR§17 & 402) administered by the National Marine Fisheries Service.

The purpose of the Division's review of the proposed project under the rare species section of the WPA regulations is to determine whether the project will have any adverse effects on the Resource Area Habitats of state-listed species. The purpose of the Division's review under the MESA regulations is to determine whether a Take of state-listed species will result from the proposed project.

Based on a review of the information that was provided and the information contained in our database, the Division has determined that this project, as currently proposed, **must be conditioned in order to avoid adverse effects** to the Resource Area Habitats of state-listed wildlife species (310 CMR 10.58(4)(b) and 10.59) and **must be conditioned in order to avoid a prohibited Take** of state-listed species (321 CMR 10.18(2)(a)). To avoid adverse effects to the Resource Area Habitats of state-listed species and to avoid a prohibited Take of state-listed species the following conditions must be implemented:

1. **Work Timing.** All work associated with the Project, is prohibited **April 1 – June 30** to protect spawning fish species.
2. **Botanical field surveys.** Surveys for Tufted Hairgrass shall be conducted to delineate and avoid impacts to this plant species along the Connecticut River side of the project.
 - a) Botanical field surveys must be conducted by a qualified botanist in appropriate habitats throughout all areas of proposed work and areas within 20 feet, including any area of contact between the debris collection netting and the ground, using methodologies consistent with the STATE-LISTED SPECIES HABITAT ASSESSMENT AND SURVEY GUIDELINES: PLANTS (dated March 2016), see <http://www.mass.gov/eea/docs/dfg/nhosp/regulatory-review/plantassessment.pdf>
 - b) The Division requires pre-approval of the botanist prior to conducting surveys. Please submit a copy of the botanist's resume/curriculum vita for review.
 - c) The approved botanist shall submit to the Division a time-table and survey protocol for written approval prior to initiation of field work. The survey protocol shall list the specific taxonomic characteristics for definitive identification as well as the characteristics of similar or easily confused species. Surveys should be successful at detecting the target plant in June.
 - d) If state-listed plants are encountered within the proposed limit of work or within 20 feet, the approved botanist shall conduct additional surveys sufficient to enable the Applicant to propose to the Division protective measures to ensure that the project does not result in a Take of the state-listed plants.
3. **Renewal, extension or Amendment of the Order of Conditions, Request for Certificate of Compliance.** Upon filing for any renewal, extension, amendment, or certification of compliance for the Order of Condition associated with this site pursuant to the MA Wetlands Protection Act, the Applicant shall similarly file with the Division pursuant to 310 CMR 10.58(4)(b) & 10.59.

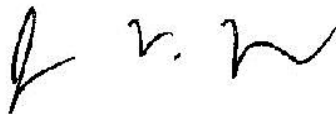
4. **Authorization Duration.** This authorization is valid for 5 years from the date of issuance. Work shall be completed by the expiration of this authorization. If needed, the Applicant shall submit a written request to the Division for an extension of time to complete the Work no later than 60 days prior to the expiration of this determination, and the Division will review the Project pursuant to the MESA for any continuing impacts as described herein, and any new impacts to any State-listed Species found subsequent to the issuance date of this Permit.
5. **Compliance Report.** Within thirty (30) days of completion of Work the Applicant shall submit a brief written report including photographs showing previous and final conditions in order to demonstrate compliance with the Conditions herein.

Provided these conditions are included in any approving Orders of Conditions issued by the Conservation Commission, and the applicant complies with all the above noted conditions, the project will not result in an adverse impact to the resource area habitats of state-listed wildlife species pursuant to the WPA and will not result in a prohibited Take pursuant to the MESA. A copy of the final Order of Conditions shall be sent to the NHESP simultaneously with the applicant as stated in the Procedures section of the WPA (310 CMR 10.05(6)(e)).

We note that all work is subject to the anti-segmentation provisions (321 CMR 10.16) of the MESA. This determination is a final decision of the Division of Fisheries and Wildlife pursuant to 321 CMR 10.18. Any changes to the proposed project or any additional work beyond that shown on the site plans may require an additional filing with the Division pursuant to the MESA. This project may be subject to further review if no physical work is commenced within five years from the date of issuance of this determination, or if there is a change to the project.

Please note that this determination addresses only the matter of state-listed species and their habitats. If you have any questions regarding this letter please contact, Misty-Anne R. Marold, Senior Endangered Species Review Biologist, at (508)-389-6356.

Sincerely,



Jonathan V. Regosin, Ph.D.
Deputy Director

cc: Melissa Cody, Tighe & Bond
David Cameron, MA DEP Western Regional Office
Mark Stinson, MA DEP Western Regional Office

009950 21320545 00999906



Check appears upside down intentionally

How to use this check

Cut along this line 

Need help? Visit [eChecks.com](https://echecks.com) or call 1-877-333-6964

Step 1 Print the check	Step 2 Validate it printed correctly	Step 3 Deposit like normal
<ul style="list-style-type: none"> ✓ Any printer works ✓ Black or color ink ✓ Basic white paper 	<ul style="list-style-type: none"> ✓ Correct if bank numbers are: Centered in white space Parallel to edge of the page Clearly printed in dark black ink ✗ Reprint if bank numbers are: Cut off, skewed, or off-center Smudged or wrinkled Too light to read 	<ol style="list-style-type: none"> 1. Cut on the dotted line above 2. Endorse the back 3. Deposit like normal: In-person at a bank or credit union Using an ATM Via smartphone mobile deposit With an office check scanner

Does your financial institution have questions about this check?

- This check was printed from an authorized check record. It is not a Check 21 Image Replacement Document.
- To confirm this check was issued by the account holder and details (pay to, amount, routing/account number) remain unmodified, the item's authenticity can be verified using the Deluxe Inc. Check Verification service at <https://echecks.com/verify>.

Questions? Visit [eChecks.com](https://echecks.com) or call 1-877-333-6964

For your records

Issued date: 2026-03-26
Check number: 9950
From: Tighe & Bond, Inc.
Amount: \$300.00
Payable to: Commonwealth of Massachus...
Delivery email: lacaba@tighebond.com
Memo: None
Documents: Yes - see Remittance below
Delivery message: Hi, attached is your Tighe & Bond electronic check. Any questions please email AP@tighebond.com.

Are you a business? To save time, money, and resources, make payments using Deluxe Payment Exchange. Call 1-877-333-6964 to get started today!

deluxe. PAYMENT EXCHANGE



Appendix F



02-0-06 100' Abutters

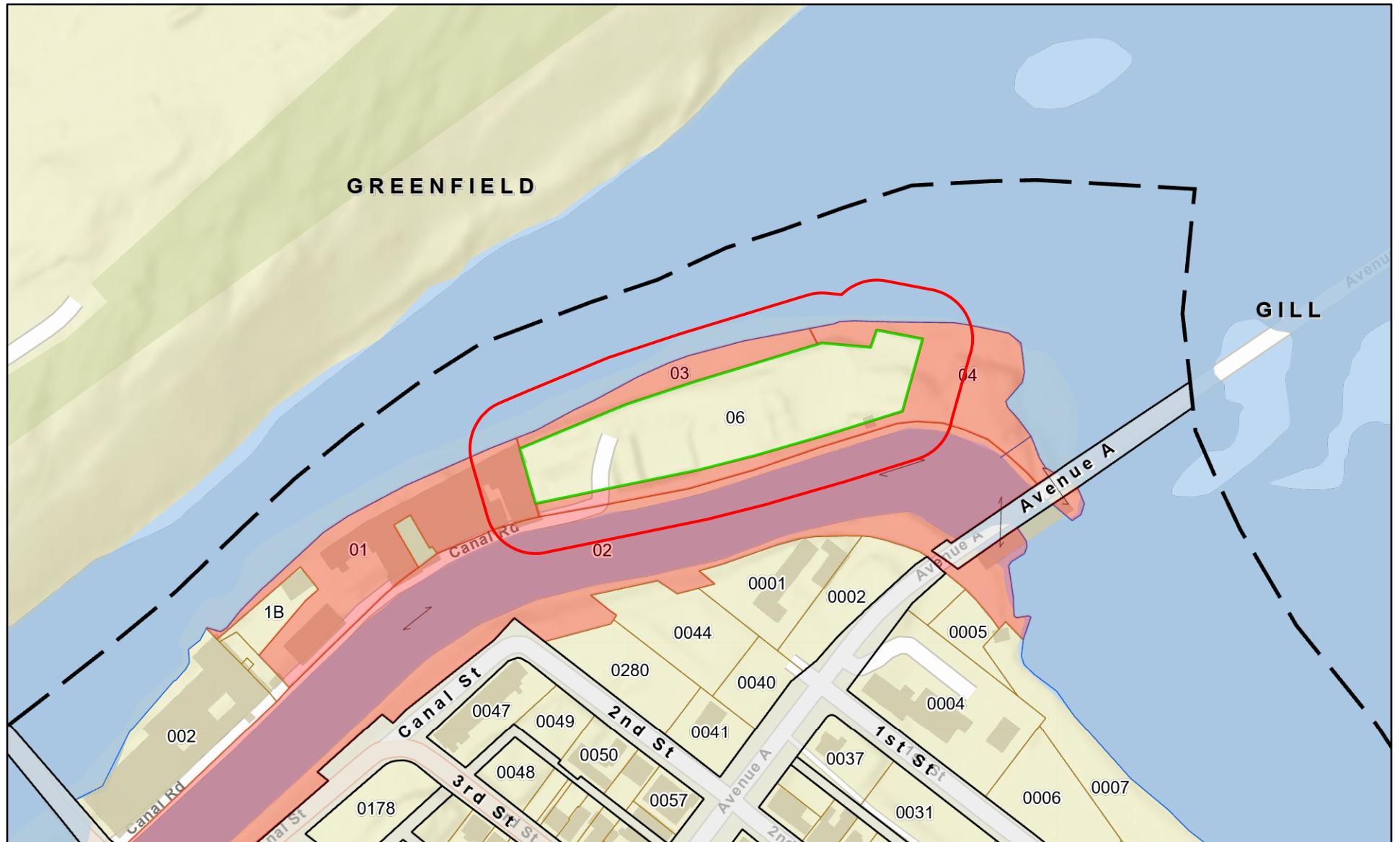
Town of Montague, MA

1 inch = 278 Feet



March 24, 2026

www.cai-tech.com



Data shown on this map is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this map.



100 feet Abutters List Report

Montague, MA

March 24, 2026

Subject Property:

Parcel Number: 02-0-06
CAMA Number: 02-0-06
Property Address: 8 CANAL RD

Mailing Address: INHABITANTS OF MONTAGUE
POSSESSION
1 AVENUE A
TURNERS FALLS, MA 01376

Abutters:

Parcel Number: 02-0-01
CAMA Number: 02-0-01
Property Address: 20 CANAL RD

Mailing Address: INHABITANTS OF MONTAGUE
POSSESSION
1 AVENUE A
TURNERS FALLS, MA 01376

Parcel Number: 02-0-02
CAMA Number: 02-0-02
Property Address: CANAL RD

Mailing Address: FIRSTLIGHT MA HYDRO LLC
C/O LAND MANAGEMENT PO BOX 100
ERVING, MA 01344

Parcel Number: 02-0-03
CAMA Number: 02-0-03
Property Address: REAR CANAL RD

Mailing Address: FIRSTLIGHT MA HYDRO LLC
C/O LAND MANAGEMENT PO BOX 100
ERVING, MA 01344

Parcel Number: 02-0-04
CAMA Number: 02-0-04
Property Address: REAR CANAL RD

Mailing Address: FIRSTLIGHT MA HYDRO LLC
C/O LAND MANAGEMENT PO BOX 100
ERVING, MA 01344



www.cai-tech.com

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MONTAGUE BOARD OF ASSESSORS

ONE AVENUE A, TURNERS FALLS, MA 01376

413-863-3200 x120

Ann M. Cenzano, Chairperson

Ann E. Fisk

Rebecca Sabelawski

Adam Tocci, Director of Assessing

Certification of Abutters List

TO: Lucas Acaba, Tighe & Bond, Inc

Date: March 24, 2026

Owner: INHABITANTS OF MONTAGUE

RE: Subject Parcel(s): 02-0-06

Subject Address: 8 Canal Rd, Turners Falls, MA 01376

I hereby certify that the attached lists reflect the names and addresses of abutters within 100' of the subject parcel(s) based upon the current assessment data to the best of my knowledge.

Adam Tocci
Director of Assessing



100 feet Abutters List Report

Montague, MA

March 24, 2026

Subject Property:

Parcel Number: 02-0-01
CAMA Number: 02-0-01
Property Address: 20 CANAL RD

Mailing Address: INHABITANTS OF MONTAGUE
POSSESSION
1 AVENUE A
TURNERS FALLS, MA 01376

Abutters:

Parcel Number: 02-0-02
CAMA Number: 02-0-02
Property Address: CANAL RD

Mailing Address: FIRSTLIGHT MA HYDRO LLC
C/O LAND MANAGEMENT PO BOX 100
ERVING, MA 01344

Parcel Number: 02-0-03
CAMA Number: 02-0-03
Property Address: REAR CANAL RD

Mailing Address: FIRSTLIGHT MA HYDRO LLC
C/O LAND MANAGEMENT PO BOX 100
ERVING, MA 01344

Parcel Number: 02-0-04
CAMA Number: 02-0-04
Property Address: REAR CANAL RD

Mailing Address: FIRSTLIGHT MA HYDRO LLC
C/O LAND MANAGEMENT PO BOX 100
ERVING, MA 01344

Parcel Number: 02-0-05
CAMA Number: 02-0-05
Property Address: CANAL RD

Mailing Address: MILTON HILTON LLC c/o TOM CUSANO
20 SPAULDING AV UNIT A
ROCHESTER, NH 03868

Parcel Number: 02-0-06
CAMA Number: 02-0-06
Property Address: 8 CANAL RD

Mailing Address: INHABITANTS OF MONTAGUE
POSSESSION
1 AVENUE A
TURNERS FALLS, MA 01376

Parcel Number: 02-0-07
CAMA Number: 02-0-07
Property Address: CANAL RD

Mailing Address: MILTON HILTON LLC c/o TOM CUSANO
20 SPAULDING AV UNIT A
ROCHESTER, NH 03868

Parcel Number: 02-0-1B
CAMA Number: 02-0-1B
Property Address: REAR CANAL RD

Mailing Address: MILTON HILTON LLC c/o TOM CUSANO
20 SPAULDING AV UNIT A
ROCHESTER, NH 03868

Parcel Number: 02-0-1C
CAMA Number: 02-0-1C
Property Address: 16 CANAL RD

Mailing Address: TURNERS FALLS HYDRO LLC DBA
EAGLE CREEK RENEWABLE ENER
PO BOX 167
NESHKORO, WI 54960

Parcel Number: 03-0-002
CAMA Number: 03-0-002
Property Address: 36 CANAL RD

Mailing Address: MILTON HILTON LLC c/o TOM CUSANO
20 SPAULDING AV UNIT A
ROCHESTER, NH 03868



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3/24/2026

Page 1 of 1



MONTAGUE BOARD OF ASSESSORS

ONE AVENUE A, TURNERS FALLS, MA 01376

413-863-3200 x120

Ann M. Conzuno, Chairperson

Ann E. Fisk

Rebecca Subelawski

Adam Tocci, Director of Assessing

Certification of Abutters List

TO: Lucas Acaba, Tighe & Bond, Inc

Date: March 24, 2026

Owner: INHABITANTS OF MONTAGUE

RE: Subject Parcel(s): 02-0-01

Subject Address: 20 Canal Rd, Turners Falls, MA 01376

I hereby certify that the attached lists reflect the names and addresses of abutters within 100' of the subject parcel(s) based upon the current assessment data to the best of my knowledge.

Adam Tocci
Director of Assessing

Notification to Abutters

By Hand Delivery, Certified Mail (return receipt requested), or Certificates of Mailing

This is a notification required by law. You are receiving this notification because you have been identified as the owner of land abutting another parcel of land for which certain activities are proposed. Those activities require a permit under the Massachusetts Wetlands Protection Act (M.G.L. c. 131, § 40).

In accordance with the second paragraph of the Massachusetts Wetlands Protection Act, and 310 CMR 10.05(4)(a) of the Wetlands Regulations, you are hereby notified that:

- A. A Notice of Intent was filed with the Montague Conservation Commission on April 30, 2026 seeking permission to remove, fill, dredge, or alter an area subject to protection under M.G.L. c. 131 §40. The following is a description of the proposed activity/activities:

The proposed project entails asbestos abatement and demolition of up to nine (9) buildings and ancillary structures associated with the former Strathmore Mill Complex. Buildings #1, #2, #3, #4, #5/5A, #6/6A, #7, #8, and #11, Smokestack located in the courtyard, and Loading Dock attached to Building #3 are scheduled for demolition. Tailrace #3 beneath Building #3 is also scheduled for capping and closure in situ. Depending on the bids received, Buildings #1, #2, #4, and #11 may remain.

- B. The name of the applicant is: Town of Montague.
- C. The address of the land where the activity is proposed is: #8 Canal Road, Turners Falls (Parcel 02-0-06) and #20 Canal Road, Turners Falls (Parcel 02-0-01).
- D. Copies of the Notice of Intent may be examined or obtained at the office of the Montague Conservation Commission, located at One Avenue A, Turners Falls, MA 01376. The regular business hours of the Commission are Monday, Tuesday, Thursday: 8:30 AM to 5:30 PM; Wednesday: 8:30 AM to 6:30 PM and the Commission may be reached at (413) 863-3200 Ext. 112.
- E. Copies of the Notice of Intent may be obtained from the applicant or their representative by calling Melissa Coady, Tighe & Bond, Inc., (representative) at 413-572-3224. An administrative fee may be applied for providing copies of the NOI and plans.
- F. Information regarding the date, time, and location of the public hearing regarding the Notice of Intent may be obtained from the Montague Conservation Commission. Notice of the public hearing will be published at least five business days in advance, in the Greenfield Recorder.

Notification provided pursuant to the above requirement does not automatically confer standing to the recipient to request Departmental Action for the underlying matter. See 310 CMR 10.05(7)(a)4.



Appendix G



Wildlife Habitat Protection Guidance

Appendix A: Simplified Wildlife Habitat Evaluation

Project Information

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.

8 and 20 Canal Road, Turners Falls (Town of Montague), Massachusetts

Project Location (from NOI)

Lucas Acaba, Tighe & Bond

Name of Person Completing Form

4/21/2026

Date



Important Habitat Features

Direct alterations to the following important habitat features in resource areas may be permitted only if they will have no adverse effect (refer to Section V).

- Habitat for state-listed animal species (receipt of a positive opinion or permit from MNHESP shall be presumed to be correct. Do not refer to Section V).
- Sphagnum hummocks and pools suitable to serve as nesting habitat for four-toed salamanders
- Trees with large cavities (≥ 18 " tree diameter at cavity entrance)
- Existing beaver, mink or otter dens
- Areas within 100 feet of existing beaver, mink or otter dens (if significant disturbance)
- Existing nest trees for birds that traditionally reuse nests (bald eagle, osprey, great blue heron)
- Land containing freshwater mussel beds
- Wetlands and waterbodies known to contain open water in winter with the capacity to serve as waterfowl winter habitat
- Turtle nesting areas
- Vertical sandy banks (bank swallows, rough-winged swallows or kingfishers)

The following habitat characteristics when not commonly encountered in the surrounding area:

- Stream bed riffle zones (e.g. in eastern MA)
- Springs
- Gravel stream bottoms (trout and salmon nesting substrate)
- Plunge pools (deep holes) in rivers or streams
- Medium to large, flat rock substrates in streams



Wildlife Habitat Protection Guidance

Appendix A: Simplified Wildlife Habitat Evaluation

Activities

When any one of the following activities is proposed within resource areas, applicants should complete a Detailed Wildlife Habitat Evaluation (refer to Appendix B).

- Activities located in mapped “Habitat of Potential Regional or Statewide Importance”
- Activities affecting certified or documented vernal pool habitat, including habitat within 100’ of a certified or documented vernal pool when within a resource area
- Activities in bank, land under water, bordering land subject to flooding (presumed significant) where alterations are more than twice the size of thresholds
- Activities affecting vegetated wetlands >5000 sq. ft. occurring in resource areas other than Bordering Vegetated Wetland
- Activities affecting the sole connector between habitats >50 acres in size
- Installation of structures that prevent animal movement
- Activities for the purpose of bank stabilization using hard structure solutions that significantly affect ability of stream channel to shift and meander, or disrupt continuity in cover that would inhibit animal passage
- Dredging (greater than 5,000 sf)