



The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

December 18, 2019

Barbara Newman
Chief, Permits and Enforcement Branch
Regulatory Division
US Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742-2751

RE: Sudbury-Hudson Transmission Reliability Project, Sudbury, Marlborough, Stow and Hudson, MA.
MHC #RC.62384. EEA #15703.

Dear Ms. Newman:

Staff of the Massachusetts Historical Commission (MHC), have reviewed additional information that was prepared and submitted by VHB, Inc., for the project referenced above.

The additional information indicates that the project has incorporated measures to avoid and minimize adverse effects to historic and archaeological resources to the extent feasible. Consultation with the Hudson and Sudbury Historical Commission has been conducted by the project proponent. The MHC looks forward to reviewing the Corps' findings and determinations for the project pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800). Copies of any comments from other consulting parties on the project as currently proposed should be submitted to the MHC.

The project as currently proposed continues to include modification of abutments and demolition of architectural elements of the Massachusetts Central Railroad Bridges #127 (MHC #SUD.901) in Sudbury and the Fort Meadow Brook Railroad Bridge/ Bridge 130 (MHC #HUD.908) in Hudson. Project impacts to the two bridges referenced above constitute an adverse effect (36 CFR 800.5(a)(2)(i); 950 CMR 71.05) to the bridges within the potential Central Massachusetts Railroad Historic District.

The MHC recommends that the Corps make an adverse effect finding, notify the Advisory Council on Historic Preservation (ACHP) (36 CFR 800.6 (a)(1)), and provide the documentation specified in 36 CFR 800.11(e). The draft Memorandum of Agreement (MOA) for the project should specify measures agreed to in consultation and adopted by the project proponent to avoid, minimize and mitigate adverse effects to significant historic and archaeological resources. The draft MOA should include the most current project plans as an appendix, including design changes referenced in the VHB memorandum dated October 23, 2019 specifying individual site avoidance and protection measures.

The MHC suggests that the draft MOA include the following stipulations:

- The development and implementation of the archaeological site avoidance and protection plan for significant historic and archaeological resources, including the George Pitt Tavern Historic District (SUD.P), the Boston and Maine Railroad Section Tool House (SUD.282) and significant archaeological resources. The draft written archaeological site avoidance and protection plan, including stipulations for fencing, signage and contractor

briefings, should be prepared by CHG using the most current project plans and submitted to the consulting parties for review and comment. Plans should reflect feasible integration of rest stops at the Gleasondale Station Site (MHC #HUD.HA.8), Ordway Station Site (HUD.HA.9), as requested by the Hudson Historical Commission.

- The development and implementation of design specifications and details for the proposed removal and resetting of railroad features, including whistle posts, rail rests, auto highway flashers, block signals, and mile markers, etc., consistent with Secretary of the Interior's Standards and Guidelines for Rehabilitation (36 CFR 67), to avoid adverse effects to the historic railroad features. Current project plans should include specifications and details for railroad feature removal and re-setting, including protection during removal and short term storage, if required.
- Mitigation measures for the Central Massachusetts Railroad historic district, including Bridge 130 on Fort Meadow Brook in Hudson; and Bridge 128 and Bridge 127 on Hop Brook in Sudbury. The MHC suggests that mitigation measures for bridges include photodocumentation to HABS/HAER standards, the production of updated MHC Inventory forms, and the development and installation of interpretive panels at each bridge that describe the history of the bridges and Massachusetts Central Railroad. Draft interpretive panel layout and content should be provided to the consulting parties for review and comment. The development and implementation of a mobile app/web-based platform for rail trail users to access railroad history is also recommended in consultation with the Hudson and Sudbury Historical Commissions.

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

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), Massachusetts General Laws, Chapter 9, Section 26-27C (950 CMR 70-71) and MEPA (301 CMR 11). If you have questions, please contact Jonathan K. Patton at this office.

Sincerely,



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

xc: Denise Bartone, Eversource
Brooke Kenline-Nyman, Eversource
Kate Atwood, USACOE-NED
Anthony Guy Lopez, ACHP
Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)
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Local Historical Commissions: Towns of Sudbury, Marlborough, Stow and Hudson
Sudbury Historic District Commission
Vivian Kimball, VHB, Inc.
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