



August 21, 2020

Ref: 12970.00

Sudbury Historical Commission
Flynn Building
278 Old Sudbury Road
Sudbury, MA 01776

Re: Sudbury-Hudson Transmission Reliability Project
MHC #RC.62384, EEA #15703

Dear Members of the Sudbury Historical Commission,

On behalf of NSTAR Electric Company d/b/a Eversource Energy ("Eversource"), VHB is providing this supplemental information in response to comments from the Sudbury Historical Commission dated June 17, 2020. Each comment is presented in bold text, and the Applicants' response is provided in plain text.

- 1. Provide (a) photographic documentation to identify each railroad feature in its present condition listed in the "Railroad Features in Sudbury" document provided as an attachment to the November 14, 2019, VHB letter to the US Army Corps of Engineers, (b) correlate each railroad feature with the plan set we previously requested, when providing the railroad features plan set to the Commission, and (c) detailed photos of various parts of the bridges including the abutments.**

These items are provided in Attachments 1a, 1b, and 1c.

- 2. Provide the plan set for Wayside Inn Station showing revised design for avoidance.**

The plan for Wayside Inn Station is provided in Attachment 2.

- 3. Provide the plan set for East Sudbury Station showing revised design for avoidance.**

The plan for East Sudbury Station is provided in Attachment 3.

- 4. Provide copy of the Archaeological Reconnaissance Survey for the Sudbury-Hudson Transmission Reliability Project, Towns of Sudbury, Hudson, Marlborough and Stow, Middlesex County, MA sent to MHC by CHG on February 23, 2018.**

A copy of the Archaeological Reconnaissance Survey is provided in Attachment 4.

- 5. Provide copy of Proposed Massachusetts Central Rail Trail: Cultural Assessment by VHB June 30, 2012.**

A copy of the Proposed Mass Central Rail Trail: Cultural Assessment is provided in Attachment 5.

Engineers | Scientists | Planners | Designers

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6. **Provide the copies sent February 23, 2018 by Richard Meyer, Commonwealth Heritage Group, to Jonathan Patton, Massachusetts Historical Commission, of the "...five sheets of engineering plans associated with the referenced (transmission line) project...These plans represent 50% Design for the four bridges crossings within the project area: Chestnut Street Culvert, Bridge 130 (Fort Meadow Brook), Bridge 128 (Hop Brook), and Bridge 127 (Hop Brook)."**

A copy of the letter and engineering plans sent to MHC on February 23, 2018, are provided in Attachment 6.

7. **Provide copies of correspondence (after September 17, 2019) pertaining to the historical and archaeological resources concerning the transmission line project between Eversource, VHB, Inc., Epsilon Associates, Commonwealth Heritage Group and the Massachusetts Historical Commission.**

Since September 17, 2019, there has been no direct correspondence between Eversource, VHB, Epsilon, CHG, and MHC. A copy of a letter sent by MHC to the USACE, on which Eversource, VHB, and CHG (as well as the Sudbury Historical Commission) are copied, is provided in Attachment 7.

8. **Provide copies of correspondence pertaining to the historical and archaeological resources concerning the transmission line project between Eversource, and its consultants, including VHB, and the US Army Corps of Engineers, including the VHB Memorandum dated October 23, 2019 that MHC references in its December 18, 2019 letter to Barbara Newman, US Army Corps of Engineers.**

A copy of VHB's November 14, 2019, update to the USACE is provided in Attachment 8. The memorandum dated October 23, 2019, that MHC references in its December 18, 2019, letter to the USACE is the memorandum that was provided from VHB to the Sudbury Historical Commission in response to the request for changes in Project design since submission of the FEIR. A copy of this was included in the November 14 submission. In addition to this submission, the USACE provided Eversource with copies of its Section 106 Consultation notices to the Mashpee Wampanoag Tribe and the Wampanoag Tribe of Gay Head (Aquinnah). These are also provided in Attachment 8.

9. **Provide copies of correspondence pertaining to the historical and archaeological resources concerning the transmission line project between Eversource, CHG, or other Eversource consultants and the Mashpee Wampanoag Tribe, the Wampanoag Tribe of Gay Head (Aquinnah) and the Narragansett Tribe and/or their representatives.**

A summary of correspondence between Eversource, CHG, and the Tribes are provided in Attachment 9.

10. **Provide the names and contact information of the tribal-appointed representatives of the Mashpee Wampanoag Tribe, the Wampanoag Tribe of Gay Head and the Narragansett Tribe that Eversource, CHG or Eversource representatives have consulted with regarding the Eversource project and the Reconnaissance-Level Historic Properties Survey, the Archaeological Reconnaissance Survey and/or Archaeological Intensive (Locational) Survey.**

The names and contact information of the tribal-appointed representatives are listed below.



Bettina Washington, Tribal Historic Preservation Officer

Wampanoag Tribe of Gay Head (Aquinnah)
20 Black Brook Road
Aquinnah, MA 02535
(508) 645-9265, x175 (phone)
(508) 645-3790 (fax)
thpo@wampanoagtribe-nsn.gov

Mark Andrews, Tribal Cultural Resources Monitor

Wampanoag Tribe of Gay Head (Aquinnah)
20 Black Brook Road
Aquinnah, MA 02535
(508) 645-9265, x175 (phone)
(508) 645-3790 (fax)
tcrm2@wampanoagtribe-nsn.gov

David Weeden, THPO, Tribal Councilman

Mashpee Wampanoag Tribe
Historic Preservation Office
483 Great Neck Rd.
Mashpee, MA 02649
P: 508.477-0208*102
C: 774.327.0068
E: David.Weeden@mwt.tribe-nsn.gov

Doug Harris, Preservationist for Ceremonial Landscapes, Tribal Historic Preservation Officer

Narragansett Indian Longhouse
4425 South County Trail
Charlestown, RI 02813
(401) 585-0142 (phone)
(413) 325-7691 (cell)
tashtesook@aol.com
dhnithpo@gmail.com

11. **Has a hard copy of the CHG Archaeological Intensive (Locational) Reconnaissance Survey been provided to the appropriate tribal authorities of each of the Mashpee Wampanoag Tribe, the Wampanoag Tribe of Gay Head (Aquinnah) and the Narragansett Tribe, and if so, when and to whom. If not a hard copy, how have the three tribal authorities been informed about the contents of the survey?**

A summary of report submittals to Tribal authorities is provided in Attachment 11. There was a Tribal representative for the Mashpee Wampanoag Tribe on site for the intensive survey, and on July 2, 2020, a copy of the CHG Archaeological Intensive (Locational) Survey report was provided to Mark Andrews of the Wampanoag Tribe of Gay Head (Aquinnah). No other Tribes requested copies of the report, and to date the Tribes have indicated they have no concerns about the Project.



12. **Provide a list of bridges that are plate girder bridges or bridges of other construction methods that are listed on the Massachusetts Historical Commission MACRIS listing that Eversource and DCR has either replaced/removed or rehabilitated.**

Eversource and DCR have not jointly replaced/removed or rehabilitated any bridges that are listed on MACRIS.

13. **Provide updated plan drawings/renderings and detailed description of the change in the Project design since the FEIR that shifts southward the project to "avoid the Boston and Maine Railroad Section Tool House (SUD.282), and the avoidance and protection plan during construction.**

The change in Project design that shifted southward to avoid the Boston and Maine Railroad Section Tool House was previously provided to Mr. Duchesneau in the October 24, 2019, email following Eversource's meeting with the Sudbury Historical Commission (as noted in Comment 18). It is provided here again as Attachment 13.

14. **Provide clarification about "Bridge 217" -where it is located and what bridge it is - as referenced in October 23, 2019 VHB Memorandum to the Sudbury Historical Commission Re: Sudbury-Hudson Transmission Reliability Project Design Changes since FEIR Submission.**

This was a typographic error and should have referred to Bridge 127.

15. **Provide copy of the avoidance and protection plan for significant historic and archaeological resources, including the George Pitt Tavern Historic District (SUO.P), the Boston and Maine Railroad Section Tool House (SUD.282) and significant archaeological resources.**

The avoidance and protection plan for the Project will be developed and submitted to the appropriate regulatory authorities. It will include provisions as appropriate to avoid and protect significant historic and archaeological resources, including the George Pitt Tavern Historic District and the Boston and Maine Railroad Section Tool House, and all railroad features to be removed and reset.

16. **Provide copy of the avoidance/protection/mitigation plan for all railroad features including design specifications and details for the proposed removal and resetting of railroad features, including whistle posts, rail rests, au to highway flashers, block signals, and mile markers, etc. to avoid adverse effects to the historic railroad features, and specifications and details for railroad feature removal and re-setting, including protection during removal and short term storage.**

See response to Comment 15 above.

17. **Provide copy of mitigation plan for the Massachusetts Central Railroad historic district, including Bridge 128 and 127 on Hop Brook in Sudbury.**

Although no formal mitigation plans for the project have been drafted to date, any such plans will be developed in consultation with the MHC and any other consulting parties based on feedback received.

18. **Provide the (effective) date of the post FEIR revised "proposed design at the Boston and Maine Section Tool House, with notes identifying proposed components and the distance to the existing building" sent as an attachment to the October 24, 2019 email from Eversource to the Sudbury**



Director of Planning and Community Development, Adam Duchesneau. Is the "proposed design" the final design?

Yes, the design provided to Mr. Duchesneau in the October 24, 2019, email is the final design.

19. **The Historical Commission received a copy of the Reconnaissance-Level Historic Properties Survey dated October 2017, yet notes that the Commonwealth Heritage Group 12-27-2017 FedEx Transmittal to Jonathan Patton at Massachusetts Historical Commission indicates the bound copy provided to the MHC of the Reconnaissance-level Historic Properties Survey was dated December 2017. The Historical Commission requests a copy of the updated December 2017 Survey or the latest version of the survey, if a later date.**

A copy of the updated December 2017 Survey report is provided in Attachment 19.

Sincerely,

A handwritten signature in black ink, appearing to read "Vivian Kimball", written in a cursive style.

Vivian Kimball

vkimball@vhb.com

CC: Denise Bartone, Eversource
Brooke Kenline-Nyman, Eversource
Paul Jahnige, DCR
Alan Anacheka-Nasemann, USACE
Brona Simon, Massachusetts Historical Commission