



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

June 30, 2017

Secretary Matthew A. Beaton  
Executive Office of Energy & Environmental Affairs  
Attn: Page Czepiga, MEPA Unit  
100 Cambridge Street, Suite 900  
Boston, MA 02114

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

Dear Secretary Beaton:

Staff of the Massachusetts Historical Commission have reviewed the Massachusetts Environmental Policy Act (MEPA) Environmental Notification Forms (ENF) for the project referenced above. The proposed project consists of construction of an approximately 9 mile underground transmission line, including construction of an access corridor within an existing MBTA former railroad right-of-way in the towns of Sudbury, Marlborough, Stow and Hudson.

The project requires review and permitting by the US Army Corps of Engineers. The MHC will review the project under Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800) and looks forward to consultation with the Corps. The MHC proposes to coordinate the MHC's state historic preservation review for the state agency permitting and funding, and for the MEPA review (950 CMR 71.04 (2) & (3)). The MHC recommends that project planners provide project information to the Local Historical Commissions (and local Historic District Commissions as appropriate) in the towns referenced above for concurrent review and comment. Copies of any written comments received from potential interested and consulting parties should be provided to the Corps and the MHC.

The ENF does not include sufficient information for the MHC to ascertain the project area of potential effect, including potential off-right-of-way (ROW) project impact areas, such as stormwater management structures, equipment and materials storage and staging areas. Additional information is required for the MHC to comment on the area of potential effect, eligibility opinions, and effects to significant historic and archaeological resources. Project planners should submit scaled existing and proposed conditions project plans for the preferred project alternative to the Corps, and to the MHC and other consulting parties, when they become available.

The ENF (pg. 31-32) includes a preliminary identification of historic and archaeological resources within the preliminary project right-of-way. The project impact area is within and adjacent to historic and archaeological resources included in the MHC's Inventory of Historic Assets of the Commonwealth and/or State and/or National Registers of Historic Places. Reuse and rehabilitation of historical bridges is proposed. Repair and rehabilitation specifications for significant bridges should be developed in accordance with the Secretary of the Interior's Standards and Guidelines for Rehabilitation (36 CFR 67).

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

The MHC understands that an EIR is categorically required for the proposed project and offers the following comments concerning the scope of the EIR.

The MHC requests that an archaeological reconnaissance survey (950 CMR 70) and a reconnaissance-level historic properties survey be conducted for the currently proposed project area of potential effect. The survey should include a matrix of effects to known historic and archaeological resources. The survey should include an updated archaeological sensitivity assessment of the currently proposed impact areas and recommendations for intensive (locational) archaeological survey, if warranted, in order to locate and identify any significant archaeological resources that may be affected by the project.

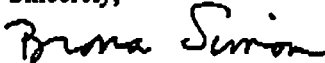
The results of the surveys should be incorporated into ongoing project planning to develop project alternatives that would avoid adverse effects to potentially significant historic and archaeological resources. The draft research designs and survey methodologies for the surveys, including a State Archaeologist's permit application (950 CMR 70) should be submitted to the Corps and MHC for review and comment (36 CFR 800.4(a)).

The MHC notes that the former railroad corridor contains extant railroad-related historic archaeological resources, such as the site of the former Sudbury Railroad Station (MHC # SUD.HA.26) and tool house (SUD.282). Measures to avoid, minimize or mitigate adverse effects to significant railroad-related historic and archaeological resources, including historic property and/or archaeological site avoidance and protection plans, may be required for the project.

The MHC looks forward to reviewing the draft EIR and information requested above.

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

Sincerely,



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

xc: Denise Bartone, Eversource  
Barbara Newman, USACOE-NED  
Kate Atwood, USACOE-NED  
EFSC  
Patrice Kish, DCR  
Local Historical Commissions; Towns of Sudbury, Marlborough, Stow and Hudson  
Sudbury Historic District Commission  
Marc Bergeron, VHB, Inc.  
Marty Dudek, Commonwealth Heritage Group



Massachusetts Office  
410 Great Road, B-14, Littleton, MA, 01460  
P: (978)793-2579

commonwealthheritagegroup.com

September 26, 2017

**VIA FEDERAL EXPRESS**

Ms. Brona Simon  
State Historic Preservation Officer and State Archaeologist  
Massachusetts Historical Commission  
220 Morrissey Blvd.  
Boston, MA 02125

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

Dear Brona:

Enclosed please find a copy of our permit application entitled "*Permit Application to Conduct an Archaeological Reconnaissance Survey for the Sudbury-Hudson Transmission Reliability Project, Towns of Sudbury, Hudson, Marlborough, and Stow, Middlesex County, Massachusetts*" for your review.

Thank you for your consideration. If you have any comments or questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Martin G. Dudek".

Martin G. Dudek  
Principal Archaeologist

Encl.

xc: Kate Atwood, USACOE-NED





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

---

---

PERMIT TO CONDUCT ARCHAEOLOGICAL FIELD INVESTIGATION

---

---

Permit Number 3783 Date of Issue October 2, 2017  
Expiration Date October 2, 2018

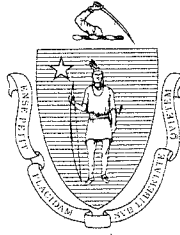
Commonwealth Heritage Group--Littleton is hereby  
authorized to conduct an archaeological field investigation pursuant to  
Section 27C of Chapter 9 of General Laws and according to the regulations  
outlined in 950 CMR 70.00.

Eversource Sudbury-Hudson Transmission Reliability Project,  
Sudbury, Marlborough, Stow & Hudson

Project Location

*Brona Simon*

Brona Simon, State Archaeologist  
Massachusetts Historical Commission



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

December 4, 2017

Secretary Matthew A. Beaton  
Executive Office of Energy & Environmental Affairs  
Attn: Page Czepiga, MEPA Unit  
100 Cambridge Street, Suite 900  
Boston, MA 02114

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

Dear Secretary Beaton:

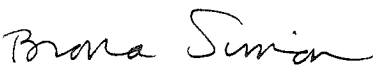
Staff of the Massachusetts Historical Commission have reviewed the Draft Environmental Impact Report for the project referenced above.

The MHC will continue to review the project under Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800) and looks forward to consultation with the US Army Corps of Engineers. The MHC will continue to coordinate the MHC's state historic preservation review for the state agency permitting and funding and for the MEPA review (950 CMR 71.04 (2) & (3)).

A summary of MHC consultation to date is included in Section 12. The MHC looks forward to reviewing the draft technical report summarizing the results of the archaeological reconnaissance survey (950 CMR 70) and a reconnaissance-level historic properties survey for the project from Commonwealth Heritage Group. The results of the surveys will be used in consultation to avoid, minimize or 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), M.G.L Chapter 9, Sections 26-27C (950 CMR 70-71) and MEPA (301 CMR 11). If you have any questions or require additional information, please contact Jonathan K. Patton at this office.

Sincerely,

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

xc: Denise Bartone, Eversource  
Barbara Newman, USACOE-NED  
Kate Atwood, USACOE-NED  
Vivian Kimball, VHB, Inc.  
Marty Dudek, Commonwealth Heritage Group



**West Chester Office**

535 N. Church Street, West Chester, PA 19380  
P: 610.436.9000 | F: 610.436.8468  
commonwealthheritagegroup.com

**TRANSMITTAL**

To: Jonathan K. Patton  
Massachusetts Historical Commission  
220 Morrissey Boulevard  
Boston, MA 02125  
(617) 727-8470

From: Richard Meyer  
[rmeyer@chg-inc.com](mailto:rmeyer@chg-inc.com)

Date: 12-27-2017

Project: Sudbury-Hudson Transmission Reliability Project  
Sudbury, Marlborough, Stow and Hudson, MA  
MHC #RC.62384. EEA #15703  
WC-282

<b>Item No.</b>	<b>Quantity</b>	<b>Description</b>
1	1	bound copy of <i>Reconnaissance-Level Historic Properties Survey</i> (December 2017)

cc: Martin Dudek  
Commonwealth Heritage Group, Inc.  
[mdudek@chg-inc.com](mailto:mdudek@chg-inc.com)

Vivian Kimball  
Vanasse Hangen Brustlin, Inc.  
[vkimball@vhb.com](mailto:vkimball@vhb.com)

Delivery: FedEx 12/29/2017





Massachusetts Office  
410 Great Road, B-14, Littleton, MA, 01460  
P: (978)793-2579

commonwealthheritagegroup.com

December 29, 2017

**VIA PRIORITY MAIL**

Ms. Brona Simon  
State Historic Preservation Officer and State Archaeologist  
Massachusetts Historical Commission  
220 Morrissey Blvd.  
Boston, MA 02125

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

Dear Brona:

Enclosed please find a copy of our draft report entitled "*Archaeological Reconnaissance Survey for the Sudbury-Hudson Transmission Reliability Project, Towns of Sudbury, Hudson, Marlborough, and Stow, Middlesex County, Massachusetts*" for your review.

Thank you for your consideration. If you have any comments or questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Martin G. Dudek".

Martin G. Dudek  
Principal Archaeologist

Encl.

xc. Vivian Kimball, VHB





January 12, 2018

Martin G. Dudek  
Commonwealth Heritage Group  
410 Great Road B-14  
Littleton, MA 01460

## The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth

Massachusetts Historical Commission

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

Dear Marty:

Staff of the Massachusetts Historical Commission (MHC), have reviewed the draft technical reports, *Archaeological Reconnaissance Survey for the Sudbury-Hudson Transmission Reliability Project, Towns of Sudbury, Hudson, Marlborough and Stow, Middlesex County, Massachusetts*, and *Sudbury-Hudson Transmission Reliability Project Reconnaissance-Level Historic Properties Survey*, submitted for the project referenced above.

Please promptly submit two copies of the final technical archaeological reconnaissance report, a CD with a Word file listing the report author, date, report title, page count and the archaeological abstract, and new and/or updated MHC archaeological site forms, that incorporate the following comments. Please indicate in your cover letter whether or not a State Archaeologist's permit application (950 CMR 70) will be submitted to conduct the recommended intensive (locational) survey.

The technical report includes insufficient information for the MHC to evaluate the identified historic and archaeological resources and archaeological sensitivity in relation to the proposed project impact area. Please revise Appendix II archaeological sensitivity maps using current scaled proposed conditions project plans as the base maps. The revised plans should incorporate the following information: project segment labels keyed to the text, a key to all photographic plates, and the locations of all extant historic and archaeological resources described in Tables 4, 5 and 6 and on pages 53 and 58, including those associated with the potential Central Massachusetts Railroad historical archaeological site. The proposed boundaries of the Central Massachusetts Railroad should be clearly defined in the revised Appendix II plans in relation to the project impact area.

Please revise Figure 5 (Walling 1856) to show the History of Sudbury Precontact (HSP) Sites 1 to 12 referenced on page 37. The MHC would appreciate receiving new and/or updates archaeological site forms for the 12 identified archaeological site locations.

The Sudbury-Hudson-Marlborough granite boundary marker referenced on page 58 is recommended for avoidance and protection. The tri-town marker is not included in the MHC's Inventory or documented in the Historic Properties Reconnaissance Survey report. Please add a description and photographic documentation of the granite boundary marker and an opinion of its significance. Please propose suitable avoidance and protection measures keyed to the revised Appendix II maps.

These comments are offered to assist in compliance with Massachusetts General Laws, Chapter 9, Sections 26-27C (950 CMR 70). If you have any questions or need additional information please contact Jonathan K. Patton at this office.

Sincerely,

A handwritten signature in blue ink that reads "Brona Simon".

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





Massachusetts Office  
410 Great Road, B-14, Littleton, MA, 01460  
P. (978)793-2579

commonwealthheritagegroup.com

February 23, 2018

**VIA HAND DELIVERY**

Ms. Brona Simon  
State Historic Preservation Officer and State Archaeologist  
Massachusetts Historical Commission  
220 Morrissey Blvd.  
Boston, MA 02125

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

Dear Brona:

Enclosed please find two copies of our final report entitled "*Archaeological Reconnaissance Survey for the Sudbury-Hudson Transmission Reliability Project, Towns of Sudbury, Hudson, Marlborough, and Stow, Middlesex County, Massachusetts*" that have incorporated all the requested changes and additions to the report in your review letter of January 12, 2018. Also enclosed, as requested, are 21 new or updated site forms for archaeological sites, as well as the report bibliographic entry and abstract on CD-ROM. In addition, current bridge designs for the project are also enclosed for your review and comment.

Thank you for your consideration. If you have any comments or questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Martin G. Dudek".

Martin G. Dudek  
Principal Archaeologist

Encl.

xc. Vivian Kimball, VHB



West Chester Office

535 N. Church Street, West Chester, PA 19380

P: 610.436.9000 | F: 610.436.8468

[commonwealthheritagegroup.com](http://commonwealthheritagegroup.com)

February 23, 2018

WC-282

Jonathan K. Patton  
Massachusetts Historical Commission  
220 Morrissey Boulevard  
Boston, MA 02125

Re: Sudbury-Hudson Transmission Reliability Project  
Sudbury, Marlborough, Stow, and Hudson, Massachusetts  
MHC #RC.62384; EEA #15703  
Proposed Bridge Treatments

Dear Mr. Patton:

Enclosed for your review are five sheets of engineering plans associated with the referenced project. These plans represent 50% Design for four bridge crossings within the project area: Chestnut Street Culvert, Bridge 130 (Fort Meadow Brook), Bridge 128 (Hop Brook), and Bridge 127 (Hop Brook).

- The Chestnut Street Culvert would replace an existing filled embankment, which was created following removal of an earlier Chestnut Street bridge. The structure is proposed as a precast-concrete arch culvert, flanked on either end by precast-concrete wingwalls (Plan 2 of 5).
- Bridge 130 would replace an existing timber-pile trestle on the same alignment. The new structure is proposed as a prefabricated steel truss with timber decking and rub rails. The 12-foot deck width of the existing structure would be retained in the new structure. Existing timber piles would be cut at the mudline (Plan 3 of 5).
- Bridge 128 would retain and reuse the granite-block abutments of the existing plat-girder structure but would replace the existing superstructure with new timber floor beams, decking, and rub rails. The 10-foot deck width of the existing structure would be replaced by a 12-foot deck width (Plan 4 of 5).
- Bridge 127 would partially retain and reuse existing backwalls of the existing plat-girder structure, but would replace the existing superstructure with a prefabricated steel truss, steel floor beams, timber deck, and timber rub rails. The 12-foot deck width of the existing structure would be retained in the new structure. Existing timber piles would be cut at the mudline (Plan 5 of 5).

We trust you will find these plans useful. Should you require additional information, please contact Vivian Kimball ([VKimball@VHB.com](mailto:VKimball@VHB.com)).

Sincerely,

**Commonwealth Heritage Group, Inc.**

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

Richard Meyer  
[rmeyer@chg-inc.com](mailto:rmeyer@chg-inc.com)

cc: Martin Dudek, Commonwealth







March 19, 2018

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

## The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

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 the technical reports, *Archaeological Reconnaissance Survey for the Sudbury-Hudson Transmission Reliability Project, Towns of Sudbury, Hudson, Marlborough and Stow, Middlesex County, Massachusetts*, and *Sudbury-Hudson Transmission Reliability Project Reconnaissance-Level Historic Properties Survey*, prepared and submitted by Commonwealth Heritage Group (CHG) for the project referenced above. The MHC has also received 50% design drawings for four bridge crossings in the project area, including the Chestnut Street culvert, and Bridge 130 on Fort Meadow Brook, in Hudson; and Bridge 128 and Bridge 127 on Hop Brook in Sudbury.

The reconnaissance surveys for historic and archaeological resources have identified multiple historic properties and archaeologically sensitive locations within the project area of potential effect. The MHC will continue to review the project under Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800) in consultation with the Corps. Once identification efforts have been completed to identify potentially significant archaeological resources, the MHC looks forward to consultation with the Corps and to reviewing the Corps' findings and determinations for the project.

CHG has recommended intensive (locational) archaeological survey for archaeologically sensitive portions of the project impact area. The MHC looks forward to reviewing the State Archaeologist's permit application (950 CMR 70) from CHG to conduct the intensive (locational) archaeological survey for the project. The results of the surveys will assist in consultation to avoid, minimize or mitigate any 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,

A handwritten signature in cursive script that reads "Brona Simon".

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

xc: Denise Bartone, Eversource  
Kate Atwood, USACOE-NED  
Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)  
Ramona Peters, Mashpee Wampanoag Tribe  
Secretary Matthew A. Beaton, EEA. Attn: Page Czepiga, MEPA Unit  
EFSC  
Local Historical Commissions; Towns of Sudbury, Marlborough, Stow and Hudson  
Marc Bergeron, VHB, Inc.  
Marty Dudek, Commonwealth Heritage Group

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



Massachusetts Office  
410 Great Road, B-14, Littleton, MA, 01460  
P. (978)793-2579

commonwealthheritagegroup.com

April 20, 2018

**VIA PRIORITY MAIL**

Ms. Brona Simon  
State Historic Preservation Officer and State Archaeologist  
Massachusetts Historical Commission  
220 Morrissey Blvd.  
Boston, MA 02125

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

Dear Brona:

Enclosed please find a copy of our permit application entitled "*Permit Application to Conduct an Archaeological Intensive (Locational) Survey for the Sudbury-Hudson Transmission Reliability Project, Towns of Sudbury, Hudson, Marlborough, and Stow, Middlesex County, Massachusetts*" for your review.

Thank you for your consideration. If you have any comments or questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Martin G. Dudek".

Martin G. Dudek  
Principal Archaeologist

Encl.



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

May 2, 2018

Martin G. Dudek  
Commonwealth Heritage Group  
410 Great Road B-14  
Littleton, MA 01460

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

Dear Marty:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the State Archaeologist's permit application to conduct intensive (locational) archaeological survey, submitted for the project referenced above.

Please provide a letter that addresses the following comments to supplement the research design and methodology.

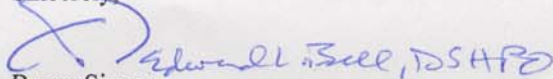
As you prepare the report for this project and in future surveys, please consider using a simplified archaeological sensitivity assessment (sensitive/not sensitive), rather than the five-part sensitivity evaluation categories (high, medium-high, medium, medium-low, and low). Descriptions of survey areas should continue to include details of background research and existing conditions to explain and justify the testing strategy.

In the report, please propose that summary tables (e.g., Table 4) have an additional column with figure or plan sheet numbers for ease of reference.

Please clarify that the testing methodology (described in the second paragraph of research design page 32) proposes excavation of shovel test pit arrays at shovel test pits containing potentially significant artifact deposits, and please specify the interval of the array testing.

These comments are provided to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (36 CFR 800), the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 Fed. Reg. 190)(1983)), and 950 CMR 70. If you have questions or require additional information, please contact Jonathan K. Patton at this office.

Sincerely,

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





Massachusetts Office  
410 Great Road, B-14, Littleton, MA, 01460  
P. (978)793-2579

commonwealthheritagegroup.com

May 9, 2018

**VIA FIRST CLASS MAIL**

Ms. Brona Simon  
State Historic Preservation Officer and State Archaeologist  
Massachusetts Historical Commission  
220 Morrissey Blvd.  
Boston, MA 02125

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

Dear Brona:

As requested in your review letter dated May 2, 2018, the following supplement to our research design for our permit application to conduct an Archaeological Intensive (Locational) Survey for the Sudbury-Hudson Transmission Reliability Project is offered for your review.

I propose the following modifications or additions to our research design as follows:

- For archaeological sensitivity, our reporting using five-part sensitivity evaluation categories (high, medium-high, medium, medium-low, and low) will be simplified as requested into the two categories of sensitive and not sensitive.
- In the summary report, descriptions of the survey areas will include the details of background research and existing conditions as noted in our reconnaissance survey report to explain and justify the testing strategy.
- Summary tables will have an additional column with figure or plan sheet numbers for ease of reference.
- Additional test pits (array test pits) will be placed around isolated test pits in which precontact Native American artifacts, calcined bone, possible Native American features, early historic artifacts or concentrations of historic artifacts, nineteenth-century or older, are recovered. Array test pits will be placed 5-m from the test pit in question in each of the four cardinal directions to determine if recovered artifacts represent a site or an isolated find. Where systematic testing is already at 5-m intervals, array testing is proposed at 2.5-m intervals. Array testing may need to avoid cut-and fill areas as necessary.

Thank you for your consideration. If you have any comments or questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Martin G. Dudek".

Martin G. Dudek  
Principal Archaeologist



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

---

---

PERMIT TO CONDUCT ARCHAEOLOGICAL FIELD INVESTIGATION

---

---

Permit Number 3828 Date of Issue May 21, 2018  
Expiration Date May 21, 2019

Commonwealth Heritage Group--Littleton is hereby  
authorized to conduct an archaeological field investigation pursuant to  
Section 27C of Chapter 9 of General Laws and according to the regulations  
outlined in 950 CMR 70.00.

Eversource Sudbury-Hudson Transmission Reliability Project,  
Sudbury, Marlborough, Stow, and Hudson

Project Location

*Brona Simon*

---

Brona Simon, State Archaeologist  
Massachusetts Historical Commission





## The Commonwealth of Massachusetts

August 31, 2018 William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

Secretary Matthew A. Beaton  
Executive Office of Energy & Environmental Affairs  
Attn: Page Czepiga, MEPA Unit  
100 Cambridge Street, Suite 900  
Boston, MA 02114

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

Dear Secretary Beaton:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the Final Environmental Impact Report for the project referenced above.

The MHC will continue to review the project under Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800) and looks forward to consultation with the US Army Corps of Engineers. The MHC will continue to coordinate the MHC's state historic preservation review for the state agency permitting and funding, and for the MEPA review (950 CMR 71.04 (2) & (3)).

A summary of MHC consultation to date is included in Sections 2.3.2.1 and 10. The MHC looks forward to reviewing the draft technical report summarizing the results of the intensive (locational) archaeological survey (950 CMR 70) from Commonwealth Heritage Group. The results of the surveys will be used in consultation to avoid, minimize or 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), M.G.L Chapter 9, Sections 26-27C (950 CMR 70-71) and MEPA (301 CMR 11). If you have any questions or require additional information, please contact Jonathan K. Patton at this office.

Sincerely,

A handwritten signature in cursive script that reads "Brona Simon".

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

xc: Denise Bartone, Eversource  
Barbara Newman, USACOE-NED  
Kate Atwood, USACOE-NED  
Vivian Kimball, VHB, Inc.  
Marty Dudek, Commonwealth Heritage Group