

# Town of Sudbury

## Historical Commission

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June 9, 2020

Brona Simon  
State Historic Preservation Officer  
Executive Director  
State Archivist  
Massachusetts Historical Commission  
The Commonwealth of Massachusetts  
220 Morrissey Boulevard  
Boston, MA 02125

RE: Section 106 Consultation: Eversource Sudbury-Hudson Transmission Reliability Project, Sudbury, Marlborough, Stow and Hudson, MA MHC#RC.62384, EEA #15703

Dear Ms. Simon:

While the Sudbury Historical Commission continues to diligently review the Sudbury-Hudson Transmission Project and its impacts on Sudbury's historical and archaeological resources, our commission has not completed its review at this time but fully intends to provide comment to the MHC as part of the Section 106 consultation process.

The Historical Commission met with Eversource representatives on November 7, 2018 and September 17, 2019, and requested further information at that later meeting – some of which we have not received, including a plan set for all the railroad features. After receipt of requested information, we anticipate the need to meet again with Eversource to continue our consultation before the commission can finalize our Section 106 comments to MHC.

We are seeking information about the project plan post FEIR which impact on historic and archaeological resources, including details about the design changes for the Boston and Maine Railroad Section Tool House (SUD.282). We are particularly focused on the project's impacts on Massachusetts Central Railroad Hop Brook Bridges #127 (SUD.901) and #128 (SUD.900).

The Historical Commission takes notice that the December 18, 2019 MHC letter to the Army Corps of Engineers recommends mitigation measures rather than measures to avoid adverse effects for Bridge #130 on Fort Meadow Brook in Hudson; and Bridge #128 and #127 on Hop Brook in Sudbury. There are distinct differences in the historical significance of these three bridges. Bridge #130 is a replacement bridge that is not individually eligible for National Register Listing, and "is a common bridge form, widely used throughout the region." However, Bridge #128 and Bridge #127 – as stated in the MHC letter dated April 3, 2019, "are rare extant examples of plate girder construction method..." are not replacement bridges, and are individually eligible for National Register listing.

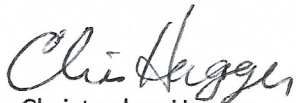
To date Eversource has not provided any proof to the Sudbury Historical Commission that justifies demolition/replacement of Bridge #127 and partial demolition/rehabilitation of Bridge #128 in order to install the transmission line, or proof that there is no method to install the transmission line which will avoid demolition, and therefore avoid adverse effects to these bridges. Consideration of the bridge demolition/partial demolition issue is part of our on-going review.

We appreciate the MHC recommendation in its December 18, 2019 letter to the US Army Corps of Engineers that the Corps make an adverse effect finding for this project. We request that a copy of the current written draft of the ACOE Memorandum of Agreement be provided to the Sudbury Historical Commission for our review and comment.

COVID and the lack of a significant amount of information from Eversource has resulted in the Historical Commission's continuing review and need for more time to provide comment to the Massachusetts Historical Commission.

The proposed transmission line installation is the largest most complicated impactful project that the Town of Sudbury - and our all-volunteer Historical Commission - has ever had to review and comment on. Our commission most assuredly wants and intends to provide the Massachusetts Historical Commission with our input as soon as we are possibly able to do so. Sudbury highly values its history - and is dedicated to the protection and preservation of its historical and archaeological resources.

Sincerely,



Christopher Hagger  
Chair  
Sudbury Historical Commission



Diana Warren  
Vice Chair  
Sudbury Historical Commission

cc:

Barbara Newman, US Army Corps of Engineers-NED  
Denise Bartone, Eversource  
Sudbury Historic Districts Commission  
Sudbury Town Manager  
Sudbury Town Counsel