



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

February 15, 2022

EMAIL READ RETURN RECEIPT REQUESTED

Regulatory Division
File No. NAE-2017-01406

Ms. Brona Simon, Executive Director and SHPO
Massachusetts Historical Commission
The Massachusetts State Archives Building
220 Morrissey Boulevard
Boston, Massachusetts 02125

Subject: Revised Memorandum of Agreement (MOA) and Response to Comments from the Sudbury Historical Commission for the Sudbury-Hudson Transmission Reliability and Massachusetts Central Rail Trail Project

Dear Ms. Simon:

The U.S. Army Corps of Engineers (USACE), New England District, has been consulting with your office and other consulting parties on the above referenced permit application for the Sudbury-Hudson Transmission Reliability and Massachusetts (MA) Central Rail Trail Project in the communities of Hudson, Marlborough, Sudbury, and Stow, MA. On December 17, 2021, the USACE submitted to your office and all consulting parties an updated Permit Area and Area of Potential Effect (APE) with revised maps, an updated historic properties inventory with project impacts, an updated Post Review Discoveries Plan, and an overall Determination of Effect (DOE) finding for impacts to the Central Massachusetts Railroad Corridor Historic District (CMRRCHD) from the project. Your office responded to the USACE Determination of Effect finding via a letter dated February 10, 2022, which the USACE received on February 15, 2022. As stated in that letter, the Massachusetts Historical Commission (MHC) concurs with the USACE's determination of adverse effect to the CMRRCHD and historic properties that contribute to the District.

In response to the USACE December 17th letter, the Sudbury Historical Commission (SHC) submitted detailed comments on the updated project information. The USACE is providing a detailed, annotated response to all SHC comments as an enclosure to this correspondence. In addition, we are also enclosing the following documents:

1. A revised Memorandum of Agreement (MOA) that takes into account SHC comments and other views received to date from the consulting parties.
2. An updated Historic Properties Avoidance and Protection Plan (HPAPP) dated February 11, 2022.
3. An updated Post Review Discoveries Plan dated February 11, 2022.

4. Updated Issued for Construction (IFC) Plans, dated February 3, 2022, for the project provided by Eversource (2 enclosures).
5. USACE Response to Sudbury Historical Commission, dated February 14, 2022.
6. MA Department of Conservation and Recreation (DCR) plans (not construction ready) for its phase of the project, dated February 11, 2022; and
7. An updated chart of all identified impacts to features of the CMRRDHC dated February 11, 2022.

Please review the enclosed documents and provide any comments within 30 days of receiving this letter. In the interim, and to facilitate your review and provide further discussion, the USACE and project applicants have suggested a follow-up consultation meeting after receipt of this letter. We have scheduled a second, separate consultation meeting as requested by the SHC on February 24, 2022. Per the request of Mr. John Brown, we are scheduling a separate meeting with the Narragansett Indian Tribe in February. Lastly, the USACE would like to schedule a meeting with all consulting parties in February. We have attempted to determine availability of all consulting parties, but have not received a response from your office, and others. We will schedule a meeting time and send an invitation under separate cover.

Lastly, the USACE would like to update Eligibility Determinations and provide new Determinations of Effect (DOE) for three historic properties that are contributing elements to CMRRCHD, but which also have been evaluated as individual historic properties: Bridge #127 (SUD.901), Bridge #128 (SUD.900), and the Section Tool House (SUD.282), all in Sudbury.

Bridge #127 (SUD.901) was previously evaluated in 2018 by Rachel Goodrich of the SHC who submitted a Form F (Structure) form to your office. This bridge dating from 1881 is eligible for listing on the National Register and is noted as “one of the oldest plate girder span bridges in the system and perhaps in all of Massachusetts. The bridge is also historically significant as part of the second rail line to run through Sudbury – the Massachusetts Central Railroad which connected Sudbury eastward to Boston and westward to Northampton – expanding the agricultural and manufacturing industries in the town. The bridge retains the integrity of location, design, setting, materials, workmanship and association.”

Bridge #128 (SUD.900) was also evaluated by Rachel Goodrich of the SHC through preparation and submittal of a Form F (Structure) form. Similar to Bridge 127 above, this bridge is eligible for listing in the National Register as “one of oldest (1881) girder spans in the system and perhaps in the state of Massachusetts. The bridge is also historically significant as part of the second rail line to run through Sudbury – the Massachusetts Central Railroad which connected Sudbury eastward to Boston and westward to Northampton – expanding the agricultural and manufacturing industries in the town – fueling growth in the area for almost 100 years. The bridge retains the integrity of location, design, setting, materials, workmanship and association.”

Lastly, the Section Tool House (SUD.282) built in 1890 was recommended as eligible for listing on the National Register in the 1990’s primarily as a contributing element to the CMRRCHD since restoration of the building was required. However, the Section Tool House is

one of only a few remaining section houses of its type in the area and throughout Massachusetts; is located within its original environment and setting, and has been restored by the Town of Sudbury. We feel that the building retains sufficient integrity of location, design, setting, materials, workmanship, and association to merit National Register eligibility as both an individual property and as a contributing element to the CMRRCHD.

Therefore, we have determined that the proposed project will have an adverse effect on these three individual historic properties (Bridge #127, Bridge #128, and the Section Tool House) as well as the overall CMRRCHD, due to the removal, replacement, and rehabilitation of these resources (see enclosed updated project impact spreadsheet). Overall, the impacts to these individual properties, as for the CMRRCHD as a whole, would be detrimental to the integrity of design, materials, setting, feeling, association, workmanship, and location. We would appreciate your concurrence with our new eligibility determinations within the APE and our determination of adverse effect, in accordance with the NHPA, implementing regulations 36 CFR 800; and 33 CFR 325, Appendix C.

If you have any questions, please contact Marc Paiva, our New England District Archaeologist/Tribal Liaison at 978-318-8796 or by email at marcos.a.paiva@usace.army.mil. You may also contact the USACE Regulatory Project Manager, Katelyn M. Rainville at 978-318-8677 or by email at: katelyn.m.rainville@usace.army.mil or me at 978-318-8515 or by email at: paul.m.maniccia@usace.army.mil.

Sincerely,

Paul Maniccia

Paul M. Maniccia
Chief, Permits & Enforcement Branch A
Regulatory Division

Enclosures:

Sudbury Historical Commission Annotated Response to Comments
IFC PLANS - SUD-HUD 2-3-2022 (part 1 of 2)_Stamped_REV1.pdf
IFC PLANS - SUD-HUD 2-3-2022 (part 2 of 2)_Stamped_REV1.pdf
DCR Plans (not construction-ready): MCRT - DCR 2-11-22.pdf
Revised and updated Memorandum of Agreement (MOA)
Updated Historic Properties Avoidance and Protection Plan (HPAPP) dated February 11, 2022.
Updated Post Review Discoveries Plan, dated February 11, 2022
Updated chart of all identified impacts to features of the CMRRDHC, dated February 11, 2022.

cc:

John Brown, Narragansett Indian Tribe, tashtesook@aol.com
Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah), thpo@wampanoagtribe.net
David Weeden, Mashpee Wampanoag Tribe; David.Weeden@mwtribe-nsn.gov
Adam Duchesneau, Town of Sudbury: duchesneau@sudbury.ma.us
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