

Historical Commission response:

The Sudbury Historical Commission (SHC) received Mr. Paiva's February 25, 2022, email reminding the Commission and other parties about the USACE proposed March 4, 2022 consulting parties group meeting for the Sudbury-Hudson Transmission Reliability and MCRT projects.

The SHC is of the opinion that the logical sequence of steps of this Section 106 consultation process should consist of first a completed Narragansett THPO conducted site visit to identify potential historic properties and subsequent issuance of the site findings/report by the NITHPO, then second, for a joint SHC and USACE consultation meeting to be held, and third, for a USACE group consultation meeting to be held thereafter. Without the findings/report from the NITHPO, the SHC cannot fully discuss or comment at a joint consultation meeting. In addition, it is not clear to the SHC how this subject can be discussed at a group consultation meeting either without these site visit findings/report.

This February 25th email was preceded by the USACE February 17th email and its nine accompanying documents – totaling 474 pages – to include a fourth revised MOA. A Sudbury Historical Commission meeting with the USACE is currently scheduled to held on March 16, 2022. It appears to us that the NITHPO site visit and issuance of their findings will not be completed and provided to the SHC at least 2 weeks prior to our currently scheduled March 16, 2022 meeting for our review.

The Commission has previously stated its opinion to the USACE that the THPO site visit should happen prior to the USACE group consultation meeting and that the site visit should be scheduled when the site is accessible and visible due to favorable weather and ground conditions.

On February 18th the SHC had requested a reasonably adequate amount of time (approximately 30 days) to review the 474 pages of documents including responses to the SHC October 25, 2021 and January 14, 2022 comment letters it received on February 17th before meeting with the USACE. The Historical Commission will not have the time it requested or needs to be ready to comment at a March 4th USACE group meeting, which would fall two weeks before the end of the requested 30-day period.

Furthermore, the USACE February 17, 2022, letter to the Massachusetts Historical Commission (MHC) states that USACE gave the MHC 30 days to respond to the letter and revised MOA which is by March 19, 2022 – a full two weeks after the date of the proposed March 4 USACE group meeting. Also, the USACE February 25 email indicated that the Corps had not sent its formal invitation letter to MHC yet but that one would be forthcoming. The SHC, MHC and NITHPO need adequate time to review and comment, and a March 4th date does not at all provide adequate time the USACE has already agreed to and is premature.

To reiterate, the reasonable logical sequence is first, for the site visit to be held and for the NITHPO to have reasonable time to report its findings, then second, for a joint Commission and USACE meeting to be held, and third, for a USACE group consultation meeting to be held thereafter.

Although the SHC had hoped that the March 16th meeting could be held because a site visit and findings would have been completed, it appears this will not be accomplished. Due to the current heavy snow cover at the site accessibility and visibility has not and continues to not be possible. In addition, the SHC would need to receive the site findings report by tomorrow, March 2, two weeks prior to March 16th. The SHC hopes that winter conditions pass soon so the site becomes accessible and visible and therefore we request a change in the joint meeting date to a date at least 2 weeks after the findings of the NITHPO site visit are available.

Regarding the February 15, 2022, Response to Comments document provide to the SHC by the USACE, the document refers to numerous attachments such as a USACE email under item C.3. The SHC requests copies of these attachments which were not included in the USACE February 17th document package emailed to the SHC.

The SHC looks forward to moving the consultation process forward with the USACE in a logical adequately timed sequence and one that will facilitate the SHC having a reasonable opportunity to proceed through each procedural step in the Section 106 review process under 36 CFR 800.