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The Commonwealth of Massachusetts

June 27, 2022

William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

Paul M. Maniccia
Chief, Permits & Enforcement
Regulatory Division
New England District
US Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

Attn: Katelyn Rainville

RE: Eversource Sudbury-Hudson Transmission Reliability Project, DCR Mass Central Rail Trail, Sudbury, Marlborough, Stow and Hudson, MA. MHC #RC.62384. EEA #15703. ACHP #016522. NAE-217-01406.

Dear Mr. Maniccia:

Staff of the Massachusetts Historical Commission (MHC), office of the Massachusetts State Historic Preservation Officer, have reviewed the US Army Corps' revised draft Memorandum of Agreement (MOA) dated May 27, 2022, which was received at this office on June 2, 2022.

The revised MOA has been written with explicit reference to the Advisory Council on Historic Preservation's (ACHP) Section 106 regulations (36 CFR 800). The MHC recognizes that the revised MOA is responsive to MHC's previous comments to follow the ACHP's regulations rather than the Corps' Appendix C, which is not consistent with 35 CFR 800.

The MHC has learned that the Sudbury Historical Commission, as a consulting party, has asked the Corps for a short extension of the Corps' comment period in order to meet their commission meeting schedule. Has the Corps allowed the extension?

Will the Sudbury Historical Commission sign the MOA? If not, then their important involvement in implementing the stipulations will be in question (e.g., Stipulation II Sections D, E, F, G, H, K).

MHC recommends the following changes to the revised MOA:

5th Whereas clause: After (MHC), please insert the phrase "the office of the State Historic Preservation Officer,"

Please add a new Whereas clause that explains the lack of prudent and feasible alternatives to the proposed demolition and replacement of Bridge #127 in Sudbury.

8th Whereas clause: the words "Historic" should be replaced by "Historical."

Stipulation II Section I: Please add the following sentence: Design plans for the rehabilitation of Bridge #128 shall be submitted to the MHC for review and comment.

These comments are provided 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, please contact me..

Sincerely,



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

xc: Denise Bartone, Eversource
Brooke Kenline-Nyman, Eversource
Patrice Kish, DCR, Attn: Jeffrey Harris
Marcos Paiva, Army Corps of Engineers
John Eddins, ACHP
Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)
David Weeden, Mashpee Wampanoag Tribe
Secretary Kathleen A. Theoharides, EEA, Attn: Purvi Patel, MEPA Unit
Adam Duchesneau, Sudbury Planning & Community Dev.
Local Historical Commissions: Towns of Sudbury and Hudson
Vivian Kimball, VHB, Inc.
Marty Dudek, Commonwealth Heritage Group