



Town of Sudbury

Historical Commission

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January 14, 2022

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

Re: Section 106 Consultation: Eversource Sudbury-Hudson Transmission Reliability Project, USACE NAE-2017-01406, MHC #RC.62384, ACHP Case 016522

Dear Mr. Maniccia,

The Sudbury Historical Commission (SHC) received the US Army Corps of Engineers (Corps) December 17, 2021 letter regarding its Determination of Effect (DOE) Finding and Revised Permit Area of Potential Effect (APE) Boundaries for the above named project with the following attachments: (1) VHB Eversource Energy (Sudbury-Hudson Transmission Reliability Project) *Updated Plans* with Permit Area & Area of Potential Effects Boundaries, (2) MHC *Inventory Form A (Area)* for Central Massachusetts Railroad Corridor Historic District (CMRRCHD) in Hudson, MA dated October 2021, (3) *Updated Project Impacts* to (Sudbury) Railroad Features listing dated November 11, 2021, and (4) *Post Review Discoveries Plan* dated November 17, 2021.

The Historical Commission has reviewed the Corps' December 17th letter and the attachments and is responding to the Corps' December 17th request that the Commission make formal comments to the Corps on the information contained in and attached to its letter within 30 days. The SHC appreciates the opportunity to provide further comment as a Consulting Party during the ongoing consultation process and review concerning the above-named undertaking under Section 106 of the NHPA of 1966, as amended.

SHC Requests Section 106 Consultation Meeting with the Corps

The Historical Commission requests a consultation meeting with the Corps as soon as possible to consult prior to the release of a revised draft MOA for comment.

The Commission appreciates the comment made by Regulatory Division Chief, Ms. Tammy Turley, during the October 14, 2021 consultation meeting suggesting that a follow-up consultation meeting be held. The Commission agrees with this idea to hold a follow up consultation meeting and therefore requests a consultation meeting with the Corps as soon as possible prior to the distribution of a revised MOA. Since the October 14th meeting, the Corps has made a determination of adverse effect and a determination that the CMRRC is NR-eligible as a Historic District, So the Commission seeks to meet with the Corps at this next stage in the Section 106 process to consult for the purpose of seeking solutions to preferably avoid or minimize the undertaking's adverse effect on the NR-eligible CMRRCHD including consulting about Bridges 127 and 128 and the Section Tool House, and any historic properties/cultural resources that may have been identified with the assistance of the Narragansett THPO.

We suggest that the MA SHPO, THPOs, project proponents and other Section 106 consulting parties be included. The SHC can host a virtual Commission meeting with a Corps facilitator leading the meeting as was done at the SHC October 14, 2021 meeting or the Commission could attend a Corps' hosted virtual meeting like the Corps hosted group consultation meeting on September 28, 2021.

Memorandum of Agreement

The Corps' December 17, 2022 letter states, "*The District is located both within the permit area as well as the surrounding area of potential effect (APE) that the Corps **must** consider for known properties outside the permit area.*"

Therefore, it is the Commission's expectation that the MOA stipulations will address solutions to the undertaking's adverse effects on all the NR-eligible historic properties (all 70+ railroad features and structures in Sudbury) of the CMRRCHD in the entire APE as defined under 36 CFR 800. The Sudbury Historical Commission would like confirmation from the Corps on this expectation.

Those railroad structures to be addressed in the MOA should include Bridges 127 and 128, and the Section Tool House which are railroad features the SHC is most concerned about and seeks solutions to avoid or minimize the undertaking's adverse effect. The SHC's October 25, 2021 letter outlines the Commission's thinking about these and other railroad features of the CMRRCHD.

Determination of National Register Eligible Historic Properties

According to the Corps' December 17, 2021 letter the Corps has "determined that the CMRRC Historic District in Sudbury and Hudson is eligible for listing as a National Register-eligible District that encompasses the rail right-of-way as well as extant railroad structures and objects along this corridor." **The Sudbury Historical Commission supports this important determination made by the Corps.**

The Commission notes that the December 17th letter describes the CMRRC NR-eligible Historic District to be comprised of "the railroad corridor and bed, the track structure, bridges, culverts, Section Tool House, South Sudbury Station Building, signals, whistle posts, mile posts, rail rests, switch stands, telegraph poles, concrete sign posts, concrete foundations and archaeological sites (East Sudbury Station Site, Section Tool House Site, South Sudbury Station Site, and the Wayside Inn Station Site)." **The Commission notes that the Diamond Junction and the railroad battery wells are also extant railroad features of the CMRRCHD but were not mentioned and should be included in a description of the CMRRCHD as they are included in the Updated Projects Impacts Listing of railroad features.** The SHC also notes that the Section Tool House and bridges are included in the defined NR-eligible CMRRC Historic District and that the reference to bridges refers to Bridges 127 and 128.

The SHC concurs with the Corps that the Central Massachusetts Railroad Corridor (CMRRC) in Sudbury extending into Hudson (to include newly identified railroad features described in the October 2021 MHC Form A inventory) is eligible for listing in the National Register of Historic Places (NR) as a Historic District. **The SHC also understands that although three individual historic properties in Sudbury – the Section Tool House and Bridges 127 and 128 – are contributing elements to the NR CMRRC Historic District – additionally these resources should also be determined by the Corps for purposes under Section 106 regulations to be NR eligible for individual listing, not just considered as contributing elements to the NR Historic District.**

The individual MHC Form F Structure inventories for Bridges 127 and 128 (attached) indicate that both bridges are NR individually eligible under criteria A and C because they are rare plate girder design construction, are historically significant and retain their integrity having not been substantially altered. On the contrary, the MHC MACRIS Historic Structure Inventory Form (attached) for Bridge 130 (Fort Meadow Brook) – a timber pile trestle construction design - indicates that this bridge is not NR eligible because it is a modern example of a common form widely used throughout the region. The bridge's integrity has been impacted - having been significantly modified and rebuilt. The bridge appears to be a *non-contributing* element to the NR-eligible CMRRC Historic District.

The SHC notes that the Hudson Planning and Community Development Director's September 4, 2019 letter¹, on behalf of the Hudson Historical Commission (HHC), commented on the Commission's August 15, 2019 meeting

¹ Correspondence, Jack Hunter, Director, Town of Hudson, MA Planning Department, to Michael S. Weirbonics, Chief Regulatory Division, US Army Corps of Engineers, New England Division, September 4, 2019.

with the project proponent when visual renderings for the replacement of the proposed Fort Meadow Brook Bridge (#130) project design were presented. The letter states that the Hudson Historical Commission concurred with the proposed design to replace, rather than restore or rehabilitate, Bridge 130. And the Hudson's April 13, 2021 letter² to the MA DEP Waterways Regulatory Program stated that the HHC "does not think the bridge should be preserved" and "...is in support of plans to remove the remnants of the bridge... and replace it" Therefore, because the HHC does not object to replacement of Bridge 130 and it is a non-contributing element of the CMRRHD it would not be subject to the MOA.

Determination of Adverse Effects

The December 17, 2021 Corps letter states, "In accordance with the NHPA, implementing regulations 36 CFR 800; and 33 CFR 325, Appendix C, we have determined that the *proposed project will have an adverse effect on historic properties* due to the removal, replacement, and rehabilitation of contributing resources within the CMRRCHD.

The SHC concurs with the Corps that "the impacts to the CMRRCHD as a whole would be detrimental to the integrity of design, materials, setting, feeling, association, workmanship, and location of the District."

If the Corps defines the "proposed project" as both the Eversource transmission line project and the DCR MCRT project, the Commission asks the Corps to explain how DCR project activities will impact the historic resources by removal, replacement, and rehabilitation. SHC understands that Eversource and only Eversource will (during Phase I) engage in activities for the removal, replacement, and rehabilitation of contributing resources that will adversely impact (by alteration in the character or use of) the historic properties. Further, it is SHC's understanding that the DRC project (Phase II) will *not* engage in activities that will have an adverse effect on historic properties because Eversource, not DCR, will remove, replace, and rehabilitate NRHD contributing resources. Information the SHC has received indicates that the impacts of the Eversource transmission line installation and associated activities during Phase I (not during DCR Phase II) will be detrimental and cause the adverse effects.

The SHC requests the Corps confirm whether the DCR project activities will have an adverse effect on historic properties. And if so, how?

Appendix C (33 CFR 325)

The SHC notes that the Corps December 17th letter refers to 33 CFR 325, Appendix C as implementing regulations of the NHPA. However, as the Advisory Council on Historic Preservation (ACHP) stated in its April 30, 2021 letter³ to the Corps, the Corps' "relying on Appendix C as a basis for making findings and determinations in the Section 106 review will leave the Corps' compliance with Section 106 subject to challenge due to fundamental inconsistencies between Appendix C and the Section 106 implementing regulations (36 CFR 800)." The ACHP's letter comments further that it "has never approved Appendix C as an alternative to the Section 106 implementing regulations as required by Section 110 (a)(2)(E) (now U.S.C. 306102(b)(5)(A)) of the NHPA, because it differs from the Section 106 regulations in many fundamental ways, including the definition of undertaking, the delineation of APE, and the nature of consultation during the Section 106 review."

Identification of Historic Properties

As the SHC has stated in prior letters to the Corps including our October 25, 2021 letter⁴, the Commission has been and continues to be concerned that the Section 106 identification of historic properties has not been completed. The reason Historic Properties' Identification is not complete – is because efforts to identify potential Native-American cultural properties – including a field site visit of the project area with the

² Correspondence, Peter Breton, Chair, Town of Hudson Historical Commission to Daniel Padien, Program Chief, MA DEP, Waterways Regulatory Program, April 13, 2021.

³ Correspondence, Jaime Loichinger, Asst. Director, Advisory Council on Historic Preservation, to Tammy Turley, Chief Regulatory Division, US Army Corps of Engineers, New England District, April 30, 2021.

⁴ Correspondence, Sudbury Historical Commission to Tammy Turley, Us Army Corps of Engineers, October 25, 2021.

Narraganset Tribe THPO as had been requested in early 2021 has not, to our knowledge, happened. Native-American cultural resource identification is required under 36 CFR 800 to determine NR-eligible historic properties (Traditional Cultural Properties/TCP) and for determination of the extent of the APE.

The SHC would appreciate an update about the status of the Corps' consultation process with the Narragansett THPO and if any site visit with the Narragansett Tribe has taken place, and if it has occurred, if any Native-American cultural resources have been identified. The SHC appreciates and respects the confidentiality issue concerning the identification and location of TCP's but seeks assurance that a site visit to identify Native-American cultural resources has occurred. It is the opinion of the SHC that a site visit between the Corps and the Narragansett THPO is required for there to have been a reasonable and good faith effort to identify historic properties under 36 CFR 800 NHPA Section 106 process.

The SHC's opinion is that it is premature to sign off on determination of the APE, determination of eligibility of resources within the APE for listing in the NR and determination of effect/adverse effect until a good faith effort to identify potential Native-American cultural resources has been completed.

Area of Potential Effect - Scope of the Undertaking

The ACHP April 30, 2021 letter commented that "The APE is defined as the geographic areas within which the undertaking may *directly or indirectly* cause alterations in the character or use of the historic properties." **Has the Corps made a determination of not only the areas in which the undertaking may directly cause alterations in the character or use of the historic properties, but also determined indirect impacts as well?** Will this undertaking cause any indirect impacts including any to traditional cultural properties? If so, what indirect impacts would be caused?

DCR's Standing Under NHPA Section 106/ Clean Water Act Section 404

The SHC commented on the matter of DCR's standing in our October 25, 2021 letter to the Corps and would appreciate the Corps reviewing those comments again.

The Commission notes that the USACE December 17, 2021 letter states: "Corps involvement pertains to the discharge of fill into waters of the United States (WOTUS) under Section 404 of the Clean Water Act (CWA)", but the letter does *not* identify and affirmatively state who the project proponents are – Eversource and/or the MA Department of Conservation and Recreation (DCR) – *who will engage in activities that will result in such discharge/fill*, and therefore be entitled to be granted a CWA General Permit and be party to the Section 106 Memorandum of Agreement (MOA).

The SHC understands the activities Eversource will engage in to install the transmission line (based on the current proposed project design choices) that will result in discharge/fill into the WOTUS, and therefore understands why Eversource is subject to Section 404 of the CWA and a Section 106 review and MOA. However, it appears that DCR's activities do not result in *any* discharge/fill into the WOTUS. **The Commission would appreciate and requests a written explanation from the Corps explaining the exact activities DCR will engage in that will result in discharge/fill into the WOTUS.** The Commission would also appreciate clarification from the Corps explaining the legality of DCR's standing under Section 404 of the CWA, of the Corp's issuance of any General Permit to DCR and of DCR being a signatory to the Section 106 Memorandum of Agreement (MOA).

Updated Plans for Permit Area and Area of Potential Effects Boundaries

The SHC notes that all 31 Sheets of the documents (referred to in the December 17, 2021 Corps' letter as Updated Plans) are labeled Eversource Energy Sudbury-Hudson Transmission Reliability Project. None of the Sheets indicate that they include information about impacts from the MA Department of Conservation and Recreation (DCR) Mass Central Rail Trail (MCRT) project.

For clarification, the SHC would like the Corps to confirm that the date of the Updated (Sheet) Plans is November 18, 2021 to not confuse these revised plans with prior updated plans referenced in the 2020 Pre-Construction Notification.

Inventory for Central MA Railroad Corridor (CMRRC) in Hudson, MA.

The SHC is pleased that an MHC Inventory has been completed to identify additional railroad elements of the CMRRCHD located in Hudson, MA. The Commission suggests that a combined comprehensive listing be compiled of all identified CMRRC railroad elements located in Sudbury and Hudson for reference during the Section 106 consultation process and for inclusion and reference in the Section 106 Memorandum of Agreement (MOA) and Archaeological Site Avoidance and Protection Plan (ASAPP). The Updated Projects Impacts Listing provided to the SHC does not list CMRRC resources in Hudson that contribute to the National Register of Historic Places (NR) eligible CMRRC Historic District.

Updated Project Impacts Listing of (CMRRCHD) Railroad Features in Sudbury

As the SHC October 25, 2021 letter discussed, the 2010 Lease Agreement that DCR has with the Massachusetts Bay Transportation Authority (MBTA) allows DCR to remove and dispose of *any* railroad infrastructure in the CMRRC right-of-way. The Updated Project Impacts List provides information about what the proposed activity will be for each of the 74 identified railroad features which have been listed but does specify whether Eversource or DCR will be engaged in the activity impacting each feature. The Commission would like a separate column added to the Updated Impacts listing to indicate who (Eversource or DCR) will perform the impact activity and when it will occur - in either Phase I or Phase II of the project. If DCR will not perform any activity in Phase II that will impact any of the 74 features (by removal, replacement, or rehabilitation), then the Commission wants the document to reflect that fact. **The Commission requests that the Corps provide confirmation in writing to the Commission that DCR will not remove any of the identified railroad features/infrastructure during Phase II.**

The list includes the Diamond Junction (SUD.956, Milepost 20.02) and also indicates that the Proposed Project Activity for the Diamond is Remove and Reset. Who will remove the Diamond and when, and who will reset it and when? The SHC requests that the Corps provide the Commission with a copy of the sheet plan and other project information it has about the Diamond Junction.

The Updated Impacts listing indicates that approximately 30 of the railroad features are outside the limit of work (LOW). **Since these 30 railroad features are contributing elements of the CMRRCHD, and within the APE, how will the Corps assure that adverse impacts will not happen to railroad features that lie outside the LOW?** How far outside the LOW is each railroad feature that is so indicated on the list? Railroad features and structures are not shown on the Updated Eversource Sheet Plans to be able to determine and understand where the features are located relative to the delineated APE.

A Table listing all identified CMRRC features and structures and indicating the impacts to each and which project proponent will undertake the activity related to each railroad feature should be made an attachment to the Memorandum of Agreement (MOA).

Post Review Discoveries Plan (PRDP)

The SHC will have additional comment after the MHC has reviewed and commented on the PRDP. The Commission notes that the provisions of the PRDP (Section 1.0) only apply to areas within the so-called "limit of work." **Does the LOW correspond to the APE?** If the LOW does not correspond to the APE, the Commission questions this narrow area scope whereas the Section 106 regulations pertain to the entire APE (per 36 CMR 800). **Is the LOW shown on the PRDP the same LOW for both Eversource's activities during Phase I and DCR's activities during Phase II?**

The SHC offers these additional comments:

- Section 2.1, Unanticipated Discoveries of Archaeological Resources: **The SHC notes that contrary to the statement below, it appears that discoveries of precontact and archaeological resources may likely be**

found especially during excavation of the Splice Vaults areas. Section 2.1 states, “The Nature of the cut-and-fill railroad bed construction within the Project’s Limit of Work makes it likely that most precontact and earlier historic archaeological sites were removed during the historic excavation of the railroad bed cuts, while raised railroad beds were built through low areas and wetlands that were less likely to contain such sites.” This statement underestimates the potential for discoveries because it does not take into account that: there are long stretches in the railroad right-of-way where no berm was needed for the build out of the railroad as they were naturally flat runs, berms where needed were created from fill from the area placed on top of the natural ground level, the bridge areas and Hop Brook as likely Native fishing and canoe landing sites (potential Native cultural resources), and do not consider the project’s excavation activities to construct the Splice Vaults at a depth of approximately 15 feet in an area approximately 8 feet wide by 40 feet. The depth of the field work test pits for the Archaeological Intensive (Locational) Survey were less than a depth of 15 feet.

- Section 2.1.2 Notification Procedures: explicitly state that discovery memorandums will be submitted to the Sudbury Historical Commission, and to the THPOs as well, including the Narragansett THPO, e
- Section 3.5: confirm with the Narragansett THPO what the correct mailing address is, and
- Section 3.6: correct the mailing address of the Sudbury Historical Commission to **Flynn Building, 279 Old Sudbury Road, Sudbury, MA 01776.**
- The PRDP contains no Figures for the route of the DCR MCRT project.

Archaeological Site Avoidance and Protection Plan (ASAPP)

The SHC understands that the Corps will provide the Commission with a copy of the revised ASAPP after the Corps has received SHC comments concerning the December 17, 2021 letter. **The SHC intends to provide comments on the revised ASAPP to both the Corps and MHC.**

The October 27, 2020 ASAPP draft version the SHC has previously reviewed was prepared (only) for Eversource Energy. Eversource and DCR representatives have informed the SHC that DCR would not draft a ASAPP for Phase II and therefore this is another indication that the undertaking is not a joint project. The only common aspect between the two projects is that the Eversource project and the DCR project will occur within the same railroad right-of-way footprint and at different times.

The 2020 draft ASAPP states that the Archaeological Site Avoidance and Protection Plan is to protect significant historic and archaeological resources in proximity to the (Eversource) Project’s Limit of Work. Thus, DCR is not subject to the Plan according to this draft, but DCR should be subject to the provisions of a Site Avoidance and Protection Plan if the undertaking is a legitimately a joint project. On page five, Railroad Features, of the 2020 draft is listed various railroad features, but the Plan does not contain a list describing each specific feature or structure and avoidance and protection measures that will be implemented to protect each of them. The revised ASAPP should include and reference a comprehensive railroad features/structures list, the avoidance and protection measures for each, and site location identification reference for each feature/structure. The Commission expects the ASAPP will be revised to be reflect all the railroad features in the CMRRC which are contributing elements to the NR-eligible Historic District. Like the draft PRDP, the 2020 draft ASAPP limits its scope to the area within the LOW.

Please see the SHC October 25, 2021 letter to the Corps for additional comments and requests for changes and modifications to the wording and provisions of the ASAPP including the SHC’s request that a representative of the Commission’s choosing be onsite to monitor during construction and removal.

Conclusion

To summarize, the main concerns, issues and requests the Commission has commented upon in this letter are:

- The SHC seeks to meet with the Corps as soon as possible – to consult about solutions to avoid, minimize or mitigate adverse effects of the undertaking.
- Inclusion of MOA stipulations covering **all** railroad features of the entire NR-eligible CMRCHD in Sudbury and other NR-eligible historic resources in the entire APE as defined under 36 CFR 800 including those which may be identified though consultation with the THPO’s including the Narragansett THPO.

- The SHC supports the determination made by the Corps determining that the CMRRC Historic District in Sudbury and Hudson is eligible for listing in the National Register-eligible District that encompasses the rail right-of-way as well as extant railroad structures and objects along this corridor.
- The SHC notes that the Diamond Junction and railroad battery wells are also extant railroad features of the CMRRC Historic District but were not mentioned and should be included in a description of the CMRRC Historic District as they are included in the Updated Projects Impacts Listing of railroad features.
- Three historic properties – Bridges 127 and 128 and the Section Tool House should also be determined by the Corps for purposes of Section 106 to be NR-eligible for **individual** listing, not just determined as contributing elements to the NR-eligible CMRRC Historic District.
- The SHC requests the Corps confirm whether the DCR project will have an adverse effect on historic properties.
- The SHC continues to be concerned that the Identification of Historic Properties has not been completed because efforts to identify potential Native-American cultural properties or to hold a site visit with the Narragansett THPO has not, to our knowledge, happened.
- The SHC requests an update about the status of the Corps' consultation process with the Narragansett THPO, and whether a site visit has taken place, and if any cultural resources have been identified.
- 36 CFR 800 are the NHPA Section 106 implementing regulations.
- It is the SHC's opinion that it is premature to sign off on: determination of APE, determination of eligibility of resources within the APE for listing in the NR, and determination of effect/adverse effect until a good faith effort to identify potential Native-American cultural resources has been completed.
- The SHC seeks information about what if any assessment of undertakings indirect impacts has occurred and the results.
- Explanation and identification of what, if any, adverse effects DCR project activities will cause to NR-eligible historic resources
- DCR standing under Clean Water Act Section 404/NHPA Section 106: The SHC requests written explanation from the Corps explaining the **exact** activities DCR will engage in that will result in discharge/fill in the WOTUS.
- Updated (Sheet) Plans for Permit Area and APE: inclusion on sheet plans of impacts, if any, from DCR's Massachusetts Central Rail Trail (MCRT) project.
- The SHC requests that the Corps provide confirmation in writing to the Commission that DCR **will not remove any** of the railroad features/structures/infrastructures in the CMRRC Historic District during Phase II
- A Table listing should be compiled of all identified CMRRC Historic District features and structures, indicating the impacts to each and which project proponent will undertake the activity that impacts the railroad feature, and that the Table be made an attachment to and referenced in the MOA.
- The SHC notes that, contrary to the Post Review Discoveries Plan, discoveries of precontact and archaeological resources may likely be found during excavation of the Splice Vault areas in Phase I and construction activities associated with the rail bed and berm.
- The SHC likely will provide additional comments on the PRDP and the ASAPP.
- SHC lists changes to Post Review Discoveries Plan
- Applicability of Archaeological Site Avoidance and Protection Plan to DCR Project Phase II
- The SHC asks the Corps to respond to the requests for information and answer the questions in SHC October 25, 2021 letter to the Corps.

The Commission respectfully requests that the Corps respond to the requests for information and provide answers to the questions posed in the SHCs October 25, 2021 letter that were not subjects covered in the Corps' December 17, 2020 letter. The SHC is concerned that it still lacks important information about the DCR MCRT project to assist the Commission in its Section 106 review and to find solutions to avoid or minimize the undertaking's adverse effect on the CMRRC Historic District and Bridges 127 and 128 and the Section Tool House. Therefore, the SHC would like a response to our previous request for copies of all the information (including structural engineering analysis, if any) that VHB, Eversource or DCR has provided to the Corps concerning project design alternatives. The Commission has enclosed as an Attachment A - is a summary of the SHC's questions contained in this letter.

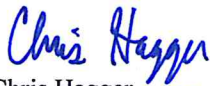
The SHC looks forward to continuing the consultation process with the Corps at this next stage in the Section 106 process. This next stage is for consultation about an assessment of alternatives and solutions to avoid, minimize or

mitigate the adverse effect of the proposed undertaking on the NR-eligible CMRRCHD and other potential NR eligible historic properties, an assessment of alternatives to removal and replacement of Bridge 127 and partial removal of Bridge 128, and avoidance of adverse effects to the Section Tool House, and other railroad features of the NR-eligible CMRRCHD.

Please direct future email correspondence to the Historical Commission through Mr. Adam Duchesneau, Town of Sudbury Planning Director, Planning and Community Development Department, at DuchesneauA@sudbury.ma.us (978-636-3387). Thank you. Also, please note that the correct mailing address for the Commission is not 299 Old Sudbury Road, but rather the address on this letter's letterhead.

The Commission looks forward to a consultation meeting with the Corps and continuing the NHPA Section 106 process. Please contact Mr. Duchesneau to facilitate arrangements for setting up the consultation meeting. Thank you.

Sincerely,



Chris Hagger
Chair
Sudbury Historical Commission



Diana Warren
Vice Chair
Sudbury Historical Commission

Enclosures: Attachment A
MHC Inventory Bridge 127
MHC Inventory Bridge 128
MHC Bridge 130

CC (without enclosures):
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