



Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form
MS Word format

Send to: e106@achp.gov

Please review the instructions at www.achp.gov/e106-email-form prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.

I. Basic information

1. Purpose of notification. Indicate whether this documentation is to:

- Notify the ACHP of a finding that an undertaking may adversely affect historic properties
- Invite the ACHP to participate in a Section 106 consultation
- Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
- Supply additional documentation for a case already entered into the ACHP record system
- File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
- Other, please describe

2. ACHP Project Number (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): Project # 16522

3. Name of federal agency (If multiple agencies, list them all and indicate whether one is the lead agency): U.S. Army Corps of Engineers, New England District, Regulatory Division

4. Name of undertaking/project (Include project/permit/application number if applicable): Sudbury-Hudson Transmission Reliability and Massachusetts Central Rail Trail Project. NAE-2017-01406.

5. Location of undertaking (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands): The project is located in the communities of Hudson, Marlborough, Sudbury, and Stow, Massachusetts.

6. Name and title of federal agency official and contact person for this undertaking, including email address and phone number:

Katelyn M. Rainville
Project Manager
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751
Katelyn.M.Rainville@usace.army.mil
978-318-8677 (Office)

and

Marcos Paiva
Archaeologist
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751
Marcos.A.Paiva@usace.army.mil
978-318-8796 (Office)

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 □ Washington, DC 20001-2637
Phone: 202-517-0200 □ Fax: 202-517-6381 □ achp@achp.gov □ www.achp.gov

II. Information on the Undertaking*

7. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

The project consists of two phases. First, Eversource is proposing to install a new 9-mile 115-kilovolt (“kV”) underground electric transmission line. Second, the Department of Conservation and Recreation (“DCR”) is proposing to construct a portion of the Mass Central Rail Trail (“MCRT”) above the new underground transmission line. This work is proposed within a Massachusetts Bay Transportation Authority (“MBTA”) railroad right-of-way (“ROW”) and along public roads located in Hudson, Stow, Marlborough, and Sudbury, Massachusetts. The USACE is reviewing this project because project impacts in waters of the United States trigger a permit under Section 404 of the Clean Water Act. Therefore, the USACE is tasked with review of the proposed work for compliance with NEPA and other applicable regulations, including Section 106 of the National Historic Preservation Act.

The undertaking includes 3,695 square feet of impacts that are proposed within waters of the United States. These wetlands and the immediate surrounding uplands have been identified as the Permit Area (see enclosures).

8. Describe the Area of Potential Effects (APE):

The Area of Potential Effects (APE) is identified as the entire Central Massachusetts Railroad Corridor Historic District (CMRRCHD). Please see the following enclosure: Updated Plans with Permit Area & Area of Potential Effect Boundaries.

9. Describe steps taken to identify historic properties:

Since the initiation of this project, there have been changes to the boundaries of the permit area designation and APE. Originally, only two bridges (#127 and #130) were considered as known historic properties. However, since that time we have compiled information on the identification of additional historic properties and the new Central Massachusetts Railroad Corridor Historic District.

The USACE, project applicants, and the Sudbury Historical Commission have conducted and provided the following historic and archaeological surveys and studies of the project area:

Reconnaissance Level Historic Properties Survey, Sudbury Hudson Transmission Reliability Project, Town of Sudbury, City of Marlborough, Town of Stow, and Town of Hudson, Middlesex County, Massachusetts, Prepared by Commonwealth Heritage Group, Inc. Littleton, Massachusetts, December 2017.

Archaeological Reconnaissance Survey for the Sudbury-Hudson Transmission Reliability Project, Towns of Sudbury, Hudson, Marlborough, and Stow, Middlesex County, Massachusetts, Prepared by Commonwealth Heritage Group, Inc. Littleton, Massachusetts, February 2018.

Archaeological Intensive (Locational) Survey for the Sudbury-Hudson Transmission Reliability Project, Towns of Sudbury, Hudson, Marlborough, and Stow, Middlesex County, Massachusetts, Prepared by Commonwealth Heritage Group, Inc. Littleton, Massachusetts, May 2019.

Form A – Area – Massachusetts Historical Commission, Central Massachusetts Railroad Corridor (Boston & Maine Railroad Corridor), Recorded by: Stacy E. Spies for the Sudbury Historical Commission, December 2020.

For your consideration and review, we are also enclosing the MHC Form A (Area) Inventory form for the expansion of the CMRRCHD into the Town of Hudson, prepared by VHB and the Commonwealth Heritage Group, along with a spreadsheet outlining project impacts to the railroad features.

10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

In assessing the complete inventory of historic properties both within the USACE permit area and within the surrounding APE, the CMRRCHD in Sudbury is 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). In Hudson, many of these same features are present along with miscellaneous structures and features, and two archaeological sites (Ordway Station Site and the Gleasondale Station Site). Please refer to the respective inventory forms for detailed information on these features.

We have determined that the CMRRCHD 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 CMRRCHD is eligible for listing on the National Register under Criteria A and D of the National Register Criteria (36 CFR 67). The District is located both within the permit area as well as the surrounding area of potential effect (APE). Revised project plans that depict the Permit Areas, and when combined with those known historic properties, encompass the APE, are enclosed.

Three bridges (No. 127, 128, and 130) are each considered contributing elements to the District. Of those three bridges, 127 and 128 are individually eligible for the National Register of Historic Places (NRHP). The Section Tool House is individually eligible for the NRHP as well as a contributing feature to the CMRRCHD. See additional information below for each historic property:

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.

11. Describe the undertaking's effects on historic properties:

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 (see enclosed project impact spreadsheet for more details).

12. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

DCR and Eversource have taken several actions to avoid and minimize adverse effects to the CMRRCHD:

- At Bridge #127, an in-depth evaluation of eight alternatives was completed which considered several metrics including historic, environmental, structural, maintenance, bike/pedestrian use, constructability, and cost considerations (see enclosed letter to the USACE from Eversource dated November 14, 2019). The existing bridge is partially submerged in Hop Brook, which has resulted in severe deterioration of the existing piers and moderate deterioration of the steel sections, such that the existing structure would not provide a safe crossing for the MCRT. The proposed replacement has been designed to distinguish it as a new structure in material, design, and bridge type, and the existing abutments will largely remain in place. See C.16 and C.17 of the Sudbury Historical Commission (SHC) Response to Comments dated February 14, 2022.
- At Bridge #128, the existing steel girders, timber piers, cross-frames, and the majority of the granite block abutments will be retained and reused. The steel girders represent a character-defining feature of plate girder bridges, and retaining them and other historic bridge fabric retains the historic character of the bridge and preserves distinctive features, finishes, and construction techniques that characterize the historic bridge.
- At Bridge #130, a structural review found that the existing timber ties, timber beams, and pile caps are decayed beyond practicable reuse for safely supporting the proposed bike path and transmission line. The western abutment has washed away, and a fire in October 2019 further damaged an already-deteriorated structure. The new bridge will be clearly distinguishable as a new structure in material, design, and bridge type.
- The Project design has been modified to avoid and protect several historic and archaeological features, including:
 - The Boston and Maine Railroad Section Tool House (SUD.HA.37/SUD.282)
 - Gleasondale Station Site (HUD.HA.8)
 - Ordway Station Site (HUD.HA.9)
 - Wayside Inn Station Site (SUD.HA.38)
 - South Sudbury Station Site (SUD.HA.26)
 - East Sudbury Station Site (SUD.HA.39)
 - *In-situ* preservation of two sections of spur-track west of Union Avenue and west of Boston Post Road, as outlined in Plan.

However, the impacts to the CMRRCHD as a whole would still be detrimental to the integrity of design, materials, setting, feeling, association, workmanship, and location of the CMRRCHD. The USACE has requested that MHC provide their concurrence with our determination of eligibility of resources within the APE for listing in the National Register of Historic Places and our determination of adverse effect.

Eversource and DCR propose the following mitigation measures to take into account the effect of the undertaking on historic properties.

1. The production of updated MHC Inventory forms for Massachusetts Central Railroad Bridges #127 and #128 (MHC#s SUD.901 and SUD.900, respectively) and Fort Meadow Brook Railroad Bridge #130 (MHC# HUD.908) in Sudbury and Hudson.
2. Historic American Engineering Record (HAER) Documentation of Massachusetts Central Railroad Bridges #127 and #128 (MHC#s SUD.901 and SUD.900, respectively) to be undertaken by an Architectural Historian qualified under 36 CFR 61. The HAER documentation shall consist of a structure report to include large format photographs, photo key and index, measured drawings, site plan, and an architectural/historical narrative (“Level II documentation”).
3. Photodocumentation to Historic American Building Survey (HABS)/HAER standards of the Massachusetts Central Railroad Bridge #130/Fort Meadow Brook Railroad Bridge #130 (MHC# HUD.908) in Hudson.
4. Development and installation, in consultation with the Hudson and Sudbury Historical Commissions, of one 24" x 36" interpretive panel design that describes the history of the bridges and Massachusetts Central Railroad, with one panel each to be located at Massachusetts Central Railroad Bridges #127 and #128 (MHC#s SUD.901 and SUD.900, respectively) and Fort Meadow Brook Railroad Bridge #130 (MHC# HUD.908) in Sudbury and Hudson.
5. Development and installation, in consultation with the Sudbury Historical Commission, of one 24" x 36" interpretive panel that describes the history of the diamond junction between the Massachusetts Central Railroad and the Framingham & Lowell Railroad.
6. Development and installation, in consultation with the Hudson and Sudbury Historical Commissions, of one 24" x 36" interpretive panel design that describes the general history of the Massachusetts Central Railroad, with one panel each to be located in Hudson and Sudbury.
7. Development and installation of up to 15 feature markers consisting of approximately 18" square signs on posts, including markers for railroad features to be removed, in consultation with the Hudson and Sudbury Historical Commissions.
8. Rehabilitation of the Massachusetts Central Railroad Bridge #128 (MHC# SUD.900) in Sudbury that is consistent with the *Secretary of the Interior’s Standards and Guidelines for Rehabilitation*, as follows: the existing steel girders, timber piers, cross-frames, and the majority of the granite block abutments will be retained and reused. The existing timber ties, steel rails, timber deck (non-historic), and timber handrail (non-historic) are to be removed and replaced. The new handrail will be made of timber and will be clearly identifiable as a new bridge element but will also be compatible with the existing historic fabric.
9. Installation of granite markers (6-foot-tall 8" x 8" pillars, lettered on two sides with 2.5"-high lettering) at the East Sudbury Station Archaeological Site (SUD.HA.39), South Sudbury Station Archaeological Site (SUD.HA.26), Wayside Inn Station Archaeological Site (SUD.HA.38), Gleasondale Station Archaeological Site (HUD.HA.8), and the Ordway Station Archaeological Site (HUD.HA.9).
10. The retention of representative sections of rail, one pair each of two different rail lengths, to be removed at the bolts, stacked at the Section Tool House, and donated to the Sudbury Historical Commission.

13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai’ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

We have summarized outstanding comments and coordination with the consulting parties to date:

Massachusetts Historical Commission: The MHC responded to a general project notification on March 19, 2018. Their response indicated that historic properties were present, and that Commonwealth Heritage Group (CHG) recommended an intensive (locational) archaeological survey for archaeologically sensitive portions of the project impact area. Since then, extensive surveys have been conducted as described herein. We have engaged with the MHC via phone call, email, letter and through virtual meetings to identify historic properties and address adverse impacts to those properties. We met with the MHC during the September 28, 2021 consulting parties meeting where the MHC provided several comments on the project. The USACE addressed those comments, and others, provided by the other consulting parties during that meeting. On December 17, 2021, the USACE sent a Determination of Effects to historic properties letter to the MHC and other consulting parties. The USACE is scheduling a second consulting party meeting with the MHC to discuss the project and that December 17, 2021 letter.

Narragansett Indian Tribe: The Tribe had concerns about litigation regarding the use of the MBTA ROW for the proposed project. We responded to the Tribe and said that our review and evaluation of the permit application can continue, and that any issues regarding property rights are not applicable to the USACE permitting process. On February 2, 2022, the Surface Transportation Board (STB) denied Protect Sudbury's requested issuance of a declaratory judgement against the MBTA and its plan to grant an easement to Eversource for the use of the MBTA ROW in Sudbury (see enclosure, STB Order 2-2-22). The USACE sent this decision to the Narragansett Indian Tribe. The Tribe also requested an individual meeting to discuss the project specifics further, which is being scheduled in February 2022.

Wampanoag Tribe of Gay Head (Aquinnah): The USACE has not received written comments to date. During the September 28, 2021 consulting party meeting, the Tribe provided comments on the project. Their comments supported the comments provided by the MHC.

Mashpee Wampanoag: We have not received any correspondence from the Mashpee Wampanoag Tribe to date.

Sudbury Historical Commission: Please refer to the "Sudbury Historical Commission (SHC) Response to Comments" enclosure dated February 14, 2022.

Hudson Historical Commission (HHC): During the September 28, 2021 consulting party meeting, the HHC provided comments to the USACE about the project. The USACE and applicants worked with the HHC to address their comments during the meeting, and afterwards. The HHC did not respond to our December 17, 2021 letter within the comment timeframe. Therefore, the USACE believes that the HHC's comments were addressed thus far in the Section 106 process.

* see *Instructions for Completing the ACHP e106 Form*

III. Additional Information

14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation. Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

Consulting Parties & Contact Information:

John Brown III, Narragansett Indian Tribe; tashtesook@aol.com

Cora Pierce, Narragansett Indian Tribe, coradot@gmail.com; coradot@yahoo.com

David Weeden, Mashpee Wampanoag Tribe; David.Weeden@mwtribe-nsn.gov

Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah), Aquinnah, MA; bettina@wampanoagtribe.net

Brona Simon, SHPO, MA Historical Commission, 220 Morrissey Blvd., Boston, MA 02125

Chris Hagger, Sudbury Historical Commission, Sudbury, MA; cldh7@aol.com

Diana Warren, Sudbury Historical Commission, Sudbury, MA; dewwarren@gmail.com

Peter Breton, Hudson Historical Commission, Hudson, MA; pbreton@yahoo.com; petebreton@gmail.com

Status of Consultation: The U.S. Army Corps of Engineers (USACE), New England District, has been consulting with the above Consulting Parties regarding a permit application for the Sudbury-Hudson Transmission Reliability and Mass Central Rail Trail Project in the communities of Hudson, Marlborough, Sudbury, and Stow, Massachusetts. The USACE held a meeting on September 28, 2021 with the consulting parties and another meeting on October 14, 2021 with the Sudbury Historical Commission (SHC). We received comments verbally during both meetings from the consulting parties. The SHC also responded via letter on October 25, 2021. The USACE sent a letter to SHC on December 6, 2021. The USACE also sent a letter to the consulting parties on December 17, 2021. This letter describes our determination of eligibility of resources within the APE for listing in the National Register of Historic Places and our determination of adverse effect. The SHC responded to this letter on January 14, 2022, and the USACE is following up with a detailed response to both the October 25, 2021 and January 14, 2022 letters. In addition, the USACE is revising the draft Memorandum of Agreement and will send that information to the consulting parties in February 2022. Accompanied with the revised MOA, the USACE will also send the revised Historic Properties Avoidance and Protection Plan (HPAPP), which was formerly referred to as an Archaeological Site Avoidance and Protection Plan (ASAPP). Lastly, the USACE is organizing several meetings with the consulting parties. First, the USACE will meet individually with the Narragansett Indian Tribe in February 2022. Second, the USACE will meet individually with the Sudbury Historical Commission on February 24, 2022. Third, the USACE is scheduling another Consulting Party meeting to occur in February 2022.

15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

N/A

16. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:

No

The following are attached to this form (check all that apply):

- Section 106 consultation correspondence
- Maps, photographs, drawings, and/or plans
- Additional historic property information
- Consulting party list with known contact information

Other:

Response to the Sudbury Historical Commission's Comments (February 14, 2022)
Updated Project Impacts to Railroad Features (February 11, 2022)
Post Review Discoveries Plan (February 11, 2022)
Historic Properties Avoidance and Protection Plan (HPAPP) (February 11, 2022)
Revised Draft Memorandum of Agreement (February 2022)
STB Order 2-2-22
IFC PLANS - SUD-HUD 2-3-2022 (part 1 of 2)_Stamped_REV1
IFC PLANS - SUD-HUD 2-3-2022 (part 2 of 2)_Stamped_REV1
Updated Plans with Permit Area & Area of Potential Effect Boundaries (November 18, 2021)
Form A Central Mass RR in Hudson (October 2021)
MHC Inventory Form A (Area) for CMRRCHD (December 2020)
Project Alternatives Letter (November 14, 2019)
MHC to USACE Response Letter (March 19, 2018)