

**MEMORANDUM OF AGREEMENT  
BETWEEN THE U.S. ARMY CORPS OF ENGINEERS  
AND THE MASSACHUSETTS HISTORICAL COMMISSION, NSTAR d/b/a  
EVERSOURCE ENERGY AND THE MASSACHUSETTS DEPARTMENT OF  
CONSERVATION AND RECREATION  
REGARDING THE SUDBURY-HUDSON TRANSMISSION RELIABILITY AND MASS  
CENTRAL RAIL TRAIL PROJECT, HUDSON, STOW, MARLBOROUGH, AND  
SUDBURY, MASSACHUSETTS**

**WHEREAS** the U.S. Army Corps of Engineers (USACE) plans to issue a Department of the Army Permit to NSTAR d/b/a Eversource Energy (Eversource) and the Massachusetts Department of Conservation and Recreation (DCR) for the Sudbury-Hudson Transmission Reliability and Mass. Central Rail Trail Project (File No. NAE-2017-01406) in Hudson, Stow, Marlborough, and Sudbury, Massachusetts, (“the undertaking”) pursuant to Section 404 of the Clean Water Act (33 U.S.C. 1344); and

**WHEREAS**, the undertaking consists of the discharge of fill material in order to install a new electric transmission line and construct a rail trail within an existing inactive railroad right-of-way, including, but not limited to, the removal of the rails and wood ties, the modification of two culverts, the replacement of Bridge # 127 and Bridge # 130, and rehabilitation of Bridge # 128, which are contributing historic properties to the Central Massachusetts Railroad Corridor Historic District, which is eligible for listing in the National Register of Historic Places. Bridge # 127 and Bridge # 128 are also individually eligible for listing in the National Register of Historic Places; and

**WHEREAS**, the USACE has defined the scope of the undertaking to include the permit area and Area of Potential Effects (APE) as shown in the figures submitted to the USACE on May 23, 2022; and

**WHEREAS**, the USACE issuance of a Section 404 permit is subject to review under Section 106 of the National Historic Preservation Act (NHPA), as amended (54 U.S.C. 306108), which requires federal agencies to take into account the effects of their undertakings on historic properties listed in or eligible for inclusion in the National Register of Historic Places and afford the Advisory Council on Historic Preservation (“ACHP”) a reasonable opportunity to comment; and

**WHEREAS**, the USACE has determined that the undertaking shall have an adverse effect on the Central Massachusetts Railroad Corridor Historic District, a property eligible for listing in the National Register of Historic Places, and has consulted with the Massachusetts Historical Commission (MHC) pursuant to 33 CFR Part 325, Appendix C and 36 CFR Part 800, the regulations implementing Section 106 of the NHPA; and

**WHEREAS**, the USACE has consulted with Eversource and DCR regarding the effects of the undertaking on the Sudbury-Hudson transmission line/Mass Central rail trail and has invited them to sign this Memorandum of Agreement (MOA) as invited signatories pursuant to 36 CFR §800.6(c)(2); and

**WHEREAS**, the USACE has consulted with the Wampanoag Tribe of Gay Head (Aquinnah), the Mashpee Wampanoag Tribe and the Narragansett Indian Tribe, for which the historic properties may have religious and cultural significance and has invited them to sign this MOA as concurring parties pursuant to 36 CFR §800.6(c)(3); and

**WHEREAS**, the USACE has consulted with the Sudbury Historic Commission and the Hudson Historic Commission regarding the effects of the undertaking on the Sudbury-Hudson electric utility line and Mass Central rail trail and has invited them to sign this Memorandum of Agreement (MOA) as concurring parties pursuant to 36 CFR §800.6(c)(3); and

**WHEREAS**, in accordance with 36 CFR § 800.6(a)(I), the USACE has notified the ACHP by letter dated **February 16, 2022**, of its adverse effect determination with specified documentation, and the ACHP has chosen *not* to participate in the consultation pursuant to 36 CFR §800.6(a)(I)(iii);

**NOW, THEREFORE**, the USACE, MHC, Eversource, and DCR agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties. The USACE will incorporate the following stipulations as conditions to any Section 404 permit issued to Eversource and DCR for this project.

## **STIPULATIONS**

The USACE shall ensure that the following measures are carried out in consultation with the MHC. Eversource and DCR shall provide proof of compliance with such measures to the USACE and MHC:

### **I. HISTORIC PROPERTIES AVOIDANCE AND PROTECTION MEASURES**

- A. Eversource and DCR shall implement the “Historic Properties Avoidance and Protection Plan” (HPAPP), attached to this MOA as Exhibit 1. The HPAPP outlines specific measures to be taken prior to, during, and after construction activities of Eversource Phase I and DCR Phase II to protect, avoid, and/or minimize impacts to significant, including National Register eligible identified, historic properties and their contributing resources such as archaeological sites and railroad-related features.

### **II. CENTRAL MASSACHUSETTS RAILROAD CORRIDOR HISTORIC DISTRICT**

- A. Eversource and DCR shall produce updated MHC Inventory Forms for Massachusetts Central Railroad Bridges #127 and #128 (MHC#s SUD.901 and SUD.900, respectively) in Sudbury and Fort Meadow Brook Railroad Bridge #130 (MHC# HUD.908) in Hudson.

- B. Eversource shall produce 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").

A digital draft HAER document will be submitted to the MHC for one round of review and comment; any comments shall be received within 30 days of submittal. If no comments are received from the MHC within 30 days of submittal, the project proponents may proceed. One draft copy shall also be provided by Eversource Energy on behalf of USACE to NPS for review and comment. Removal of Bridge #127 and rehabilitation of #128 will not commence until NPS comments or a conditional letter of approval is received; however, construction on the remaining portions of the project will not be delayed by this activity. A digital copy of the final HAER documentation shall be provided to the Hudson and Sudbury Historical Commissions.

- C. Eversource and DCR shall produce photo documentation to Historic American Building Survey (HABS)/HAER standards of the Massachusetts Central Railroad Bridge #130/Fort Meadow Brook Railroad Bridge (MHC# HUD.908) in Hudson prior to demolition.
- D. DCR shall develop, place, and install, in consultation with the Hudson and Sudbury Historical Commissions, one 24" x 36" interpretive panel design that describes the history of the Central Massachusetts Railroad Bridges #127, #128, and #130 (MHC #s SUD.901, SUD.900, and HUD.908, respectively). This design shall be fabricated and installed in three locations: at Bridges #127 and #128 in Sudbury, and at Bridge #130 in Hudson. These signs shall be installed within 12 months of DCR completing construction of the rail trail.
- E. DCR shall develop, place, and install, in consultation with the Sudbury Historical Commission, one 24" x 36" interpretive panel that describes the history of the diamond junction between the Central Massachusetts Railroad and the Framingham & Lowell Railroad. This sign shall be installed within 12 months of DCR completing construction of the rail trail.
- F. DCR shall develop, place, and install, in consultation with the Sudbury Historical Commission, one 24" x 36" interpretive panel at the Section Tool House (MHC ID # SUD.282) that describes the history of the Section Tool House. This sign shall be installed within 12 months of DCR completing construction of the rail trail.

- G. DCR shall develop, place, and install, in consultation with the Hudson and Sudbury Historical Commissions, one 24" x 36" interpretive panel design that describes the general history of the Central Massachusetts Railroad. This design shall be fabricated and installed in two locations in total, in consultation with the Hudson and Sudbury Historical Commissions, with one panel each to be located in each town. These signs shall be installed within 12 months of DCR completing construction of the rail trail.
- H. DCR shall develop, place, and install up to 20 railroad feature markers consisting of approximately 18" square signs on steel posts, including markers for railroad features to be removed, in consultation with the Hudson and Sudbury Historical Commissions. These signs shall be installed within 12 months of DCR completing construction of the rail trail.
- I. Eversource shall rehabilitate the Massachusetts Central Railroad Bridge #128 (MHC# SUD.900) in Sudbury in a manner 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 in place 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.
- J. DCR shall install granite markers (6-foot-tall 8" x 8" pillars, lettered on two sides with 2.5"-high lettering) in the vicinity of 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). These granite markers shall be installed within 12 months of DCR completing construction of the rail trail.
- K. Eversource shall retain three pairs of representative sections of rail, of two different rail lengths, to be removed at the bolts, and placed, in consultation with the DCR and Sudbury Historical Commission, at the Section Tool House and at two rail rest locations in Sudbury.

### **III. TRIBAL MONITORING**

- A. Eversource shall provide notification of the construction schedule and site access for the Narragansett Indian Tribe, Mashpee Wampanoag Tribe, and Wampanoag Tribe of Gay Head (Aquinnah) to monitor ground disturbing construction activities at designated areas of interest within the limit of work.



#### **IV. UNANTICIPATED DISCOVERIES**

If properties are discovered that may be historically significant or unanticipated effects on historic properties found, Eversource and DCR shall follow the steps outlined in the Post Review Discoveries Plan attached in Exhibit 2, in accordance with the requirements of 36 CFR 800.13 and 33 CFR 325, Appendix C.

#### **V. DURATION**

This MOA shall be null and void if its terms are not carried out within five years from the date of its execution. Prior to such time, USACE may consult with the other signatories to reconsider the terms, including duration, of the MOA and amend it in accordance with Stipulation VII, below.

#### **VI. MONITORING AND REPORTING**

Each year following the execution of this MOA until the work is complete, or the permit expires or is terminated, Eversource and DCR shall provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes or objections received by USACE in its efforts to carry out the terms of this MOA.

#### **VII. DISPUTE RESOLUTION**

At any time during the implementation of the measures stipulated in this MOA, should an objection to any such measure or its manner of implementation be raised by a signatory, the USACE will notify all signatories to the agreement, take the objection into account, and work as needed to resolve the objection. The disputing signatory Parties will first strive to resolve matters informally. If the signatories cannot agree regarding the dispute, the USACE shall then initiate appropriate actions in accordance with the applicable provisions of 36 CFR 800.

#### **VIII. AMENDMENTS**

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment shall be effective on the date a copy signed by all of the signatories is filed with the ACHP.

#### **IX. TERMINATION**

If any signatory to this MOA determines that its terms shall not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation VII, above. If within thirty (30) days an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, the USACE must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. The USACE shall notify the signatories as to the course of action it shall pursue.

Execution of this MOA by the USACE, MHC, Eversource, and DCR, and implementation of its terms evidence that the USACE has taken into account the effects of this undertaking on historic properties and satisfied its obligations under Section 106 of the NHPA.

**SIGNATORIES:**

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**Tammy Turley**

Chief, Regulatory Division  
New England District  
U.S. Army Corps of Engineers

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Date

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**Brona Simon**

Executive Director  
State Historical Preservation Officer  
Massachusetts Historical Commission

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Date

**INVITED SIGNATORIES:**

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**Catherine Finneran**

Vice President, Sustainability and  
Environmental Affairs

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Date

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**Stephanie Cooper**

Acting Commissioner  
Department of Conservation and Recreation

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Date

**CONCURRING:**

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**Brian Weeden**

Chairman

Mashpee Wampanoag Tribe

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Date

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**John Brown III**

Tribal Historic Preservation Officer  
Narragansett Indian Tribe

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Date

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**Cheryl Andrews-Maltais**

Chairwoman

Wampanoag Tribe of Gay Head (Aquinnah)

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Date

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**Peter Breton**  
Chair  
Hudson Historical Commission

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Date

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**Chris Hagger**

Chair

Sudbury Historical Commission

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Date



**HISTORIC PROPERTIES  
AVOIDANCE AND PROTECTION PLAN:**

**EVERSOURCE ENERGY/MASSACHUSETTS DEPARTMENT  
OF CONSERVATION AND RECREATION'S  
SUDBURY-HUDSON TRANSMISSION RELIABILITY AND  
MASS CENTRAL RAIL TRAIL PROJECT  
TOWNS OF HUDSON, MARLBOROUGH,  
SUDBURY, AND STOW,  
MIDDLESEX COUNTY, MASSACHUSETTS  
MHC #RC.62384, EEA #15703.**

**HISTORIC PROPERTIES AVOIDANCE AND PROTECTION PLAN:**

**EVERSOURCE ENERGY/MASSACHUSETTS DEPARTMENT OF  
CONSERVATION AND RECREATION'S  
SUDBURY-HUDSON TRANSMISSION RELIABILITY AND MASS CENTRAL  
RAIL TRAIL PROJECT  
TOWNS OF HUDSON, MARLBOROUGH, SUDBURY, AND STOW ,  
MIDDLESEX COUNTY, MASSACHUSETTS  
MHC #RC.62384, EEA #15703.**

Prepared for

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and

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Submitted to

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**February 11, 2022**

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## 1.0 INTRODUCTION

Eversource Energy (Eversource) and the Massachusetts Department of Conservation and Recreation (DCR) are proposing a joint project (the “Project”) to construct a new, approximately 9-mile, underground 115-kilovolt electric transmission line and rail trail sited primarily within an unused railroad corridor/right-of-way (ROW) owned by the Massachusetts Bay Transportation Authority (MBTA). This project passes through the municipalities of Sudbury, Hudson, Marlborough, and Stow (Figures 1 and 2). Construction will be conducted in two integrated phases with the majority of the earthwork and the installation of the underground transmission line to be conducted in Phase I and Phase II will consist of the paving and additional ancillary activities associated with the construction of the rail trail.

On behalf of Eversource and the DCR, the following Historic Properties Avoidance and Protection Plan (HPAPP) has been developed by Commonwealth Heritage Group, Inc. (CHG) to protect significant historic and archaeological resources in proximity to the Project’s Limit of Work. An Archaeological Site Avoidance and Protection Plan was requested by the Massachusetts Historical Commission (MHC) for submittal to the MHC (MHC Review Letter to the US Army Corps of Engineers dated December 18, 2019). This document has been revised to incorporate both archaeological and above ground resources and was thus renamed an HPAPP to account for the multiple resource types presented in this document.

This HPAPP consists of three sections: Introduction, Prior Cultural Resources Investigations, and the Avoidance and Protection Plan. The latter includes subsections that address Pre-Construction, Construction and Post-Construction Activities.

## 2.0 PRIOR CULTURAL RESOURCE STUDIES

The Project requires review and permitting by the US Army Corps of Engineers (USACE) and is being reviewed by the MHC under Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800). The MHC has determined that the project area is within and adjacent to historic and archaeological resources included in the MHC’s Inventory of Historic Assets of the Commonwealth and/or State and/or National Registers of Historic Places (MHC letter dated June 30, 2017). A reconnaissance-level historic properties survey and archaeological reconnaissance survey (under MHC Permit #3783) were conducted by CHG and final reports submitted (Myruski and Meyer 2017; Dudek and Donohue 2018). Based on the results of the reconnaissance surveys, an archaeological intensive (locational) survey was recommended for archaeologically sensitive portions of the Project and two MHC Area Inventory Forms were drafted to document the Central Massachusetts Railroad Corridor Historic District (CMRRCHD) in the Towns of Sudbury (Spies 2020) and Hudson (Benjamin-Ma, et al. 2021). The archaeological intensive (locational) survey was conducted under Permit #3828 issued by the State Archaeologist. Field work was conducted during the summer of 2018 and the final report submitted (Dudek and Donohue 2019).

The archaeological intensive (locational) survey field work identified ten archaeological sites that are considered to be potentially significant (i.e., having the potential to meet the criteria of eligibility for listing on the National Register of Historic Places). Two of the archaeological sites are precontact Native American sites and both sites will be avoided: The Ordway Locus 2 Precontact Site (19-MD-1208) in Hudson consists of a quartz tool, a rhyolite flake, four fire-cracked rocks and a possible fire-related feature; The Ordway Locus 3 Precontact Site (19-MD-1209), also in Hudson, consists of ten pieces of stone chipping debris from tool making and two fire-cracked rocks.

In addition, eight of the ten sites consist of historic archaeological sites. Five railroad station sites and a railroad section tool house associated with the CMRRCHD are present in the Project ROW and include the Gleasondale Station (HUD-HA-8) and the Ordway Station (HUD-HA-9) in Hudson; the Wayside Inn

Station (SUD-HA-38), the South Sudbury Station (SUD-HA-26), the Boston & Maine Railroad Section Tool House (SUD-HA-37) and the East Sudbury Station (SUD-HA-39) in Sudbury. The Boston & Maine Railroad Section Tool House site (SUD-HA-37) includes the standing ca. 1890 section tool house (SUD.282). Intact yard deposits associated with two colonial sites that are primarily located outside of the ROW - the Memorial Forest Cellar Hole (SUD-HA-36) and the Walker Garrison House (SUD-HA-30) - were also identified.

Avoidance and protection of the potentially significant archaeological sites was recommended (Dudek and Donohue 2019). The MHC commented that: “A draft written archaeological site avoidance and protection plan, including stipulations for fencing, signage and contractor briefings, should be prepared by CHG and submitted to the MHC for review and comment” (MHC Review Letter to the USACE dated April 3, 2019).

### 3.0 AVOIDANCE AND PROTECTION PLAN OF CULTURAL RESOURCES

**Table 1. Identified potentially significant archaeological sites and proposed action.**

Affected Property			Proposed Action		
Archaeological Site	Site # and town	Segment	Avoidance measures during construction	Burial of site under fill/ geotextile fabric	Figure
Ordway Locus 2 Precontact Site	19-MD-1208 Hudson	5 Main Street to Parmenter Road	Yes		Figure 3
Ordway Locus 3 Precontact Site	19-MD-1209 Hudson	5 Main Street to Parmenter Road	Yes		Figure 3
Gleasondale Station site (CMRRCHD)	HUD-HA-8 Hudson	3 Chestnut Street to Fort Meadow Brook	Partial	X	Figure 4
Ordway Station site (CMRRCHD)	HUD-HA-9 Hudson	6 Parmenter Road to White Pond Road	Yes		Figure 5
Memorial Forest cellar hole	SUD-HA-36 Sudbury	8 Hudson Town Line to Dutton Road	Yes		Figure 6
Walker Garrison House	SUD-HA-30 Sudbury	8 Hudson Town Line to Dutton Road	Yes		Figure 7
Wayside Inn Station site (CMRRCHD)	SUD-HA-38 Sudbury	8 Hudson Town Line to Dutton Road	Yes		Figure 8
South Sudbury Station (CMRRCHD)	SUD-HA-26 Sudbury	11 Horse Pond Road to Union Avenue	Yes		Figure 9
Boston & Maine Railroad Section Tool House (CMRRCHD)	SUD-HA-37 Sudbury	12 Route 20 to Landham Road	Yes		Figure 10
East Sudbury Station site (CMRRCHD)	SUD-HA-39 Sudbury	13 Landham Road to Sudbury Substation	Partial	X	Figure 11

Table 1 lists the ten archaeological sites recommended for avoidance and protection and the proposed measures to be taken. While some of the archaeological sites (Sites 19-MD-1208, 19-MD-1209, SUD-HA-30, and SUD-HA-36) are located outside of the Project's Limit of Work (defined as the maximum extent of ground disturbance during construction activities and shown on Project plans), modifications to the Project route and the Limit of Work have been made to completely avoid four additional sites: HUD-HA-9, SUD-HA-26, SUD-HA-37, and SUD-HA-38. Sites HUD-HA-8 and SUD-HA-39 are partially within the Limit of Work but are being protected from grading or excavation; these sites will be protected by burial of the site within the Limit of Work under the installation of geotextile fabric with clean road-grade fill over the geotextile fabric.

The South Sudbury Railroad Station site (SUD-HA-26) is located west of Union Avenue and south of the railroad under an asphalt-paved driveway and parking area. The 1888 Victorian-style station was demolished in the mid 1950s and no impact to the site is proposed; the site will be protected by the pavement. Prior to demolition of the station, a small Colonial-style depot was constructed in 1952 south of the rail line and east of the former South Sudbury Depot. The 1952 depot was retired from service on January 17, 1965; it is still intact. Avoidance and protection of the ca. 1952 Colonial-style depot is recommended (Figure 9); presently the building has been vacated from the business that was located there recently, but fencing may need to be modified to take into account access to the building or business owner concerns if a business is present at the time of construction.

### Central Massachusetts Railroad Corridor Historic District Contributing Resources

In addition to the aforementioned railroad station archaeological sites and the railroad section tool house, a number of other railroad-related features including, but not limited to, bridges, whistle posts, rail rests, signal relay boxes, battery wells, culverts and mile markers were identified and listed as contributing resources to the CMRRCHD. A comprehensive listing of all CMRRCHD contributing resources and the proposed Project actions is presented in Appendix I. A number of these resources will be either removed, replaced, rehabilitated, or altered. These resources include the rails and wood ties (SUD.933 and SUD.934 – MHC Inventory #s for rails and wood ties in Hudson are TBD), with the exception of two sections of spur track located west of Union Avenue and west of Boston Post Road as outlined in the Project plans, Bridge 127 (SUD.901), Bridge 128 (SUD.900), Bridge 130 (MHC Inventory # TBD), Culvert 125B (No MHC Inventory # on form), Culvert 126D (SUD.940), Culvert 127A (SUD.945), and the stone retaining wall at MP 23.95 (MHC Inventory # TBD).

For the remaining contributing resources, individual proposed project actions, along with their mile post and VHB Station locations (present on the Project plan sets) are summarized in Table 2. These impacts were updated after an initial review with the Phase I construction contractor on 1/27/2022. Of these resources, any located well outside the Limit of Work shall be retained and protected with construction fencing and signage that shall be installed in consultation with and approved by the cultural resource consultant (see *Resources to be Avoided* in Table 2). The consultant shall be given 24 hours advanced notice before any construction activities within the immediate vicinity of the feature occurs.

The resources located within the Project's Limit of Work will need to be removed and reset in a new location, but will be reset as close as possible to their original location (see *Resources within Limit of Work to be Removed & Reset* in Table 2). Lastly, a number of additional features are located at the very limit of or directly adjacent to the Limit of Work and will need additional contractor input during construction as to whether or not these objects will need to be removed and reset (see *Resources at very limit of or directly adjacent to Limit of Work and will be Avoided or Removed & Reset* in Table 2); whenever feasible these features will be preserved *in situ*.

**Table 2. Identified CMRRCHD contributing resources and proposed action.**

Contributing Resource	MHC#	MP	VHB STA	Town
<b>Resources to be Avoided</b>				
Section Tool House	SUD.282	19.75	712+20	Sudbury
South Sudbury Station	SUD.396	19.99	601+50	Sudbury
Telegraph Poles (approx. 23 in total)*	SUD.935	Various	Various	Sudbury
Culvert 126A	SUD.936	18.96	752+17	Sudbury
Milepost	SUD.937	19.00	751+50	Sudbury
Culvert 126B	SUD.938	19.06	747+39	Sudbury
Battery Well for Distant Approach Signal	SUD.942	19.26	736+45	Sudbury
Whistle Post - W on east face, N of tracks	SUD.946	19.73	712+80	Sudbury
Concrete base for Auto Highway Flashers	SUD.947	19.76	711+80	Sudbury
Concrete base for Auto Highway Flashers	SUD.948	19.76	710+90	Sudbury
Signal Relay Box (mast only)	SUD.949	19.76	710+85	Sudbury
Culvert 127B	SUD.950	19.87	704+56	Sudbury
Concrete Bases for Highway Signal	SUD.951	19.97	602+45	Sudbury
Signal Relay Box	SUD.961	20.13	594+50	Sudbury
Culvert 127C	SUD.962	20.14	593+18	Sudbury
Signal Relay Box	SUD.963	20.34	585+00	Sudbury
Wood Post	SUD.964	20.34	584+60	Sudbury
Culvert 127D	SUD.966	20.44	577+31	Sudbury
Culvert 127E	SUD.970	20.75	560+82	Sudbury
Signal Relay Box	SUD.972	20.79	555+50	Sudbury
Milepost B21 N83	SUD.976	21.00	548+80	Sudbury
Culvert 127F	SUD.979	21.18	539+40	Sudbury
Wood Post, south side of ROW	SUD.982	21.36	529+80	Sudbury
Culvert 127G	SUD.983	21.40	527+30	Sudbury
Culvert 127H	SUD.984	21.51	521+64	Sudbury
Culvert 127I	SUD.985	21.58	517+96	Sudbury
Whistle Post (broken) - S side of tracks	SUD.986	21.58	517+50	Sudbury
Rail Rest	SUD.988	21.94	414+15	Sudbury
Milepost B22 N82	SUD.989	22.00	413+05	Sudbury
Culvert 127J	SUD.990	22.05	410+25	Sudbury
Culvert 129A	SUD.992	22.83	368+80	Sudbury
Farm Crossing	TBD	18.79	761+25	Sudbury
Milepost	TBD	23	360+20	Hudson
Rail Rest	TBD	23.05	357+90	Hudson
Telegraph Pole	TBD	23.06	357+25	Hudson
Milepost	TBD	24	307+30	Hudson
Culvert 129C	TBD	24.3	206+15	Hudson
Cattle pass	TBD	25.83	124+90	Hudson
Milepost	TBD	26	114+25	Hudson
Culvert 132A	TBD	26.12	107+90	Hudson
<b>Resources within Limit of Work to be Removed &amp; Reset</b>				
Poured Concrete base for Signal Relay Box/Battery Well	SUD.944	19.60	718+10	Sudbury
Milepost	SUD.953	20.00	601+60	Sudbury
Concrete bases & steel posts for Signal/Electrical boxes (5)	SUD.955	20.00	600+60	Sudbury
Diamond junction with Framingham & Lowell RR	SUD.956	20.02	600+50	Sudbury



Signal Relay Box	SUD.968	20.59	570+05	Sudbury
Whistle Post	SUD.969	20.63	569+15	Sudbury
Crossing Sign Base	SUD.971	20.79	555+65	Sudbury
Wood Post North Side of ROW	SUD.980	21.29	531+90	Sudbury
Conduit Pipe Derail Switch	TBD	23.33	343+35	Hudson
Concrete base well	TBD	24.36	201+10	Hudson
Whistle post (N)	TBD	24.5	195+75	Hudson
Wood Post	TBD	24.72	183+55	Hudson
Utility Pole	TBD	24.76	182+20	Hudson
Track Switch Stand with Electrical Box	TBD	24.8	179+15	Hudson
Concrete Box	TBD	24.89	174+90	Hudson
Milepost	TBD	25	167+75	Hudson
Rail Rest	TBD	25	167+55	Hudson
Rail Rest	TBD	26	114+60	Hudson
<b>Resources at very limit of or directly adjacent to Limit of Work and will be Avoided or Removed &amp; Reset</b>				
Rail Rest	SUD.939	19.21	743+75	Sudbury
Distant Approach Signal	SUD.941	19.26	736+55	Sudbury
Signal Relay Box	SUD.943	19.37	729+60	Sudbury
Electric Switch Box**	TBD	19.75	710 +85	Sudbury
Concrete Sign Post	SUD.952	19.98	602+10	Sudbury
3 Switch Stands	SUD.954	20.00	600+60	Sudbury
Wood whistle/stop sign post	SUD.957	20.02	600+80	Sudbury
Signal Relay Box	SUD.958	20.07	598+55	Sudbury
Concrete Base for Signal E2	SUD.959	20.07	598+55	Sudbury
Rail Rest	SUD.960	20.09	596+90	Sudbury
Tall Concrete Sign Post	SUD.965	20.39	581+10	Sudbury
Rail Rest	SUD.967	20.55	570+65	Sudbury
Distant Approach Interlocking Signal #M208	SUD.973	20.80	551+50	Sudbury
Battery Well for Interlocking Signal #M208	SUD.974	20.80	551+45	Sudbury
Rail Rest	SUD.975	20.98	549+05	Sudbury
Whistle Post – eastbound, S side of tracks	SUD.977	21.13	542+55	Sudbury
Signal Relay Box	SUD.978	21.16	540+85	Sudbury
Auto Highway Flashers/Signal Relay Cabinet	SUD.981	21.35	530+60	Sudbury
Whistle Post - westbound, N of tracks	SUD.987	21.66	513+15	Sudbury
Whistle Post - W on west face, S of tracks	SUD.991	22.19	403+70	Sudbury
Section post	TBD	24	307+30	Hudson
Rail Rest	TBD	24.09	302+60	Hudson
Whistle post (S)	TBD	24.4	200+10	Hudson
Wood Post	TBD	24.78	180+80	Hudson

\*Only one of the approximately 23 telegraph poles in Sudbury will need to be removed due to recently identified safety concerns and the remaining will be avoided. The pole to be removed is adjacent to the Diamond Junction.

\*\*Recently identified by Eversource/DCR and not included on CMRRCHD Inventory Form within the Town of Sudbury (Spies 2020).

The removal and resetting of the railroad features identified as contributing resources will be directed by several guidelines:

- 1) Any features to be removed and reset will be photographed beforehand.
- 2) Those features that are in the Project's Limit of Work will be removed and reset. Whenever feasible, features will be preserved *in situ*.
- 3) If features need to be removed and reset, they will be reset as close as possible to their original location.
- 4) If a feature consists of multiple objects (e.g., SUD.955) the spatial association of these objects will be documented prior to removal and the minimum number of objects will be removed and reset.

- 5) If a feature is closely associated with another feature (e.g., SUD.941 and SUD.942), the spatial association of these objects will be documented prior to removal. If both features need to be reset, the original spatial organization will be maintained when reset, as best as possible. If only one feature needs to be removed and reset, the feature to be removed will be reset in a location a similar distance from the second feature, as best as possible.
- 6) Any feature that is currently leaning will be reset in their original, upright, position, as best as possible, unless this requires additional alteration of or repairs to the object.
- 7) Other than resetting features in an upright position, no attempts will be made to further alter or repair the current condition of the RR features.
- 8) Removal and resetting shall only be done after consultation with the cultural resource consultant, who shall specify the methodology used to remove, protect, and reset the feature, as well as determining the most appropriate location for the resetting of features.
- 9) If there is more than one day's delay between removal and resetting of a feature, the object will be stored on site within the MBTA ROW, but outside the Limit of Work. The resource will be fenced off with high visibility fencing and marked with *No Trespassing* signs until the time in which it can be reset.
- 10) Although not anticipated, if any railroad features are significantly damaged during the removal and resetting process, the feature will be carefully placed outside the Limit of Work, but within the MBTA ROW, and protected with high visibility fencing placed around the feature along with *No Trespassing* signage. Eversource and the DCR will consult with the MHC and the USACE to determine appropriate next steps.

### **Granite Town-Line Marker**

In addition to the historic properties covered under this HPAPP, the Sudbury-Hudson-Marlborough town boundary marker near Old Concord Road will also require protection measures under this Plan (Figure 12). The town boundary location is presently marked with a granite post measuring 10 inches wide and with a height of 47 inches above the ground surface. The post is marked on the west side with the date of "1993"; on the north side with "H" for Hudson; on the east side with "S" for Sudbury; and on the south side with "M" for Marlborough. No railroad ties and tracks are in this area and the present marker was presumably installed around 1993, as the date on the stone suggests. Since the present granite marker is less than 50 years of age, it is not considered to be potentially eligible for the National Register of Historic Places. However, avoidance and protection of the town boundary stone is planned as the marker is protected under Massachusetts General Laws Chapter 42, Boundaries of Cities and Town, Sections 1-12 ([www.massachusettsgenerallaws.com/generallaws.htm](http://www.massachusettsgenerallaws.com/generallaws.htm)). Modifications to the Project route and the Limit of Work have been made to avoid the marker (Figure 12).

### **Avoidance and Protection Measures**

Avoidance and protection measures for the resources include installing high-visibility temporary fencing (i.e., orange construction fence) around the resources or for archaeological sites, at key locations such as along the edges of the Project's Limit of Work and the sensitive cultural resource area, as noted in Figures 3 to 12. Signs with *No Trespassing* should be posted along the fence to indicate that these are off-limits areas. No access or impacts are allowed within the fenced areas. Construction personnel and contractors will be instructed to neither perform nor permit any construction, excavation, grading, tree stumping, filling, dumping, or the storage or staging of equipment vehicles, or supplies within the boundaries of the fenced area. Monitoring or flagging of the areas by CHG can assist in facilitating the employment of protection measures (i.e., placement of fencing). For sites HUD-HA-8 and SUD-HA-39 a CHG Project Archaeologist will monitor the installation of geotextile fabric and clean road-grade fill as necessary to assist in the accurate placement of protective fill over the archaeological sites.

CHG cultural resource personnel will make field visits to ensure that the avoidance and protective measures are carried out as specified, with photographic documentation prior to, during and after construction. The pre-construction, construction, and post-construction elements of the HPAPP for the Project are detailed below:

### 3.1 PRE-CONSTRUCTION PHASE

A pre-construction meeting will be held with Project personnel and contractors and CHG's Principal Investigator to review these measures.

The pre-construction activities will involve the following:

- Pre-construction site inspection;
- Photography;
- Construction personnel briefing; and
- High-visibility fencing with *No Trespassing* signs along the sensitive cultural resource areas to be protected.

### 3.2 CONSTRUCTION PHASE

Construction will be conducted in two integrated phases with the majority of the earthwork and the installation of the underground transmission line to be conducted in Phase I; Phase II will consist of paving and other activities associated with the construction of the rail trail. The majority of the removal and resetting of railroad features will be performed during Phase I of construction.

CHG cultural resource personnel will be available during the course of Phase I of construction work as needed, which will include the monitoring and other activities identified above. For Phase II construction activities, the DCR staff archaeologist or another qualified professional archaeologist will also be available for any necessary monitoring activities.

The construction activities will include the following:

- Avoidance of the fenced sensitive cultural resource areas;
- Monitoring of the installation of geotextile fabric and clean road-grade fill at Sites HUD-HA-8 and SUD-HA-39;
- Specification of the methodology used to remove, preserve, and reset the railroad features;
- Monitoring the removal and resetting of the railroad features; and
- Response, reporting, and corrective actions if these conditions are not met.

### 3.3 POST-CONSTRUCTION PHASE

CHG cultural resource personnel will conduct a post-construction inspection immediately after the construction phase of the Project to evaluate the condition of the archaeologically sensitive areas and determine whether or not project-related impacts had taken place within the protected areas. The findings of the inspection will be reported to the MHC and the USACE via a memorandum.

The post-construction activities will include the following:

- Fence and sign removal;
- Post-construction site inspection;

- Photography; and
- Post-construction memorandum.

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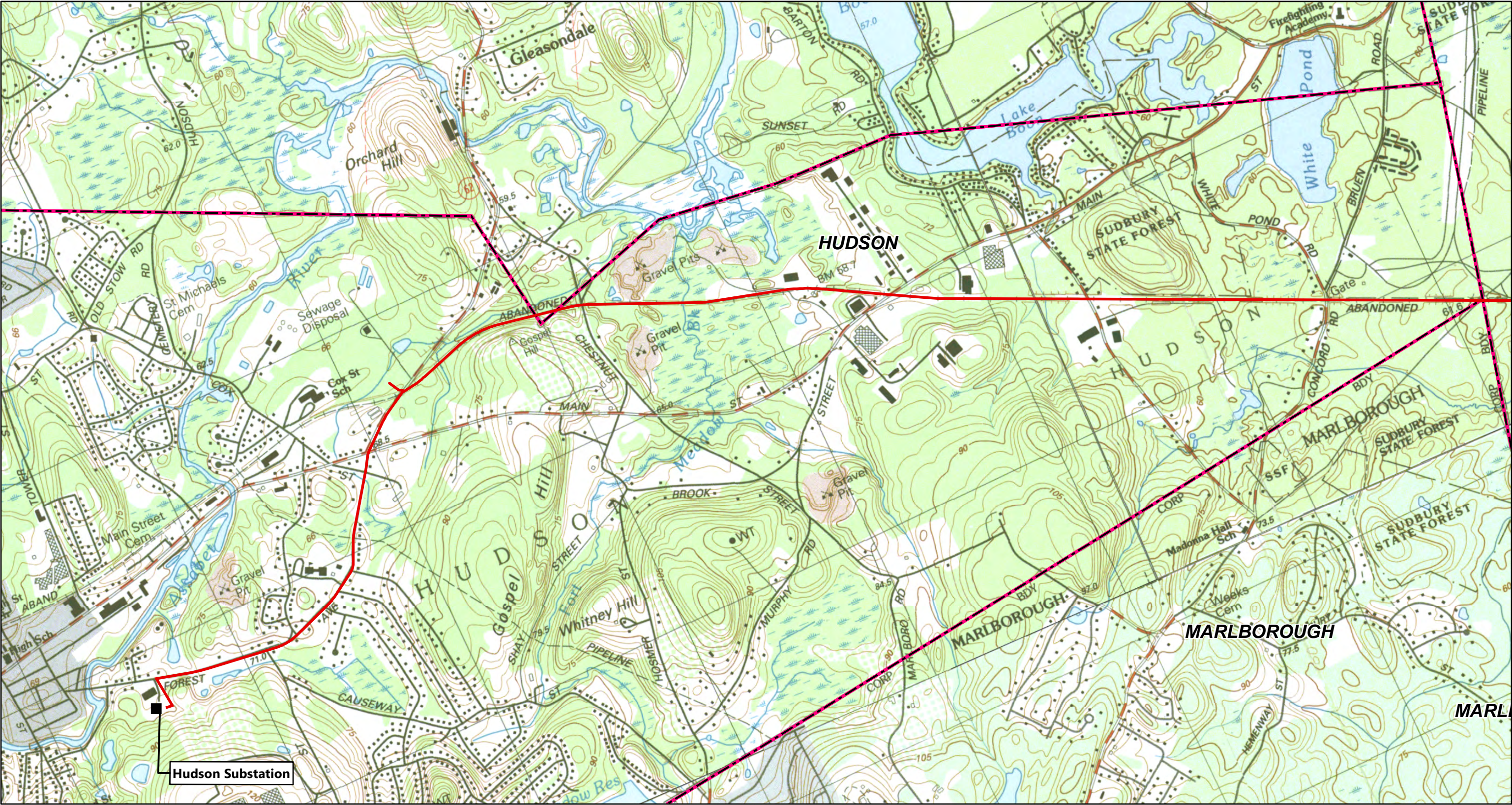
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Spies, Stacy E.

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## *Figures*

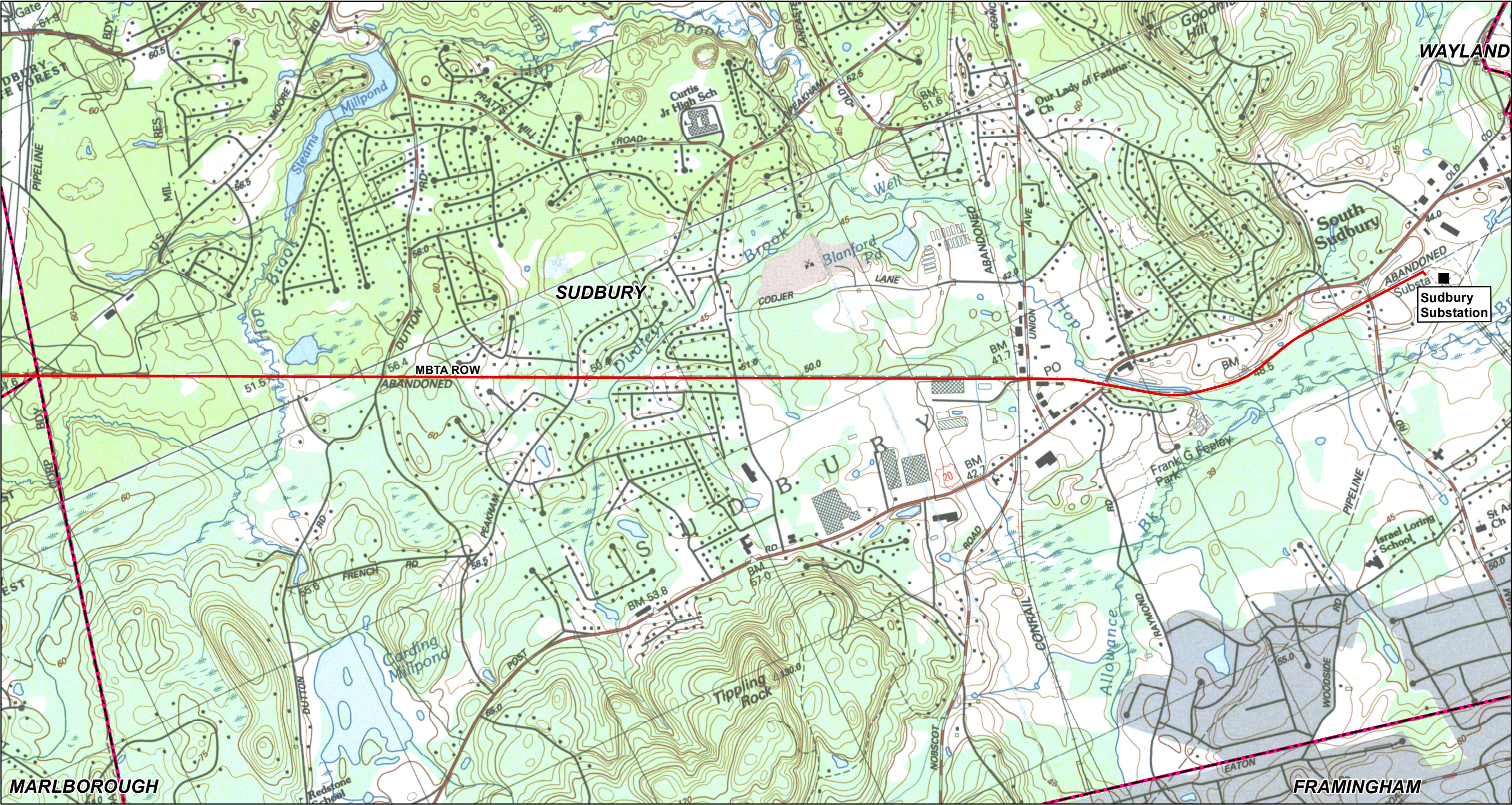




- Project
- Substation Location
- - - Municipal Boundary

Figure 1: Sudbury-Hudson Transmission Reliability and Mass Central Rail Trail Project, Hudson Locus Map (USGS)





- Project
- Substation Location
- Municipal Boundary

**EVERSOURCE**  
ENERGY

**dc**  
MASSACHUSETTS DEPARTMENT OF  
CONSERVATION AND RECREATION

Figure 2: Sudbury-Hudson Transmission Reliability and Mass Central Rail Trail Project, Sudbury Locus Map (USGS)



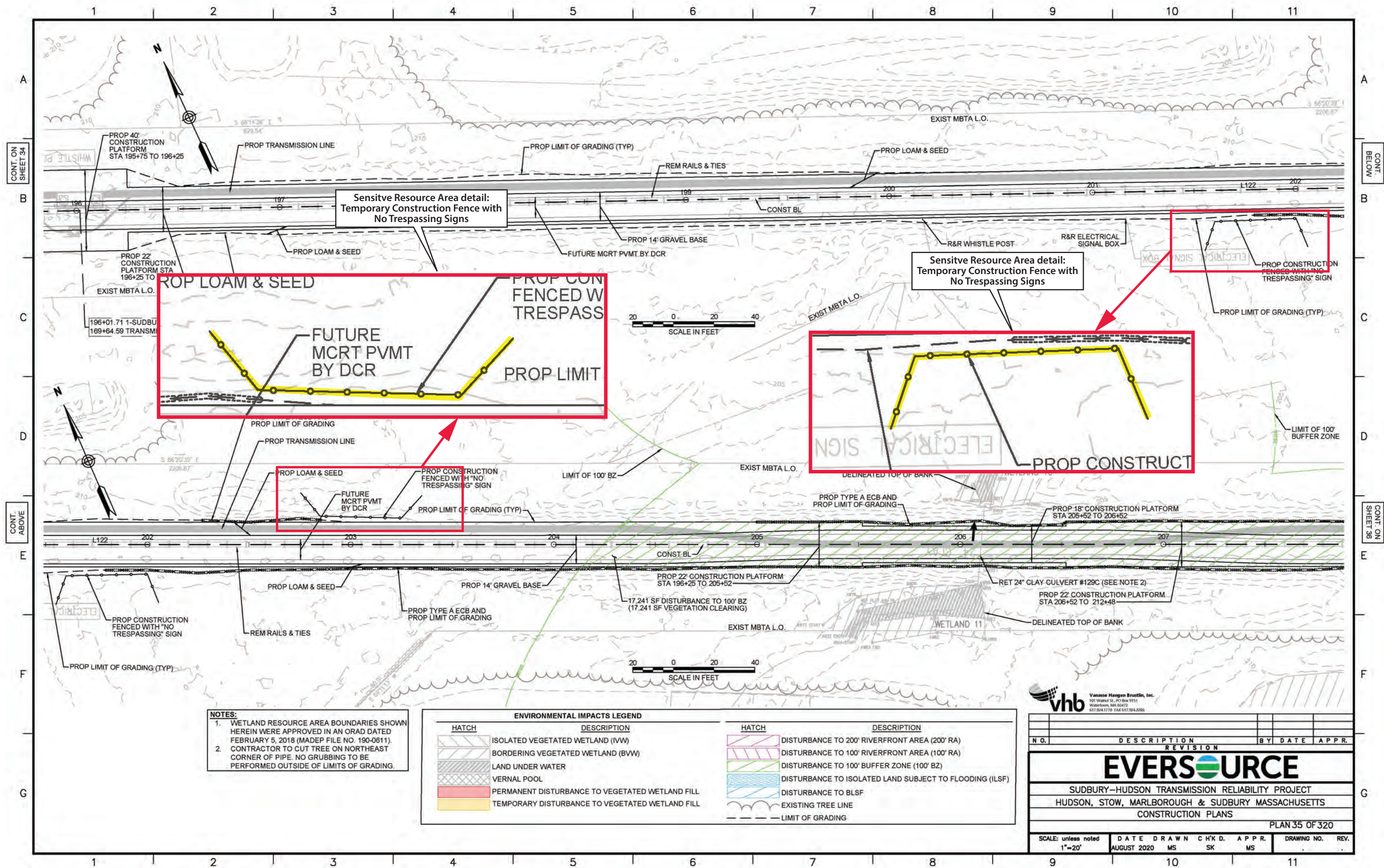


Figure 3. Avoidance and protection measures for sensitive cultural resource areas 19-MD-1208 and 19-MD-1209.



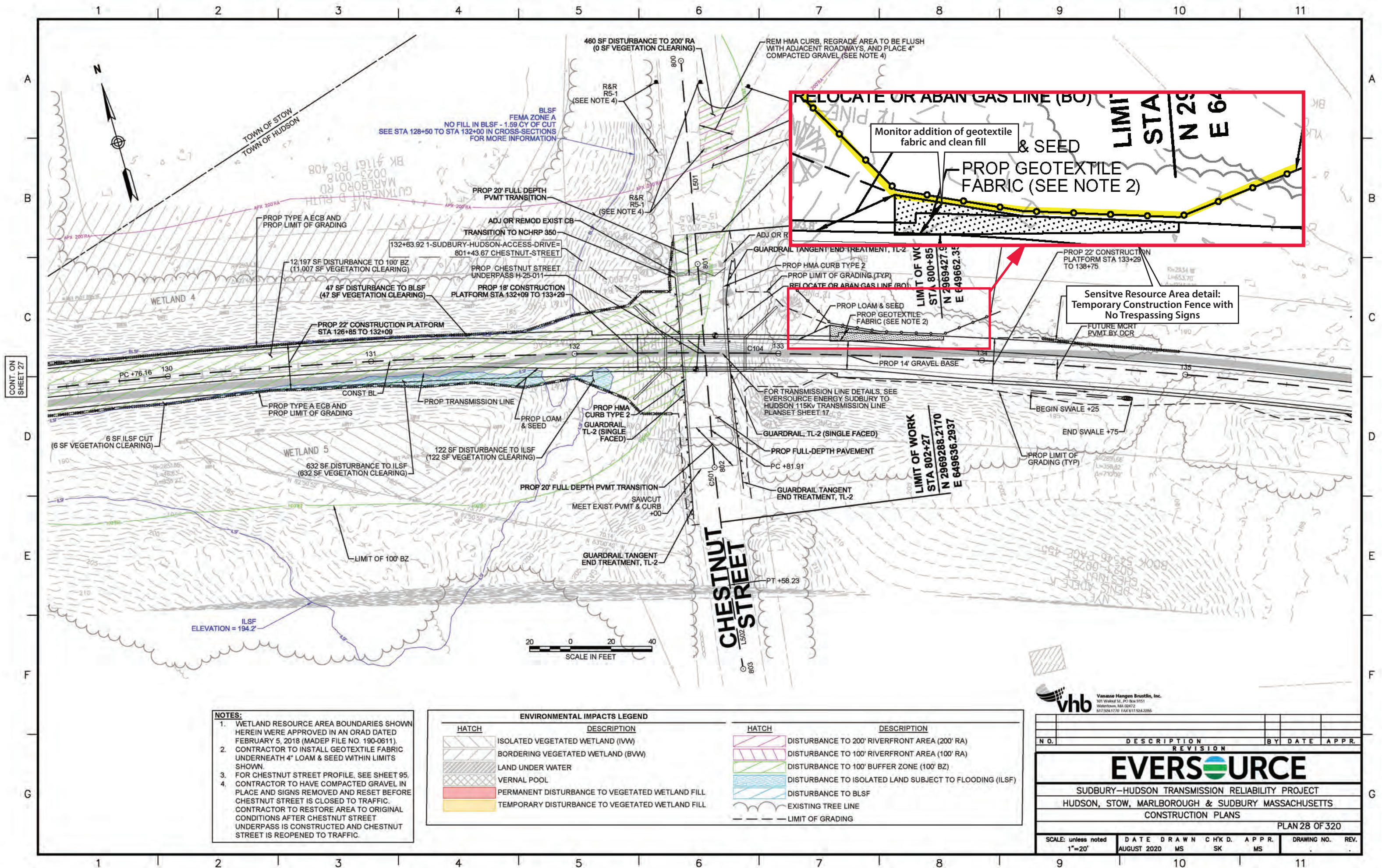


Figure 4. Avoidance and protection measures for sensitive cultural resource area HUD-HA-8.



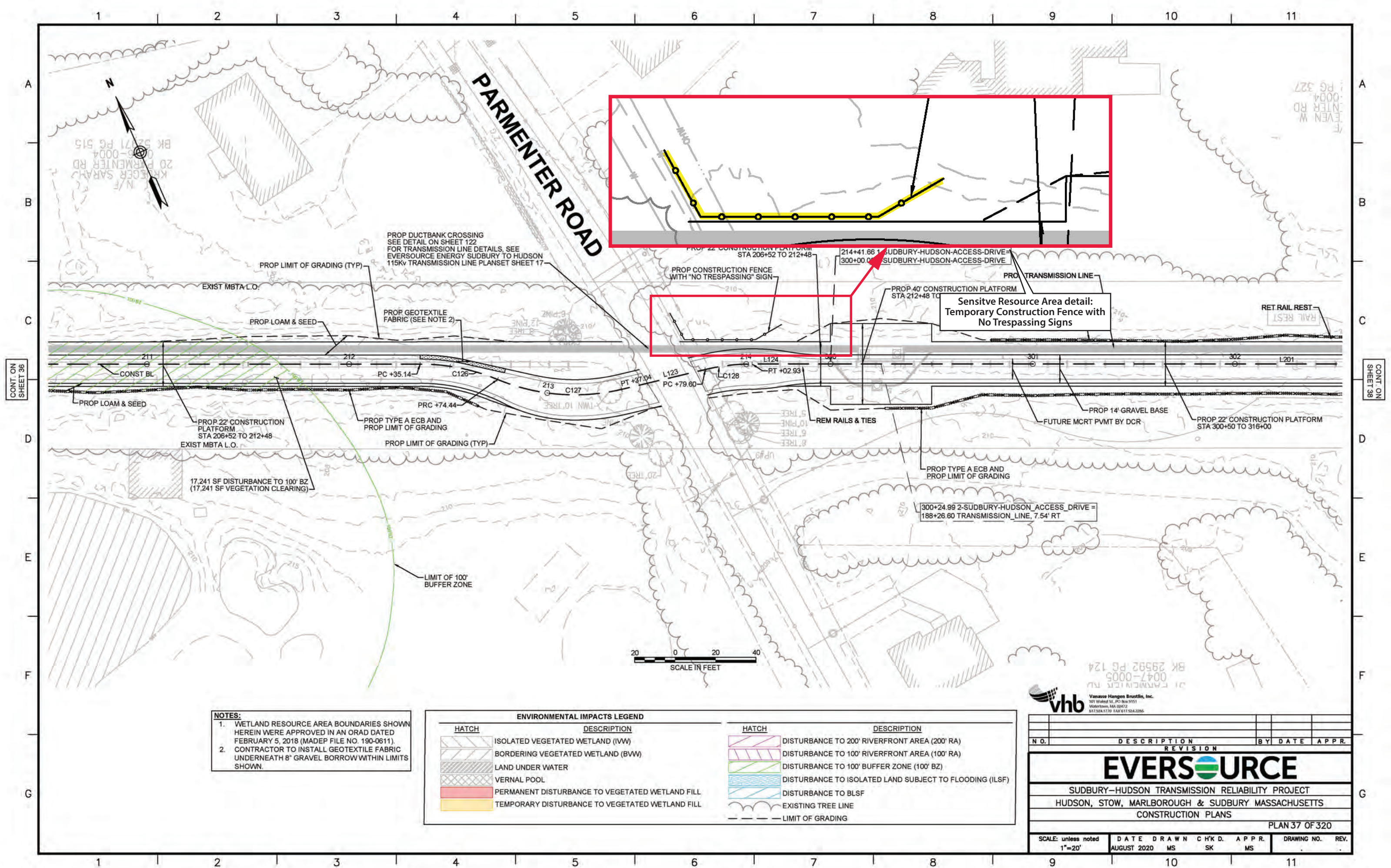
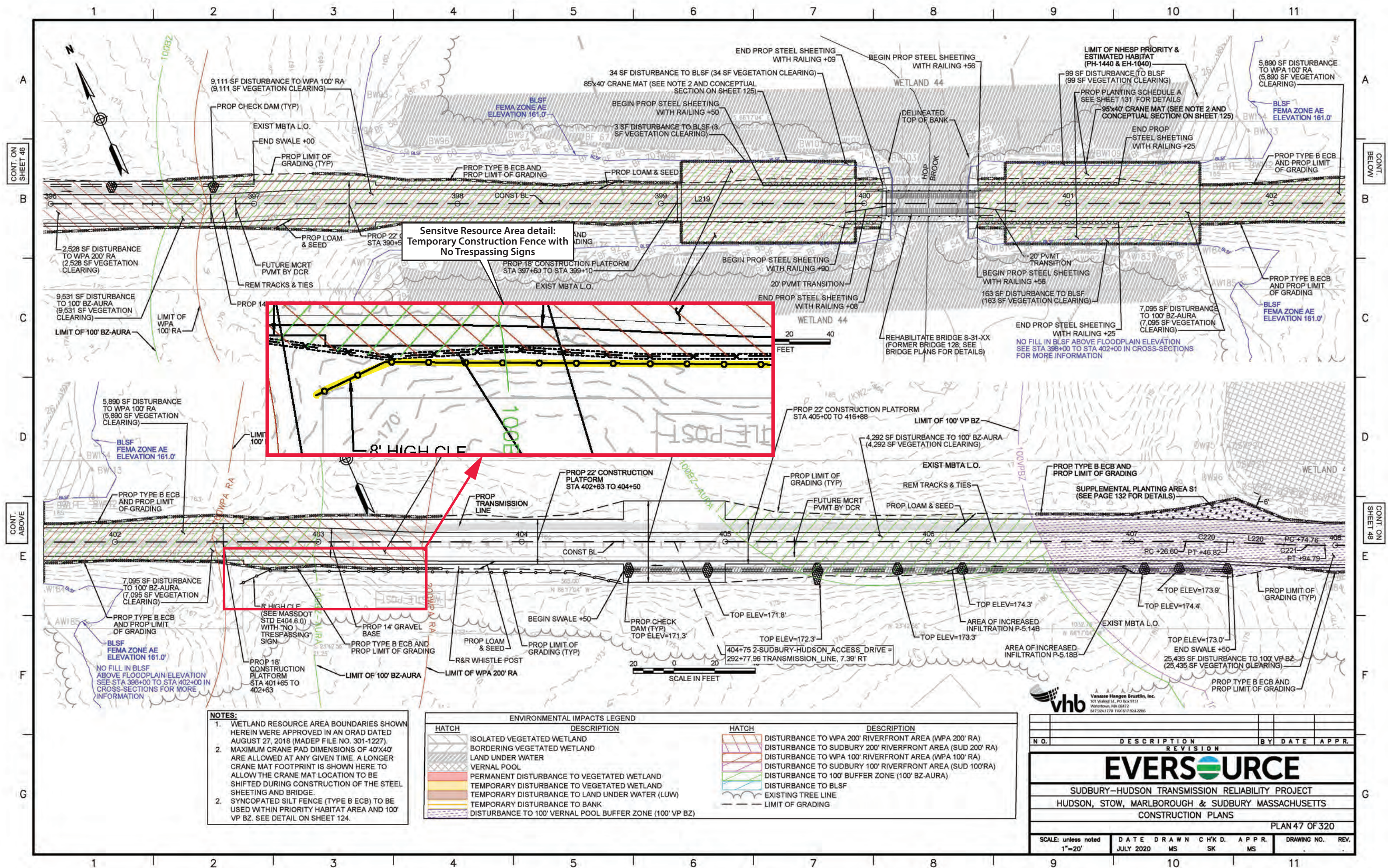


Figure 5. Avoidance and protection measures for sensitive cultural resource area HUD-HA-9.











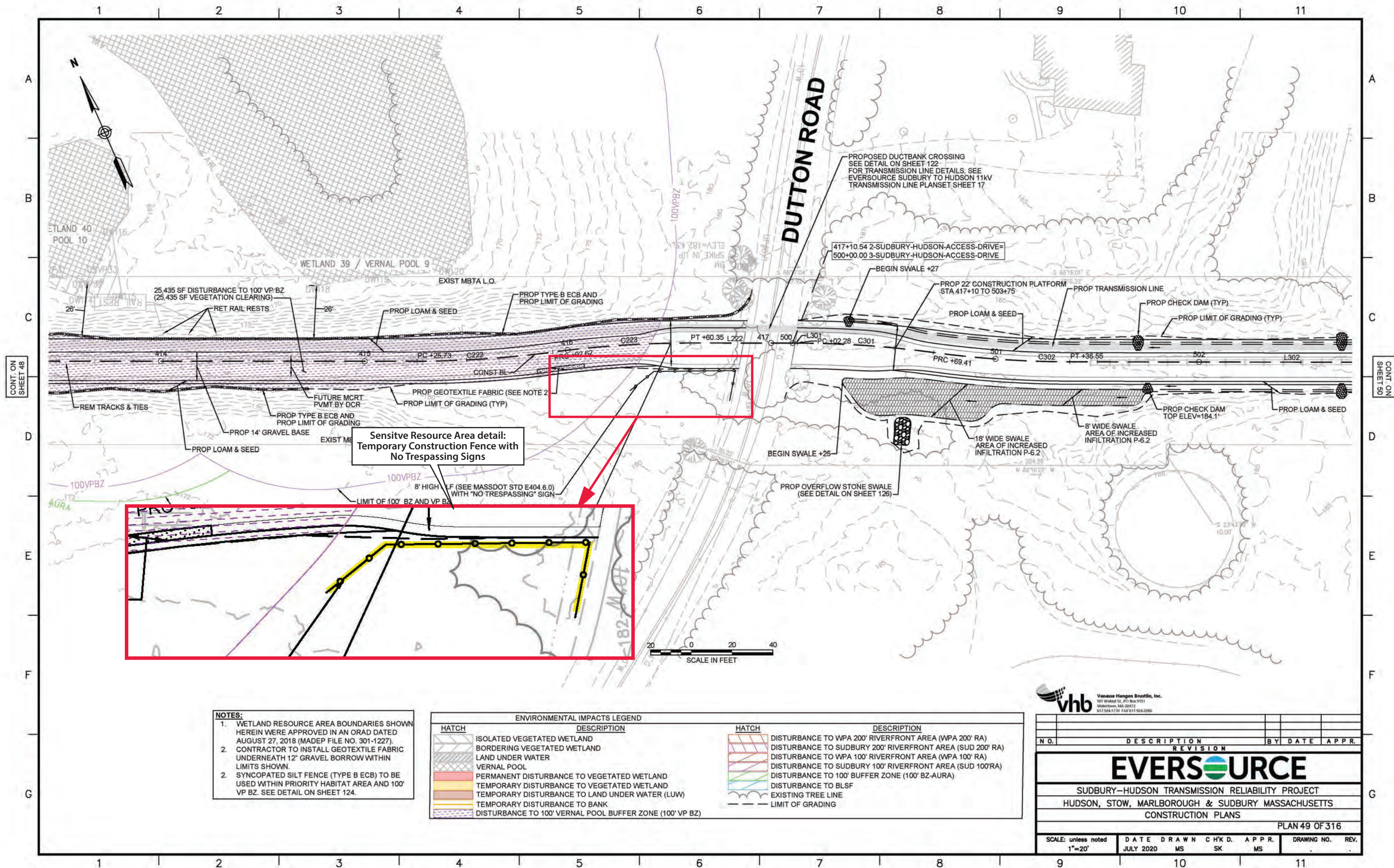


Figure 8. Avoidance and protection measures for sensitive cultural resource area SUD-HA-38.





Figure 9. Avoidance and protection measures for sensitive cultural resource area SUD-HA-26.



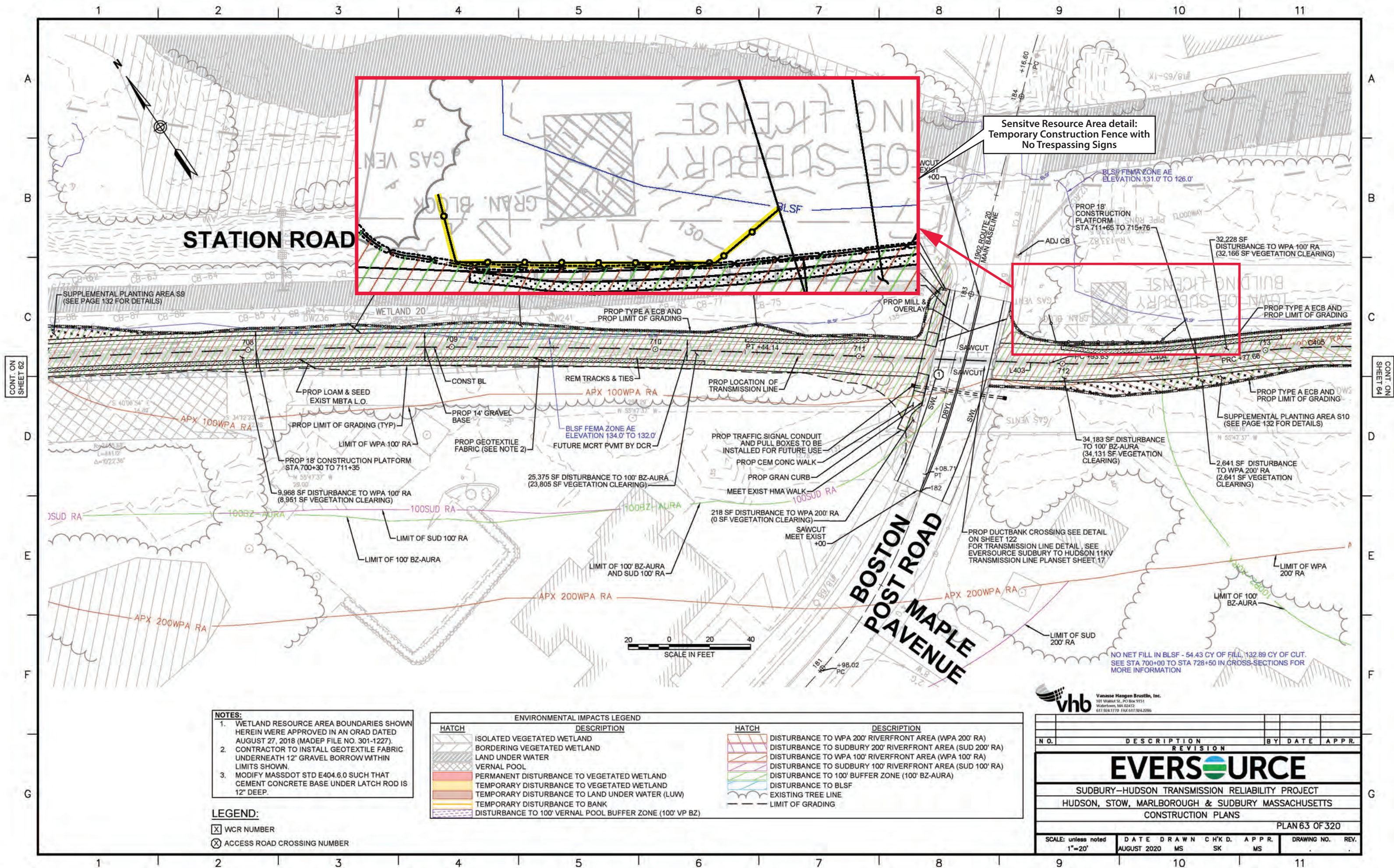


Figure 10. Avoidance and protection measures for sensitive cultural resource area SUD-HA-37.



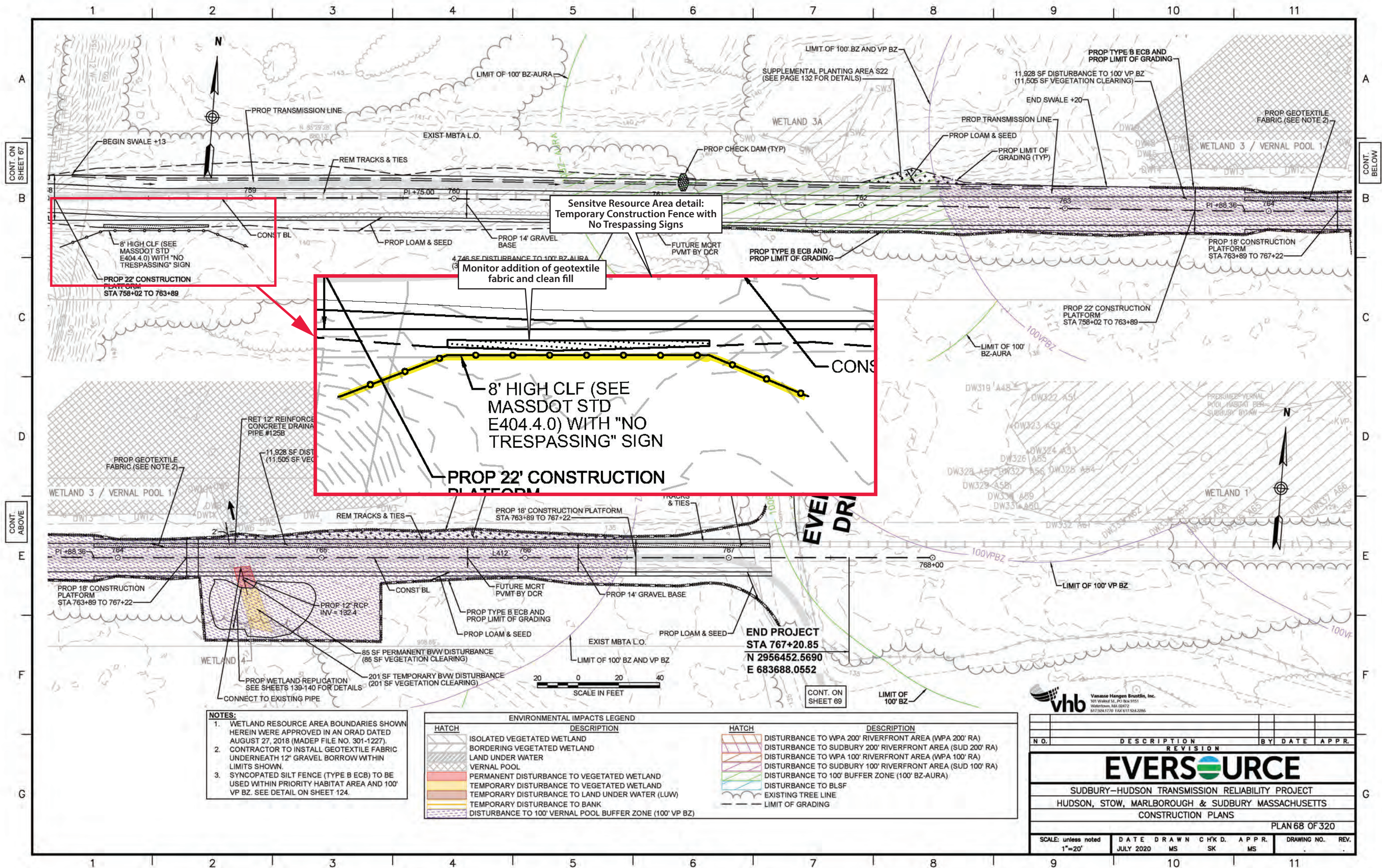


Figure 11. Avoidance and protection measures for sensitive cultural resource area SUD-HA-39.







*APPENDIX I:*  
*CMRRCHD Contributing Resources and Proposed Project Impacts Spreadsheet*

MHC#	Feature	VHB STA	Milepost	Proposed Action	Proposed Project Activity	Party to Complete Proposed Action
<b>Newly identified contributing resource (not included on SUD.R inventory form)</b>						
	Electric switch box	710+85	19.75	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
<b>Contributing resources on SUD.R inventory form that could not be located by SHC/Spies, but were located by Eversource/DCR</b>						
	Farm Crossing -Wood Box 1' span, 3' H	761+25	18.79	Avoid	Outside limit of work	
	Culvert 125B	764+60	18.73	Extend	Extend existing pipe to maintain vernal pool hydrology.	Eversource
<b>Contributing resources on SUD.R inventory form that were located by both SHC/Spies and Eversource/DCR</b>						
SUD.933	Rails	Throughout	Throughout	Remove	Remove	Eversource
SUD.934	Wood Ties	Throughout	Throughout	Remove	Remove	Eversource
SUD.935	Telegraph Poles (approx. 23 in total)	Throughout	Throughout	Avoid*	*All outside limit of work but one. Remove 1 telegraph pole closest to diamond junction due to safety hazard.	Eversource
SUD-HA-39	East Sudbury Station Archaeological Site	758+50	18.84	Avoid & protect	Protect with geotextile fabric & fill.	Eversource
<b>Landham Road</b>						
SUD.936	Culvert 126A	752+17	18.96	Avoid	Clear out sediment	
SUD.937	Milepost	751+50	19.00	Avoid	Outside limit of work	
SUD.938	Culvert 126B	747+39	19.06	Avoid	Cut vegetation on northeast wingwall that is causing collapse (no grubbing).	
SUD.939	Rail Rest	743+75	19.21	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.940	Culvert 126D	738+77	19.22	Replace	Replace with 18" ductile iron pipe ("DIP") with concrete headwall to maintain drainage patterns.	Eversource
SUD.941	Distant Approach Signal	736+55	19.26	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.942	Battery Well for Distant Approach Signal	736+45	19.26	Avoid	Outside limit of work	
SUD.943	Signal Relay Box	729+60	19.37	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.901	Bridge 127	725+25	19.47	Replace	Replace superstructure (top two courses of stone abutments to be removed; other courses to remain).	Eversource
SUD.944	Poured Concrete base for Signal Relay Box/Battery Well	718+10	19.60	R&R	Remove & reset	Eversource
SUD.945	Culvert 127A	713+63	19.70	Replace	Replace with 24" ductile iron pipe ("DIP") with concrete headwall due to heavy corrosion.	Eversource
SUD.946	Whistle Post - W on east face, N of tracks	712+80	19.73	Avoid	Outside limit of work	
SUD.282	Section Tool House	712+20	19.75	Avoid	Outside limit of work	
SUD-HA-37	Section Tool House Archaeological Site	712+20	19.75	Avoid & protect	Outside limit of work	Eversource
SUD.947	Concrete base for Auto Highway Flashers	711+80	19.76	Avoid	Outside limit of work	
<b>Boston Post Road</b>						
SUD.948	Concrete base for Auto Highway Flashers	710+90	19.76	Avoid	Outside limit of work	
SUD.949	Signal Relay Box (mast only)	710+85	19.76	Avoid	Outside limit of work	
SUD.950	Culvert 127B	704+56	19.87	Avoid	Outside limit of work	
SUD.951	Concrete Bases for Highway Signal	602+45	19.97	Avoid	Outside limit of work	
<b>Union Avenue</b>						
SUD.952	Concrete Sign Post	602+10	19.98	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.936	South Sudbury Station	601+50	19.99	Avoid	Avoid	
SUD-HA-26	South Sudbury Station Archaeological Site	601+50	19.99	Avoid & protect	Outside limit of work	Eversource
SUD.953	Milepost	601+60	20.00	R&R	Remove & reset	Eversource
SUD.954	3 Switch Stands	600+60	20.00	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.955	Concrete bases & steel posts for Signal/Electrical Boxes (5)	600+60	20.00	R&R	Remove & reset	Eversource
SUD.956	Diamond junction with Framingham & Lowell RR	600+50	20.02	R&R	Remove & reset	Eversource Remove; DCR Reset
SUD.957	Wood whistle/stop sign post	600+80	20.02	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.958	Signal Relay Box	598+55	20.07	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.959	Concrete Base for Signal E2	598+55	20.07	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.960	Rail Rest	596+90	20.09	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.961	Signal Relay Box	594+50	20.13	Avoid	Outside limit of work	
SUD.962	Culvert 127C	593+18	20.14	Avoid	Outside limit of work	
SUD.963	Signal Relay Box	585+00	20.34	Avoid	Outside limit of work	
SUD.964	Wood Post	584+60	20.34	Avoid	Data shows outside limit of work. Could not find on 1/27/22 field visit.	
SUD.965	Tall Concrete Sign Post	581+10	20.39	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.966	Culvert 127D	577+31	20.44	Avoid	Outside limit of work	

Remove	2
Replace	3
Rehab	1
Extend	1
Avoid	36
Avoid / R&R	20
R&R	8
Total**	71

\*\* including 4 archaeological sites, two resources included on Spies' inventory but were not located nor given MHC inventory numbers, and one new resource (electric switch box) that was identified recently by CHG/VHB.

MHC#	Feature	VHB STA	Milepost	Proposed Action	Proposed Project Activity	Party to Complete Proposed Action
SUD.967	Rail Rest	570+65	20.55	Avoid/R&R	Avoid; if not possible, remove and reset. Data shows on edge of work. Could not find on 1/27/22 field visit.	Eversource
SUD.968	Signal Relay Box	570+05	20.59	R&R	Remove & reset	Eversource
SUD.969	Whistle Post - westbound, N of tracks	569+15	20.63	R&R	Remove & reset	Eversource
SUD.970	Culvert 127E	560+82	20.75	Avoid	Outside limit of work	
<b>Horse Pond Road</b>						
SUD.971	Crossing Sign Base	555+65	20.79	R&R	Remove & reset	Eversource
SUD.972	Signal Relay Box	555+50	20.79	Avoid	Outside limit of work	
SUD.973	Distant Approach Interlocking Signal #M208	551+50	20.80	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.974	Battery Well for Interlocking Signal #M208	551+45	20.80	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.975	Rail Rest	549+05	20.98	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.976	Milepost B21 N83	548+80	21.00	Avoid	Outside limit of work	
SUD.977	Whistle Post - eastbound, S side of tracks	542+55	21.13	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.978	Signal Relay Box	540+85	21.16	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.979	Culvert 127F	539+40	21.18	Avoid	Outside limit of work	
SUD.980	Wood Post North Side of ROW	531+90	21.29	R&R	Remove & reset	Eversource
SUD.981	Auto Highway Flashers/Signal Relay Cabinet	530+60	21.35	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
<b>Peakham Road</b>						
SUD.982	Wood Post, south side of ROW	529+80	21.36	Avoid	Outside limit of work	
SUD.983	Culvert 127G	527+30	21.40	Avoid	Outside limit of work	
SUD.984	Culvert 127H	521+64	21.51	Avoid	Cut two 12" trees that are causing wingwall damage (no grubbing).	
SUD.985	Culvert 127I	517+96	21.58	Avoid	Clear out debris on north end.	
SUD.986	Whistle Post (broken) - S side of tracks	517+50	21.58	Avoid	Outside limit of work	
SUD.987	Whistle Post - westbound, N of tracks	513+15	21.66	Avoid/R&R	Outside limit of work	Eversource
<b>Dutton Road</b>						
SUD-HA-38	Wayside Inn Archaeological Site	500+15	21.90	Avoid & protect	Outside limit of work	Eversource
SUD.988	Rail Rest	414+15	21.94	Avoid	Outside limit of work	
SUD.989	Milepost B22 N82	413+05	22.00	Avoid	Outside limit of work	
SUD.990	Culvert 127J	410+25	22.05	Avoid	Outside limit of work	
SUD.991	Whistle Post - W on west face, S of tracks	403+70	22.19	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
SUD.900	Bridge #128	400+30	22.24	Rehab	Upgrade bridge deck to support trail & transmission line (removal of small portion of stone abutments on south side of both east and west abutments; other portions to remain).	Eversource
SUD.992	Culvert 129A	368+80	22.83	Avoid	Outside limit of work	

Contributing resources on SUD.R inventory form that could not be located by SHC/Spies or Eversource/DCR

XXX	Signal Relay Box		18.39?
XXX	Culvert 126C		19.28?
XXX	Whistle Post -- W on East face N of tracks		22.?

MHC#	Feature	VHB STA	Milepost	Proposed Action	Proposed Project Activity	Party to Complete Proposed Action
<b>Town Boundary</b>						
	Rails		Throughout	Remove	Remove	Eversource
	Ties		Throughout	Remove	Remove	Eversource
	Milepost	360+20	23	Avoid	Outside limit of work	
	Rail Rest	357+90	23.05	Avoid	Outside limit of work	
	Telegraph Pole	357+25	23.06	Avoid	Outside limit of work	
	Conduit Pipe Derail Switch	343+35	23.33	R&R	Remove & reset	Eversource
	Stone wall	309+55	23.95	Remove	Remove	Eversource
	Milepost	307+30	24	Avoid	Outside limit of work	
	Section Post	307+30	24	Avoid/R&R	Remove & reset	Eversource
	Rail Rest	302+60	24.09	Avoid/R&R	Remove & reset	Eversource
HUD.HA-9	Ordway Archaeological Site	214+00	24.1	Avoid & protect	Outside limit of work	Eversource
<b>Parmenter Road</b>						
	Culvert 129C	206+15	24.3	Avoid	Remove tree on northeast corner; stabilize bank	
	Concrete base well	201+10	24.36	R&R	Remove & reset	Eversource
	Whistle post (S)	200+10	24.4	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
	Whistle post (N)	195+75	24.5	R&R	Remove & reset	Eversource
	Wood Post	183+55	24.72	R&R	Remove & reset	Eversource
	Utility Pole	182+20	24.76	R&R	Remove & reset	Eversource
<b>Main Street</b>						
	Wood Post	180+80	24.78	Avoid/R&R	Avoid; if not possible, remove and reset.	Eversource
	Track Switch Stand with Electrical Box	179+15	24.8	R&R	Remove & reset	Eversource
	Concrete Box	174+90	24.89	R&R	Remove & reset	Eversource
	Milepost	167+75	25	R&R	Remove & reset	Eversource
	Rail Rest	167+55	25	R&R	Remove & reset	Eversource
HUD.908	Bridge #130	148+75	25.37	Replace	Replace superstructure (no existing abutments)	Eversource
<b>Fort Meadow Brook</b>						
HUD.HA-8	Gleasondale Station Archeological Site	132+95	25.64	Avoid & protect	Protect with geotextile fabric & fill.	Eversource
<b>Chestnut Street</b>						
	Cattle pass	124+90	25.83	Avoid	Remove rails and ties on top of cattle pass	
	Rail Rest	114+60	26	R&R	Remove & reset	Eversource
	Milepost	114+25	26	Avoid	Outside limit of work	
	Culvert 132A	107+90	26.12	Avoid	Outside limit of work	
<b>Wilkins Street</b>						

Remove	3
Replace	1
Rehab	0
Extend	0
Avoid	10
Avoid / R&R	4
R&R	10
Total*	28

\* includes 2  
archaeological sites

**POST-REVIEW DISCOVERIES PLAN  
FOR THE EVERSOURCE  
ENERGY/MASSACHUSETTS DEPARTMENT OF  
CONSERVATION AND RECREATION'S  
SUDBURY-HUDSON RELIABILITY AND MCRT  
PROJECT  
TOWNS OF HUDSON, MARLBOROUGH,  
SUDBURY, AND STOW  
MIDDLESEX COUNTY, MASSACHUSETTS**

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TOWNS OF HUDSON, MARLBOROUGH,  
SUDBURY, AND STOW  
MIDDLESEX COUNTY, MASSACHUSETTS**

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107 Selden Street  
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## 1.0 INTRODUCTION

Eversource Energy (Eversource) and the Massachusetts Department of Conservation and Recreation (DCR) are proposing a joint project (the “Project”) to construct a new, approximately 9-mile, underground 115-kilovolt electric transmission line and rail trail sited primarily within an unused railroad corridor/right-of-way (ROW) owned by the Massachusetts Bay Transportation Authority (MBTA). This project passes through the municipalities of Sudbury, Hudson, Marlborough, and Stow (Figures 1 and 2). Construction will be conducted in two phases with the majority of the earthwork and the installation of the underground transmission line to be conducted in Phase I; Phase II will consist of paving and other activities associated with the construction of the rail trail.

On behalf of Eversource and the DCR, the following Post-Review Discoveries Plan has been developed by Commonwealth Heritage Group, Inc. (Commonwealth) for unanticipated archaeological resources that may be encountered by the Project. The Post-Review Discoveries Plan supplements the Archaeological Site Avoidance and Protection Plan (ASAPP) developed by Commonwealth to protect identified significant historic and archaeological resources in proximity to the Project’s Limit of Work. While the ASAPP protects known cultural resources, the Post-Review Discoveries Plan is designed for potentially significant and previously unidentified discoveries that may be encountered by the Project.

## **2.0 PROTOCOL FOR UNANTICIPATED POST-REVIEW DISCOVERIES**

### **2.1 UNANTICIPATED DISCOVERIES OF ARCHAEOLOGICAL RESOURCES**

To ensure compliance with all federal and state regulations concerning the protection of cultural resources, a Protocol for Post-Review Discoveries has been prepared for the Project. The Protocol has been designed by Commonwealth for consistency with 36 CFR 800.13 (a-d) (Post-review discoveries).

Potentially significant archaeological resources could include precontact archaeological sites, historic foundations, and railroad-related features. Precontact archaeological sites in the Project corridor generally consist of stone tools or stone tool-making debris, sometimes associated with campsites and fire pits. Historic archaeological sites include those with stone foundations such as from a cellar hole or barn foundation, and warrant review under this plan. The most common or likely discovery would be a railroad-related resource, such as a buried railroad marker or whistle post. 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. Human remains are not considered likely to be encountered. However, burials of farm or work animals, such as mules or horses, may be possible. Discoveries of buried animal remains or any potential human remains warrant review under this plan.

Determination of an appropriate course of action (avoidance or mitigation) for the discovery will be determined through consultation with the appropriate authorities including the Massachusetts Historical Commission (MHC) and the United States Army Corps of Engineers (USACE).

#### ***2.1.1 CULTURAL RESOURCES TRAINING***

The identification of archaeological resources requires basic training in order to recognize potential sites. As a result, basic training in cultural resource site recognition will be provided to Project Inspectors and construction contractor personnel in advance of both phases of construction. The training program will emphasize the protocol to be followed regarding actions to be taken and notification required in the event of a significant site discovery during construction. The protocol will be included in all relevant construction contractor documents. The implementation of this protocol will require the controlling oversight of the Project Environmental Leads and Inspectors and the cooperation and compliance of the construction crew. The trainings will be performed by a qualified on-call professional archaeologist (On-Call Archaeologist). The On-Call Archaeologist for Phase I construction training will be Commonwealth's Principal Investigator and the On-Call Archaeologist for Phase II construction training will be either DCR's staff archaeologist or another qualified professional archaeologist, to be named at a later date.

- Holding a pre-construction meeting with the construction crew, supervisors, and inspectors to review the protocol.

- Training construction supervisors and inspectors in the nature of archaeological and historical site remains.
- On-Call Archaeologist will be available to respond immediately to any unexpected discoveries.
- Hard copies of the protocol will be handed out during the pre-construction meeting with the construction crew, supervisors, and inspectors, to be kept on hand by work crews, supervisors and inspectors in the field.
- Explanation of the Unmarked Burial Law process and protocol if human remains are encountered.

### 2.1.2 NOTIFICATION PROCEDURES

Eversource and the DCR are committed to the protection and preservation of cultural resources, in accordance with federal and state legislation. Eversource and the DCR recognize that – despite the intensive cultural resource field investigations that are typically performed prior to project construction – it is nonetheless possible that previously unknown cultural resources could be discovered during the project construction process, particularly during excavation activities. Eversource and the DCR recognize the requirement for strict compliance with federal and state regulations and guidelines regarding the treatment of human remains, if any are discovered. The following details the protocol that will be followed in the event that new cultural resource sites or human remains are discovered during both phases of the construction process.

The protocol to follow in the event of an unanticipated discovery during both phases of construction contains the steps outlined below. The identity of key personnel including the Environmental Project Lead and On-Call Archaeologist will change depending on the phase of construction. For Phase I construction activities, the Environmental Project Lead will be Denise Bartone (Eversource) and the On-Call Archaeologist will be a qualified professional archaeologist from Commonwealth Heritage Group. For Phase II construction activities, the Environmental Project Lead will be Paul Jahnige (DCR) and the On-Call Archaeologist will be either the DCR staff archaeologist or another qualified professional archaeologist.

- The Contractor will immediately notify the Environmental Project Lead of an unanticipated discovery.
- The Environmental Project Lead will direct a *Stop Work* order for the area within 20 ft of the discovery to the Contractor's Site Foreman to flag or fence off the discovery location and direct the Contractor to take measures to ensure site security. Any discovery made on a weekend or overnight hours will be protected until all appropriate parties are notified of the discovery. The Contractor will not restart work in the area of the find until the Environmental Project Lead has granted clearance.
- The Environmental Project Lead will indicate the location and date of the discovery on the project plans and will notify the On-Call Archaeologist, who will undertake a site visit or otherwise coordinate an on-site archaeological consultation.
- The On-Call Archaeologist will conduct a preliminary assessment of the find to determine if it is a potentially significant archaeological site.

- If the find is determined by the On-Call Archaeologist to not be a potentially significant archaeological site, the Environmental Project Lead will notify the Contractor's Work Foreman to resume work.
- If the find is a previously unidentified railroad feature, of a common type (e.g., whistle post, displaced rail rest, or buried culvert) and is within the LOW, it will be removed and later reset, if applicable, according to the guidelines set forth in the Historic Properties Avoidance and Protection Plan (HPAPP) and the Environmental Project Lead will notify the Contractor's Work Foreman to resume work. Any such features encountered will be documented in the Post-construction memorandum outlined in the HPAPP.
- If the On-Call Archaeologist determines the find is a potentially significant archaeological site, Project personnel will notify the MHC's and the USACE's designees of the find. The On-Call Archaeologist and the Project Team will consult with the MHC and the USACE on an appropriate course of action (c.f., Avoidance and Protection or further evaluation) depending upon the potential significance of the discovery and the potential project effects.
- If the find is a potentially significant cultural resource and measures to avoid or minimize adverse effects must be considered, the On-Call Archaeologist will prepare a discovery memorandum with appropriate maps and photographs for submittal to Eversource, DCR, the MHC, the U.S. Army Corps of Engineers (USACE), and all of the consulting parties for their review and comment. The discovery memorandum will be submitted within 48 hours of the On-Call Archaeologist's field review of the discovery and may include an assessment of significance (National Register eligibility) of the site and recommended treatment options. The discovery memorandum may be sent to the MHC, the USACE and other consulting parties by facsimile or email, as appropriate, to expedite review.
- Duration of any work stoppages at the discovery location will be contingent upon the significance of the identified archaeological resource(s) and consultation with the MHC, the USACE, and other appropriate parties to determine the prudent and feasible measures to avoid, minimize, or mitigate any adverse effects to the site. Measures to avoid or minimize adverse effects to significant archaeological resources, including the development and implementation of a site avoidance and protection plan, will be considered in consultation, prior to development of mitigation plans. If no prudent and feasible alternatives exist to avoidance or minimization of project impacts, then mitigation measures may be recommended.

In the unlikely event that human remains are encountered during Project ground disturbance, whether as part of a burial or as an isolated occurrence of human bone from a disturbed context, the Massachusetts Unmarked Burial Law (MUBL) (Massachusetts General Laws (MGL), Chapter 38, Section 6; Chapter 9, Section 26A and 27C; and Chapter 7, Section 38A; all as amended) will be adhered to. All work in the vicinity of the discovery shall stop (i.e., work within 20 ft). The Contractor will immediately notify the Environmental Project Lead of the discovery of human remains. The Environmental Project Lead will direct a *Stop Work* order to the Contractor's Site Foreman to flag or fence off the archaeological discovery location and direct the Contractor to take measures to ensure site security. Any discovery made on a weekend or

overnight hours will be protected. The Project team will notify the USACE, the MHC, and any other consulting parties as directed by the USACE (e.g., Tribal Historic Preservation Officers) of the discovery. The Contractor will not restart work in the area of the find until the Environmental Project Lead has granted clearance following compliance with Massachusetts Unmarked Burial Law.

## **3.0 FEDERAL, STATE, TRIBAL AND PROJECT CONTACTS**

### **3.1 FEDERAL CONTACTS**

#### **United States Army Corps of Engineers – New England District**

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### **3.2 MASSACHUSETTS STATE HISTORIC PRESERVATION OFFICE**

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### **3.3 MASSACHUSETTS MEDICAL EXAMINER AND POLICE CONTACTS**

#### **Medical Examiner**

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Chief Medical Examiner  
Office of the Chief Medical Examiner  
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## **State Police**

State Police Framingham Barracks  
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### **3.4 COMMISSION ON INDIAN AFFAIRS**

#### **Massachusetts Commission on Indian Affairs**

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### **3.5 FEDERALLY-RECOGNIZED TRIBAL CONTACTS**

#### **Wampanoag Tribe of Gay Head (Aquinnah)**

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Tribal Historic Preservation Officer  
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#### **Mashpee Wampanoag Indian Tribe**

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#### **Narragansett Indian Tribe**

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### **3.6 TOWN HISTORICAL COMMISSIONS**

#### **Hudson Historical Commission**

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#### **Sudbury Historical Commission**

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### **3.7 PROJECT CONTACTS**

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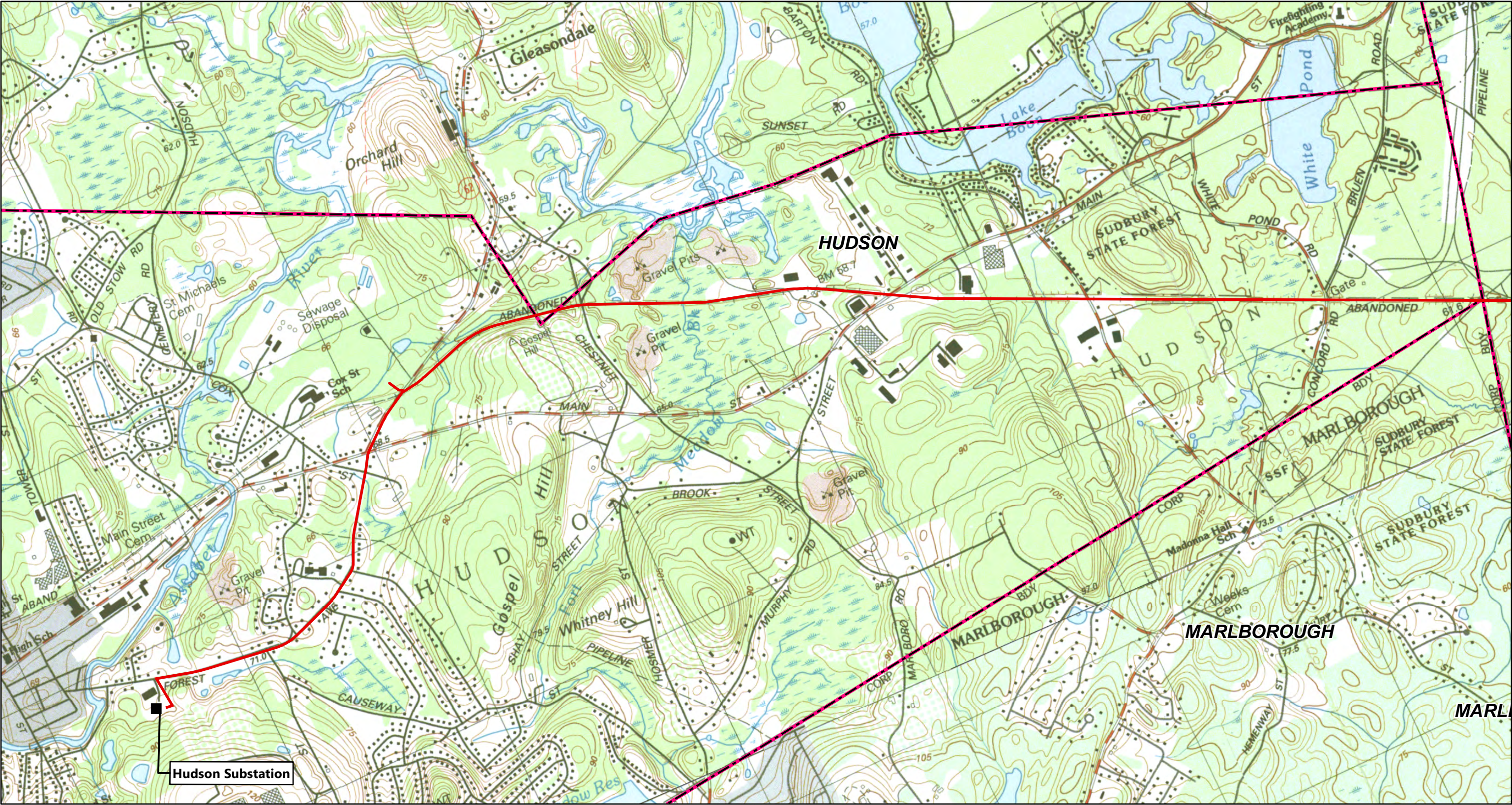
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# FIGURES



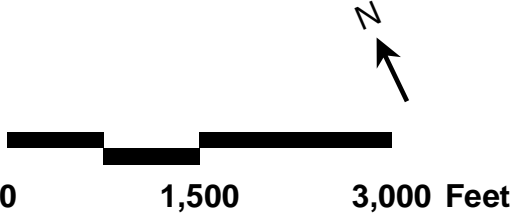


- Project
- Substation Location
- ▭ Municipal Boundary

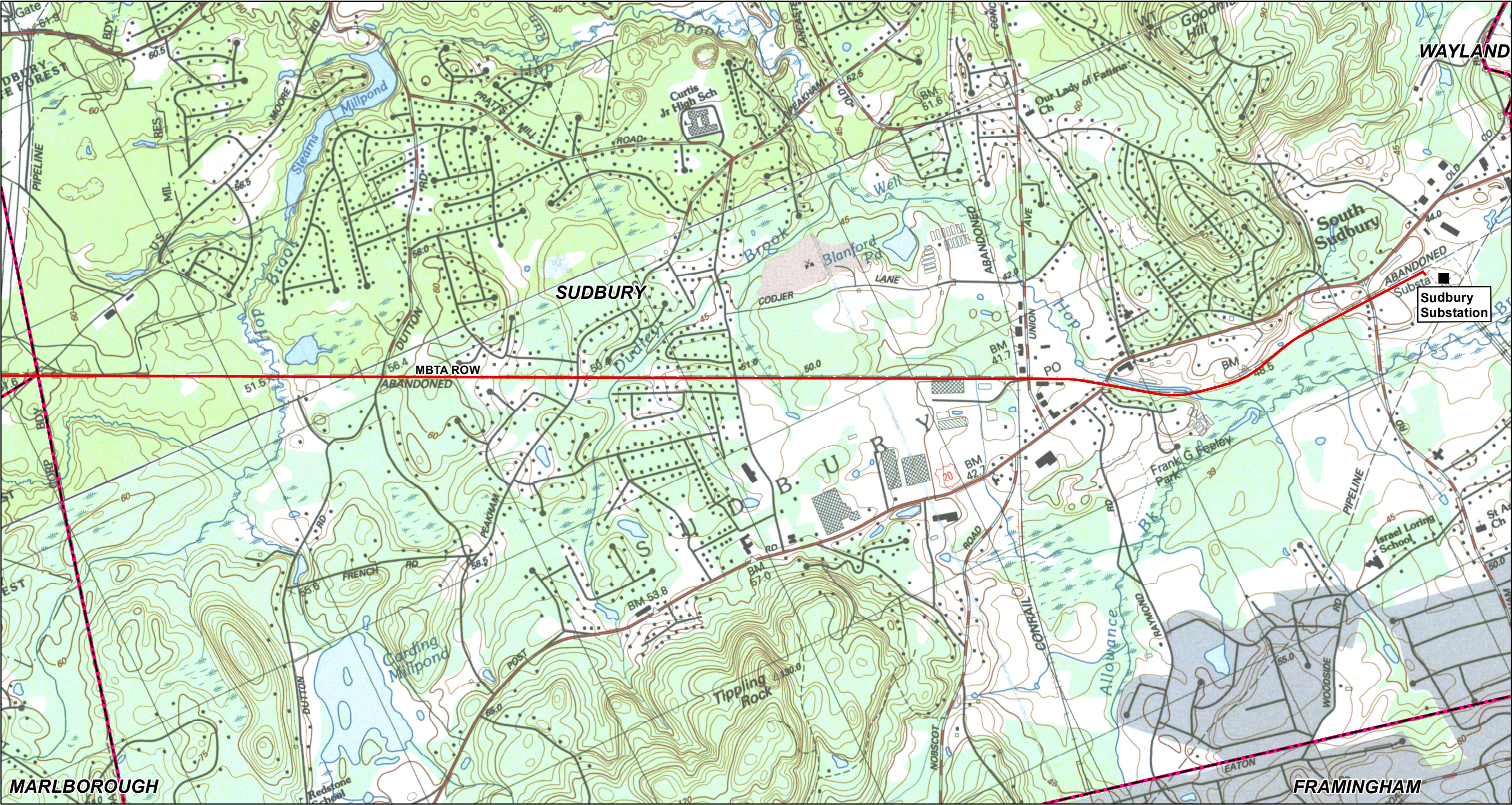
**EVERSOURCE** ENERGY **dcR** MASSACHUSETTS DEPARTMENT OF CONSERVATION AND RECREATION

Figure 1: Sudbury-Hudson Transmission Reliability and Mass Central Rail Trail Project, Hudson Locus Map (USGS)

Source:  
MassGIS, VHB  
12/23/2019







- Project
- Substation Location
- Municipal Boundary

**EVERSOURCE**  
ENERGY

**dc**  
MASSACHUSETTS DEPARTMENT OF  
CONSERVATION AND RECREATION

**Figure 2: Sudbury-Hudson Transmission Reliability and Mass Central Rail Trail Project, Sudbury Locus Map (USGS)**

Source:  
MassGIS, VHB

1/9/2020

0

1,500

3,000 Feet

N