

*Keith: For your info on our MST#*



**The Commonwealth of Massachusetts**  
William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

December 10, 2010

Mary Beth Mello  
Regional Administrator  
Federal Transit Administration  
55 Broadway, Suite 920  
Cambridge, MA 02142-1093

RE: Fitchburg Commuter Rail Line Extension Project, Littleton Commuter Rail Station Improvements, Littleton, MA. MHC #RC.42860.

Dear Ms. Mello:

Staff of the Massachusetts Historical Commission (MHC), office of the State Historic Preservation Officer, have reviewed the information that you submitted for the project referenced above, received by the MHC on November 15, 2010. At this time, the MHC cannot concur with your determinations of the area of potential effect, and that the project will have "no effect" on historic properties. More information is required by the MHC.

As you know, on August 4, 2010, the MHC commented to the Federal Transit Administration (FTA) that there are historic properties in the project area vicinity. The presence of historic properties in the project vicinity suggests that other, as yet unidentified historic resources could be present as well. At that time, the MHC requested that a scope be developed for an identification effort for historic properties and the MHC requested the opportunity to review and comment on a scope for identification of historic properties (36 CFR 800.3).

The information that you provided indicates that in 2007 Epsilon Associates Inc. reviewed MHC's inventory for recorded historic properties within 200 feet of the right of way. It is not clear to the MHC that the area of potential effect for the currently proposed project does not extend beyond 200 feet from the right of way. Review of MHC's Inventory is not sufficient to identify historic properties that may be present but not documented within the area of potential effect.

MHC does not concur that the area of potential effect for historic properties is limited to the footprint of the project construction boundaries. The proposal to replace the existing low-level platform with a high-level platform and pedestrian bridge would appear to propose a project that increases the height of the facilities. Consequently the project has the potential to cause a change in the setting, or to introduce visual elements that diminish the integrity of historic properties that may be present in visual proximity.

The project information for proposed conditions is presented schematically on an aerial photograph on page 9. The conceptual drawing in Appendix A shows additional project impact areas, such as the proposed wetlands mitigation areas. It appears to the MHC that most of the project impact areas as outlined schematically on the plans appear to lack archaeological sensitivity. However, the MHC cannot determine from the limited information provided if all the proposed project construction impact areas are located within previously disturbed areas.

As you know, on August 4, 2010, the MHC issued a State Archaeologist's permit to the PAL for archaeological survey of an earlier proposed project concept.

The MHC requests that a reconnaissance-level archaeological assessment (950 CMR 70) be conducted for the currently proposed project. If the proposed project construction plans showing the limit of work area are not available, the assessment should be conducted for the maximum area required to construct the project, not limited to the proposed as-built footprints of the project elements.

The MHC recommends that the FTA provide project information and the results of the historic properties survey to the Littleton Historical Commission, and to ascertain if they wish to comment on the project or to participate as a "consulting party" (please see 36 CFR 800.2(c)(3)).

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (36 CFR 800) and the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Fed. Reg. 190(1983)). Please contact Edward L. Bell of my staff if you have any questions.

Sincerely,



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

xc:

Holly Palmgren, MBTA  
Maureen Cavanaugh, Epsilon Associates Inc.  
Suzanne Cherau, PAL  
Littleton Historical Commission