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

FEDERAL ENERGY
REGULATORY COMMISSION

November 5, 2014

Secretary Kimberly D. Bose
 Federal Energy Regulatory Commission
 888 First St NE Room 1A
 Washington DC 20426

RE: Tennessee Gas Pipeline Company, L.L.C., a Kinder Morgan Company, Northeast Energy Direct Project, PA, MA, CT, NH. MHC #RC.56771. FERC Docket #PF14-22-000.

Dear Secretary Bose:

The Massachusetts Historical Commission (MHC), office of the State Historic Preservation Officer (SHPO), received additional information on October 21, 2014 regarding the project referenced above. After review of the materials submitted, the MHC offers the following comments to assist the Federal Energy Regulatory Commission (FERC) in its compliance with 36 CFR 800, the regulations implementing Section 106 of the National Historic Preservation Act.

The information submitted includes USGS topographic quadrangle locus maps with a "project area corridor" indicated across the state, a list of the federal and state agency permits anticipated to be required for the project, and a list of the Massachusetts municipalities in which the project is proposed.

To assist in avoiding and protecting areas within Massachusetts that are known to have or are sensitive for significant historic and archaeological resources, and to minimize the overall project effects to the Commonwealth's finite cultural resources, especially those on lands previously designated for conservation and preservation, feasible alternatives for routing the proposed project within areas that have been previously impacted, such as existing transportation and infrastructure corridors, should be considered.

Additional information is required by the MHC to understand the precise location and areas of potential effects, and the nature of the potential effects of the pipeline project within Massachusetts. A narrative description of the project components and methods of construction should be provided to the MHC, describing where open trench, directional drilling, ground disturbance activities, new construction, etc., are proposed. The location and boundaries of the project, including the new pipeline, new above-ground construction such as meter stations, valves, compressor stations, temporary and permanent construction easements, access ways, staging areas, equipment and materials storage areas, and all other related project work areas should be clearly indicated on USGS locus maps and on project plans and drawings. Appropriate sections of USGS topographic quadrangle locus maps, enlarged as necessary, and project plans and drawings, should be prepared which show all aspects of the project clearly identified and labeled with the project components. The locus maps, project plans and drawings submitted to the MHC should be no larger than 11" x 17."

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The MHC will advise and assist FERC in carrying out its responsibilities to take into consideration the effects of the project on historic and archaeological resources and to provide consulting parties the opportunity to comment on its findings and determinations (36 CFR 800.2(c)(1)).

The MHC advises FERC that potential consulting parties may include, among others: (a) the local government historical commissions of the municipalities in which the project is proposed; (b) local historic district commissions of any local historic district (Mass. Gen. Laws [MGL] c. 9, s. 40C) in which the project is proposed; (c) Tribal Historic Preservation Officers of the Stockbridge-Munsee Community, the Wampanoag Tribe of Gay Head (Aquinnah), and the Mashpee Wampanoag Tribe; and (d) the Massachusetts Board of Underwater Archaeological Resources (BUAR) for any submerged lands of the Commonwealth in which the project is located (36 CFR 800.2(c)(2), (3), & (5)). The MHC advises that FERC should commence notification to these potential consulting parties to learn of their interest in participating in the Section 106 consultation process.

The MHC advises that FERC should contact the Advisory Council on Historic Preservation (ACHP) to learn if the ACHP will participate because of the multi-state project location and its potential to meet the criteria for ACHP involvement (see 36 CFR 800, Appendix A).

The MHC advises that FERC should develop a plan for public comment (36 CFR 800.2(d)).

The MHC looks forward to consultation with FERC on FERC's determination and documentation of the project's areas of potential effects (APE) for historical architectural and for archaeological resources (36 CFR 800.4(a)(1)).

The MHC looks forward to consulting with FERC in the development of an adequate scope for identification and evaluation efforts for historic and archaeological resources that may be affected by the project (36 CFR 800.4(b) to (c)).

The MHC requests that a reconnaissance-level cultural resources survey for historic architectural and archaeological resources within the project areas of potential effects be conducted by a qualified cultural resources consulting firm with previous relevant experience in Massachusetts. The survey should be conducted in accordance with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 Fed. Reg. 190 (1983)) and the Massachusetts State Archaeologist's field investigation regulations (950 CMR 70).

The research design and methodology of the survey should consider and evaluate previous cultural resources survey methods and results for linear project corridors located within the regions in Massachusetts in which the project is proposed. The research design and methodology should describe explicitly how relevant previous research findings, including locations and results of previous survey efforts and reported historical and archaeological resources within the project areas of potential effects, will be considered, evaluated, and reported. The MHC's numbering systems for historic and archaeological properties and areas, and survey reports should be referenced.

As part of the reconnaissance-level identification effort in the areas of potential effects for historic architectural resources, a suitable and explicit survey methodology should be developed. The project's professional cultural resources consultants should produce new or updated MHC Historic Properties Inventory Forms prepared in accordance with the MHC's *Historic Properties Survey Manual*. The archaeological reconnaissance survey should evaluate the locations of proposed project impacts and document archaeologically sensitive locations within the project areas of potential effects for archaeological resources. The archaeological sensitivity assessment models should be developed to consider ancient and historical period environmental attributes, the ancient and historical cultural

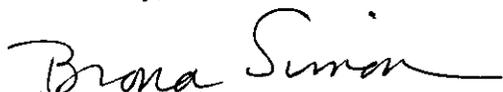
archaeological resources. The archaeological sensitivity assessment models should be developed to consider ancient and historical period environmental attributes, the ancient and historical cultural geography of the Massachusetts regions in which the project is proposed, and any previous impacts of the project impact areas.

The MHC requests that FERC inform other involved federal, state, and municipal agencies, the project proponent, and consultants that the locations of archaeological resources should not be disclosed in documents prepared for public review (see 36 CFR 800.11(c) and MGL c. 9, s. 26A(1) & (5)).

A draft scope for the reconnaissance-level cultural resources survey should be submitted to MHC, and other interested consulting parties such as Tribal Historic Preservation Officers and the Massachusetts BUAR, for review and comment.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (36 CFR 800), the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 Fed. Reg. 190 (1983)), and MGL c. 9, ss. 26-27C (950 CMR 70-71). If you have any questions, please contact Edward L. Bell, Deputy State Historic Preservation Officer at the MHC.

Sincerely,

A handwritten signature in black ink that reads "Brona Simon". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

xc: see attached

xc:

Eric Tomasi, FERC

Charlene Dwin Vaughan, ACHP

John Eddins, ACHP

Karen Kirk Adams, US Army Corps of Engineers

Kathleen Atwood, US Army Corps of Engineers

Tim Timmerman, USEPA Region 1

Lois K. Adams, USEPA Region 1

Mike Stover, USEPA Region 1

Sherry White, Stockbridge-Munsee Community

Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)

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