



DATE: December 16, 2020
TO: Christine Hopps, DEP, Waterways Regulation Program
RE: Notice of License Application pursuant to M.G.L. Chapter 91 Waterways License:
W20-5826, Transmittal No. X285957
Applicants: NSTAR Electric Company (Eversource) and Mass DCR
Project Location: Bridge No. 127 and 128, Map H03 Parcel 5000, 0 Railway, MBTA RoW
Good day Ms. Hopps et al;

I will say right up front that I wear many hats. Though today I am using the NEGS letterhead. NEGS is a vehicle I sometimes use to provide guidance and assistance to communities considering to convert their dead railroad corridor into a linear park. Writing a letter supporting a project or providing clarifications also falls under this umbrella.

Another “hat” I wear is that I am the Volunteer Coordinator for the Mass Central Rail Trail (MCRT)—a loose coalition of community groups working to buildout their section of the MCRT. This is not a 501c3 because there are groups building out their sections of the corridor who already have 501c3 status and we don’t want to be in any competition with our friends. I’ll also mention that the MCRT is the longest rail trail project in the northeast US — and the most complicated one too. It also connects directly with the longest interstate rail trail in the northeast—the New Haven & Northampton Canal Greenway. And connects directly with about another dozen linear parks—both rustic hiking trails and more formalized linear parks like rail trails.



One of my other “hats” is Central Highlands Conservancy, LLC a hybrid land acquisition vehicle I set up fifteen years ago to swoop-in and buy former RR corridor—along this exact RoW — to block potential sales to adjoining land owners. In 2005, I bought 3.2 miles that included 3 large bridges. One of my bridges was a pony-truss bridge and the bridge historian at MassDOT told me it was the last of its type still standing in New England. I held and managed this property for two years, meeting my new neighbors, protecting my bridges and giving a local land trust time to fundraise and get me out—for my costs. No mark up. And I prevented these bridges from being torn down. Today my bridges and the 3.2 miles of corridor—almost as long as the Sudbury segment itself — are owned by the East Quabbin Land Trust and are an open and well-loved part of the MCRT.



And another “hat” is the Norwottuck Network, (NN) where I am the Executive Director. This is a 501c3 set up to do historic callouts on this corridor and perhaps, on some of the nearly dozen connecting trail corridors. Don’t forget, this is Massachusetts and we love our history. While we are quietly organizing and raising money, one of the most notable things we currently do is an E-newsletter. A free, monthly E-newsletter that goes out to over 10,000 interested parties each month and there is great interest in developing this network as there are more dead steam railroad corridor within 125 miles of here than anywhere else in North America. I will be posting this letter into the next issue.

I am writing in support of the Eversource project that will improve ex-railroad bridges over waterways in Sudbury that will then become a part of the linear park being developed across the state from Boston to Northampton. There are several more bridges on this corridor that are missing and will be replaced. A nearly 1,000 foot tunnel is a part of this project too. In fact the tunnel and about 1.5 miles of corridor was just purchased by the town of Clinton this past Friday. Additionally, MassDOT has recently released a feasibility study on how to reassemble several miles of the center section of this corridor. In the past 18 months there have been about 12 former railroad bridges in southern N.E. that have been restored and/or upgraded for bike/ped use. Interestingly, this is a world-wide phenomenon. A headlining story in Citylab a few years ago touted this concept in "The Bright Future of the Pedestrian Bridge." <https://tinyurl.com/ya3e5lhq>

I understand that one part of the issue in Sudbury is that there are three bridges in question in Sudbury/Hudson that are antique and deficient railroad bridges and I would think that it would be easier and more streamlined for Eversource to just remove the old bridges and put in new clear-span bridges that are specifically made to carry their electric cables along with the trail users. I would suspect that it is more difficult to put their wires underneath the antique bridges. To that, I’ve put a few pictures of a renovated bridge in nearby Hudson on the Assabet River Rail Trail. This bridge was disassembled, transported to a warehouse to be sandblasted removing the lead paint and then repainted and brought back to its home. (pictures in this packet.) I would love to see this be the model for the bridges in Sudbury, simply because it would be the right thing to do. Though probably not the easiest thing to do.

Here's more comments about other facets of this project.

- **I support Mass Historic Commission's idea of a "Local Historic District" in Sudbury on the former railroad RoW at the intersection of the E-W trail (Mass Central Rail Trail) and the N-S trail (Bruce Freeman Rail Trail). This would be interesting. I know about LHDs, since I serve on the Elm Street Local Historic District Commission in Northampton—along with the Northampton Historical Commission. I also lead bike tours of a LHD in Holyoke teaching people how they get created. (Never easy) I like that idea by the MHC team and in fact I am expecting that Norwottuck Network (NN) will be having a conversation this winter to develop a working relationship with DCR that will layout a plan to develop the specs, styles and layout of a cross-state program to install historic interpretive signage for the entire corridor. Not just Sudbury. If a LHD get created in Sudbury, we would want to see the signage there to be consistent with what will be developed across the state. Indeed, I can see guided bike and/or walking tours of the notable historic features on the trail—over-all—not just Sudbury. One of NN's board members has already identified most of the remaining mile markers on the corridor and categorized them by condition and identified some that are missing. A volunteer has stepped-up and begun to redo the paint and markings on the deficient markers that are an exact duplicate of the railroad's style and colors.. This info and photos of most of the old railroad stations that used to be on the corridor are on the website at: <https://www.masscentralrailtrail.org/interactive-google-map>. The Norwottuck Network, Mass Historic Commission, DCR, and all the Historical Commissions along the entire corridor should think about a meeting post Covid to ensure continuity.**
- **The only problem I see with the Local Historic District concept is the idea of making it a "Central Mass RR" Local Historic District.** The grand and brilliant original name of this railroad was the MASSACHUSETTS CENTRAL RAILROAD. It was assigned the name CENTRAL MASSACHUSETTS RAILROAD by a bankruptcy court. Assigning the name Central Mass to the LHD, would be a mistake. That name assigned by the court ensured the railroad would only achieve backwater status and when it ultimately failed again, it would be acquired by the B&M RR—which of course kept it in a backwater status. When branding the trail, we purposefully called it the original name Mass Central Rail Trail. It is the longest rail trail in the northeast and it cannot be branded with a narrowing name. DCR has come to see this value too having rebranded the areas of the project that they are already managing to be the MCRT. The Mass Central Rail Trail as the umbrella name, but with the local name still prominent. Mass Central Rail Trail —Wayside section. We are living in the densest network of dead steam railroad corridors in North America and when fully built out, this will allow Massachusetts—a leader in historic preservation in the US—to be known nationally for our efforts to call out our heritage on these linear parks.
- **Bridges of the sort seen in Sudbury are pretty rare around the region.** The pony truss bridge I owned, was special and with the railroad out of the ownership chain, I protected it until the land trust could take over. Stepping up to protect these deficient bridges in Sudbury is good, but it will mean additional thought and resources are going to be needed to redo these bridges to carry the concrete trench-way and bikes and pedestrians as well.
- **But really, the unspoken and unwritten reason why there is such great angst in Sudbury is because it takes too long to build rail trails in Massachusetts.** Taking 2+ generations to build out a trail is not normal. In Glens Falls, New York, when a trail was going to take 3 years to build, people who lived along the trail corridor were upset that it was going to take so long. Did you know that in the mid 1970s, the MBTA bought both live corridor and abandoned, former railroad corridor in over 70 communities? So, during the ensuing 40+ years in the communities with the dead corridors —haven't stayed static. The trees have grown-up making neighbors think that the view shed they currently see is going to stay that way. The utility's project to lay the powerlines in a concrete trench is a new wrinkle for sure, but I think it would a great opportunity to do make lemonade from the lemon. Do something special and iconic when replanting new trees. Why not plant the new cultivars of American Elms and American Chestnut trees. Maybe a local 501c3 formed to start a nursery of these iconic, but modern and healthy New England trees could happen. Maybe Eversource could be a partner in this effort.

Thanks for the opportunity to comment.

Yours truly,



Craig Della Penna

Cc list enclosed.

CC list

Brona Simon, MHC

Denise Bartone Eversource

Brooke Kenline-Nyman, Eversource

Secretary Kathleen A. Theoharides EBA. Attn: Page Czepiga, MEPA Unit

Patrice Kish, DCR

Paul Jahnige, DCR

Town of Sudbury Historical Commission

Sudbury Historic District Commission

Town of Sudbury Historical Society

Vivian Kimball VHB

Marty Dudek, Commonwealth Heritage Group

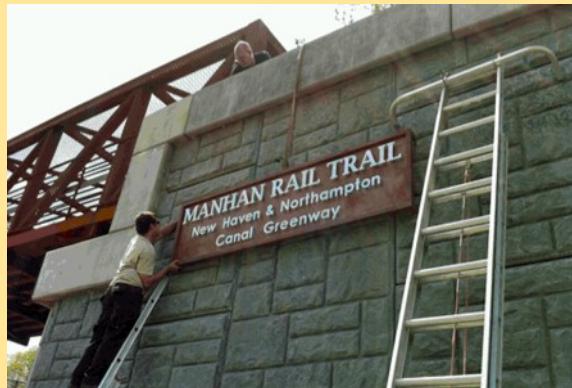
Anthony Guy Lopez, ACHP



Mass Central Rail Trail

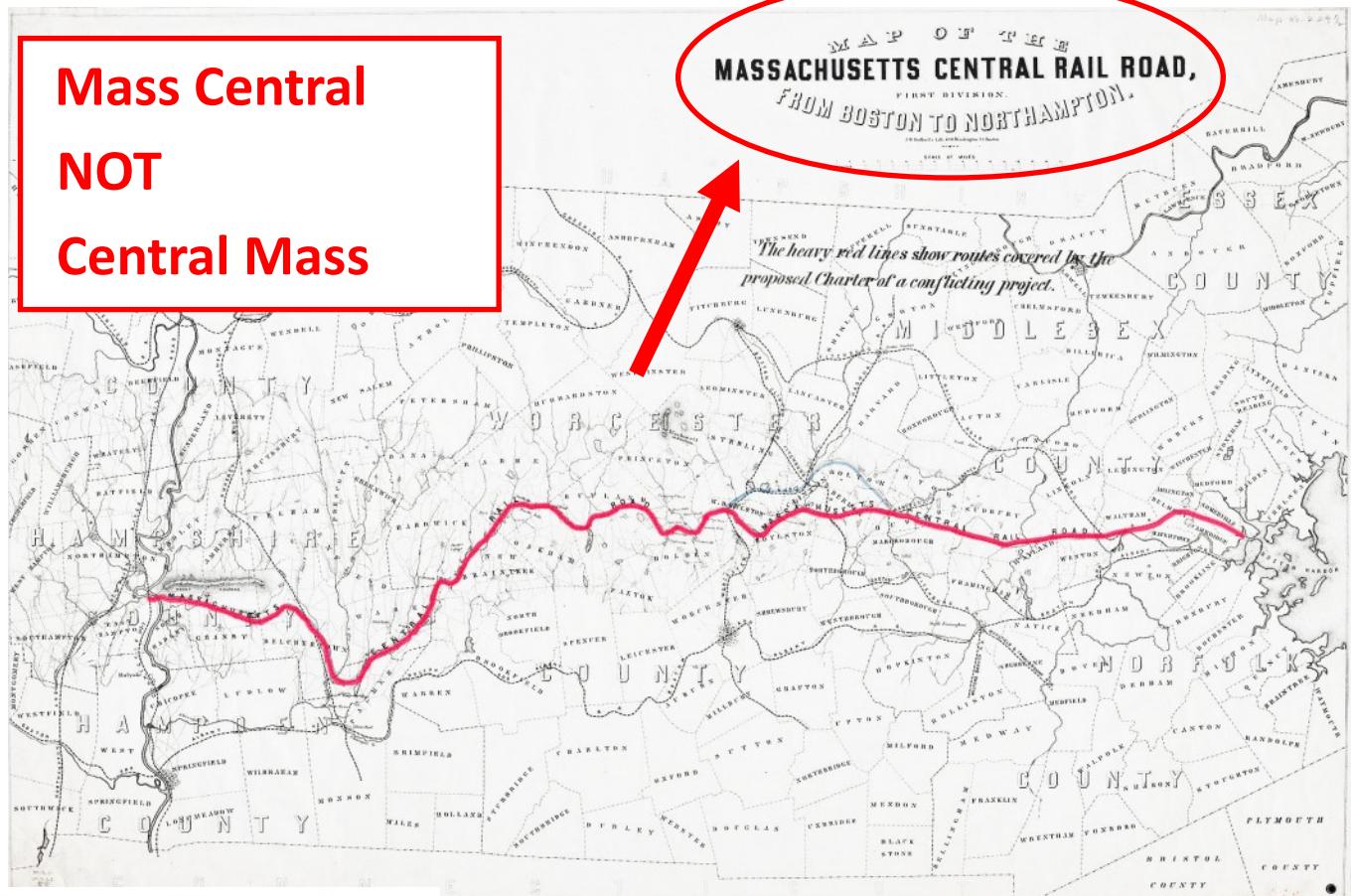
- Mass Central Rail Trail from Boston to Northampton 104 miles total.
- Longest and most complicated Rail Trail project in the northeast.
- 51 miles open now. More segments open each year.
- 85± miles in public or protected ownership.
- Three communities still with B&M RR owned pieces of the corridor are making arrangements to purchase these stray pieces this coming year.

- New Haven & Northampton Canal Greenway 84 miles total.
- Longest interstate trail in the northeast.
- 70± miles now open. 80± miles in public or protected status.
- Northampton's connection between the E-W and N-S trails are open now—funded by American Recovery Act (ARA) funding during the Great Recession.
- Rebranding discussions to have an umbrella name and then the local name are underway.
- Scheduled passenger rail service between Boston and New Haven to take trail users back to point A.

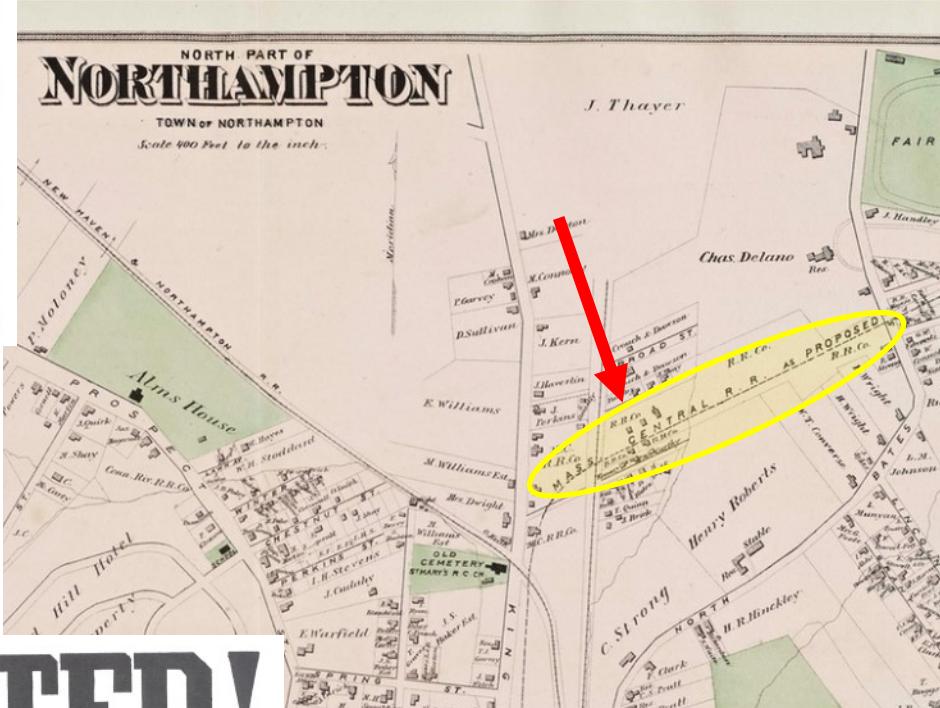


Mass Central
NOT
Central Mass

MAP OF THE
MASSACHUSETTS CENTRAL RAIL ROAD,
FIRST DIVISION.
FROM BOSTON TO NORTHAMPTON.



Northampton - North 1873



All sections of the MCRT are being rebranded under the umbrella name and then with the local name being prominently displayed as well.

WANTED!

100 MEN 100

To work on the Massachusetts Central R. R.
in West Rutland. Steady Employment.

Wages. - \$1.75 per day.
RUTLAND, APRIL 27, 1872.

J. M. STONE & CO.

J. Henry Goddard, Printer, Gazette Office, Barre, Mass.

Renovating an antique RR bridge over the Assabet River in Hudson

In the winter and spring of 2004 and 05, the antique, 1880s high bridge over the Assabet River near Broad St in nearby downtown Hudson was disassembled and taken to a warehouse in Oxford to be sand-blasted, repainted and reassembled on-site over the river. This is a signature place on the Assabet River Rail Trail.

RIGHT: REMOVING A RUSTED BRIDGE SECTION.

BELOW: SHOWS THE REFURBISHED BRIDGE,, IN PLACE



RIGHT: THIS SHOWS A COUPLE OF THE REPAINED BRIDGE SECTIONS BEING INSPECTED BY A DOT BRIDGE INSPECTOR BEFORE BEING RE-INSTALLED.



ABOVE AND LEFT SHOW FINISHED SECTIONS IN PLACE.

PHOTOS FROM THE ARRTINC.ORG SITE
AND BRIDGEHUNTER.COM SITE.