



## The Commonwealth of Massachusetts

December 15, 2020 William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

Laurie O'Connor  
Remedial Project Manager  
Superfund and Emergency Management Division  
US Environmental Protection Agency  
Region 1  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

RE: Iron Horse Park Superfund Site, B&M Railroad Landfill, Billerica, MA. MHC #RC.68964.

Dear Ms. O'Connor:

Staff of the Massachusetts Historical Commission (MHC), the office of the Massachusetts State Historic Preservation Officer, have reviewed the EPA's finding of no adverse effect on the Middlesex Canal Historic District, received December 9, 2020, for the project referenced above.

The MHC has received comments from the Middlesex Canal Association (MCA; copy enclosed). The MCA has recommended systematic recording of canal elevations and dimensions between the rail yard and Pond Street. Measurements of intact portions of the buried canal towpath and berms at the project impact area, and modification of the proposed grading plan within the Middlesex Canal Historic District section of the project impact area, may assist to preserve the canal and provide additional important data on historical canal construction and engineering techniques not otherwise available in the documentary record.

The MHC recommends that EPA modify their finding to a conditional no adverse effect on the Middlesex Canal Historic District. The MHC recommends that the project as proposed will have no adverse effect on the Middlesex Canal Historic District on the following conditions: The EPA should consult with the MCA during project excavation and grading within and adjacent to the Middlesex Canal Historic District. A qualified industrial historian should systematically record any buried canal-related architectural features identified during project excavation and/or grading, and report the results to the MCA.

These comments are provided to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800). If you have questions or require additional information, please contact Jonathan K. Patton at this office.

Sincerely,

A handwritten signature in cursive script that reads "Brona Simon".

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

Encl: MCA comments to MHC dated November 27, 2020

xc w/o encl:  
Christopher Wilson, ACHP  
J. Jeremiah Breen, Middlesex Canal Association