



May 27, 2016

Jerry A. Mullins

President

Parker River Clean Water Association

7 Parsons Street

Newburyport, MA 01950

The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth

Massachusetts Historical Commission

RE: Little River Trail System, Common Pasture, Newburyport, MA. MHC # RC.60288.

Dear Mr. Mullins:

Thank you for submitting the Project Notification Form (PNF) and additional information to the Massachusetts Historical Commission (MHC), office of the Massachusetts State Historic Preservation Officer, received May 16, 18 and 25, 2016, for the projects referenced above. The proposed projects consist of trail improvements, including bridge construction, trail reroutes and resurfacing and kiosk installation, within multiple properties containing existing trail networks of the Common Pasture portion of the Little River watershed in Newburyport. The MHC is providing these comments in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800) because the proposed project requires funding through the National Park Service.

Review of the Inventory of Historic and Archaeological Assets of the Commonwealth indicates that there are no recorded historic or archaeological resources within proposed trail improvement project impact areas. The portion of the Common Pasture included in the MHC Inventory (MHC # NEW.G), including multiple individual inventoried properties, located south of the proposed project impact area between Hale Street and Scotland Road. Although at least some portions of the properties appear to have been previously disturbed through use as landfill and former railroad and highway right-of-way, undisturbed portions of the properties may contain intact significant ancient and historical archaeological resources and are archaeologically sensitive. This archaeological sensitivity is primarily due to environmental setting, with level, sandy, well-drained soils in proximity to the wetlands and water resources of Little River and the Merrimack River, highly favorable for ancient and historic period land use and occupation.

The MHC recommends that project planners consider prudent and feasible project alternatives to avoid ground impacts for project construction aspects, including new trails and bridge abutments in upland areas. The use of helical pier boardwalk construction within wetlands is unlikely to impact intact, significant archaeological resources. For example, clearing could be done by hand and with light tools and include flush cutting of large trees with no removal of stumps. Trail and bridge abutment construction could include mounding of soils or gravel fill materials on the current ground surface with minimal stripping, where feasible. Conducting construction during the winter, when the ground is frozen, will also reduce ground impacts. Project planners should also consider the use of surface foundations for signage and kiosks located in undisturbed areas.

The MHC recommends that the National Park Service could make a conditional finding of "no historic properties affected" (36 CFR 800.4(d)(1)) for the proposed, as proposed, on the condition that ground impacts are avoided and/or minimized during the project.

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 any questions please contact Jonathan K. Patton at this office.

Sincerely,

A handwritten signature in blue ink that reads "Brona Simon".

Brona Simon

State Historic Preservation Officer

Executive Director

State Archaeologist

Massachusetts Historical Commission

xc: Annie C. Harris, Essex National Heritage Commission
Newburyport Historical Commission

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