

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

December 13, 2012

Anthony T. Mackos, P.E.
Chief, Engineering/Planning Division
Evaluation Branch
Department of the Army
New England District
Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

RE: U.S. Army Soldiers Systems Center (SSC), East of Lake Cochituate, Natick, MA;
MHC# RC.42510

Dear Mr. Mackos:

Thank you for submitting a draft MOA for future developments proposed as part of the soon-to-be-finalized Master Plan at the SSC in Natick.

The MHC has no concerns regarding the submitted draft MOA, which I have signed and enclosed for the signature of your office. The MHC looks forward to receiving a copy of the fully-signed MOA.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800). Please do not hesitate to contact Ryan Maciej of my staff if you have any questions.

Sincerely,

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

Brona Simon
State Historic Preservation Officer
Executive Director
Massachusetts Historical Commission

Enclosure

xc: David Duncan, US Army Soldier Systems Center
Crystal I. Gardner, US Army Corps of Engineers
Kate Atwood, US Army Corps of Engineers
Natick Historical Commission (w/Copy of Enclosure)

**MEMORANDUM OF AGREEMENT
SUBMITTED TO THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
FOR THE PROTECTION OF HISTORIC PROPERTIES
DURING NORMAL OPERATION AND MAINTENANCE
AT THE U.S. ARMY SOLDIERS SYSTEM CENTER
NATICK, MASSACHUSETTS**

WHEREAS, the U.S. Army Soldiers System Center (NSSC) operates and manages its facility in Natick, Massachusetts; and,

WHEREAS, 13 of the original buildings, structures, and objects, at the SSC, are contributing elements of the Natick Research and Development Laboratories, a district that has been determined eligible to the National Register of Historic Places (NR); and,

WHEREAS, the NSSC has determined that proposed and future improvements at the facility meet the definition of undertakings for the purposes of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) (P.L. 89-665, 16 U.S.C. 470f), and, therefore the NSSC is responsible for complying with Section 106 for these actions; and,

WHEREAS, the NSSC is responsible for complying with the NHPA including Section 110 that requires federal agencies 1) to establish a program to preserve, protect, identify, evaluate, and nominate historic properties under their jurisdiction or control in consultation with others, and 2) to give full consideration to the preservation of historic properties not under their jurisdiction or control but affected by federal agency undertakings; and,

WHEREAS, the NSSC has determined that operation and maintenance at their facility may have an effect on properties listed on or eligible for listing on the NR, and;

WHEREAS, in compliance with Section 106, the NSSC and Massachusetts State Historic Preservation Officer (MA SHPO), and the NSSC will implement this Memorandum of Agreement (MOA) for certain NSSC operation and management actions as outlined in this MOA, in accordance with 36 CFR Part 800, regulations for implementing Section 106 of the NHPA [16 U.S.C. Part 470(f)]; and,

WHEREAS, archaeological investigations were completed by the NSSC, including an intensive archaeological survey and a site examination at two loci of pre-contact material; and,

WHEREAS, out of four sites, no archaeological sites were determined eligible for the NR. The NSSC consulted with the appropriate Tribal Historic Preservation Officer, and received no response to the NSSC request for comment. The MA SHPO concurred in the results of the archaeological investigations and agreed no further studies needed to be completed at the Natick SSC; and,

WHEREAS, the NSSC completed photographic and written recordation of the Natick Research and Development Laboratories Historic District in accordance with the standards and regulations outlined in the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation [48 FR 190 (1983)], and 950 CMR 70, prior to new construction being proposed by the installation's new Master Plan. The MA SHPO accepted the archival set of photographs as part of this documentation; with the final paper documentation sent on July 18, 2012; and,

WHEREAS, the NSSC completed an Integrated Cultural Resource Management Plan (ICRMP), in conjunction with the Master Plan, that will ensure that Section 106 and Section 110 compliance is completed at the facility. No response was received from the THPO. The MA SHPO concurred in the recommendations in the ICRMP. The final ICRMP was sent on July 18, 2012

NOW, THEREFORE, the NSSC, the MA SHPO, and Council agree that the operation and maintenance of the NSSC facility shall be administered in accordance with the following stipulations to avoid, minimize, or mitigate adverse effects and satisfy NSSC responsibilities under Section 106 for those actions outlined within this MOA.

STIPULATIONS

The NSSC shall ensure that the following measures are carried out in consultation with the MA SHPO.

A. EXEMPT AND NON-REPORTING UNDERTAKINGS

1. The NSSC, in consultation with the MA SHPO agree that the following types of undertakings and actions will be exempted from review and consultation under this MOA because they have little or no potential to affect historic properties. These undertakings must also involve minor, repetitive maintenance that will not alter the exterior appearance or setting of contributing, NR eligible structures.

- a. Staining/painting/repair of existing concrete buildings
 1. Removal of all existing paint or stain coatings from masonry surfaces and masonry joints, the repair and/or replacement of damaged masonry units and masonry surfaces, removal of old joint sealant, caulking, and backer rod at building expansion joints, around all window and door openings, and at all other building façades.
 2. Application of clear primer and pigmented topcoat sealers to masonry façade, including joints. Primers and sealers will be in colors used in the past for maintenance of concrete. Paint on other than masonry, such as window or door frames will utilize colors similar to those used in the past at the NSSC.

3. Repair of existing masonry surfaces will include crack repair, general surface repair, and removal and replacement of individual concrete masonry units.
4. These activities will follow plans and specifications which were previously reviewed and approved by the MA SHPO.

b. Window and door replacement within NR eligible historic district

1. Window replacement would only be exempt if the replacement involves glazing similar to the original windows and takes place within existing fenestration. The original windows at the NSSC consisted of steel frames, with multiple projected sashes within each frame. Many of these windows were replaced in the 1970s, and involved removing the original steel frames, and replacing them with aluminum frames, many of which were not fit to the original fenestration.
2. Window replacement must comply with the minimum window requirements in the Unified Facilities Criteria (UFC) 4-010-01, *DOD Minimum Antiterrorism Standards for Buildings*, dated October 8, 2003, and updated January 2007. The UFC 4-010-1 institutes the Antiterrorism/Force Protection (AT/FP) requirements that DOD is committed to effectively minimize loss of life from a terrorist attack. The glazing will mask construction elements needed for AT/FP, and will evoke the original 1954-55 design.
3. Window openings with aluminum louvers, will be replaced to louvers similar in appear but that will meet blast requirements.
4. Curtain walls will be replaced within current fenestration limits but will use a combination of spandrel glass and tinted, glazed, double-pane windows. Fenestration will not change, but windows will be more energy efficient and will meet AT/FP requirements.
5. Current main entry doors are aluminum framed with glass panels. Service doors are generally hollow core steel in steel frames. Door replacement will only be exempt if the doors are similar in size and appearance to the original doors on the structure.
6. If a design change in the doors is anticipated, the NSSC will consult with the MA SHPO, to determine the effects to historic properties.
7. These activities will follow plans and specifications which were previously reviewed and approved by the MA SHPO.

c. Exterior stair replacement

1. All concrete stairs and landings that are original to the facility will be replaced as needed due to safety and maintenance issues. The stairs will be replaced in-kind using granite rather than concrete for durability. The granite will be similar in appearance to the existing concrete but will last longer for safety reasons.

2. These activities will follow plans and specifications which were previously reviewed and approved by the MA SHPO.
- d. Exterior canopy replacement
1. Most buildings that are contributing structures to the NR eligible historic district have a canopy overhang at building entrances. Replacement of overhang canopies must not affect the setting and appearance of the original structure in order to be considered an exempt undertaking.
 2. Canopies are constructed of concrete with concrete ribbing covered with concrete panels. If concrete paneling cracks and becomes a safety hazard, the panels will be replaced with aluminum skin "Granite Stone" insulated panels. Any panels replaced over curtain walls will match the existing mullion layout of the glass curtain.
 3. The "Granite Stone" panels must closely resemble the original concrete.
 4. These activities will follow plans and specifications which were previously reviewed and approved by the MA SHPO.

B. FUTURE PROJECTS PLANNED THAT WILL TRIGGER A REVIEW WITH MA SHPO

1. The NSSC has several known future projects that are anticipated to require extensive consultation with the MA SHPO. The timeline for these projects are not yet known. These include: 1) connecting wings between Building 3 and Building 4; 2) exterior façade upgrades (excluding exempt undertakings such as staining, and window and door replacements); 3) Building 32 (Recreation Center) façade upgrade;) Building 1 Elevator.

2. The NSSC shall ensure that the project designs for new construction are compatible with the historic and architectural qualities of the Natick Research and Development Laboratories Historic District in terms of scale, massing, color, and materials, and is responsive to the recommended approaches to new construction set forth in the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (U.S. Department of the Interior, National Park Service, 1983), and that the design and specifications for the projects are developed in consultation with the MA SHPO and submitted to the MA SHPO for approval.

3. These projects will be coordinated following the steps laid out in the final ICRMP to avoid, minimize, or mitigate adverse effects to the Natick Research and Development Laboratories Historic District.

C. REPORTING

1. The NSSC shall ensure that reports on all activities carried out pursuant to this MOA are provided to the MA SHPO, and upon request, to other interested parties.

D. UNIDENTIFIED HISTORIC PROPERTIES

1. The NSSC will ensure that if additional previously unidentified historic properties are discovered which may be affected by any undertaking, they will notify the MA SHPO. The NSSC and the MA SHPO will apply the National Register criteria of eligibility and consult pursuant to 36 CFR 800.4.

E. ANNUAL REVIEW

1. The parties to this MOA shall consult annually to review implementation of the terms of this Agreement and determine whether revisions are needed. If revisions are needed, the NSSC and MA SHPO will consult in accordance with 36 CFR Part 800 to make such revisions.

F. DISPUTE RESOLUTION

1. Should the MA SHPO object within thirty (30) days to any actions proposed or carried out pursuant to this agreement, the NSSC shall consult with the MA SHPO to resolve the objection. If the NSSC determines that the objection cannot be resolved, the NSSC shall forward all documentation relevant to the dispute to the Advisory Council on Historic Preservation (Council). Within thirty (30) days after receipt of all pertinent documentation, the Council will either:

- a. provide the NSSC with recommendations which they will take into account in reaching a final decision regarding the dispute; or
- b. notify the NSSC that it will comment pursuant to 36 CFR 800.6(b), and proceed to comment. Any recommendations or comment provided by the Council will be understood to pertain only to the subject of the dispute; the SSCs responsibility to carry out all actions under the Memorandum of Agreement that are not subjects of the dispute will remain unchanged.


2. At any time during the implementation of the measures stipulated in this agreement, should any objection regarding the subject matter of this agreement be raised by a member of the public, the NSSC shall take the objection into account and consult as needed with the objecting party, the MA SHPO, or the Council to resolve the objection.

G. SUNSET CLAUSE

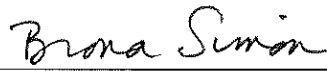
1. This MOA will be in effect for ten (10) years after signing, unless the SSC and the MA SHPO agree to terminate or extend the Agreement beyond that date.

Execution of this Memorandum of Agreement by the NSSC and the MA SHPO, its subsequent filing with the Council, and the implementation of its terms, shall establish that the NSSC has taken into account the effects of their undertakings on historic properties.

DEPARTMENT OF THE ARMY, SOLDIERS SYSTEM CENTER

By:  Date: 1/11/13
FRANK K. SOBCHAK
Lieutenant Colonel
Garrison Commander

MASSACHUSETTS STATE HISTORIC PRESERVATION OFFICER

By:  Date: December 13, 2012
BRONA SIMON
Executive Director
State Historic Preservation Officer