



## The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth

February 11, 2014

Massachusetts Historical Commission

James G. Turek  
National Oceanic and Atmospheric Administration  
Restoration Center  
28 Tarzwell Drive  
Narragansett, RI 02882

FEB 13 2014

RE: Palmer's Island Trails Maintenance, Signage, Picnic Tables, and Invasive Species Control, New Bedford, MA. BSC Project No. 89524.00. MHC #RC.50015.

Dear Mr. Turek:

Staff of the Massachusetts Historical Commission (MHC), office of the State Historic Preservation Officer, have reviewed the information submitted for the project referenced above, and the MHC's files. More information regarding the invasive species control plan activities is required by the MHC.

Previously identified historic properties on Palmer's Island include Palmer's Island Light Station (MHC# NBE.AD & NBE.907) listed in the National Register of Historic Places, and the Light Keeper's House archaeological site (MHC #NBE.HA.7) included in the Inventory of Historic and Archaeological Assets of the Commonwealth. Portions of the island are archaeologically sensitive and other archaeological sites are expected in areas of the island that have not been previously impacted. Palmer's Island was likely to have been used during ancient and historical times by resident Wampanoag. The property has a long and important documented history beginning in the 17th century when the island was used as a prison for Native Americans during the War of 1675. The island was used as a "garrison" during the Revolutionary War, and summer homes and a hotel were built in the 19th century.

The proposed project consists of maintenance of existing trails, installation of two educational signs, picnic tables in two locations, and management of invasive and noxious species.

One alternative method for removing Oriental Bittersweet, Sweet Autumn Clematis, and Cow Parsnip, involves pulling the entire plant including the root ball, which has the potential to damage archaeological deposits and features. The MHC requests that the alternative "Cut Stem and Treat" (CST) method that does not involve impacts to the ground or subsurface be implemented as a feasible alternative. If the CST method is not feasible, then the MHC requests consultation with the MHC and other consulting parties to develop a plan to identify, evaluate, and mitigate any adverse effects to, significant historic and archaeological resources.

Please determine if the CST alternative for invasive and noxious species that does not involve impacts to the surface and subsurface is feasible and will be adopted, and please provide the information to the MHC for review and comment.

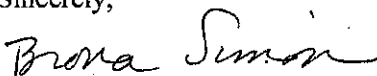
The Massachusetts Department of Environmental Protection Notice of Intent (NOI), Attachment G, Educational Signage, provides draft texts for proposed signage. For the draft texts about "History of Palmers Island" and "Palmers Island Lighthouse," the MHC recommends that NOAA and project

planners consult with the Wampanoag Tribe of Gay Head Aquinnah, the Mashpee Wampanoag Tribe, the New Bedford Historical Commission, and any other interested organization.

The NOI indicates that metal detecting has occurred at the public property. The MHC requests that the signage and rules for visitors to the public property should prohibit metal detecting, digging, and artifact collecting, citing MGL c. 9, s. 27C. The proposed text for "Palmer's Island Passive Recreation" should be amended to add: "Metal detecting, digging, and artifact collecting are prohibited. Mass. Gen. Laws, c. 9, s. 27C." The same information can be provided on websites.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800) and MGL c. 9, ss. 26 & 27C. If you have any questions, please contact Edward L. Bell, Deputy State Historic Preservation Officer and Senior Archaeologist.

Sincerely,



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

xc:

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New Bedford Conservation Commission  
New Bedford Historical Commission  
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