

TOWN OF CONCORD HISTORICAL COMMISSION

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November 16, 2022

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Jeffrey Shrimpton, Cultural Resources Supervisor
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Massachusetts Department of Transportation
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Dear Ms. Ostrander and Mr. Shrimpton,

Thank you for the revised 100% plans of October 22, 2022 for the State Rte 2A/Battle Road resurfacing project and for hosting a Consulting Parties meeting on November 4, 2022. Attached is the Concord Historical Commission's (CHC) response to the January 7, 2022 100% submission (dated 3/28/22). Please make it part of this letter and the public record.

To reiterate, the project area is part of an All-American Road and the Battle Road Scenic Byway; it overlays segments of the original Battle Road and bisects Minute Man National Historical Park (MMNHP). Efforts to preserve the April 19, 1775, corridor from Lexington to Concord began in 1925. Today, this road remains a relatively simple remnant of the original Battle Road with historic structures, sites and landscapes along the route. It is ironic that on the eve of the 250th Anniversary of the American Revolution adverse changes to this important road and its future potential may be implemented.

CHC appreciates the efforts to date to mitigate adverse impacts associated with certain elements of the project including: changing vertical granite edging for proposed splitters, crossings and landings to sloped granite edging with a 4" reveal; reconfiguring the Airport Road intersection with Rte 2A; reducing the number of crossings; reducing the travel lane from 11' wide to 10.5' wide and reconstructing split rail fencing in selected locations. However, we remain concerned that inviting more pedestrians to across and travel along this 40mph road may prove to be unwise from a safety standpoint, and it seems very likely that raised structures will push cyclists and pedestrians along the road off the paved surface in these locations.

CHC makes following recommendations which would benefit the historic road and safety:


- Guardrails - Ensure the use of steel backed wood guardrails to replace the existing steel guardrails. This is a critical 'mitigation' for other adverse changes to the road which now seem likely. They will signal arrival in this special place and help reduce speeds.
- Crossing at Bedford Road - Remove this crossing. Safety and visual impact on the road remain concerns as well as the clear indication of the national park that they are not prepared to accept visitors at this location. Pedestrian access will be provided at the nearby Bedford Lane crossing.
- Raised Crossings, Landings and Splitters - Place remaining crossings, landings and splitters at grade and change to conventional striping which will soften in time. The Toole slides clearly showed that these raised structures (along with related new signage, extra durable striping and stabilized gravel road extensions) would be dominant features adversely impacting the character of the road. The 5' wide stabilized road extensions are newly proposed. The need for them is not clear and they appear to widen the road.

- Roadway Edge Repair - Return the areas newly proposed for 3' wide "Stabilized Gravel" road extensions to the previously proposed treatment of "Loam and Seed". These extensions will appear as road widening. Although not shown in the Toole presentation, this new treatment would visually widen both sides of the road along extensive stretches and set the stage for ongoing "maintenance," additional road extensions and asphalt paving in the future. Vegetated edges would bolster the simple, rural character of the road. Removal of the black gravel along the road and replacing it with loam and seed is highly recommended as these unsightly areas have also created unsafe pull outs along the road.
- Mill Street path/crossing – Reduce the width of the 8' wide stabilized gravel extension which seems excessive and will appear as road widening. A National Scenic Byway Program grant may fund a pedestrian path along the road in this location.

Currently, people living adjacent to or very near the national park and related historic and natural areas already benefit greatly from that proximity. While they use the park more than others, there are thousands of motorists who travel the road on a daily basis and approximately one million annual visitors come from around the country and from around the world to MMNHP and related historic communities along the Battle Road Scenic Byway/All-American Road. Their experience of this road bisecting the national park should be carefully considered when trying to strike a balance here.

The Commission stands ready to continue the Section 106 process when the Determination of Effect is made. In May, we wrote to you following the first Section 106 meeting (and following CHC's March 28, 2022 letter). We asked how disagreements among consulting parties would be resolved and how the consultation process would proceed but did not hear back. We ask that you please respond to these questions.

Sincerely,


Melissa C. Saalfield, Chair
Concord Historical Commission

Attachment: March 28, 2022 Letter to Federal Highways Massachusetts Department of Transportation

CC

Concord Select Board – Matt Johnson, Chair
Concord Town Manager – Kerry LaFleur
State Historic Preservation Officer – Brona Simon
Lexington Historical Commission – Susan Bennett
Lincoln Historical Commission – Andrew Glass
Minute Man NHP – Simone Monteleone, Superintendent
Advisory Council on Historic Preservation – Mandy Ranslow
Highway Administrator/MassDOT – Jonathan Gulliver
Division Administrator FHWA – Jeffrey McEwen

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March 28, 2022

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RE: Comments on Route 2A 1/9/2022 100%PSE Submission – Project ID 608495

Dear Ms. Ostrander and Mr. Shrimpton,

Thank you for initiating the Section 106 process and for hosting the Consulting Parties meeting on February 18, 2022 which a majority of the members of the Concord Historical Commission (CHC) were able to attend. The project area is located almost entirely within Minute Man National Historical Park, is part of an All-American Road and part of the Battle Road Scenic Byway. The CHC offers the following comments about the January 9, 2022 Route 2A Draft 100%PSE Submission.

The CHC supports Minute Man National Historical Park's positions as stated in Superintendent Simone Monteleone's Feb 9, 2022 letter to Paul Stedman, District Highway Director/MassDOT. It is well researched and specific.

The Commission specifically supports the following project goals/elements:

- Reducing vehicle speed along the road by whatever non-structural means possible as soon as possible. All interested parties agree with this goal;
- Repaving the road with no expansion of the paved surface to provide an improved shoulder for cyclists/pedestrians;
- Narrowing the travel lane to 10.5' throughout the project area;
- Installing steel backed wood guard rails within the project area;

- Realigning the Rte 2A/Lexington Road intersection in Concord and the Rte 2A/Airport Road intersection in Lexington Road.

However, certain visual elements are incompatible with the simple historic road and its national park setting. Specifically, CHC does not support the 4'x 40' raised granite splitter islands and 4'x 69' raised granite pedestrian crossing islands (w/accompanying tall posts, flashing lights, solar panels, VGC edged landing pads and increased signage) and requests that they be removed from the current project. The Commission believes that these large granite structures constitute direct and indirect "adverse effects" to the historic character (see Attachment 1 "Character Defining Features") of MMNHP and to the simple, historic road (Rte 2A) which bisects national park land. They would similarly impact the All-American Road (AAR) and the Battle Road Scenic Byway (BRSB) within the project area.

Ironically, the current plans may result in reduced safety for cyclists or pedestrians travelling along the side of the road. The proposed crossings do not connect with safe paths on one or both sides of the road. Because they are 4' wide plus striping, the splitters and crossings significantly reduce the width of the paved surface available for cyclist and pedestrian use. They seem to be obstacles which could prevent drivers from swerving to avoid collisions with cyclists or pedestrians along the road.

Removal of these raised structures from this project would ensure completion of core repaving work prior to the 2025 national celebrations and create the opportunity to carefully evaluate any/all crossing locations and designs for need, connectivity, safety and appropriateness. In addition, plans could be developed for safe connecting paths to and from the national park (none currently exist).

Context sensitive alternatives to protect nationally significant historic resources, reduce speeds along the road and improve access and safety for all road users have not yet been adequately considered. CHC suggests consideration of the following:

- nonstructural speed reduction measures asap: set context sensitive advisory speed limits, reduce the speed limit for this "Special Area", add "Reduce Speed Ahead" signage and/or other nonstructural strategies and elements (a conversation w/DOT & others needed)
- develop one prototype pedestrian crossing at the Ranger Station with custom designed crossing solutions (ex laser activated beacons w/bollards) which would improve access and safety as well as appropriateness in the project area.
- place splitters at grade and reduce width to mitigate visual impact and provide a wider paved shoulder for cyclists' safety
- install wood backed steel guard rail throughout,
- develop entry treatment at the eastern end of the project
- commit to speed limit enforcement (national park, local towns)
- repair stone walls (DOT w/national park)
- improve road side (DOT) and historic landscape (national park) maintenance

The CHC requests formal clarification about the phases of this project. At the Feb 18 Consulting Parties Meeting, MassDOT stated that the current project is a 'stand alone' project and that there is no Phase 2. However, since at least 2020, numerous presentations, meetings, letters and phone calls have referenced a Phase 2 which could include other potentially detrimental changes

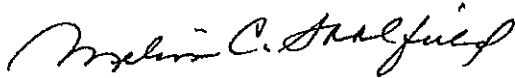
including: full depth reconstruction, additional pedestrian crossings, road widening, relocation of stone walls, intersection realignments, signalization, and sidewalk installation w/in the ROW. This remains a serious concern for future 'stand alone' projects and possible cumulative impacts.

We understand that both FHWA and MassDOT are leaning toward increased flexibility in highway design, speed control, and reassessing the 85th percentile speed study. Utilizing a context sensitive approach with design exceptions would likely lead to solutions which would provide increased safety for all users and honor the nation's Revolutionary War heritage, the neighboring towns that share that history, the 1 million people who visit these sites annually and Minute Man National Historical Park. For nearly a century there have been concerted efforts and major public investments to ensure protection of the route of the opening battle of the American Revolution along with associated structures and landscapes along the Battle Road. The All-American Road and the BR Scenic Byway are contemporary expressions of the importance of this area.

While we are not experts in highway design or in the detailed requirements of the Section 106 process we have worked to develop our understanding of the steps and definitions which govern this project and process.

Working together, the Commission feels that we can achieve a better result. We look forward to continuing the consultation with MassDOT and FHWA.

Sincerely,



Melissa C. Saalfield
Chair, Concord Historical Commission

CC:

Concord Select Board, Terri Ackerman
Concord Town Manager, Kerry LaFleur
State Historic Preservation Officer/Massachusetts Historical Commission, Brona Simon
Lexington Historical Commission, Susan Bennett
Lincoln Historical Commission, Andrew Glass
Highway Administrator/MassDOT, Jonathan Gulliver
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Division Administrator FHWA, Jeffrey McEwen
Advisory Council on Historic Preservation, Mandy Ranslow

ATTACHMENT 1
Character Defining Features

"Historic Character:

...the sum of all visual aspects, features, materials, and spaces associated with a cultural landscape's history, i.e. the original configuration together with losses and later changes. These qualities are often referred to as character-defining."

Source: NPS Guidelines for Treatment of Cultural Landscapes

Route 2A within the project area and its national park setting possess "character-defining" features which together establish the "historical character" of this nationally significant cultural landscape. For nearly a century, efforts to preserve the memory of the opening battle of the American Revolution have recognized that the experience of the road is integral to the perception and experience of the surrounding historic landscape. They are mutually reinforcing and interdependent. The addition of large and visually 'heavy' granite structures and their related visually distracting accompaniments (common and appropriate today in more urban locations) throughout the project area will be dominant features in the landscape and the experience of the historic setting will be diminished.

The road itself:

- the road is a simple, two lane road with typical/common? Often w/a paved width close to that of historic "2 rod" roads. When not burdened with fast moving traffic, the experience of the road allows for visitors to begin to imagine what happened along the Battle Road on April 19, 1775. While not all of the road overlays the 1775 road, it remains remarkably simple – thanks to nearly 100 years of efforts to preserve its essential character.
- there are long stretches with a grassy shoulder without curbs of any kind, minimal signage and lighting and only 2 minimally signalized intersections.
- simple stone walls are common along the road, some ancient and others more modern reflecting the evolution of land uses and the straightening of the road ca 1820
- ancient trees remain, often close to the road
- the road winds gently through the national park and there are moderate changes in elevation and provides a variety of landscape types – open vistas across fields, meadows and wetlands as well as reforested areas

The surrounding national park "setting" is visible from the road:

- rehabilitated historic structures (some which witnessed the opening battle of the American Revolution as it moved along the Battle Road) including homes, taverns and barns
- rehabilitated agricultural fields with crops, grazing animals and remnant orchards
- wetlands important in the battle of April 19, 1775
- granite markers showing the distance between Boston and Concord's North Bridge
- the site of Parker's Revenge
- the Paul Revere Capture site and monument
- places where the restored route of battle diverges from the straightened segments of 2A