



**TOWN OF CONCORD**  
**CONCORD HISTORICAL COMMISSION**

141 KEYES ROAD, CONCORD, MA 01742  
TEL. (978) 318-3290 FAX (978) 318-3291

February 2, 2023

Cassandra Ostrander, Program Development Team Leader  
Massachusetts Division, FHWA  
55 Broadway 10<sup>th</sup> Floor  
Cambridge, MA 02142

Jeffrey Shrimpton, Cultural Resources Supervisor  
Environmental Services, Highway Division  
Massachusetts Department of Transportation  
10 Park Plaza  
Boston, MA 02116

Brona Simon, State Historic Preservation Officer  
Massachusetts Historical Commission  
220 Morrissey Boulevard  
Boston, MA 02125

Subject: Route 2A Roadway Resurfacing and Related Improvements Project (MassDOT  
Project # 608495)

Dear Ms. Ostrander, Mr. Shrimpton and Ms. Simon,

The Concord Historical Commission (CHC) is responding to FHWA's proposed Section 106 Determination of No Adverse Effect and its request for concurrence from the Massachusetts Historical Commission (MA SHPO). While the Commission has supported specific aspects of this project, it has consistently raised serious concerns about others. (See attached CHC letters of March 28, 2022, and November 16, 2022) We disagree with the Determination of No Adverse Effect and request that the Section 106 process continue so that adverse effects to Minute Man National Historical Park (MMNHP) and its setting (including Rte2A) and the Battle Road Scenic Byway/All-American Road can be reduced, mitigated or eliminated. The CHC is closely aligned with and supportive of Minute Man National Historical Park Superintendent Monteleone's comprehensive and well documented letter of January 30, 2023. Specifically, we support: removal of the Bedford Road crossing; a commitment without conditions to use steel backed wood guardrails throughout the project area; and the need for an Environmental Assessment/NEPA and a Section 4(f) Evaluation/NTA in addition to Section 106.

We also have additional comments which follow.

As it runs through the project area, Rte 2A (the Battle Road) overlays significant segments of the route of the opening battle of the American Revolution. The events of April 1775 and the role of the Battle Road are well documented and are not repeated here. However, it is important to emphasize that even today the road retains much of its character as a simple rural road with few modern elements. This has not been by accident. For nearly a century the deliberate actions taken by countless people and organizations have led to the preservation of this historic route, its setting and historical elements including structures, landscapes, stone walls and distinctive artifacts.

While not currently listed or treated as a historic resource, Rte 2A within the project area would likely meet three of the Secretary of the Interior's criteria for listing on the National Register of Historic Places: 1) association with events that have made a significant contribution to our history; 2) association with significant people in our past (e.g. the "embattled farmers" who fought and died that day; Paul Revere, William Dawes, Captain William Smith); and 3) places which have yielded or are likely to yield important historic/pre historic information through additional archaeological investigation.

Importantly, this section of Rte 2A is also part of the Battle Road Scenic Byway and part of an All-American Road which must "...possess multiple intrinsic qualities that are nationally significant and have one-of-a-kind features that do not exist elsewhere..." It must also be considered a "destination unto itself."

In addition to the detailed analysis of Adverse Effects in the national park's letter, the CHC has the following concerns and comments:

**Bedford Road Crossing** – At the November 4 Consulting Parties meeting a slide was presented which showed that the crossing here (with associated signs, post/flashing lights, highly visible striping, landings w/vertical granite curb etc.,) might be barely visible from the Captain Smith House. However, this crossing with associated infrastructure will be highly visible for the thousands of Park and Byway visitors and others who drive along the road every day. Their experience should not be discounted.

**Steel Backed Wood Guardrails** – These would be an important element critical to defining the special nature of the BR/Rte 2A and the BRSByway/All American Road w/in a national park. They would also contribute to speed reduction and should be retained.

**Road Widening/'Roadway Edge Repair'** – The 5' wide 'Stabilized Gravel' road extensions proposed at the splitters, pedestrian crossings as well as lengthy stretches of 3' wide 'edge repair' will visually and functionally widen the road on one or both sides – although not with asphalt paving. A previous detail for 'Roadway Erosion Repair' included a 3' wide strip of "Loam and Seed" along the road. It is difficult to determine how many linear feet of the project will be affected. These road extensions widen the road and will result in a discordant mix of stabilized gravel surface, loose black gravel "patches" (ongoing deposits over recent years), vegetated edges and asphalt (where the paved surface is relatively wide). Reinstatement of the "Loam and Seed" detail for "Roadway Edge Repair" would revegetate roadsides and provide a major and more consistent visual improvement for the corridor.

**Path at Mill Street** – Is there a reason this path is so excessively wide? It replaces well established vegetation. Can it be more sensitively located? Will the split fence be replaced?

**Safety** – Some elements of the project not only detract from the character of the historic road and the setting of MMNHP but seem unsafe as well. The speed limit remains at 40mph. It is hard to be safe at this speed particularly since the ADA compliant pedestrian landings/refuge islands will invite more people with diverse abilities to cross and travel along the road. The ADA compliant refuge islands, pedestrian landings and splitter islands will create the expectation for a safe crossing, but they will also push pedestrians, strollers/wheelchair users, and bicycles off of the asphalt road onto shoulders with a changing mix of black gravel, vegetation and stabilized gravel. The problem is of particular concern at the Bedford Road crossing where sight distance is not optimal, and people will need to walk along or cross Bedford Road to reach the pedestrian landing. Once across Rte 2A there is no safe connecting path to the park.

**Data** – CHC challenges the data cited to justify the use and need for pedestrian crossings. This data was collected over a Patriots Day Weekend, widely known to be the busiest weekend of the year. On this weekend, thousands of visitors travel along the Byway/Battle Road and flood the national park to attend multiple special events especially near the Minute Man Visitors Center and Airport Road. It is also the time when park rangers from other parks along with local and regional public safety and law enforcement personnel are on hand to ensure safety and to assist pedestrians, bicycles and others as they cross Rte 2A. Visitor counts on this weekend do not reflect typical use.

**Environmental Justice** – CHC was puzzled by the reference to the Environmental Justice population in Lincoln. We would appreciate clarification where this population is located and how any of the three proposed crossings improve their access to the national park.

Finally, we envision incremental and cumulative impacts that may occur in the foreseeable future:

**Former Phase 2 elements** – Beginning with the 2019 “stakeholder” and other public meetings and referenced in early correspondence, it was frequently stated that there were 2 phases to this “repaving” project. Phase 1 would be the ‘low hanging fruit’... repaving, and traffic calming elements (e.g. pedestrian crossings, travel lane reduction). Phase 2 would include more substantial changes such as road widening with 5’ wide bike lanes and additional signage, more pedestrian crossings, realignment of Hanscom Drive and Old Massachusetts Avenue. Pressure to achieve some or all of these detrimental changes will undoubtedly continue.

**Stabilized Gravel road extensions** – These significant extensions will widen the road - presumably to assist people travelling on or crossing 2A. They will be less stable than asphalt and future maintenance issues could set the stage for asphalt paved shoulders, leading to the widening of the current paved surface. Roadside revegetation (as opposed to gravel, stabilized gravel, or asphalt) is an important visual characteristic of the current road which could give way and disappear over time - replaced by asphalt.

**Painted Steel Guardrails** – These guardrails will not improve the setting of the road or the national park. If installed, they will preclude the future replacement of the existing guardrails with Steel Backed Wood Guardrails for the life of the proposed guardrails. An important opportunity to mitigate adverse impacts and greatly improve the historic setting will be missed.

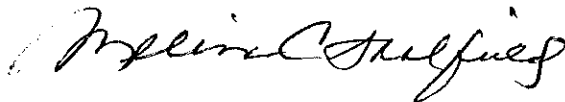
**128/2A Bridge project** – We are just learning about this project and understand bids are expected this spring. The plans include a 12' shared use path across Rte 128 up to Forbes Road and the eastern entry of the national park. This could increase pressure for similar treatment along 2A w/in the park. At the Design Public Hearing presentation (Oct 14, 2021) the Old Massachusetts Avenue /2A intersection was identified as a “Signalized Study Intersection.” The current status is unknown but a signal here would be concerning.

**Archaeology** – Work and ongoing maintenance and increasing public use at the proposed Bedford Road pedestrian landings and elsewhere has the potential to disturb archaeological resources.

The Concord Historical Commission was created in part to safeguard the historic and archaeological attributes of the town, attributes which are inextricably linked to those protected and honored by the establishment of Minute Man National Historical Park. Among the Park’s primary features is Battle Road, the essential element of the Battle Road Unit. We find the proposed treatments by MassDOT and FHWA threaten the integrity of this road and therefore its relationship to the historical fabric of Concord.

We look forward to continuing this consultative process in the hope more appropriate solutions may be found to ensure the safety of the public and the preservation of the Battle Road and Minute Man National Historical Park.

Sincerely,



Melissa C. Saalfield, Chair  
Concord Historical Commission

cc

Concord Select Board – Matt Johnson, Chair  
Concord Town Manager – Kerry La Fleur  
Lexington Historical Commission – Susan Bennett  
Lincoln Historical Commission – Andrew Glass  
Minute Man National Historical Park – Simone Monteleone  
Advisory Council on Historic Preservation – Mandy Ranslow  
National Trust for Historic Preservation – Betsy Merritt  
Massachusetts Historical Commission - Elizabeth Sherva