



TOWN OF CONCORD
HISTORICAL COMMISSION
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4 June 2024

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strycky, MEPA Analyst, EEA No. 16654
100 Cambridge St., Suite 900
Boston, MA 02114

Re: EEA No. 16654 – L.G. Hanscom Field North Airfield Development, Bedford –
Draft Environmental Impact Report

To whom it may concern:

Having reviewed the L.G. Hanscom Field North Airfield Development Draft Environmental Impact Report (March 2024), the Concord Historical Commission has the following comments.

Summary

First and foremost, it is the view of the Commission that the proposed project will have an adverse effect on the integrity of many significant historic resources in Concord, detailed below. Second, in light of the direct flyover route as well as vehicular access to the Hanscom Field North Airfield, we ask that the Concord Historical Commission and Minuteman National Historical Park be named as consulting parties in the Section 106 process.

Comments

For decades, the Concord Historical Commission has expressed its concerns about the growth of civil aviation at Hanscom Field and its potential impact to nationally significant resources unified through interconnected cultural landscapes and a National Historical Park. The Commission was part of a successful effort to prevent Hanscom expansion in 2003 and remains steadfast in its long-term commitment to this preservation effort. It is the view of Concord Historical Commission that the proposed private jet expansion at Hanscom will have an **adverse effect on nationally significant historic structures, landscapes and cultural features in Concord**, including the National Park Service Minute Man National Historical Park.

Due to the anticipated adverse effect of Hanscom expansion, the National Trust for Historic Preservation recognized the national resources of Concord and neighboring communities among America's 11 Most Endangered Historic Properties on May 1, 2024. Of these resources which have been on the national watch list since 2003, the National Trust recently wrote:

Minute Man National Historical Park and nearby areas of Concord, Lexington, Lincoln and Bedford are home to places of great significance in American history, including [battlegrounds of the outbreak of the American Revolutionary War], Walden Pond and Woods, and the preserved homesteads of authors and environmentalists: *Little Women's* Louisa May Alcott, Nathaniel Hawthorne, Ralph Waldo Emerson, and Henry David Thoreau.

Visitors from around the world draw inspiration from these unique and irreplaceable places of memory, symbolic of our nation, where Americans expressed their political and literary independence from Europe.

The cultural landscapes for some of the nation's most important and beloved historic resources lie in the direct path of low flying aircraft departing and approaching Hanscom field. Noise and airborne pollutants from these aircraft significantly impact the outdoor experience for visitors and stewards of Concord's historic properties. **Further expansion of flights over Concord will have a cumulative effect by further diminishing the qualities of setting and feeling which are essential to the integrity of these resources and which substantially contribute to their significance. It will also irreparably harm the visitor experience in these places of our collective national memory.**

The vast number of historic properties affected is also significant, summarized below. Many individually significant cultural resources are also included in National Register and Local Historic Districts, and Concord. The Concord Historical Commission is deeply concerned about the increase in low overhead flights, noise pollution, air pollution, and the proposed increase in fuel truck deliveries within Concord's historic districts and the Battle Road Scenic Byway as well as the individually significant buildings, structures, sites (landscapes) and objects in Concord, including several National Historic Landmarks.

In light of these anticipated adverse effects, we are concerned about the potential of diminished integrity to:

- Minute Man National Historical Park: in Concord, includes multiple individually significant historic objects, sites, buildings and structures
- Great Meadows National Wildlife Refuge (see MHC MACRIS inventory form CON.927) important for its past indigenous use and existing pre-historic artifacts and for its role in early settlement of the area
- 4 National Register Districts encompassing 611 square miles; they include
 - Concord Monument Square – Lexington Road Historic District
 - Minute Man National Historical Park
 - Hubbard – French Historic District
 - Isaac Davis Trail
- 7 National Historic Landmarks
 - Minute Man National Historical Park, Orchard House, The Old Manse, the Ralph Waldo Emerson House, Walden Pond, The Wright Tavern, and The Wayside
- Freedom's Way National Heritage Area
- 6 Local Historic Districts encompassing 863 square miles; they include
 - American Mile Local Historic District

- Barrett Farm Local Historic District
- Church Street Local Historic District
- Hubbardville Local Historic District
- Main Street Local Historic District
- North Bridge/Monument Square Local Historic District
- The Battle Road Scenic Byway, a National Scenic Byway and an All-American Road
- 9 locally designated Scenic Roads
 - Balls Hill Road
 - Barrett's Mill Road
 - Garfield Road
 - Liberty Street
 - Monument Street
 - Old Road to Nine Acre Corner
 - Strawberry Hill Road
 - Sudbury Road
 - Westford Road
- Numerous other individual properties on or determined eligible for listing on the National Register of Historic Places (such as Sleepy Hollow Cemetery, Thoreau Birthplace [Deacon John Wheeler – Captain Jonas Minot Farmhouse], Deacon Thomas Hubbard/Henry French House, Damon Mill, and Robbins House)

In its periodic Hanscom Field Environmental Status and Planning Reports (ESPR), Massport lists the above-mentioned historic resources and many others in its 45-square mile study area impacted by flights and traffic associated with Hanscom Field. The Commission strongly recommends that **the EIR expand the small study area of just ¼ mile of the project site to be consistent with the 45-square-mile study area of ESPR and to more accurately assess the true impact of the proposed project.**

The Concord Historical Commission remains profoundly concerned that any expansion of civil aviation at Hanscom field will compromise the integrity and experience of the historic resources, cultural landscapes and enduring symbols of our nation. **We also request that the Concord Historical Commission and the National Park Service Minute Man National Historical Park be designated as consulting parties to the Section 106 process.** We look forward to continuing the conversation.

Sincerely,



Alan Bogosian
Chair

Exhibit: Noise map L.G. Hanscome Field ESPR

Cc: Brona Simon, Massachusetts Historical Commission; Members of the Concord Select Board; Simone Monteleone, Superintendent, Minute Man National Historical Park; Lexington Historical Commission; Lincoln Historical Commission; Bedford Preservation Commission