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WAYLAND HISTORIC DISTRICT COMMISSION

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MEPA

March 14, 2008

Ian A. Bowles, Secretary of Environmental Affairs
Executive Office of Energy and Environmental Affairs
MEPA Office – Attention: Holly Johnson
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Twenty Wayland, LLC: EOE #13844

Dear Secretary Bowles,

As the Wayland Historic District Commission (WHDC) noted in its January 2007 response to the Draft EIR, it has been following the Wayland new Town Center Project with great interest and enthusiasm in hopes that it will enhance the town and will respect the significance of the existing Wayland Center Historic District, which is listed in the State Register of Historic Places [National Register District, 1974; MGL Chapter 40C Local Historic District, 1965]. These comments relate to the Final Environmental Impact Report (FEIR) filed by Twenty Wayland LLC, developer of this project, on February 15, 2008.

As you well know, the size of this project will affect off-site areas, most specifically the Wayland Center Historic District, which preserves the original center of Wayland, incorporated from part of Sudbury in 1780. Part of the significance of our historic district is its continuity with our community's development and today's world. It not only has historic transportation routes through the community, but also is a neighborhood where Wayland residents live and work. The WHDC comments relate to specific historic resources and to the context of this collection of buildings, structures and landscapes that retains historical and architectural significance.

The final EIR statement presents eight (8) plans for ways in which traffic congestion related to the new town center development could be mitigated. The developer (through this document) indicates that the most recent and preferred plan is A3-3 (Figure 2-25). Each of the eight plans proposes alterations that would substantially derogate the historic district and the WHDC believes it is its responsibility to comment. The WHDC is aware that Wayland Road Commissioners have recommended several strategies to decrease the adverse impacts; however the scale of the plans in the FEIR are not sufficient to determine whether they incorporate some of the lane width reductions and parking changes that have been recommended by the Road Commissioners. In addition the WHDC believes that it must comment on the eight plans that are part of this FEIR.

Re: EOE #13844 – Wayland Town Center Project

- 1 **Traffic Light at the Route 27 and 126 Intersection.** The addition of this light will have a negative impact on residences at this intersection as well as historic character, particularly of the Wayland Depot, railroad artifacts and the Wayland Historical Society's Grout-Heard House. The addition of the light requires a dedicated right turn lane north bound and widening of Route 27/126 from Route 20 north, which in seven of the eight plans affects historic hitching posts as well as a potential threat to large copper beech trees (Figures 2-18 to 2-24). Past discussions with Mass Highway, when the newly reconstructed Route 20 intersection was under construction, indicated that it would be nearly impossible to synchronize a light here with the Route 20 light which is only 577 feet south of this intersection (30 feet are unusable for storage, dropping the actual storage to 547 feet, because motorists traveling on Route 27/126 south bound are directed to not block the intersection of the road with the intersection of Millbrook Road [east side] and Pelham Island Road [west side], due to public safety vehicle access. It was also made clear that there would not be enough storage space for the cars queuing southbound on Route 27 from the proposed new light to the intersection of Route 20. This light is recommended by the developers, yet a light at the new entrance to the project area is not recommended. The entrance to the proposed development from Route 27 (a left from the north bound lane) is 1,350 feet north of this Route 27/126 intersection and only 1,035 feet south of the Bow Road Historic District (State Register of Historic Places - MGL Chapter 40C-Local Historic District designation-2003). It appears that a light at the entrance to the proposed development could be an feasible alternate solution to traffic congestion that will create gaps in southbound traffic on Route 27 and certainly has substantially less impact on the Historic District. The Route 27/126 light is included in all eight alternatives and there has been no study of the need for this light if there were a light at the Route 27 entrance to the project site.
- 2 **Route 20 Eastbound – East of Route 27/126.** Proposals A3-1 and A3-3 recommend a second east bound lane on the east side of the major intersection that merges down to one lane just a few car lengths east of the intersection. This additional lane would remove some of the green space in front of the First Parish Church – part of which was recently added as mitigation for green space removed from the Mellen Law Office Green during the most recent intersection reconstruction. The addition of this lane is likely to also require relocation of monuments that are set back on this green space as well as at least one granite post at the corner. It also appears that the stone wall that extends along Route 20 (south side) will be disturbed in front of 221 Boston Post Road. While these alterations may be in the State right-of-way, they nevertheless impact non-renewable historic features in the Wayland Center Historic District. These physical changes are of concern to the WHDC as are the logistics of use of the church and residence driveways at this location. Merging of lanes in the vicinity of these two driveways will compound the access to and from these driveways, particularly for nursery school parents in the AM. Furthermore, in a recent conversation with an on-site state engineer for the current road reconstruction project, the point was made that the proposed eastbound merge lane was insufficient in length to have any real affect on mitigating the traffic flow. (Clearly maintaining the No Turn on Red on to Route 20 will be critical.) Finally expanding the pavement area contributes to isolating portions of the historic district, making it significantly less pedestrian friendly. Due to all of these considerations the WHDC asks if the merging could occur before the driveways or if it may be safer to NOT have this proposed second lane on the eastbound side of the intersection, eliminating the need to merge immediately after crossing the intersection.
- 3 **Wetlands Removal on North Side of Route 20.** While the wetlands infill (with replication elsewhere) does not seem to be an historic district issue, generally, here it poses a threat to the historic buildings in the area – all of which require sump pumps, several in some cellars to keep up with the water intake during rainy seasons. The historic Town Center is built on a flood plain with substantial wetlands – an area that probably would not be built today. Each new

construction project affects the high water table and water problems in the historic dwellings increases. Once the wetlands are filled for new road surface – where else can the water go but into basements of 18th and 19th century historic structures.

- 4 **Reduction of Mellen Law Office Green.** The WHDC stands firm in its conviction that the Mellen Law Office Green is a vital resource that must be preserved. It has been eroded over the years so that now it is barely a symbol of where East Sudbury's (now Wayland's) Minutemen gathered before heading to Concord in 1775. Potential road widening that includes removal of green space at the Mellen Law Office Green is problematic in terms of context of this town center. This town green is small in comparison to many town greens. It is highly visible and is experienced by anyone passing through Wayland's town center from any and all directions. Its most recent reduction in size occurred during the most recent reconstruction (2006-2007) for which green space was added in front of the First Parish Church as a mitigating factor. The Law Office Green's future is pivotal to the preservation of the district as a whole. The most recent plan, A3-3, appears to have less reduction than others due to the lane width reduction recommended by the Wayland Board of Road Commissioners.

It also may be important to note that the WHDC played an active role in the enhancement grant that was received by the town and used to create sidewalks and crosswalks as well as the corten guard rail along the wetlands area on the northern side of Route 20 east of Route 27. The WHDC anticipates that these design features that are recently installed will be retained in any future road reconstruction/widening that may be a result of the Town Center project.

The Wayland Road Commissioners and Board of Selectmen have been working with the project proponent and with Mass Highway to balance the negative impact on the character of the district, while maintaining safety and improving capacity. Everyone believes that the safety factor has been substantially improved with the recent reconstruction of the Wayland Historic District intersection. The WHDC believes that it too must be part of the final planning process and looks forward to reviewing the final plan. Many of us have attended recent meetings where yet another plan has been introduced beyond the eight (8) plans included in the FEIR. For this reason the WHDC believes that your office and the Massachusetts Historical Commission should be given an opportunity to review the **final** traffic plans for the Historic District (rather than eight alternatives) through a supplemental FEIR process, prior to issuance of the Certificate.

Thank you for your attention to these concerns. We look forward to an appropriate solution that preserves the integrity of the long standing Wayland Center Historic District.

Yours truly,



Gretchen G. Schuler, Chairman
Wayland Historic District Commission

cc: Massachusetts Historical Commission
Massachusetts Highway Department
Wayland Board of Road Commissioners
Wayland Board of Selectmen
Wayland Conservation Commission
Wayland Historical Commission
Wayland Planning Board
Wayland Historical Society

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