

United States Department of the Interior
NATIONAL PARK SERVICE
Minute Man National Historical Park
174 Liberty Street
Concord, Massachusetts 01742



A.1.A (MIMA)

September 21, 2026

Robert Creech, Chair
Town of Lexington Planning Board
Town Office Building
1625 Massachusetts Avenue
Lexington, MA 02420

Subject: National Park Service Corrections; Protecting Cultural and Natural Resources, Archeological Survey, Proposed Multi-Family Development at 114 Wood Street, Lexington, MA (Parcel 01-178 within the Administrative Boundary of Minute Man National Historical Park)

Dear Mr. Creech,

I am writing to reiterate the National Park Services' (NPS) significant concerns regarding the proposed multi-unit development at 114 Wood Street in Lexington. Specifically, I remain concerned about the proposal's failure to protect critical cultural and natural resources, viewsheds, and park resources. The NPS met directly with Seaver Properties at the Town of Lexington's request to try and resolve our concerns. Unfortunately, those concerns have not been adequately addressed.

Background - The Park's Administrative Boundary and its Regulatory Authority

In an August 24, 2026, memorandum, Seaver Properties -states that the NPS and Minute Man National Historical Park "have no title or acquired any interests in or restrictions on the Property [114 Wood Street]" and "The Town of Lexington assessor's records do not indicate that the property is part of the boundary of the MMNHP."¹ The applicant's attorney stated that the NPS has no regulatory authority over the 114 Wood Street parcel.

Parcel 01-178, while within the park administrative boundary, was never acquired by the Park and remains a privately owned inholding, as shown on park land status maps TractsNet 1.5 AGOL Public portal.² The Park does not claim title over the parcel, and does not contend that inclusion within the administrative boundary converts private property into federally owned land. Nor does

¹ Seaver Properties, "Memorandum," (August 24, 2026): 1-3.

² [NPS TractsNet 1.5 Public App](#)

the NPS contend that the Park has regulatory jurisdiction over development of the privately owned parcel (See Enclosures: Map 1).

However, the Town of Lexington and Federal Government identified the parcel for inclusion within the administrative boundary of the Park as part of a shared vision to protect a nationally significant battlefield. The boundary adjustment which expanded Minute Man National Historical Park to include the 114 Wood Street parcel was enacted by an act of the US Congress in recognition of its significance to the *Battle of **Lexington** and Concord*, the opening battle of the American Revolution. In addition, this parcel is located within the boundaries of the National Register of Historic Places-listed Minute Man National Historical Park Historic District. Because of this status, the NPS's concerns are important and relevant to the Planning Board's review of the proposed development, and the park urges the Town of Lexington to retain its vision for preserving a National Park area within its town.

The NPS has a specific federal responsibility to preserve and protect the resources and values of Minute Man National Historical Park. Congress established the Park for the preservation and interpretation of the historic landscape along the road between Lexington and Concord, as well as sites associated with the causes and consequences of the American Revolution.

The park urges the Town of Lexington Planning Board to revisit the Town's commitment to preserving the nation's history; its commitment to interpreting this history to millions of local, national and international visitors of all ages; and the site's inherent cultural and natural significance.

I. Impacts to Cultural Resources

A. Further Archeological Survey is Needed to Protect Resources

On August 5, 2026, Planning Board Hearing, the NPS believes the applicant misrepresented the Public Archeology Lab, Inc. (PAL), a highly respected firm specializing in cultural resource management, archeological surveys, National Register documentation, and regulatory compliance. During this hearing, in response to a question from Planning Board Associate Member Michael Leon, Mr. Seaver described a conference call between Seaver Properties and Deborah Cox, President of PAL in which he claims Ms. Cox dismissed the need to conduct an archeology survey.

In both the August 5th meeting and in my previous correspondence with the Town of Lexington through the processes for both the Planning Board and the Conservation Commission, the Park has raised the probability of archeological resources being present on this parcel. Evidence of battle-related artifacts have been recovered within a very close distance to MIMA 01-178 both on NPS fee lands and the Eversource right-of-way, and these facts alone should dispel the Planning Board from accepting Seaver Properties claims without further investigation (such as requesting a copy of any analysis prepared by PAL or contacting Ms. Cox directly).

For context, PAL authored the Minute Man National Historical Park Historic District documentation (See Enclosures: Map 2), which includes the 114 Wood Street (NPS 01-178) parcel. They have completed several archeological investigations within the park's boundaries that have identified numerous sites associated with not only the *Battle of Lexington and Concord*, but pre-contact sites as well as other historically significant sites. The project applicant's representation of the parcel as lacking archeological importance directly conflicts with actual,

documented archeological sites within the park located nearby. The site's potential as presented by Seaver Properties is disputed by NPS archeologists and the NPS does encourage the Planning Board members to reach out directly to PAL for clarification.

B. The Town's Special Residential Development Bylaw Warrants Rejection of the Current Proposal

The Town of Lexington Historical Commission, in a letter dated July 17, 2026, raises grave concerns about the proposed development. The Lexington Historical Commission cites the need to alert the Massachusetts Historical Commission (MHC) as well as revisit the Town of Lexington's Comprehensive Plan to protect the Town's nationally significant historic landscape features (*LexingtonNext Comprehensive Plan Goal 6: Historical Resources*). They state that "The Minuteman National Historical Park is arguably the most historic landscape we have in Lexington. And the proposed development would threaten and damage what we are charged to protect."

Revisiting the intent of Special Residential Development bylaw in the Town of Lexington, the §135-6.9 SRD Bylaw directly states that natural and cultural resources should not be damaged or diminished.³ Given the extent of proposed grading, excavation, driveway and utility construction, and the property's location within the administrative boundary of Minute Man National Historical Park and within the Minute Man National Historical Park Historic District, the NPS is not confident that the applicant has adequately evaluated the potential for historic or pre-contact archeological resources. In addition, the Lexington Historical Commission notes that the SRD, as defined in the zoning bylaw special regulations, "is violated with this proposed development."

The proposed development will destroy the archeological record of the battlefield as well as other potential archeological resources. The adjacent park land contains highly significant pre-contact sites; hence Tribal Consultation is a key component of adhering to the stipulations within the SRD Bylaw. To date, the park is unaware of Tribal Consultation or communication with the MHC. Similarly, the review process has not acknowledged the Town of Lexington's Comprehensive Plan to protect archeological resources.

We also strongly recommend that the Town consult with the MHC or State Archaeologist to reaffirm our statements concerning the historical significance before any approvals are provided. Please note that the Historic District is significant under Criteria A, B, C, and D with six Areas of Significance: Military History, Commemoration, Literature, Archeology, Architecture, and Agriculture.

During the August 5, 2026, Planning Board Hearing, the applicant's attorney stated that "the NPS is free to do their own [archeological] survey at their own expense." The NPS respectfully disagrees with the implication that the Park should bear the cost of investigating potential impacts created by a private development on private land. The NPS has a legitimate interest in

³ Town of Lexington, *Zoning Bylaw Chapter 135 of the Code of the Town of Lexington*, Annual Town Meeting 2026. *The purposes of §135-6.9 include sensitivity to the characteristics of the site:*

- *Preserving historically significant places;*
- *Minimizing disruption of outstanding natural features;*
- *Minimizing impacts on environmentally sensitive areas;*

The bylaw states that development shall be designed to preserve natural features, mature native trees, habitat areas, sloped areas, and historically or architecturally significant buildings or places, and, where possible, mature native trees and their critical root zones should be preserved.

understanding whether the proposed development could affect historic and archeological resources associated with the Minute Man National Historical Park Historic District and its nationally significant resources. However, that interest does not transfer the developer's responsibility for adequately identifying and evaluating the potential impacts of its own project.

C. The Applicant Has Not Demonstrated the Development Site is Disturbed Land

Also at the August 5, 2026, Planning Board Hearing, the applicant's attorney stated that the property is “disturbed land” and therefore an archeological study is not warranted. The NPS strongly disagrees as this conclusion is premature. Archeological resources can be intact even if a property has experienced agricultural, residential, landscaping, utility, or other disturbances that do not inherently destroy archeological resources. Areas that appear disturbed at the surface may contain intact soils, buried features, foundations, artifact deposits, or other archeological resources below the depth of previous disturbance. This is evident in other areas within the Minute Man National Historical Park Historic District, some of the very areas where PAL has previously completed archeological investigations. This further leads the NPS to question the “gist” of their assessment as relayed by the project proponent. The NPS is not aware of the applicant demonstrating that the proposed new excavation will occur entirely within previously disturbed soils and that no potentially significant archeological deposits could survive beneath or beyond those areas.

Whether an archeological survey is warranted is not a determination that should be made simply by characterizing the property as “disturbed.” In their July 17, 2026 letter, the Town of Lexington Historical Commission (with cc to the MHC) states that the proposed development would cause “alteration, damage and impact to...archeological resources...associated with the Battle of Lexington and Concord that could negatively impact our ability [to] discover and research lost relics from this era.” The NPS wholeheartedly agrees with the Lexington Historical Commission. They are an important part of the project review process, and their responsibilities include having an opportunity to “submit recommendations on topics of architectural and historic concern.” The NPS is not aware that this proposed development has been formally submitted before the Historical Commission for consideration and they provided the opportunity to evaluate whether known or expected historic or archeological properties could be affected and specifically determine whether an archeological survey or historic-properties study is warranted. As outlined by the MHC, an archeological survey should retain a qualified, regionally experienced archeological consultant who meets the Secretary of Interior’s Professional Qualifications Standards.

The Massachusetts regulations governing archeological investigations recognize archeological sites as unique, non-renewable, and fragile resources and identify the purpose of archeological review as protecting archeological properties from activities that could disturb them and destroy their contextual and scientific values. Given the parcel’s inclusion within the Minute Man National Historical Park Historic District, the Park requests further clarification on what evidence demonstrates that the proposed areas of excavation have been disturbed to a depth and extent sufficient to eliminate the potential for significant archaeological resources. The proposed development would introduce substantial new ground disturbance, including grading, excavation, utilities, access improvements, and construction of multiple residential buildings.

The NPS therefore respectfully requests that the Planning Board not accept the applicant's characterization of the property as “disturbed” as sufficient evidence that archeological review is unnecessary. The applicant should demonstrate the basis for that conclusion, and the appropriate state and local preservation authorities should have an opportunity to determine whether further

archaeological investigation is warranted. The NPS has provided a detailed archeological background and recommendations for consideration by the Board (See Enclosure).

II. Viewshed Impacts are Significant with Tree Leaves Off (November – April)

Minute Man NHP commemorates the *Battle of Lexington and Concord* which occurred on April 19, 1775. Critical and consequential engagements between the retreating British Regulars and swelling ranks of Colonial Militia took place at the Bloody Bluff and Fiske Hill areas within the Town of Lexington, the boundaries of Minute Man NHP, and the parcel in question. The Park actively works to restore and rehabilitate key battlefield landscapes across the park to approximate as much as possible their 1775 conditions, including through the removal of non-compatible structures and landscape features. Constructing additional twenty-first century structures in view of the Battle Road Trail diminishes the existing and ongoing rehabilitation and restoration efforts of the Park, and limits the interpretive potential of the site for all park visitors.

As we previously noted, the viewshed analyses provided by Seaver Properties on July 13- 14 and 22, 2026, are not adequate to determine visibility from the Battle Road Trail or roadways passing through the park. At the August 5, 2026, Planning Board meeting, Seaver Construction Team (p.2) and Planning Board Chair Robert Creech (p. 6) both presented photos of the viewshed recorded in May – October (Meeting Minutes, 2026-08-05-PB-min.pdf, pp 1-2, 6). These photos depicted trees with full foliage, or a “Leaves On” viewshed. However, the full impact to the viewshed cannot be appreciated without consideration of the fall and winter viewshed when no leaves buffer the view (a “Leaves Off” view). Additionally, most of the applicant’s analysis does not address views from the Battle Road Trail south or southwest of the property, and provided views from Woodpark Circle, which are outside the park boundary and not relevant to park visitors. More detailed viewshed analyses accounting for expected tree removals and on/off leaf conditions along the Battle Road Trail southwest, south, and east of the parcel are necessary to accurately determine potential visual impacts of the proposed development on the Minute Man National Historical Park National Register Historic District.

The NPS requests that the Planning Board reject this submitted analysis as inadequate and a more comprehensive analysis showing leaf-off conditions as well as demonstrating the removal of the tree cover based on the project’s proposed tree loss collectively on the site.

In order to assist the Board, NPS completed an initial viewshed analysis using GIS as a tool to demonstrate the impact of the proposed development on the park setting, and the potential impact on the Historic District’s integrity of Setting, Location, Association, and Feeling (See Enclosures: Maps 3-5). This initial analysis accounts for land surface topography, extant residential development along the park boundary (including along Hayward Avenue and Woodpark Circle), and tree cover. Initial analysis of both leaf-on and leaf-off conditions are shown. The following maps show all land area visible to viewers along the Battle Road Trail in red; Map 3 indicates in leaf-off conditions, all of the proposed units may be partially visible from the Battle Road Trail and will impair the battle setting in the Lexington portion of the Park.

We look forward to seeing a more thorough analysis that takes into consideration the time of year that is most significant to the park during the Battle anniversary in April (leaf-off).

III. Impacts to Natural Resources

A. The Proposed Development Will Adversely Affect Wetland and Vernal Pool Buffers

The Park continues to be extremely concerned by the proposed development and planting within the wetland and Vernal Pool Habitat buffers. In a letter to the Conservation Commission sent May 8, 2026, Alexander Richards of UMass Boston Department of Biology explained "development built as close as legally permissible to the vernal pool could affect this habitat through tree removal, altered hydrology, runoff, road salt, pesticides, fertilizers, lighting, soil disturbance, and increased human activity." The Park does not support any development or disturbance in these buffers and is disappointed by the Town of Lexington's continued support of proposed mitigation measures as a solution to development within and in direct proximity to these buffers. In their August 24, 2026, memorandum, Seaver Properties stated they were "willing to withdraw the Vernal Pool Habitat planting plan" in response to the Park's July 27, 2026, letter to the Lexington Conservation Commission; this decision is appreciated for the health of this natural ecosystem and should be upheld. However, in the final submitted plan, the development proposal retains disturbance within the Vernal Pool Habitat Buffer. Given the extent of proposed turf and maintained landscape, this critical habitat area will be harmed by the current landscape plan and insufficient mitigation of steep slope areas.

B. Impacts of Development Within BioMap Critical Natural Habitat

Seven of fifteen proposed units are planned within a BioMap Critical Natural Landscape.⁴ Lexington Planning Board member Tina McBride noted the presence of this Critical Natural Landscape in the August 5, 2026, Planning Board meeting.

BioMap was created by MassWildlife and The Nature Conservancy to support "strategic protection and stewardship of lands and waters that are most important for conserving biological diversity in Massachusetts."⁵ The 114 Wood Street parcel is bisected by a Critical Natural Landscape, containing 3.13 of 8.93 total Landscape acres. This is one of only three Critical Natural Landscapes identified in the Town of Lexington.

This critical natural landscape, when looking at the §135-6.9 SRD Bylaw, states that it "shall be designed to preserve natural features, mature native trees, habitat areas, sloped areas, and historically or architecturally significant buildings or places." (see Footnote 3).

Further reduction of the number of units is warranted based on the continued impacts by the proposed development.

C. Planned Use Wetland And Vernal Pool Habitat as Common Open Space

In the Lexington Planning Board's August 5, 2026, meeting, Laurie Ellsworth, Landscape Architect for Seaver Properties, described the proposed development's residential amenity space

⁴ BioMap is publicly accessible here: <https://massgov.github.io/DFG/biomap/biomap-summary-report-tool/>.

⁵ Massachusetts Division of Fisheries and Wildlife, "BioMap: The Future of Conservation in Massachusetts," <https://www.mass.gov/info-details/biomap-the-future-of-conservation-in-massachusetts>.

and common open space requirements. Ellsworth stated that “we have... over 3 acres of what could be considered... open space to be used how the residents would like to use it, both natural with views... and some wooded areas.”⁶ Following a request for clarification from the Board, Ellsworth clarified that “the common open space is anything outside of the developed... area.”

It is unclear whether this statement includes sensitive ecological areas including the Vernal Pool Habitat Buffer, wetland habitats, and the Eversource easement area itself, and what kinds of activities and/or landscape changes residents will be permitted to enact in those areas. Clearer provisions for the design and use of this common open space are needed, and if the applicant intends to use these wetland and vernal pool habitats as open space (other than as a viewpoint), it should be rejected. The NPS is encouraging the Board to consider a conservation easement on the portion of the parcel where the Vernal Pool Habitat Buffer is, and potentially the Wetland Buffer areas, to protect against inappropriate use or disturbance into the future.

D. Scale of the Development

The NPS has tried to work with the Seaver Properties to reach a compromise on the appropriate scale of development for this partial within the boundaries of MIMA. The applicant has not shown that a reduced scale of development cannot be a financially viable project. Since public resources will be impacted by this proposed project, the applicant should provide public financial information that demonstrates the financial viability of different scales of development on this parcel, including 15, 12, and 10 unit build alternatives.

E. Large-Scale Impacts of Vegetation Clearing

The area of the proposed development at 114 Wood Street covers roughly 2 acres, nearly all of which are currently forested (see Enclosures: Map 6) but would be cleared to facilitate the project. This significant forest clearing is of concern for wildlife and forest health, as well as for creation of incompatible views.

An extant forest corridor on this parcel connects the Town of Lexington conservation land north of Amherst Lane with the Vernal Pool Habitat and vegetated wetlands to the south. The proposed development heavily constricts this corridor, fragmenting forest habitat and restricting species migration, particularly that of amphibians who access the vernal pool during breeding seasons. Proposed tree clearing will additionally displace native tree woodland and understory species.

Tree clearing also risks widespread forest health decline. In their 2023 report, “Forest Summaries for Minute Man National Historical Park: 2006-2023,” the Northeast Temperate Network determined the Park’s forests are at risk of ‘Imminent Failure’ due to severe seedling regeneration debt, meaning “the forests in MIMA [Minute Man National Historical Park] are one major canopy disturbance away from forest loss.”⁷ Forest clearing additionally increases sunlight in the lower forest, fueling invasive species growth. Both seedling regeneration debt and invasive species pressure harm forest health and may lead to wider forest loss. Forest loss would not only

⁶ LexMedia, “Planning Board - 8/5/2026,” digital recording.

⁷ K. M. Miller & C. Seirup, “NETN Forest health monitoring in Minute Man NHP: 2006-2023 summary,” (2023), <https://irma.nps.gov/DataStore/Reference/Profile/2301846>.

significantly impact natural ecosystem health, but would reduce natural screening of the proposed development, making it increasingly visible from roads and trails within the park.

F. Powerline Corridor As Vital Habitat

The 114 Wood Street parcel contains a 250-foot power line easement managed by Eversource as part of ROW 8-3, covering roughly four acres of the parcel (see Enclosures: Map 6). In their July 27 and August 24, 2026, memorandums, Seaver Properties claim the site is “negatively impacted” by this power line corridor. Contrary to this claim, research across North America has recognized the important role of powerline corridors as habitat for key species.⁸ According to Eversource, “[t]ransmission corridors play a critical role for native and protected plants, wildlife and pollinators and the ecosystems needed to support them.”⁹ Eversource manages its transmission systems in the interest of preserving this vital habitat; operating on a four-year cycle, in 2026, Eversource has removed woody vegetation in ROW 8-3, work that “supports and promotes compatible and stable low growing plant communities... and provides benefit to local ecology and biodiversity.”¹⁰ Citizen scientist observations recorded in eBird provide one example of this ecosystem richness; since 2021, 64 bird species have been recorded along this corridor, with 22 species recorded this year thus far.¹¹ Rather than a sign of the parcel’s environmental degradation, the power line easement creates and protects an ecologically rich habitat amidst a developed forested area. Increased development along this corridor, including the clearing of forest edge habitat and introduction of managed lawn areas, will harm this key ecosystem.

G. Construction Timing Restrictions are Necessary to Protect Amphibians & Endangered Bats

As stated in our July 27, 2026, letter to the Lexington Conservation Commission, the park recently completed a bat survey and noted the presence of bat species protected by the Endangered Species Act in the vicinity. We recommend the proposed development project include an "Information for Planning and Consultation (IPaC)" submission with the U.S. Fish and Wildlife Service given the extent that bat habitat will be altered by the proposed development. Construction activity, destruction of forest habitat, and increased residential area lighting may all affect endangered species.

⁸ David Wagner, et. al, “Vegetation composition along a New England transmission line corridor and its implications for other trophic levels,” *Forest Ecology and Management* 327, (2024): 231, <https://doi.org/10.1016/j.foreco.2014.04.026>; Robert A. Askins, et. al, “Effects of Vegetation, Corridor Width and Regional Land Use on Early Successional Birds on Powerline Corridors,” *PLOS One* 7, no. 2 (2012): e31520, <https://doi.org/10.1371/journal.pone.0031520>; Megan Garfinkel, et. al, “Powerline Corridors Can Add Ecological Value to Suburban Landscapes When Not Maintained as Lawn,” *Sustainability* 14, no.12 (2022): 7113, <https://doi.org/10.3390/su14127113>.

⁹ Eversource, “Transmission System Vegetation Management,” <https://www.eversource.com/residential/about/reliability/vegetation-management/transmission-system-vegetation-management>.

¹⁰ Eversource, “Woburn to Waltham (ROW-8-3),” <https://www.eversource.com/residential/about/reliability/vegetation-management/transmission-system-vegetation-management/transmission-vegetation-management-projects/transmission-vegetation-ma/woburn-to-waltham-row-8-3>.

¹¹ eBird, “Lexington Powerlines,” <https://ebird.org/hotspot/L12534508/bird-list>.

In addition to an IPaC submission, timeframes of construction activity and site disturbance must be restricted to avoid harm to key vernal pool and endangered bat species. Construction work should be limited to November 1 through February 28. In Massachusetts, many amphibians begin migration to vernal pools in early spring, when nighttime temperatures reach 40-45 degrees Fahrenheit.¹² Bats are most active between April 15 and October 31st.¹³ Construction during these active periods would risk significant damage to amphibian and endangered bat species.

IV. Impacts to Park Resources

A. The Proposed Foot Path Would Create an Unsanctioned Entry Point to a National Park Unit and Put Historic Stone Walls at Risk

Seaver Properties' Proposed Site Layout, updated August 23, 2026, shows a proposed foot path leading from the proposed development south through the Vernal Pool Habitat Buffer, along a Colonial Period National Register-listed stone wall, and onto NPS Fee land. As drawn, this proposed foot path would connect to an informal social trail on NPS Fee property that does not serve or connect with the formal park trail system; the Park is not supportive of any trail connection that would lead visitors onto NPS fee property via social trails outside the established trail system (Battle Road Trail).

The proposed path connects to the Eversource Right-of-Way, where it cuts across the Isolated Vegetated Wetland, and extends south along an Eversource service road, which is also not an authorized linkage to the Battle Road Trail. The Park is strongly concerned that path improvements as presented in the most recent filing by the project proponent will result in a potentially higher volume of use associated with the proposed development that may degrade this ecologically and archeologically significant area.

The Park has invested heavily in the Battle Road Trail through the Great American Outdoors Act project, completed in 2025, and is working towards a 2027 agreement with Volpe National Transportation Systems Center to consider potential additional Battle Road Trail connection opportunities.

The Lexington town boards' proposal for a new trail within the park administrative boundary leading park visitors onto park fee land without support from the NPS, demonstrates a disregard for the Park and management of its trail system, running counter to existing management practices and putting visitor and resource safety at risk. The Park acknowledges and appreciates mitigative outreach that has resulted in a scheduled meeting between NPS and members of the trail committee in mid-September. We would also be remiss if we did not ensure awareness that under federal law, any damage or alteration of the stone wall would be deemed an Adverse Effect, as defined by Section 106 of the National Historic Preservation Act, as well as trigger the System Unit Resource Protection Act (SURPA). See 16 U.S.C. §§ 470aa *et seq.*; 54 U.S.C. §§ 100721 *et seq.* The goal of SURPA is to seek recoveries under the applicable statutes to restore injured resources to their baseline (pre-incident) conditions.

¹² "Mass Audubon, "Big Night: Amazing Amphibian Migrations in Massachusetts," <https://www.massaudubon.org/nature-wildlife/reptiles-amphibians/salamanders/big-night-amazing-amphibian-migrations-in-massachusetts>; Mary-Jane James-Pirri, "Natural Resource Assessment for Minute Man National Historical Park," (2009).

¹³ U.S. Fish and Wildlife Service, "Northern Long-eared Bat and Tricolored Bat Voluntary Environmental Review Process for Development Projects, *Version 1.1*," (2025), <https://www.fws.gov/media/consultation-technical-assistance-development-projects>.

Conclusion

We appreciate your continued engagement and commitment to addressing these concerns. The NPS is not, nor have we been, supportive of the proposed development as we have indicated in numerous communications with the Lexington Conservation Commission and Planning Board. This proposed high-density construction is not appropriate for the battlefield landscape of the *Battle of Lexington and Concord* and sits in direct contrast to the intent of the United States Congress' legislation that brought this parcel into the park administrative boundary in 1992.

Sincerely,
SIMONE

MONTELEONE

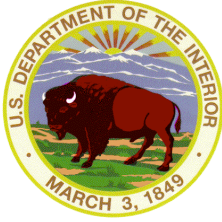
Simone Monteleone
Superintendent

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Enclosures

CC:

Brona Simon, State Historic Preservation Officer, Massachusetts Historical Commission
Edward Bell, Deputy State Historic Preservation Officer and Senior Archaeologist,
Massachusetts Historical Commission
Diane Pursley, Chair, Lexington Historical Commission
Philip Hamilton, Chair, Lexington Conservation Commission
Trenton Carls, Executive Director, Lexington Historic Museums
Chuck Hunt, National Park Trust
Kathy Robertson, American Battlefield Trust
Kathleen Fahey, Friends of Minute Man National Park
Paul O'Shaughnessy, Friends of Minute Man National Park
Margie Coffin Brown, Integrated Resource Manager, NPS-MIMA
Rachel Vincent, Biologist, NPS-MIMA
Joel Dukes, Archeologist, NPS-NARP
Mark Eberle, NPS-NERO



United States Department of the Interior
NATIONAL PARK SERVICE
Minute Man National Historical Park
174 Liberty Street
Concord, Massachusetts 01742



September 21, 2026

MEMORANDUM

To: Abigail McCabe, Planning Director, Town of Lexington

From: Simone Monteleone, Superintendent

**SIMONE
MONTELEONE**

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RE: Recommendations for Archeological Investigation at MIMA 01-178/114 Wood Street,
Lexington, MA

Archeological investigations are recommended for the 114 Wood Street Parcel, Lexington, MA (MIMA 01-178), located within the administrative boundary of Minute Man National Historical Park (NHP), to ensure that April 19th 1775 Battle of Lexington and Concord-related artifacts and other potentially significant archeological resources are not lost during modification of the landscape and construction of the condominium complex. Investigation should focus on those areas that will be impacted by the development including ground disturbing activities and construction limits of disturbance areas. The investigation must be performed to all relevant Massachusetts Historical Commission (MHC) and State Archaeologist's regulations (950 CMR 70) standards, guidelines, and policies for Phase I Archeological Investigations.

BACKGROUND

Two previous archeological surveys adjacent to the 114 Wood Street parcel recovered April 19th, 1775 battle related artifacts. In 2022, a survey for the adjacent Eversource powerline recovered two fired musket balls (Dudek 2022). The powerline project area is less than 200 feet west of the proposed Condo Parcel. In 2025, five musket balls were recovered from Trainor Field as part of a survey for an artillery demonstration (Korkuc 2025). Trainor Field is located west of the power line and approximately 500 feet southwest of the 114 Wood Street parcel. A 2005 *Archaeological Overview and Assessment of Minute Man National Historical Park* by Public Archaeology Lab identified the southern two-thirds of the 114 Wood Street parcel as highly sensitive for potential precontact archeological resources (Herbster 2005).

GENERAL RECOMMENDATIONS

These recommendations were developed in consultation with Joel Dukes, National Park Service Archeologist with the Northeast Archeological Resources Program (NARP). NARP has conducted extensive archeological investigations within Minute Man NHP including at Elm Brook Hill in Lincoln and in support of the project for Parker's Revenge in Lexington.

- The fighting within Minute Man NHP, like many battlefields created a scatter of cultural materials that when surveyed with traditional methods would be almost invisible. Controlled metal detection survey must be utilized to survey the project parcel. This methodology should be utilized since it is the only proven effective means to survey battlefields and has resulted in new insights into the Battle of Lexington and Concord within the administrative boundaries of Minute Man NHP.
- The survey of the project area should include systematic metal detection conducted with 1.0 meter wide transects within the project area. High-quality VLF metal detectors should be utilized and operated by archeologists who have received training in their use in an Advanced Metal Detecting for the Archaeologist (AMDA) course or a similar type of training. At the start of each day the metal detectors should be ground balanced. Excavation of targets should utilize small shovels and hand-held pin pointers to aid in isolating metal targets in each hole. The goal is to limit ground disturbance to what was needed to expose and recover the targeted artifact. Metal detector targets positive for unambiguous modern materials (e.g., pull tabs, bottle caps) should be noted but not retained; all others with historical relevance should be recorded and collected. Following excavation each target where an artifact is retained will be assigned a unique Metal Detector Survey (MD) number. This identifier should also be used to record the location of each recovered artifact using a high-resolution GPS unit. Metal detector target documentation will be maintained on a standardized form. All excavated metal detector targets should be backfilled, and the ground surface restored to its original contour following excavation. Digital images should be taken to document the general project area, survey progress, and any significant features.
- Sampling methods: It may be possible to exclude portions of the survey area due to the presence of large amounts of modern materials.
- The Archeologist must meet professional qualifications standards outlined in the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (Appendix C, DO-28, 1997).
- In addition to the metal detection survey, a phase I shovel testing survey is recommended for area of higher archeological potential, particularly where project related ground disturbance is recommended. Limited testing of lower potential areas is recommended to establish the soil conditions and the absence of cultural materials.
- In the event that significant archeological resources are identified the investigation should be expanded accordingly. Consultation with the National Park Service/Minute Man NHP is requested.
- Recovered artifacts should be washed and cleaned as appropriate to the material. It is recommended that recovered artifacts be donated to a willing repository in support of public understanding and researcher access such as the Lexington Historical Society. If any materials associated with precontact sites are discovered, it is recommended that consultation with associated tribes be initiated by the Town of Lexington for the identification of an appropriate repository.

- A technical report outlining the methodology and results of the Phase I testing should be completed at the completion of all field investigations. The report should include adequate graphics to allow for interpretation of project results and contain a base map indicating the location of all metal detection targets and shovel test units excavated during the project. A copy of this report should be submitted to Minute Man NHP and the Lexington Historical Society along with any requirements per MHC standards.

REFERENCES

Dudek, Martin G. and David Gutbrod

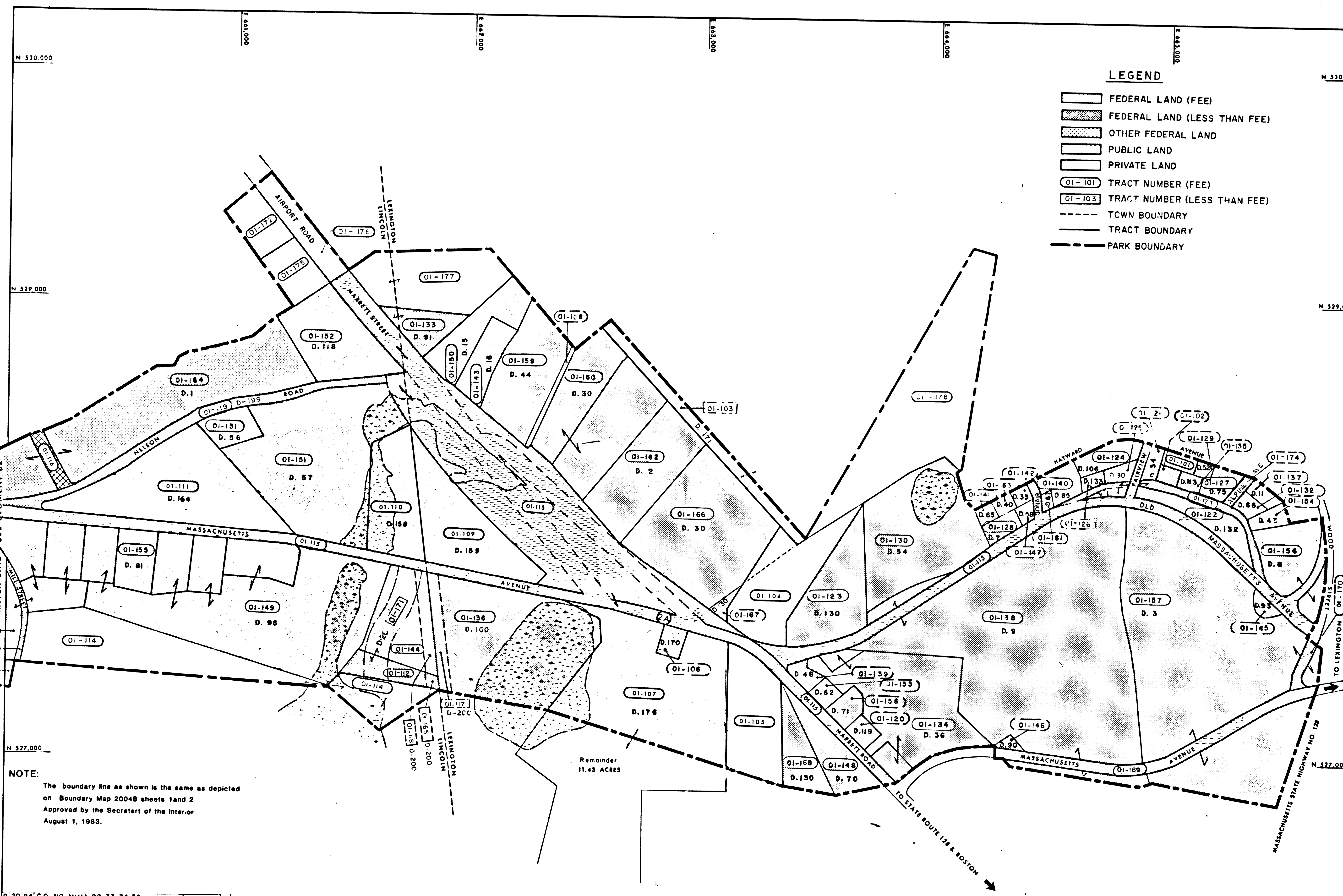
2022 Management Memorandum on the Results of an Archaeological Intensive (Locational) Survey for Eversource's Line 533-508 Structure Replacement Project, Lexington, MA. Eversource Report # ESMA-2022-004. MHC #RC.71277, NARP # MIMA.2022.D

Herbster, Holly

2005 Archaeological Overview and Assessment, Minute Man National Historical Park, Concord, Lincoln, and Lexington MA. NARP # MIMA.2005.E

Korkuc, David

2025 Technical Memorandum, Phase I Archeological Surveys and Monitoring, Minute Man National Historical Park, Lexington, Middlesex Count Massachusetts. NARP # MIMA.2025.A



NOTE:
The boundary line as shown is the same as depicted
on Boundary Map 2004B sheets 1 and 2
Approved by the Secretary of the Interior
August 1, 1963.

9-20-94 C.O. NO. MIMA 22,33,34,36	BER
2-21-89 C.O. NO. MIMA 18	BER
5-3-88 C.O. NO. MIMA 17	BER
11-5-86 CHANGE ORDER 14	M.L.
2-20-86 CHANGE ORDER 12	M.L.
10-11-85 CHANGE ORDER 9	M.L.
7-29-85 CHANGE ORDER NO. 7	M.L.
4-1-81 CHANGE ORDER NO. 5	M.L.
1-14-79 CHANGE ORDER NO. 2	M.L.
1-15-74 CHANGE ORDER NO. 1	M.L.
11-8-71 REVISED TRACT REGISTER, ADDED TRACT	M.L.
01-117 AND DELETED TRACT 01-114	M.L.
7-23-71 ADDED TRACTS 01-113, 114, 115 & 116	M.L.
TO SHOW ROAD OWNERSHIPS	M.L.
DATE	REVISIONS
BY	BY

ON BY HRW CK BY R.D.
APPR BY D.S./H/71
REGION NARO
DRAWING NO.
408
35,000 A
DATE: APRIL 1971
COMPILED BY THE CENTRAL MAP SERVICES
EASTERN SERVICE CENTER WASH., D.C.

Scale in Feet
POLYCONIC PROJECTION BASED ON MASSACHUSETTS COORDINATE SYSTEM,
MAINLAND ZONE

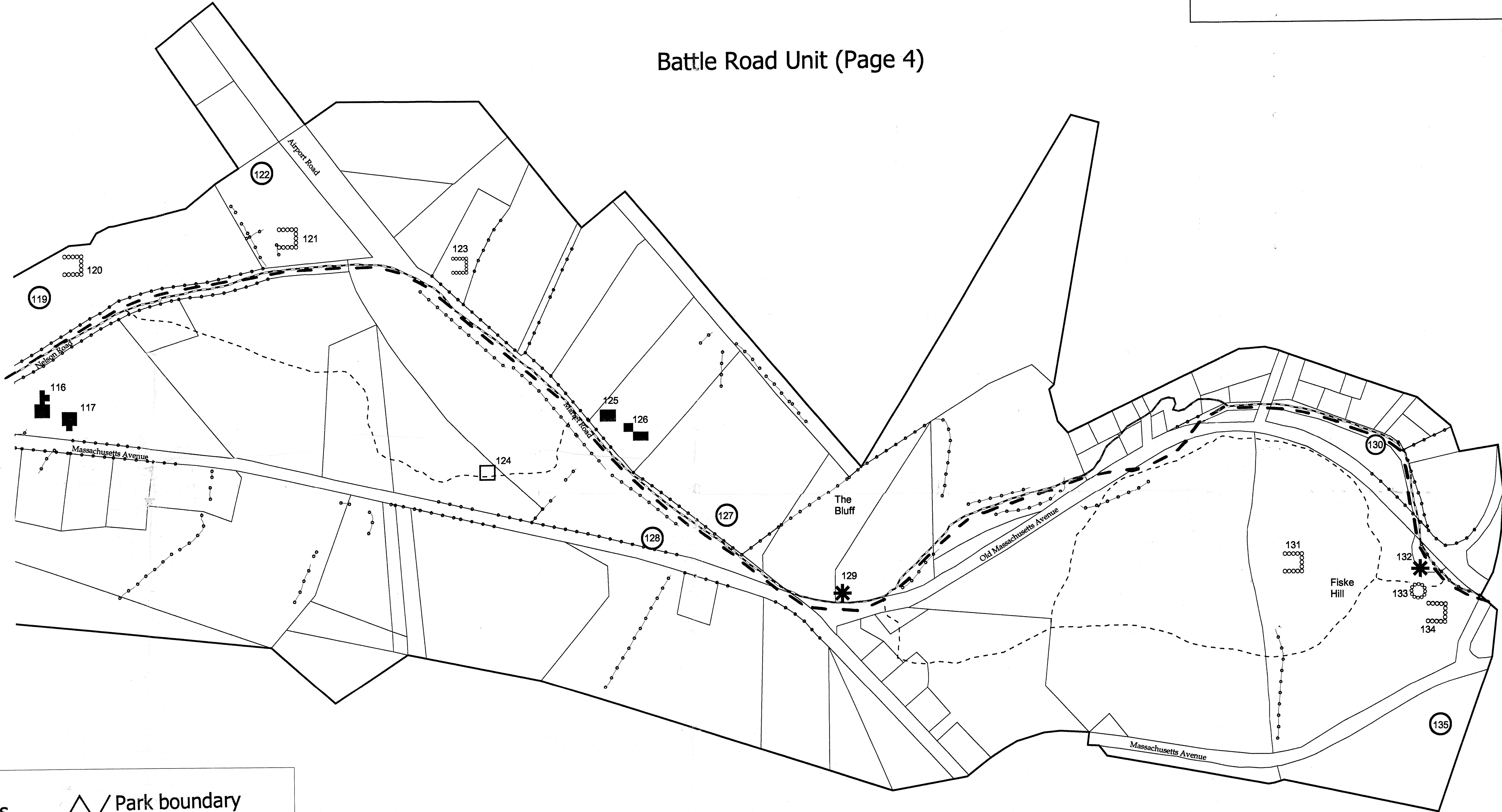
UNITED STATES
DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
OFFICE OF LAND ACQUISITION AND
WATER RESOURCES
TITLE LAND STATUS MAP

MINUTE MAN
NATIONAL HISTORICAL
PARK
MIDDLESEX COUNTY
MASSACHUSETTS

TRACT	OWNER	ACRES	INT
01-101	TOWN OF LEXINGTON D.T.	0.24	FEE
01-102	TOWN OF LEXINGTON D.T.	0.16	FEE
01-103	LANE CONSTRUCTION PUR-171	1.48	SCENIC
01-104	BOSTON EDISON COMPANY	3.09	FEE
01-105	BOSTON EDISON COMPANY	2.83	FEE
01-106	MARY ALICE HARGROVE PUR-170	0.30	FEE
01-107	EMMA E. HARGROVE et al PUR-176	7.90	FEE
01-108	ROBSON REALTY TRUST	0.24	FEE
01-109	BENTON PUR-159	3.53	FEE
01-110	BENTON PUR-159	2.76	FEE
01-111	W. NERTON NELSON PUR-164	5.48	FEE
01-112	MIMA SCHOOL DIST. DON-197	0.83	FEE
01-113	COUNTY OF MIDDLESEX	3.11	FEE
01-114	MIMA SCHOOL DIST	4.59	FEE
01-115	STATE OF MASSACHUSETTS	34.14	FEE
01-116	UNITED STATES OF AMERICA, DEPT. OF THE AIR FORCE	0.38	FEE
01-117	MIMA REGIONAL VOC. DIS/EXC TECH. SCHOOL DISTRICT D-200	(0.58)	EASE
01-118	MIMA SCHOOL DIS DIS/EXC D-200	(0.46)	EASE
01-119	TOWN OF LINCOLN DON-198	1.69	FEE
01-120	AYER, S. PUR-119	0.56	FEE
01-121	BARNES, M. PUR-34	0.21	FEE
01-122	BASHIAN, M. PUR-132	0.71	FEE
01-123	BOSTON EDISON PUR-130	3.07	FEE
01-124	BRESLIN, GEORGE PUR-106	0.58	FEE
01-125	BRESLIN, WARREN PUR-80	0.49	FEE
01-126	BRESLIN, ROBERT PUR-133	0.24	FEE
01-127	CHRISTIE, ETHEL PUR-75	0.45	FEE
01-128	BUILDERS SPEC PUR-7	0.25	FEE
01-129	COOPER, W. PUR-52	0.10	FEE
01-130	COX, MARY PUR-54	3.92	FEE
01-131	CROCKETT, ALAN PUR-58	0.82	FEE
01-132	DEHL, M. PUR-66	0.17	FEE
01-133	DEPT. OF AIR FORCE TRAN-91	0.75	FEE
01-134	HEALEY, M. PUR-36	5.20	FEE
01-135	HEIDT, A. PUR-13	0.15	FEE
01-136	HEPBURN PUR-100	7.60	FEE
01-137	HERDER PUR-11	0.21	FEE
01-138	HINDS, A. PUR-9	22.43	FEE
01-139	JACKSON, H. PUR-46	0.48	FEE
01-140	JOHNSON, O. PUR-85	0.45	FEE
01-141	KLEINER, S. PUR-65	0.12	FEE
01-142	LAWE, C. PUR-33	0.13	FEE
01-143	LENNON, E. PUR-16	0.98	FEE
01-144	LEVIN, A. PUR-58	2.19	FEE
01-145	LEXINGTON HISTORICAL DON-93	0.33	FEE
01-146	LEXINGTON MOTOR INN PUR-90	0.02	FEE
01-147	LYMAN, E. PUR-58	0.14	FEE
01-148	MURDO, W. PUR-70	1.04	FEE
01-149	NELSON, W. PUR-96	20.69	FEE
01-150	NEVILLE, J. PUR-15	1.35	FEE
01-151	NEVILLE, J. PUR-57	6.80	FEE
01-152	NEVILLE, J. PUR-118	0.50	FEE
01-153	NEVILLE, J. PUR-62	0.30	FEE
01-154	ROBERTS, M. PUR-43	0.26	FEE
01-155	ROANE, R. PUR-81	0.96	FEE
01-156	SCHUMACHER PUR-8	1.89	FEE
01-157	SEABURY, F. PUR-3	16.00	FEE
01-158	SHANER, R. PUR-71	0.47	FEE
01-159	SWEET, A. PUR-44	3.34	FEE
01-160	TRAINOR, M. PUR-30	6.82	FEE
01-161	V. SEANT, A. PUR-67	0.09	FEE
01-162	WOLFE, R. PUR-2	3.17	FEE
01-163	EATON, R. PUR-40	0.13	FEE
01-164	CROSS OF ENGINEERS TRAM-1	8.08	FEE
01-165	MIMA REGIONAL VOC. DIS/EXC TECH. SCHOOL DISTRICT D-200	(10.10)	EASE
01-166	TRAINOR PUR-30	5.89	FEE
01-167	BOSTON EDISON CO. PUR-130	0.10	FEE
01-168	BOSTON EDISON CO. PUR-130	1.19	FEE
01-169	STATE OF MASS. PUR-130	1.70	FEE
01-170	TOWN OF LINCOLN PUR-130	0.22	FEE
01-171	TOWN OF LINCOLN PUR-130	0.22	FEE
01-172	MIMA REGIONAL VOC. EXC-201 TECH. SCHOOL DISTRICT	(1.22)	EASE
01-173	McSWEENEY, ETUX	1.01	FEE
01-174	COUNTY OF MIDDLESEX DON-202	0.94	FEE
01-175	COUNTY OF MIDDLESEX DON-202	0.23	FEE
01-176	STOUT, JOSEPHINE	1.00	FEE
01-177	STATE OF MASS.	1.20	FEE
01-178	DEPT. OF AIR FORCE	3.46	FEE
01-179	TORTOLA, ANGELO ETUX.	7.48	FEE

SEGMENT 01

Battle Road Unit (Page 4)



- | | |
|------------------------------|----------------------------------|
| ■ Contributing buildings | — Park boundary |
| □ Non-contributing buildings | — Tract boundaries |
| □ Foundations | — Roads |
| * Object | — Battle Road Trail |
| ① Designed landscape | — Battle Road |
| ○ Wells | — Rock walls |
| ② Archaeological sites | — Secondary Trails (Loop Trails) |
| — Bridge | |

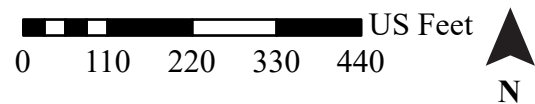
200 0 200 400 600 Feet
Scale 1 : 2,400
1 inch equals 200 feet





Visible Area From Battle Road Trail - Bonair Av. During Leaf-Off

-  Parcel 01-178 Boundary
-  Extant Structures & Proposed Units
-  NPS Trails
-  Roadways
-  Viewer Location
-  Visible Area

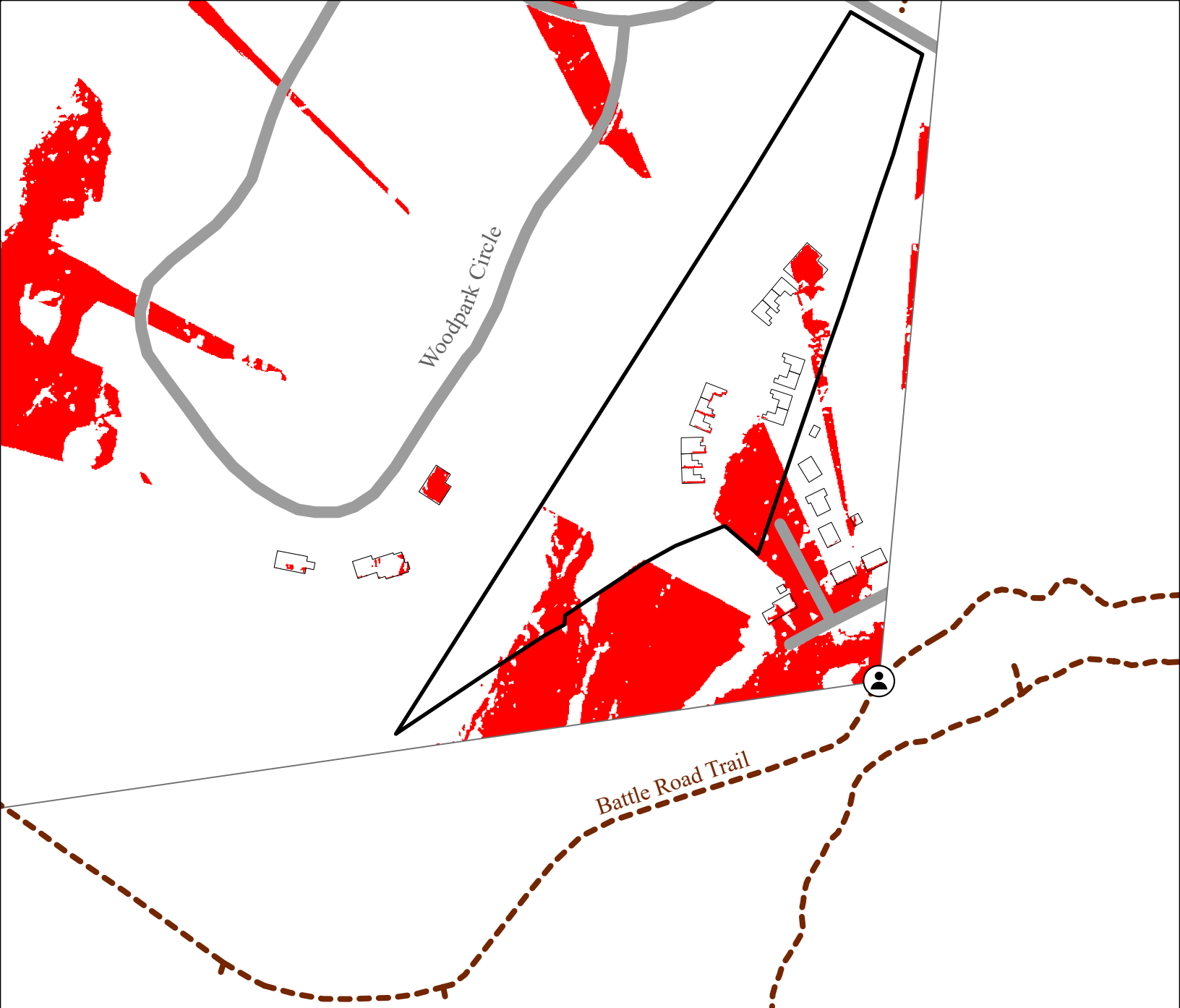


Spatial Reference
 PCS: NAD 1983 2011 StatePlane Massachusetts MnlD FIPS
 2001 FtUS
 GCS: GCS NAD 1983 2011
 Projection: Lambert Conformal Conic

Map produced September 10, 2026.

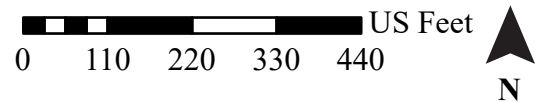
Viewshed analysis conducted using a DEM/DSM (Digital Elevation/ Surface Model) to model ground surface elevation and built structure elevation to determine impact of topography and built structures on sightlines between Battle Road Trail and proposed developed. Only built structures relevant to observer sightlines to proposed development were included in this model.

Data Sources: NPS trail data and parcel boundary from MMNHP files. Roadways downloaded from MassGIS. DEM downloaded from MassGIS. Extant built structures data downloaded from Town of Lexington public GIS files; height data calculated from property record cards [assumptions: 1 story = 10ft, roof height = (width) x (6/12)]. Only extant structures within observer sightlines were included in model. Proposed house unit footprints digitized from Keenan Survey plans, August 26, 2025, amended July 21, 2026, and elevations added based on 'Top of Highest Ridge' elevation data provided publicly by developer on OpenGov.



Visible Area From Battle Road Trail - Amherst St. During Leaf-Off

- Parcel 01-178 Boundary
- Extant Structures & Proposed Units
- NPS Trails
- Roadways
- Viewer Location
- Visible Area



Spatial Reference
PCS: NAD 1983 2011 StatePlane Massachusetts MnlD FIPS
2001 FtUS
GCS: GCS NAD 1983 2011
Projection: Lambert Conformal Conic

Map produced September 10, 2026.

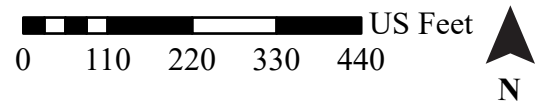
Viewshed analysis conducted using a DEM/DSM (Digital Elevation/Surface Model) to model ground surface elevation and built structure elevation to determine impact of topography and built structures on sightlines between Battle Road Trail and proposed developed. Only built structures relevant to observer sightlines to proposed development were included in this model.

Data Sources: NPS trail data and parcel boundary from MMNHP files. Roadways downloaded from MassGIS. DEM downloaded from MassGIS. Extant built structures data downloaded from Town of Lexington public GIS files; height data calculated from property record cards [assumptions: 1 story = 10ft, roof height = (width) x (6/12)]. Only extant structures within observer sightlines were included in model. Proposed house unit footprints digitized from Keenan Survey plans, August 26, 2025, amended July 21, 2026, and elevations added based on 'Top of Highest Ridge' elevation data provided publicly by developer on OpenGov.



Visible Area From Battle Road Trail - Trainor Field During Leaf-Off

-  Parcel 01-178 Boundary
-  Extant Structures & Proposed Units
-  NPS Trails
-  Roadways
-  Viewer Location
-  Visible Area



Spatial Reference
 PCS: NAD 1983 2011 StatePlane Massachusetts MnlD FIPS
 2001 FtUS
 GCS: GCS NAD 1983 2011
 Projection: Lambert Conformal Conic

Map produced September 10, 2026.

Viewshed analysis conducted using a DEM/DSM (Digital Elevation/Surface Model) to model ground surface elevation and built structure elevation to determine impact of topography and built structures on sightlines between Battle Road Trail and proposed developed. Only built structures relevant to observer sightlines to proposed development were included in this model.

Data Sources: NPS trail data and parcel boundary from MMNHP files. Roadways downloaded from MassGIS. DEM downloaded from MassGIS. Extant built structures data downloaded from Town of Lexington public GIS files; height data calculated from property record cards [assumptions: 1 story = 10ft, roof height = (width) x (6/12)]. Only extant structures within observer sightlines were included in model. Proposed house unit footprints digitized from Keenan Survey plans, August 26, 2025, amended July 21, 2026, and elevations added based on 'Top of Highest Ridge' elevation data provided publicly by developer on OpenGov.



Key Habitats In & Around 114 Wood Street

-  Parcel 01-178 Boundary
-  Roadways
-  NPS Trails
-  Town Trails
-  Extant Structures
-  Proposed Housing Units & Driveway
-  Proposed Limit of Work (Area To Be Cleared)
-  Extant Tree Cover (Approximate)
-  Eversource (Boston Edison Company) 250' Powerline Easement
-  Town Conservation Land
-  BioMap Core Habitat (Inner)*
-  BioMap Critical Natural Landscape (Outer)
-  Vernal Pool Edge Water
-  Wetland & Vernal Pool Habitat 100' Buffers

 US Feet
0 80 160 240 320



Spatial Reference
PCS: NAD 1983 2011 StatePlane Massachusetts MnlD FIPS 2001 FtUS
GCS: GCS NAD 1983 2011
Projection: Lambert Conformal Conic

Map produced September 10, 2026.

Data Sources: Town trails, conservation land downloaded from Town of Lexington public GIS files, NPS trail data from MMNHP files. Buffers, proposed house units, and limit of work digitized from Keenan Survey plans, August 26, 2025, amended July 21, 2026. Extant structures, roadways and BioMap areas downloaded from MassGIS. Extant forested area digitized from LAS-generated DSM and ESRI Imagery.

*BioMap was created by MassWildlife and The Nature Conservancy in 2022 to guide 'strategic protection and stewardship of lands and waters... most important to conserving biological diversity.' See mass.gov for more info.