

# Town of Sudbury

## Historical Commission

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August 16, 2021

Mr. Paul Jahnige, Director  
Trails & Greenways Section  
Department of Conservation and Recreation  
Commonwealth of Massachusetts  
136 Damon Road  
Northampton, Massachusetts 01060

RE: Sudbury Portion of the Proposed Mass Central Rail Trail - Retention and Interpretive Highlighting of Historic Railroad Artifacts and Cultural Landscape

By Registered USPS and Email to [paul.jahnige@mass.gov](mailto:paul.jahnige@mass.gov)

Dear Mr. Jahnige,

As a follow up to the Sudbury Historical Commission's discussion with you at our December 15, 2020 and January 19, 2021 meetings, the Sudbury Historical Commission provides the following guidance, and recommendations for incorporating and highlighting existing railroad infrastructure and creating educational opportunities along the Central Massachusetts Railroad / Boston & Maine Railroad Corridor (CMRR) rail corridor for a future rail-to-trail conversion. A historically sensitive rehabilitation of the CMRR right-of-way for the proposed Mass Central Rail Trail (MCRT) is in the best interest for the Town of Sudbury, the Department of Conservation and Recreation (DCR), and, most importantly, future users of the trail.

To enhance our understanding of the rail corridor and to assist with any projects along the CMRR right-of-way (ROW), the Sudbury Historical Commission (SHC) commissioned a historic area survey for the purposes of identifying and documenting the historic railroad-related resources related to the CMRR. The Commission's consultant examined the 4.62 mile ROW along the railbed within Sudbury in which the railroad operated, including all of the buildings, structures, and objects constructed for the purpose of running trains to transport freight and passengers. In total, sixty-six (66) railroad-related artifacts, structures, and features were identified and documented. The full area survey report, corresponding photos, as well as a table

of the identified features are included with this letter. Because the corridor has remained relatively untouched since commercial rail use ceased in 1971, it retains a high degree of integrity and qualifies as eligible for listing on the National Register of Historic Places as a linear transportation historic district with numerous contributing components.

This letter is focused primarily on the retention, protection, and interpretation of the railway's history in Sudbury.

### *Guiding Principles*

Due to the high number and rarity of extant historic artifacts and fabric, a rail-to-trail conversion along the CMRR corridor offers a unique opportunity to highlight the history of the railroad in Sudbury. These recommendations are contingent upon following best practices for protection, retention, and interpretation throughout the construction and design process. Our approach is based on the following:

- Highlighting of artifacts should take account for the integrity and/or potential for conveying a sense of place and time.
- Highlighted artifacts should represent all categories of historic artifacts identified along the corridor.
- The aggregate artifact collection portrays a comprehensive history for this stretch of the CMRR.
- In some cases artifacts may be more historically meaningful if highlighted together, i.e. the mileposts hold more historic value when retained collectively and interpreted as a group.
- Artifacts should be retained in place; if moved due to trail construction, they should be reset as close to the original position and placement as possible.
- A DCR rail trail along the CMRR corridor offers the unique opportunity to have a historically complete corridor of railroad artifacts integrated with the rail trail. This degree and level of rail artifact integration into the trail design may not or does not exist anywhere else in Massachusetts.

This is also in accordance with DCR's stated trail guidelines and best practices to "protect sensitive natural and cultural resources is fundamental in sustainable trail design and development;" and, "historic trails often involve the designation of a route along or past various features of historic or cultural significance...and contribute to an enjoyable Rail Trail experience."<sup>1</sup>

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<sup>1</sup> DCR Trail Guidelines and Best Practices Manual, July 2019, pages 2.3 and 10.

### *Rail Road Artifacts*

The MCRR in Sudbury retains a large collection of related artifacts representative of the history of the Central Massachusetts Railroad / Boston & Maine Railroad; many artifacts remain in good condition and retain a high level of integrity. The depth of the artifact collection is unmatched by other nearby sections of the CMRR and current MCRT, offering DCR a unique opportunity to highlight and feature these elements in a rail trail design. Below is a highlight of the most significant artifacts and elements found along the right-of-way. For a full discussion of the resources and how the SHC has prioritized their preservation, please see the attached report and inventory.

- *Track Structure*

The track structure retains a high level of integrity and is in fair condition. Together with the ballasts, the track structures are contributing features of the historic corridor. The diamond junction where the CMRR met the Framingham & Lowell Railroad is a particularly noteworthy and contributing feature.

- *Hop Brook Bridges 127 & 128*

Two railroad bridges are located along the CMMR corridor. Bridge 127 (MP 19.47) and Bridge 128 (MP 22.24) are nearly-identical plate girder bridges erected in 1881 as part of the initial railroad construction and represent two of the four oldest deck girder spans in the MBTA system and, possibly, in Massachusetts. Both bridges retain a high level of integrity, are in fair condition, and are individually eligible for National Register eligible.

- *Section Tool House*

The 1890 Boston & Maine RR Section Tool House (MHC MACRIS SUD.282) is located at the northeast corner of the intersection of the Boston Post Road and the railroad corridor at Milepost 19.99. The Section Tool House is part of the George Pitts Tavern Local Historic District (MHC MACRIS SUD.P), is under the jurisdiction of the Sudbury Historic Districts Commission (HDC), and is eligible for the National Register. All plans for this parcel must receive a Certificate of Appropriateness from the HDC for any proposed changes within the 150-foot local historic district setback from the road. We also request construction within this area avoid adverse impacts to historic setting of the Section Tool House and the adjacent historic district. The SHC would like to discuss the retention of the tracks abutting the Section Tool House; please see the addendum from SHC member, Steven Greene regarding his study of the site and treatment recommendations.

■ *South Sudbury Station Building*

The South Sudbury Station (1952) is located at the intersection of Union Avenue and Station Road, on the south side of the tracks. The structure retains a high level of integrity and is in good condition.

■ *Signals & Signal Relay Boxes*

Multiple styles of signals and associated elements are present throughout the MCRR corridor. There are two extant distance approach signal towers with battery wells. Over eight signal relay boxes are located throughout the corridor of varying styles and sizes. Due to their size and material, these artifacts have weathered the elements more than others, although they still retain a fair level of integrity.

■ *Whistle Posts*

Six intact concrete whistle posts and one broken post are located within the corridor. The cast concrete posts feature an inset “W” on the east or west face, depending on the direction for which the instruction is intended. Whistle signals are posted on the engineer’s side; on this line, on the north side for trains heading west and on the south side of the tracks for trains heading east. The intact posts retain a good level of integrity and are in good condition. The SHC would like all whistle posts to remain in their current (original) location.

■ *Mile Posts*

Four granite mileposts are within the ROW, all on the north side of the tracks. Mileposts 20.0, 21.0, and 22.0 have been recently painted as they would have been by the Boston & Maine Railroad. The mileposts retain a high level of integrity and are in good condition. The SHC would like all mile posts to remain in their current (original) location.

■ *Rail Rests*

Five sets of rail rests are located along the ROW. The rail rests retain a high level of integrity and vary in condition from good to poor. The SHC would like to see these remain in place, perhaps in conjunction with spans of attached track to illustrate their intended purpose.

■ *Switch Stands*

Three freestanding switch stands are located at the north edge of the platform at the South Sudbury Station building, two of which were used by the Boston & Maine Railroad in this corridor. A third stand was moved to this location. The switches are in good condition and could be used as an interactive interpretation feature.

- *Culverts*

At least 14 culverts are located within the corridor and represent varying levels of condition and integrity. The existing culverts include: stone box culverts; cast iron pipes set into stone box culverts; and poured concrete culverts.

- *Telegraph Poles*

Over 20 telegraph poles remain throughout the corridor and range in level of integrity and condition.

### *Vernacular and Natural Landscape*

In addition to the resources described in this letter and documented in the Area Form, the CMRR is also characterized by man-made alterations across the rail corridor. The ballast, culverts, embankments, and cuts specific to the railroad design are all intrinsic elements to the setting and sense of place. To the extent possible, these elements should be considered in any trail design. At present, the majority of the railroad ROW has undergone a reversion to woodland, giving the corridor the appearance of a living ruin. Some elements may be able to be retained and preserved in situ to retain the juxtaposition of industry and nature. Wherever possible, the SHC recommends minimizing construction clearing to preserve such examples and encourages the use of native species in new plantings.

### *Interpretive Displays, Signage, and Trail Design Features*

The Sudbury Historical Commission would like to consult with DCR regarding the style and format of the signs and assist in developing content material. Given the planned rail trail will intersect with the future Bruce Freeman Rail Trail (currently in the design process), signage should coordinate. The SHC encourages a similar signage style as is used on the Bruce Freeman Rail Trail in nearby Concord: a few large, kiosk-style signage used for historical interpretation, images, maps, etc., spread out at natural wayfinding, rest stops, and historic sites; medium-sized signage for interpretation of specific features or natural landscapes; and small, unobtrusive signs labeling historic artifacts by type. Several natural points for historic interpretation are present along the CMRR ROW in Sudbury, including the original location of the South Station, Bridge 127 and 128, the Section Tool House, and the “diamond junction” where the tracks intersect with the former New Haven Railroad Framingham & Lowell rail line (the proposed Bruce Freeman Rail Trail in Sudbury). The Commission would like to consult with DCR on other design features such as bike racks, benches, fencing, road crossing signals, and other rail trail infrastructure.

### *MHC Review and of MCRT Project*

The Commission respectfully requests to be updated on any review of the MCRT project by the Massachusetts Historical Commission since December 19, 2020 and on any future reviews under M.G. L. Chapter 9, Section 26-27C (950 CMR 70-71).

### *MBTA-DCR Lease Agreement*

Per the December 30, 2010 Alternate Transportation Corridor Lease Agreement between the Massachusetts Bay Transportation Authority (MBTA) and the Commonwealth of Massachusetts through DCR, both the MBTA and DCR have the right to remove the rail infrastructure. Agreement Provision 13, Existing Utilities states:

*“The MBTA reserves the right to remove the rail infrastructure and agrees that if it chooses to do so, said removal shall be within 180 days of the date the DCR notifies the MBTA to be the date of the trail construction commencement. The DCR shall be responsible for removal and disposal of all other rail infrastructure, after said 180 days, and may retain any revenue from DCR’s removal and disposal of such.”*

The SHC is concerned that exercising this provision to remove and dispose of rail infrastructure would adversely affect the historic integrity of the CMRR corridor and jeopardize its National Register eligibility status. Development of an Avoidance and Protection Plan for the identified railroad historic resources would delineate procedures to ensure their protection. Similarly, plan procedures should include protection measures to follow should archaeological artifacts be discovered during paving and installation of the MCRT.

### *Sudbury-Hudson Transmission Reliability Project*

This letter is separate from the Sudbury Historical Commission’s consultation process under the Section 106 of the National Historic Preservation Act (36 CFR 800) for the review of the Sudbury-Hudson Transmission Reliability Project currently proposed along the CMRR corridor. As the required “Identification and Determination of Effects” portion of Section 106 process has not been completed by the applicant, the SHC views the consultation process to be ongoing. Therefore, these SHC comments are directed at a future MCRT project as separate and independent from the transmission line project.


### *Conclusion*

In conclusion, the CMRR corridor in Sudbury is a valuable historical and cultural landscape because so many original railroad elements remain in place and can be understood and interpreted as 4.6-mile, contiguous and linear historic site. Careful design and planning for the retention, protection, and interpretation of these artifacts as a collective group will ensure the

greatest degree of inherent historic value and integrity will continue into the CMRR's next iteration. The preservation of the CMRR corridor with its numerous historical artifacts would be a showpiece for Sudbury and Massachusetts's railroad history.

Thank you for your time and attention to this project. The Commission invites DCR to further discuss the MCRT design details and other issues covered in this letter; we may be reached through the Town of Sudbury Planning and Community Development Department at [historical@sudbury.ma.us](mailto:historical@sudbury.ma.us). The Sudbury Historical Commission looks forward to continuing the dialogue about the CMRR corridor and its future.

Sincerely,

A handwritten signature in black ink that reads "Chris Hagger" followed by a circled "12/20".

Chris Hagger  
Chair  
Sudbury Historical Commission

Encl.

Central Massachusetts Railroad Corridor, Massachusetts Historical Commission Form A  
Inventory of CMRR Historical Artifacts and Treatment Recommendations  
Section Tool House Recommendations by Steven Greene, Sudbury Historical Commission member

CC w/o Encl.

Sudbury Historical Commission  
Select Board, Town of Sudbury  
Henry Hayes, Town Manager, Town of Sudbury  
Brona Simon, SHPO, Massachusetts Historical Commission  
Jonathan Patton, Massachusetts Historical Commission