

February 28, 2013

Town of Acton:
Community Preservation Committee
Board of Selectmen
Morrison Farm Committee
Historical Commission

To the members of the boards and the Morrison Farm Committee:

Although a recent communication to you from Peter Grover, a member of the Morrison Farm Committee, has not been made available to the public, I have had occasion to read his email. The Feb. 26 memo refers to some statements made by me at the Feb. 25th Selectmen's meeting which I would like to both clarify and reiterate.

In his email Mr. Grover states: "'destruction' of resources is defined as such if the property is federally listed and the Secretary of the Interior's Standards formally apply; I believe since this is National Register Eligible and not National Register listed, that this standard may not apply."

That is not the definition of historic resources under the Act, and the memo's interpretation of the CPA language is not correct. The fact that the Acton Historical Commission made the required findings about the historical significance of the property in anticipation of the submittal of the Morrison Farm application is enough to trigger the requirements that the project must follow the Secretary of the Interior's Standards. As most of you know, this is one of the two ways in which a property can qualify for historic preservation funds under the CPA.¹

I suggest that you review the ten Secretary's Standards. (They appear at the end of the Acton Community Preservation Plan, and I have already sent you a summary of the main applicable parts of the SOI Guidelines). You will see that the Morrison Farm application fails to meet the Standards for many reasons.

Most problematic are Standards #2, 3, 4, 5, 6, 9, and 10. The removal of the Forbes/Morrison Barn and its replacement with a new building violates each of those, but I'd like to say a special word about Standard #6: "Deteriorated historic features will be repaired rather than replaced. . . ." The engineer's report in the Kelleher Feasibility Study found that it would be quite feasible to repair and stabilize the existing barn for its current municipal storage use, and that the estimated cost for a storage-use upgrade would be just \$52,000, including \$20,000 of structural reinforcement.² That figure would probably be higher today, of course, but such stabilization work (minus a projected \$5,000 to demolish the other outbuildings) is entirely eligible for CPA funding. On the other hand, the demolition of the barn is not eligible, and its replacement with the community building/History & Nature Center/New Barn (the Committee has used all of those names for the building) also fails to meet Standards #2, 5, 6, 9, and 10. At the very least, it is widely accepted that CPA funds cannot be used to "create" a historic

¹ "'Historic resources', a building, structure, vessel, real property, document or artifact that is listed on the state register of historic places or has been determined by the local historic preservation commission to be significant in the history, archeology, architecture or culture of a city or town." (Community Preservation Act, M.G.L. Ch. 44B, Section 1; 2: Definitions.)

² Stephen Kelleher & Associates. Final Report, Morrison Farm Feasibility & Preliminary Design Study. Preliminary Construction Cost Estimate. 5/24/2010.

resource. For similar reasons under the Definitions, CPA funds cannot be used for the demolition of the ice house foundation.

At this point in the year's CPA schedule, a major consideration for the CPC has to be that the application asks for over \$900,000 in historic-preservation funds. Given that neither the Morrison Farm nor Woodlawn Cemetery is listed in the State Register, the only way those funds can be used for this project at all is through the findings by the AHC that they are locally-significant historic assets, which I have explained above. But that also means that the project must meet the SOI Standards.³ The Morrison Committee will continue to present their arguments, I am sure, but I can tell you that there is no way that actions like demolishing historic assets and simply highlighting their locations, or building an entirely new building or a playground in their place, are going to meet the Standards.

Finally, I would remind the boards that, although the programming goals of the Morrison Farm plan are admirable and publicly appealing, CPA funds are not available for historic interpretation, programming, or education, nor can they be used to build new facilities to carry out those functions. You might check out the Coalition newsletter on this subject at www.communitypreservation.org/eneews/Historic_Projects.htm.

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³ “with respect to historic resources, ‘rehabilitation’ shall have the additional meaning of work to comply with the Standards for Rehabilitation stated in the United States Secretary of the Interior's Standards for the Treatment of Historic Properties codified in 36 C.F.R. Part 68.” (Community Preservation Act, M.G.L. Ch. 44B, Section 1; 2: Definitions.)