



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

November 17, 2014

Regulatory Division
File No. NAE-2014-1535

Martin Loiselle
259 Turnpike Road, Suite 100
Southborough, Massachusetts
01772

Dear Mr. Loiselle:


This is a follow up to our letter dated August 1, 2014 and several phone calls informing you of our jurisdiction and permitting requirements as defined in Section 404 of the Clean Water Act and permit application instructions. As you know permits are required under Section 404 for discharges of dredged or fill material into all waters of the United States, including and not limited to inland rivers, lakes, streams, and wetlands, as well as discharges associated with excavation/grading within these waters/wetlands. We understand you are intending to place fill material in a stream channel and wetlands to access a proposed 140 unit apartment complex at 133 West Union Street, Ashland, MA. This project would involve activities that require a permit from the Corps of Engineers.

Although the work in wetlands may involve less than 5,000 square feet, this project would not be eligible for authorization under Category 1 of the Massachusetts General Permit. See General Condition 7 regarding historic properties in the attached Massachusetts General Permit which stipulates that work within our jurisdiction is not eligible if the activity may have the potential to cause effects to any historic property eligible or potentially eligible for listing on the National Register of Historic Places. This is necessary so that we ensure compliance with the National Historic Preservation Act. The Valentine House (inventory No. ASL 196) and Barn (ASL 207) are both listed in the Massachusetts Cultural Resources information System and are potentially eligible for listing in the National Register of Historic Places. Attached are letters from the Town of Ashland Historical Commission, and the Massachusetts Historical Commission's Inventory Form B regarding the historical significance of the Valentine House and Barn.

As we stated in our letter a Department of the Army authorization must be obtained before any work or filling is done in areas subject to Corps jurisdiction. Performing such work or filling without first obtaining Corps authorization could result in substantial penalties.

We are requesting to meet with you to discuss the project plans and permitting needs. Meeting such as these are routinely done and can avoid unnecessary delays or misunderstandings in the permitting review. Note that Section 106 consultations can take a significant amount of time and coordination before we can make a permit decision. Please contact John Sargent of my office at your earliest convenience at (978) 318-8026.

Sincerely,


For Karen K. Adams
Chief, Permits & Enforcement Branch
Regulatory Division

Attachments

cc:

Maureen Assencoa, Ashland Historical Commission, Ashland Town Hall, 101 Main Street,
Ashland, Massachusetts 01721

Ashland Conservation Commission, mshelby@ashlandmass.com

Peter Lavoie, Project Engineer, Guerriere & Halnon, Inc., 333 West Street, Milford MA 01757

Gene Crouch, Ashland Conservation Commission, GCrouch@vhb.com



Town of Ashland

MASSACHUSETTS

October 20, 2014

John C. Sargent, Project Manager
Permits and Enforcement Branch
Department of the Army
U.S. Army Corps of Engineers
696 Virginia Road
Concord MA 01742-2571

RE: The Valentine Property, 133 W Union Street, Ashland Mass

Dear Mr Sargent,

Thank you for the opportunity to present our view regarding Capital Group's proposed development at the site of the Valentine Estate in Ashland. This project will adversely affect the historic nature of the property by obliterating the historic vista comprised of the 18th century Valentine House, the hand hewn (of chestnut) barn, and the acreage upon which the Thomas and Elizabeth Valentine built their home and started their family.

Several documents previously forwarded to you and enclosed today as well (Mass Historical Commission 2013 Inventory Form and Ashland Historical Commission's January 2013 letter to Mass Housing) – detail the significance of the Valentine Estate to the history of the Town of Ashland.

More broad historical significance is described in "The Valentines in America 1664-1874" by T.W. Valentine. The author refers to the land on which Thomas and Elizabeth Valentine settled as "classic ground" and cites proximity to John Eliot's Indian church and burial ground in the Magunko Hill area. The author also notes that Harriet Beecher Stowe referenced the missions of John Eliot in her novel "Oldtown Folks".

OCT22'14 REG DIV

It is the belief of the Ashland Historical Commission that the developers' plans, which include removing the barn, will disrupt the synchronicity of house and barn as a visual representation of the agricultural history of the Estate and its subsequent function as the self-supporting (through raising crops, fowl, cattle) Green Meadow Farm, established in 1893 as a "home of rest for the worthy poor". The "classic ground" upon which the Valentines settled will be irreversibly altered.

On March 20, 2014 The Historical Commission voted unanimously to impose a 9 month demolition delay on the requested permit for demolition of buildings at 133 W Union St (the Valentine Estate). It is the hope of the Commission that the Corps finds this submission both relevant in accordance with Section 106 of the National Historic Preservation Act, and sufficient to provide support for our efforts to preserve this symbol of Ashland's history and heritage.

We respectfully request that you prevent Capitol Group's further destruction of this historic property.

Sincerely,

A handwritten signature in dark ink, appearing to read "Maureen Assencoa". The signature is fluid and cursive, with the first name "Maureen" written in a larger, more prominent script than the last name "Assencoa".

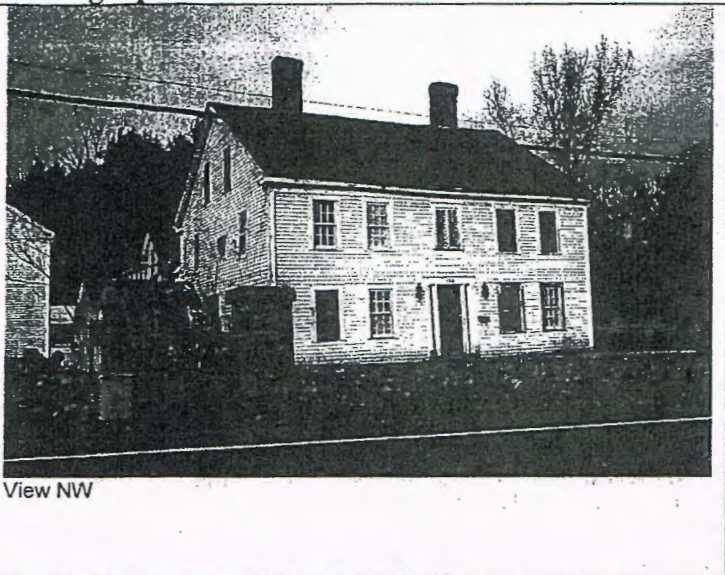
Maureen Assencoa, for the Ashland Historical Commission

cc Town of Ashland: Board of Selectmen, Conservation Commission,
Planning Board, Zoning Board of Appeals, Community Preservation
Committee, Open Space Committee.
Ashland Historical Society

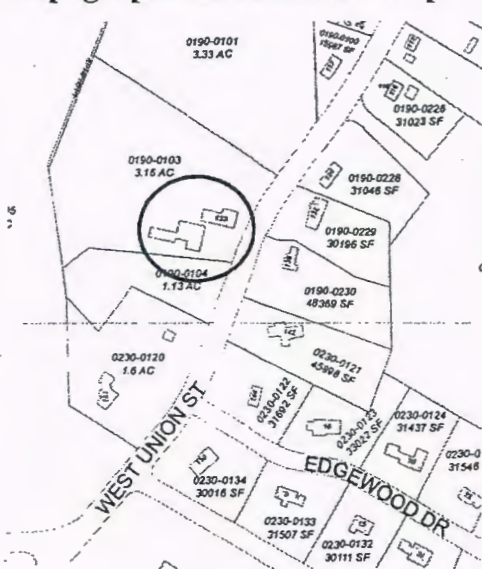
FORM B - BUILDING

MASSACHUSETTS HISTORICAL COMMISSION
MASSACHUSETTS ARCHIVES BUILDING
220 MORRISSEY BOULEVARD
BOSTON, MASSACHUSETTS 02125

Photograph



Topographic or Assessor's Map



Assessor's Number USGS Quad Area(s) Form Number

0190-0103

Framingham

ASL.196
ASL.207

Town: Ashland

Place: (neighborhood or village)

Address: 133 West Union Street

Historic Name: Valentine House

Uses: Present: residential

Original: residential

Date of Construction: late 18th century

Source: Valentines in America

Style/Form: No style

Architect/Builder:

Exterior Material:

Foundation: stone

Wall/Trim: vinyl/wood

Roof: asphalt shingle

Outbuildings/Secondary Structures:
barn

Major Alterations (with dates):

barn attached to house (20th cent.); glazed greenhouse addition and picture window (20th cent.)

Condition: good

Moved: no | ☒ | yes | | Date _____

Acreage: 3.16 acres

Setting: largely residential area on Route 135

Recorded by: Kathleen Kelly Broomer
Organization: for Ashland Historical Commission
Date (month / year): December 2009 (revised April 2010)

INVENTORY FORM B CONTINUATION SHEET

ASHLAND

133 West Union St

MASSACHUSETTS HISTORICAL COMMISSION

220 MORRISSEY BOULEVARD, BOSTON, MASSACHUSETTS 02125

Area(s) Form No.

ASL.196, 207

Recommended for listing in the National Register of Historic Places.

If checked, you must attach a completed National Register Criteria Statement form.

Use as much space as necessary to complete the following entries; allowing text to flow onto additional continuation sheets.

ARCHITECTURAL DESCRIPTION:

Describe architectural features. Evaluate the characteristics of this building in terms of other buildings within the community.

One of the better preserved late 18th-century dwellings in Ashland, the Valentine House (ASL.196) is 2½ stories, five bays across with a center entry and two to four bays deep. There are two brick interior chimneys on the side-gable main block, the northernmost being situated at the roof ridge, and the southernmost slightly forward of the roof ridge. The house retains a simple entablature and full-length sidelights at the center entry (the paneled wood door appears to be a mid- to late 20th-century replacement) and 6/6 wood sash in many windows. The second-story window over the entry features a pair of swinging multi-pane wood panels that are a Colonial Revival-style replacement. A mid-to late 20th-century picture window replaces original first-floor windows on the north elevation of the main block. On the south elevation, at the southwest corner of the main block, is a one-story, glazed greenhouse enclosure on a concrete block half-wall (ca. mid-20th century?). Also at the southwest corner of the main block, and projecting from the west (rear) elevation, is an ell that extends the house an additional four bays and incorporates a secondary entrance on the north elevation. The rear ell has had some modifications to the roofline and currently displays both pitched and flat sections. The ell is attached to a large barn by way of a one-story, one-bay connector with a flat roof.

The 2½-story, gable-front barn (ASL.207), moved to its present site in the second half of the 19th century, was connected to the house at an undetermined point in the 20th century; the connection was demolished in April 2010 and the barn is detached building once again. Clad in wood clapboard on the façade and wood shingles on the side elevations, the barn is three bays across with an oversized center entry and several bays deep. A one-story shed-roofed addition occupies much of the barn's south elevation, while a one-story, gabled garage addition extends off the barn's southwest corner. The barn retains an oversized sliding door with fixed wood sash, and windows in various configurations (single, paired, double-hung, fixed) containing wood sash.

Along the West Union Street frontage, the property retains a stone wall (ca. 1900) consisting of mortared rubble stone with a flat cap. Granite posts constructed of dressed stone frame an iron gate at the pedestrian entry.

HISTORICAL NARRATIVE

Discuss the history of the building. Explain its associations with local (or state) history. Include uses of the building, and the role(s) the owners/occupants played within the community.

An important example in Ashland of 18th-century domestic architecture, this property is significant for its long associations with the Valentine family of Hopkinton, later Ashland (this section of Ashland being a part of Hopkinton until Ashland's incorporation in 1846). Thomas Valentine (1712-1783) of Boston is said to have moved to Hopkinton about 1730; he married Elizabeth Gooch in 1735. His father, John Valentine, Esq. (d. 1724), had served the British crown as Advocate General for the province of Massachusetts Bay, New Hampshire, and the Rhode Island colony. Thomas and Elizabeth Valentine were part of a small group of families with Boston connections who established country estates in the rural town of Hopkinton during the Colonial period. The births of their children (born 1736 to 1750) are recorded in Hopkinton vital records, but the first baptism is not recorded at Hopkinton's Christ Church (Congregational) until 1744. Thomas Valentine is first mentioned in Hopkinton town records in 1750 for his work at "the great bridge." In 1752, Valentine was excused, with Sir Henry Frankland and others, from paying tax to the Congregational Church in Hopkinton, as they belonged to the Church of England. Anglicans in Hopkinton during this period shared an association with King's Chapel in Boston; in Hopkinton, their minister was the Rev. Roger Price. [Winterhalter; Historical Records Survey, 27]

Settlement in Hopkinton during the first half of the 18th century is closely aligned with the history of the Charity of Edward Hopkins trust. Established through the legacy of Edward Hopkins (d. 1657), the trust benefitted Harvard College by enabling the

INVENTORY FORM B CONTINUATION SHEET

ASHLAND

133 West Union St

MASSACHUSETTS HISTORICAL COMMISSION

Area(s) Form No.

220 MORRISSEY BOULEVARD, BOSTON, MASSACHUSETTS 02125

ASL.196, 207

college to acquire title to land in Hopkinton and establish leaseholds to generate income. In 1753, Robert Huston assigned his right to 100 acres in Hopkinton to Thomas Valentine. Valentine's parcel included the general area surrounding the junction of West Union Street, Frankland Road, and Olive Street, a short distance southwest of the present house. Until 1749, James Gooch, Esq., father-in-law of Thomas Valentine, had rights to the property immediately west of Valentine's tract. The Gooch house burned ca. 1745, whereupon Gooch assigned his rights in the property to Sir Henry Frankland. In 1832, the lease system under the Hopkins Charity was abolished, with the leaseholders assuming title to their respective lands. [Historical Records Survey, 15; Valentine, 123]

The first Valentine house on the site burned and Thomas Valentine reportedly built the present house on the same site. [Valentine, 128] His son, Samuel Valentine (1745-1834), later acquired the farm, and the property remained in the hands of Samuel's descendants until the late 1890s. Samuel married Elizabeth Jones, a great granddaughter of Savil Sampson, who in 1687 was the first European settler in the area later known as Ashland. Samuel Valentine maintained a public house (inn) at the farm and operated a grist mill and wire mill on the stream in his lower meadow, located across West Union Street southeast of the house. He was an investor in the cotton factory at Unionville, located on what is now Main Street at Ashland Center, as well as a nail factory in the area. During Samuel Valentine's ownership of the farm, he reportedly raised the roof on the house and made additional unspecified alterations. Two sons, Samuel Jr. and Joseph, opened a store in a building "running along the yard adjoining" their father's house. [Winterhalter citing Valentine genealogy] The 1820 Federal census entry for Samuel Valentine shows four people in the household were engaged in agriculture, two in commerce, and one in manufacturing. Samuel Valentine, Jr. (d. 1823) subsequently operated a public house and store in a stone building at Hopkinton Center. [Winterhalter] During this period, the Valentine house served until 1828 as a meeting place for a Sunday school that came to be associated with the First Church in Ashland. [Historical Records Survey, 55]

West Union Street, previously known as Union Street, was part of the Central Turnpike, constructed in 1828 from the Worcester Turnpike in Needham (now Wellesley) to the Hopkinton meetinghouse. With the coming of railroad service, toll collection on the turnpike ceased in 1835, and portions of the roadway were laid out (even relocated) as town ways and county roads. The path of the road roughly follows the present Route 135.

With the deaths of Samuel Valentine, Sr., his wife, and two of his sons between 1823 and 1834, the property passed to two minor grandsons, Andrew Price Valentine (d. 1895) and William Price Valentine (d. 1892), who occupied separate living quarters in the house from the mid-19th century onward. Their father, Lawson Valentine, was a merchant in Boston, and their mother, Mary Ann Price, was a granddaughter of the Rev. Roger Price, the Anglican minister in Hopkinton. The Valentine brothers were farmers. A. P. Valentine added stoves to the house for cooking and heating, and modernized the building, keeping two fireplaces. W. P. Valentine made unspecified changes to the interior in 1856 and again in 1870. Also during the third quarter of the 19th century, the barn was moved from its original location on a hill to its present site and attached to the house. The 1870 Federal census indicates W. P. Valentine owned the real estate, valued at \$5,000, though both brothers resided in the house with their families and a 14-year-old farm worker. In the last quarter of the 19th century, the brothers and their respective families occupied separate houses on adjacent properties on West Union Street, according to the 1875 and 1889 atlases and the 1880 Federal census. Deed research is needed to confirm which brother owned the subject property during the period. A Valentine family reunion reportedly was held at the property in 1896. [Winterhalter; Valentine; atlases; Federal census]

A significant event affecting the Valentine House was the opening of the Hopkinton Branch Railroad, which originated at the Boston & Albany line at Ashland Center and passed through some of the Valentine farm's "very best land," crossing West Union Street northeast of the house. Writing in 1874, Thomas Valentine observed the railroad construction's having made "sad havoc with the trees, and cutting the farm into small pieces, injuring it for farming purposes, far beyond the very small sum paid for the land taken, and injury done." [Valentine, 129] Chartered in 1869 to run from Ashland to Hopkinton, the railroad was consolidated with the newly chartered Hopkinton & Milford Railroad in 1870, opening in 1872 as a connecting route to the Milford & Woonsocket Railroad at Milford. The Milford & Woonsocket company purchased the Hopkinton branch in 1884, which put Ashland at the head of a twenty-mile route extending to Franklin Junction. The New York, New Haven & Hartford Railroad absorbed the branch line in 1898. Passenger service between Ashland and Milford was reduced in 1914 and eliminated in 1920. Tracks between Ashland and Hopkinton, including those in the vicinity of the Valentine House, were removed in 1940. [Karr, *Rail Lines*, 304-306]

In 1891, the Women's Educational and Industrial Union of Boston, through the involvement of one of its vice-presidents, Mrs. DeLana Shepley, rented the Valentine house and had it "fitted up for a temporary home where the worthy poor of the city could

INVENTORY FORM B CONTINUATION SHEET

ASHLAND

133 West Union St

MASSACHUSETTS HISTORICAL COMMISSION

220 MORRISSEY BOULEVARD, BOSTON, MASSACHUSETTS 02125

Area(s) Form No.

ASL.196, 207

be sent for a few weeks' outing in the country." According to Metcalf, the organization purchased the Valentine house in 1893 for use as a "Home of Rest for the Worthy Poor," to be made self-supporting through the raising of crops, fowl, and cattle. On 8 August of that year, the home was formally opened as Green Meadow Farm. [Metcalf]

Further research is needed to document this property during the 20th century. It continued to be known as Green Meadow Farm through at least the 1940s. [Historical Records Survey, 55] The 1908 atlas shows the owner as W. B. Kehew. William B. Kehew, an oil and starch merchant in Boston, is listed in the 1907 Ashland directory, along with Mary M. Kehew, his wife, of Green Meadow Farm. At the time, West Union Street was known as Union Street. The 1910 Federal census records the Kehews as residents of Chestnut Street (Beacon Hill) in Boston, suggesting that Green Meadow Farm may have been a weekend and seasonal retreat for the family.

BIBLIOGRAPHY and/or REFERENCES

See survey final report for complete citations

Ashland maps and Middlesex County atlases: 1836, 1854, 1856, 1875, 1889, 1908.

Ashland directories: 1907.

Federal census records. Via www.Ancestry.com.

Ashland Historical Society. Vertical files. Buildings and places. Olive(r) Street. Typescript of undated article written by Frank J. Metcalf and published in the *Ashland Advertiser*.

Karr, Ronald Dale. *The Rail Lines of Southern New England*. 1995.

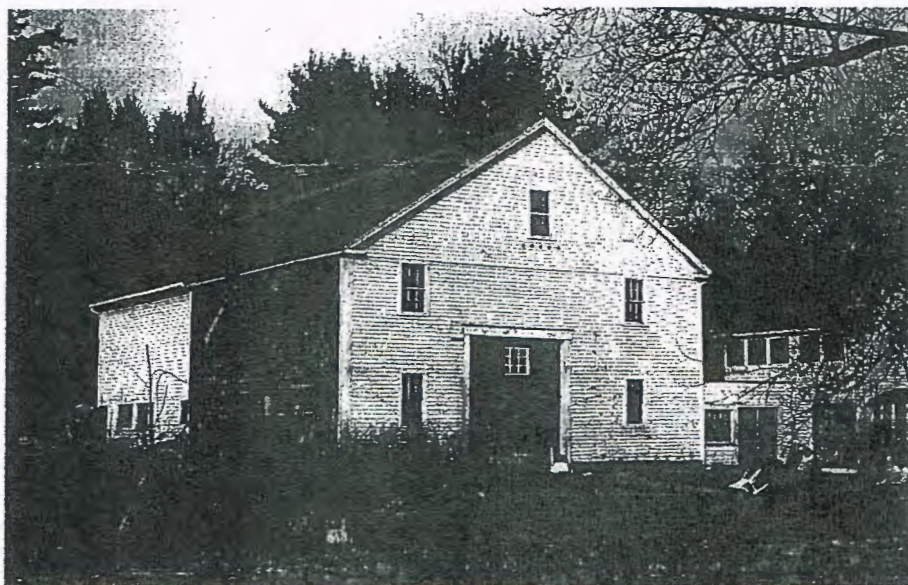
History of the Town of Ashland. 1942.

The History of Hopkinton, Mass. 1930 (typescript published 1980).

Valentine, T(homas). W(eston). *The Valentines in America*. NY: Clark & Maynard, 1874.

Winterhalter, Cynthia C. "Notes on the history of the Valentine House #133 West Union St., Ashland." Typescript provided by the author. 22 August 2007.

Barn SW of house, view NW (note connection to house demolished April 2010)



Ashland Historical Commission

Ashland Town Hall
101 Main Street
Ashland, MA 01721

January 9, 2013

Katharine Lacy, Permitting and Monitoring Specialist
Gregory Watson, Program Manager
Comprehensive Permit Program
Massachusetts Housing Finance Agency
One Beacon Street
Boston, MA 02108

Re: The Valentine Estate also referred to as The Residences at West Union by
Capital Group Properties, 133 West Union Street Ashland, Mass

Dear Ms. Lacy and Mr. Watson,

We are submitting this letter of support, as well as the Massachusetts Historical Commission Inventory Form for The Valentine Estate, to assist you in your decision to award a Project Eligibility Letter for the proposed 40b to Capital Group Properties.

The Valentine Estate is one of Ashland's top 125 historic sites. It is one of just 11 eligible for an individual listing on the National Register of Historic Places, quite an honor for our town, which has lost many of its historic properties.

We respectfully request that Mass Housing state in the Project Eligibility Letter awarded to Capital Group Properties that all development plans for the site include the historic Valentine home with a provision that it cannot be demolished.

Since the entire site is historic and eligible for the National Register, we also ask that consideration be given toward preserving the antique stonewall in front of the home and the rare barn behind the home. If the home were to be placed on the National Register, federal tax rehabilitation credits could then be applied for a total site makeover.

The Historical Significance of the Valentine Estate

The Valentines lived on the site for 150 years. The Massachusetts Historical Commission Inventory Form reads, "An important example of 18th century domestic architecture, this property is significant for its association with the Valentine Family of Hopkinton, later Ashland."

In 1891, the Women's Educational and Industrial Union of Boston, through the involvement of one of its vice-presidents, Mrs. DeLana Sheplie, rented the Valentine house and had it "fitted up for a temporary home where the worthy poor of the city could be sent for a few weeks' outing in the country." The organization purchased the Valentine house in 1893 for use as a "Home of Rest for the Worthy Poor, to be made self-supporting through the raising of crops, fowl, and cattle." On August 8th of that year, the home was formally opened as Green Meadow Farm. It stayed a farm through the 1940s.

Ashland Historical Commission
Valentine Estate

Our geographically small town already has over 16,000 residents, over 6,000 homes, almost no public transportation other than an expensive commuter rail into Boston, and not one working farm left.

There are lots of homes, condos, and apartments to buy or rent in Ashland. Many are affordable but do not count towards the 10% because they were not built with the affordable label.

There is only one Valentine Estate.

If the home and barn were to be registered on the National Register of Historic Places, the site would be eligible for Federal Historic Rehabilitation Tax Credits. Can you imagine the apartments/lofts developed in the barn? What a win-win for all concerned. The site would be comparable to the acclaimed Ames Shovel Works apartments in Easton, "Where History Becomes Home" (<http://www.amesshovelbc.com/>).

Preserving the house and barn would be an opportunity to preserve Ashland's history and heritage and provide housing. We hope you will take the information we have provided into consideration when deciding the fate of Ashland's historic, one-of-a-kind Valentine Estate.

For the Ashland Historical Commission,



Glenn Rigby
Chairperson

CC: Mass Historical Commission, Ashland Open Space Committee, Ashland Conservation Commission, Ashland Planning Board, Ashland Historical Society, and Ashland Board of Selectmen

P.S. Of important note: three of the 11 homes eligible for a coveted individual National Register of Historic Places designation are located on West Union Street. Two are slated to be demolished to make way for apartments. A third will probably share a similar fate. Another top 125 historic site on Fountain Street was bought to gain access to the land behind it for a different 40b. It's getting increasingly difficult to hold onto Ashland's unique heritage and sense of place. We would like your help to do so.