March 30, 2016
26 High Street
Newburyport, MA 01950

Ms. Brona Simon
Executive Director
Massachusetts Historical Commission
220 Morrissey Blvd.
Boston, MA 02125

Dear Ms. Simon

I have enclosed a copy of our recently published monograph, *Harbor Range Lights, Newburyport, Massachusetts,* for your records. The range lights have been iconic symbols on the Newburyport waterfront for nearly 150 years, and through the 1981 efforts of the MHC they are listed on the National Register of Historic Places (87001485 and 87001486). Our book, based exclusively on primary sources, is the first comprehensive history of these range lights.

It is a source of great pride to Newburyport to have them registered as Historic Places. However, we must point out an error in the 1981 MHC (Number 30a) application for listing the forward range light on the National Register.

The application concludes that the present position of this forward range light on the property of the United States Coast Guard station (on old Deford's wharf) was not the original position when built in 1873. That instead the light was built on Bayley's wharf — the next upriver wharf — and relocated to the Coast Guard station in 1964.

Our analysis, contained in Chapter 4 ("Solving the Dilemma of the Forward Range Light") of our monograph, conclusively proves with 100% confidence and based on overwhelming primary sources that the forward range light was always at the Deford wharf location on the present USCG station. It was never moved since it was built in 1873.

The error is significant. It influences interpretation of the integrity of the historic preservation of this system of range lights.

The MHC application on page 1 states that "The altered Newburyport Harbor Front Range Light was moved from its original location on Bayley's Wharf to its present location within in the metes and bounds of the adjacent Merrimac River Coast Guard Station..." and on page 4, "1964: Photographs showing what appears to be the removal of the range from Bayley's Wharf to the Coast Guard property." An accompanying sketch of the site places the original location at the upriver base of Bayley's' wharf. The application did not include either the photographic images or cited sources for them.

Our conclusion is based on a large number of supporting primary sources: the 1873 deed of purchase by the government from Robert Bayley and Son; the 1872 2nd Lighthouse District engineering plan; City of Newburyport maps and Sanborn Fire Insurance maps from 1880 to the early 1900s; the large body of photographs taken of the forward range light from 1873 through 1972. All of these primary sources definitively place the forward range light on Deford's wharf, the present site of the USCG station —

never on Bayley's wharf which is one wharf upriver. The attached page includes several excerpts from our book to illustrate these points.

The range lights speak for themselves: they were designed in 1872 as a coordinated navigation system in association with the Black Rock Beacon (better known as Ben Butler's Toothpick) to guide vessels into the upper harbor once they crossed the bar from the ocean. Standing in the center of the lantern room atop the brick tower of the rear range light, you can sight out across the forward range light on the USCG station (at old Deford's wharf) and follow the range bearing two miles out to Butler's Toothpick at the upper mouth of the harbor. Bayley's wharf, the next wharf upriver, and the purported original location of the forward range light is visible from the lantern room. The range bearing through that incorrectly purported location on Bayley's wharf points *upriver* to Rings Island, obviously of no use to vessels entering the harbor.

This error in location has permeated all the published and online literature on the Newburyport range lights. "Published errors are immortal" as a famous genealogists has said.

The error has other implications. Some people in Newburyport favor moving the forward range light from its USCG location to the area of the Custom House Maritime Museum, arguing basically that there is no historical impact since the range light had already been moved. That position can now be contested by those favoring preservation of the historic, original placement of these two range lights as a navigation system coordinated with Ben Butler's Toothpick beacon. Overwhelming evidence has now proven that the forward range light was never moved and is in its original 1873 location. Please note that the Newburyport Historical Commission was strongly opposed to moving the range light when it was first presented several years ago.

In the spring of this year, the Newburyport Art Association (NAA) will formally dedicate the Range Lights Community Sculpture Garden on a parcel of the USCG station that abuts the rear property of NAA and the City of Newburyport's planned Clipper City Rail Trail and Harbor Walk. This is a collaborative project among NAA, the City and the Coast Guard.

The Coast Guard, other than on special days such as their open house during Yankee Homecoming, is understandably reluctant for security reasons to routinely open the site to the public. Both the forward range light and the brick tower of the rear range light on Water Street, as is Ben Butler's Toothpick, are clearly visible from the NAA Sculpture Park venue. This offers an excellent opportunity for interpretative public displays of this navigation system, these icon symbols of maritime Newburyport, in their original historic 143-year setting.

The 1981 MHC application pointed out that these lights are one pair of only three serving in the state, and these Newburyport Harbor Range Lights are "the best example of range lights in Massachusetts." The preservation of their historical in situ integrity should be a priority.

With best regards and thanks to the MHC for preserving Massachusetts's historical heritage,

Skip Motes

Margaret Motes

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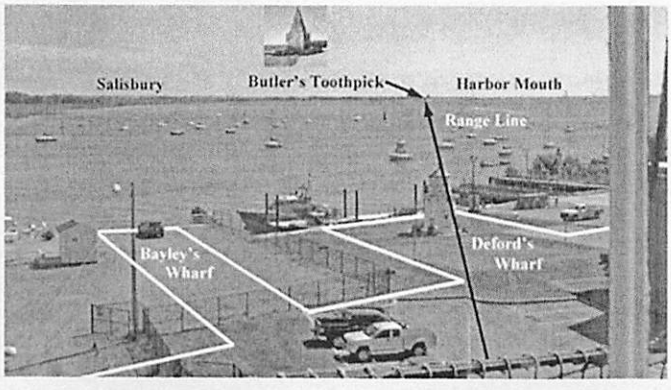
Excerpts from Jesse H. Motes and Margaret P. Motes, *Harbor Range Lights, Newburyport,* 2016, demonstrating that the forward harbor range light is today in its original 1873 position on Deford's wharf, not Bayley's wharf.

Essex County Southern District Registry of Deeds, Robert Bayley, Jr. and Charles M. Bayley to the U.S. government, book 878; 26-1, 12 Feb. 1873: "*Land situated near the corner of a certain wharf in Newburyport lately purchased by [Robert Bayley, Jr. and Charles M. Bayley] and heretofore known as Deford's wharf....*"

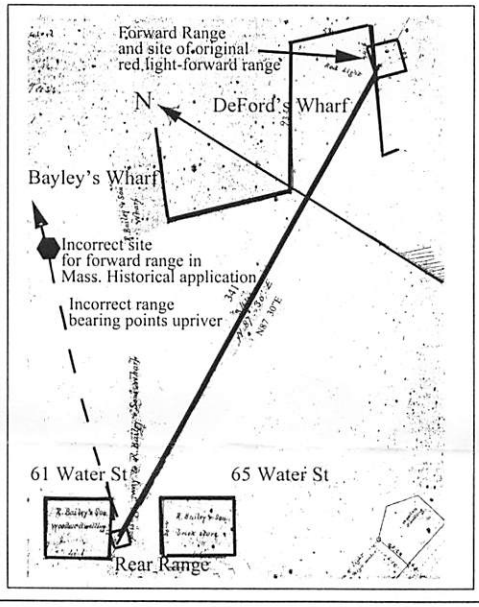


Circa 1873 stereo panel of forward range light on Deford's wharf and train trestle seen from Water Street looking across Lunt's Mast Yard, site today of the Coast Guard station. Photographer unknown, possibly Selwyn Reed. *(Courtesy of the Museum of Old Newbury.)*

Bayley's wharf is at the left in this c1873 photograph where the schooner is tied up. Today, the USCG station's main building is to the right of the range light, inboard of the train trestle. This is one of eight period photographs (1873-1966) that show the forward range light on Deford's wharf, not upriver on Bayley's wharf.



2015 photograph from the rear range light lantern room looking across forward range light to Butler's Toothpick. Outline is from 1872 engineering plan.
Photograph and graphics by Skip Motes. *(Motes Collection.)*



The 1872 Second Lighthouse District engineering plan of the range lights is shown on the right and proves that the forward range light's original 1873 position was on Deford's wharf. The 1982 Massachusetts Historical Commission's application for the National Registry incorrectly placed the original 1873 location of the rear range light at the base of Bayley's wharf, the range line would therefore point upriver, not to the harbor's entrance. (Graphics annotated by the authors. 1872 engineering plan is from the collection of the National Archives and Records Administration, Washington, D.C. and Waltham, Mass.)

cc: w/enclosure
The Honorable Donna D. Holaday, Mayor, City of Newburyport
National Park Service, National Register of Historic Places

cc: w/o enclosure
Sarah White, Chair, Newburyport Historical Commission
Thomas Kolterjahn, Co-President, Newburyport Preservation Trust
Linda Miller, Co-President, Newburyport Preservation Trust
Susan Edwards, Executive Director, Museum of Old Newbury
Michael Mroz, Executive Director, Custom House Maritime Museum
James Hyland, President, Lighthouse Preservation Society
Elena Bachrach, Executive Director, Newburyport Art Association
Jay McCarthy, President, Newburyport Art Association Board of Directors
Geordie Vining, City of Newburyport Office of Planning and Development
Jeremy D'Entrement, Light Houses Historical consultant to USCG