

October 23, 2019

Carol Gladstone, Commissioner
Division of Capital Asset Management and Maintenance
John W. McCormack Building
1 Ashburton Place, 15th Floor
Boston, MA 02108
carol.gladstone@mass.gov

Re: Feasibility Study for Medfield State Hospital Access Road

Dear Commissioner Gladstone:

On behalf of Charles River Watershed Association (CRWA), I write in regards to the Medfield State Hospital Service Access Options Feasibility Study prepared by the Vertex Companies, Inc. for the Division of Capital Asset Management and Maintenance (DCAMM), dated August 23, 2019. CRWA has significant concerns about the permanent access road options presented in the feasibility study and requests a meeting with DCAMM to discuss both the access road and DCAMM's long-term monitoring and maintenance obligations at the site.

As one of the country's oldest watershed organizations, CRWA's mission is to protect, preserve, and enhance the Charles River and its watershed through science, advocacy, and the law. Our initiatives over the last five decades have dramatically improved the quality of water in the watershed and fundamentally changed approaches to water resource management. As you know, while in operation, the Medfield State Hospital caused extensive contamination of a 269-acre property located along the Charles River in Medfield. CRWA, along with the Town of Medfield and local residents, advocated for full riverfront and sediment cleanup and played an instrumental role in negotiations between the Town and DCAAM that resulted in the largest environmental restoration project in the watershed.

After years of cleanup, remediation, and ecological restoration, the portion of the site closest to the Charles River is now safe for public access. The Charles River Gateway, created in 2015, protects drinking water, provides new parkland, recreational trails, and a canoe launch, and controls stormwater runoff. Three acres of wetlands and riverine habitat along the river have also been restored, protecting water quality in the river and creating 4.5 million gallons of floodplain storage.

The Charles River Gateway is currently accessed by car via a temporary easement across property now owned by the Town of Medfield. That easement is set to expire on December 2, 2019. DCAMM recently commissioned a feasibility study to evaluate options for a permanent public access road to the park. The study assessed two alternatives: 1) repaving and re-use of the "existing" Powerhouse Road, which was used to access the former power plant on the site, and 2) construction of a new gravel access road along a different route.

After reviewing the feasibility study, CRWA has significant concerns with the proposal to use Powerhouse Road as the permanent access road to the Charles River Gateway. Despite years of discussion and negotiation over the future of this property, use of Powerhouse Road for anything beyond occasional state access for monitoring and maintenance has never been considered by any of the stakeholders due to many of the concerns described herein.

Characterizing Powerhouse Road as “existing” is misleading.

Currently, Powerhouse Road is a path through the woods with remnants of asphalt. It is used by hikers, bikers, and horseback riders, and is more similar in condition to a hiking trail than a road. The feasibility study indicates that this option would be considerably less expensive and could be completed in a shorter time period due to its status as an “existing” road, but CRWA believes that given actual on-the-ground conditions, construction of this option would likely be more expensive and take longer to complete than the estimate suggests. Use of Powerhouse Road for vehicular access would also likely displace, or at least interfere with, those who are currently hiking, biking, and horseback riding along it.

Use of Powerhouse Road for vehicular access would likely have significant negative impacts on the Charles River and the restored wetlands along the river.

Powerhouse Road is located in close proximity to the river, as well as to the wetland areas that were restored as part of the cleanup of this site. As the feasibility study states, “[t]he 100-foot buffer zone to the Bordering Vegetated Wetlands . . . encompasses most of the length of Powerhouse Road.” Any access road that is constructed should not undermine the significant work already done and resources already invested by the state to restore the ecological integrity of the river and make it possible for the public to recreate there. Moreover, any future roadway should have no significant impact on the Charles River.

Further analysis is needed regarding impacts to the river and wetlands from 1) the significant construction activities that would be necessary to make this road capable of being used by vehicles, 2) ongoing vehicular use of this road, 3) stormwater runoff resulting from new impervious surface (pavement) along the road, and 4) the potential for migration of legacy contamination caused by the disturbance and ongoing use of this area for vehicles. Until impacts to the river and wetlands are fully analyzed, no decision can be made to move forward with this option.

We are also aware that DCAMM is failing to keep up with its existing monitoring and maintenance obligations at the site, and are concerned that the same would be true for the additional maintenance obligations contemplated in the feasibility study. Specifically, the study envisions the use of grassed swales to manage stormwater along the road, but DCAMM is not maintaining its existing stormwater management measures, like the rain gardens on site. Without proper maintenance, these stormwater control measures do not function as intended, resulting in additional negative impacts to the river.

Finally, we believe that the true cost of the Powerhouse Road option may actually be much higher than estimated in the feasibility study once impacts are fully understood and any

associated requirements to minimize and mitigate those impacts are accounted for. Without adequate demonstration that the Powerhouse Road option would not negatively impact the river and restored wetlands – which we have not seen and may not be possible – CRWA cannot support it.

Use of Powerhouse Road for vehicular access risks disturbing areas of the site where contaminated fill is capped in place.

In addition to the significant issues associated with locating a road in close proximity to a sensitive and recently-restored river and wetland ecosystem, the proposed use of Powerhouse Road for permanent public access is further complicated by the fact that it would run directly through and over portions of the site where contaminated fill has been capped in place. Capped areas like this are particularly sensitive to disturbances – like construction of a road and ongoing vehicle traffic – that could undermine the structural integrity of the cap and cause a release of the hazardous materials secured beneath it.

The cleanup of the Medfield State Hospital site was a testament to what can be accomplished through cooperation and constructive dialogue and its success was touted by many, including CRWA. We hope DCAMM will continue to work with the Town of Medfield, CRWA, and other stakeholders to ensure that the Charles River Gateway access road does not undermine the years of work and millions of taxpayer dollars that have been invested in this site. To that end, CRWA requests a meeting with DCAMM to discuss the access road, as well as DCAMM’s long-term monitoring and maintenance obligations at the site. We appreciate your consideration of these concerns and look forward to working together to ensure that this cleanup project remains a success.

Sincerely,



Heather Miller, Esq.
General Counsel & Policy Director

cc: Gus Murby, Chairman, Medfield Board of Selectmen
Osler Peterson, Medfield Board of Selectmen
Michael Marcucci, Medfield Board of Selectmen
Representative Denise Garlick
Representative Shawn Dooley
Kristine Trierweiler, Medfield Town Administrator
William Massaro, Medfield resident
Margaret R. Stolfa, Environmental Counsel
John Thompson, LSP, Medfield State Hospital Buildings & Grounds Committee
Mark Baldi, Massachusetts Department of Environmental Protection