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October 17, 2025

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
SINGLE ENVIRONMENTAL IMPACT REPORT

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| PROJECT NAMES | : Medfield State Hospital Clean Up and Redevelopment Project |
| PROJECT MUNICIPALITY | : Medfield |
| PROJECT WATERSHED | : Charles River |
| EEA NUMBER | : 14448R |
| PROJECT PROPONENT | : Trinity Acquisitions LLC[1] |
| DATE NOTICED IN MONITOR | : September 10, 2025 |

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62L) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Single Environmental Impact Report (Single EIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations.

Original Project and Procedural History

The procedural history and full background of the project were described in the July 14, 2023 Certificate on the Expanded Notice of Project Change ("2023 NPC"), and are reproduced below.

MEPA review of the Original Project commenced in 2010 when an Expanded Environmental Notification Form (EENF) was submitted by the Massachusetts Division of Capital Asset Management and Maintenance (DCAMM) proposing the cleanup and redevelopment of the 269-acre former Medfield State Hospital (MSH) site located at Hospital Road in Medfield. The former MSH site was originally developed in the late nineteenth century as a residential hospital for the mentally ill. The hospital was closed in 2003 and its control was transferred from the Department of Mental Health (DMH) to DCAMM. The EENF proposed first to conduct a cleanup of debris at five sites, and, under the

[1] Development on the site is also proposed by others, including the Town, Cultural Alliance of Medfield (CAM), etc.

provisions of the Massachusetts Contingency Plan (MCP), to remediate hazardous waste at three sites. Redevelopment was then planned for the 94.2-acre central portion of the campus once cleanup measures are complete. The site was previously developed and contains ±50 buildings totaling 788,000 square feet (sf) of building space. Redevelopment would be guided by the MSH Reuse Plan, authorized by the Legislature through special legislation passed in 2008, and included rehabilitation of the campus and the construction of several new buildings to provide 440 dwelling units and ±41,000 sf of office and community center space.

As described in the EENF, DCAMM anticipated transferring a 134-acre portion of the site to a third party through a public bidding process and ±60 acres of that area (comprised of the hospital tubular well fields, Sledding Hill, and the hospital water tower and access easement) would be transferred to the Town of Medfield (Town). The Commonwealth would retain control of ±114.8 acres of the site, with portions to be transferred among four agencies. The Department of Conservation and Recreation (DCR) would receive control of 73.3 acres, as well as a six-acre parcel located between a rail line and Route 27. The Department of Developmental Services (DDS) would retain a 2.5-acre parcel for a group home. Another 30.3 acres of the site (former sewage beds) would be transferred to the Executive Office of Public Safety and Security (EOPSS) for the continued use by public safety agencies as a firearms practice range. Finally, DMH would retain the 2.7-acre hospital cemetery. The EENF presented a conceptual plan for redevelopment over the 94.2-acre central portion of the campus, which included 440 units (32 single-family homes, 197 apartments, 43 age-restricted apartments, and 168 age-restricted condominiums), a 28,325-sf office building, and a 12,000-sf community center.

A Certificate on the EENF was issued on April 2, 2010, which required DCAMM to submit a Single EIR for the entire Original Project, including both remediation and redevelopment components. However, cleanup and remediation of hazardous waste in areas that would not impact wetland resources (both those regulated under the MCP and otherwise) were allowed to proceed prior to submission of the Single EIR for the entire project.

As noted above, portions of the site were contaminated from past activities related to operation of the state hospital. These areas would be remediated in compliance with the MCP prior to transfer of the property. DCAMM was granted a Special Project Designation (SPD) Permit by the Massachusetts Department of Environmental Protection (MassDEP) in accordance with 310 CMR 40.0060 for the three MCP-regulated sites to coordinate public involvement and remediation. DCAMM twice updated the status of site investigation work under the MCP and filed two NPCs as described below.

In June 2011, DCAMM filed an NPC (2011 NPC) with a request for a Phase 1 Waiver to proceed with the selection and implementation of an Immediate Response Action (IRA) cleanup option for the Construction and Debris (C&D) Area and adjacent portions of the Charles River at the site in advance of the submission of the Single EIR. The discovery of an oily sheen in the Charles River in May 2011 created a condition of Substantial Release Migration (SRM) under the MCP which warranted the implementation of an IRA to resolve the condition. The proposed remedial approach included bank stabilization, excavation of contaminated material and cover of the C&D Area, and construction of a temporary sediment cap within the adjacent Charles River to isolate impacted sediment and impede migration of the material. The 2011 NPC indicated that a fourth disposal area – the Clay Containment Area (a historically non-MCP site) was included in the SPD Permit (in addition to the Salvage Yard Area, the Former Power Plant Area, and the C&D Area). A Certificate on the 2011 NPC was issued on August 10, 2011 and a Final Record of Decision (FROD) was issued on September 1, 2011 granting the

Phase 1 Waiver, which allowed cleanup activities in the C&D Area and adjacent Charles River to proceed prior to submission of the Single EIR for the Original Project.

In February 2014, DCAMM filed a second NPC (2014 NPC), with a request to amend the Phase 1 Waiver granted for the Original Project. Based on further evaluations of existing site conditions, associated risks and remedial alternatives, and mediation efforts with the Town to address outstanding concerns, DCAMM and the Town developed an enhanced remediation approach and entered into a Settlement Agreement. The revised approach identified an increase in alterations to wetland resource areas from that in the EENF and consisted of excavation and relocation of contaminated fill from the bank of the Charles River and adjacent wetlands for disposal. It included wetlands restoration and enhancement measures extending from the new bank to the Charles River. The project change was a significant improvement from the previous alternative because it would excavate contaminated sediment in the Charles River and avoid migration of this material. A Certificate on the 2014 NPC was issued on March 7, 2014 and an Amended Record of Decision (FROD) was issued on March 7, 2014 amending the previously issued Phase 1 Waiver, which allowed cleanup activities in the C&D Area and adjacent Charles River to proceed prior to submission of the Single EIR for the Original Project. The Certificate clarified that the project change described in the 2012 NPC did not necessitate a revised scope for the Single EIR. The Single EIR has not yet been submitted for MEPA review.

Relevant Land Transfers

Following issuance of the 2010 EENF Certificate and review of subsequent NPCs, legislative authorizations were obtained to authorize land transfers to enable redevelopment of the Original Project site. Chapter 69 of the Acts of 2014 authorized DCAMM to convey the Water Tower (WT) parcel and the Tubular Wellfields to the Town for the purpose of the Medfield public water supply system under a land disposition agreement (LDA) (Attachment E to 2023 NPC, LDA-WT). Chapter 211 of the Acts of 2014 authorized DCAMM to convey land for redevelopment at the MSH to the Town under a separate LDA (Attachment F to 2023 NPC, LDA-1). The Town received several parcels within the slightly larger ±134-acre portion of the site previously discussed including: ±87.3-acre Parcel A (excluding the Laundry Parcel) which included the currently identified Campus Core (including the Common), the North Field, the Arboretum, and the Green subzones; and the ±39.9-acre Parcel B south of Hospital Road (referred to as Sledding Hill). The ±0.86-acre Laundry Parcel has been retained by DCAMM until remediation is completed; future disposition of this parcel to the Town is anticipated in late 2024 or early 2025.

On April 5, 2021, the Town issued a Request for Proposals (RFP) for the acquisition and redevelopment of the ±87-acre parcel (LDA-1 Parcel A redevelopment area) located to the north of Hospital Road on the former MSH property. A Special Town Meeting vote on June 21, 2022, approved to proceed with the LDA for the Redevelopment of Portions of the Former MSH, with the Proponent as the designated developer to build 334 units of multifamily housing (25% affordable) in the existing historic buildings at the former MSH site (Attachment G to 2023 NPC, LDA-2). This is the principal site of the Proponent's project under review here (referenced as the "2023 Project" in 2023 NPC). The Town agreed to lease two buildings (24 and 25) onsite to the Cultural Alliance of Medfield associated with development of the Bellforge Arts Center (BAC) on a portion the former MSH grounds within the Core Campus. In addition to the buildings, the lease provides for shared use of 48 parking spaces and 0.8 acres of open space abutting the site of the proposed Arts Center.

As part of the RFP, the Proponent proposed to include the construction of the public parking area (which is within the "Water Tower Parcel") in coordination with the Town as part of the 2023 Project. Because the Water Tower Parcel was not included in the land transfer governed by LDA-2, the Proponent would secure an easement from the Town to access and maintain the parking areas. In addition, the following areas are excluded from LDA-2 though included within the redevelopment areas covered by the prior land transfer (LDA-1) from DCAMM to the Town: Arboretum, the Green and the "non-buildable" portion of the North Field. The Proponent is proposing to use Building 13 in the North Field[2] for multi-family housing and building parking on either side of it. The parcels of land that the Town intends to convey to the Proponent under LDA-2 (±48-acres) are defined as the "Proponent's Site."

LDA-1 and LDA-2 provide for the Town, or any acquirer of the property, to become the successor proponent with respect to those portions of the site as they relate to redevelopment of the respective disposition parcels. DCAMM will continue to be responsible for those portions that relate to the C&D area remediation and restoration and the Laundry Parcel remediation.

Medfield Strategic Reuse Planning for Town-Owned Parcels

As stated in the 2023 NPC, the Town bought ±136 acres[3] of the MSH property (approximately the amount of area that is subject of the LDA-1 transaction described above) for redevelopment with a lower density of housing that balances school costs with real estate tax revenues and protects the vistas and views around MSH and open space and agricultural lands. The Strategic Reuse Master Plan for Medfield State Hospital (SRMP) was released in 2018 following extensive outreach, discussion and consensus building, and sets forth the vision preferred by Town residents. It included designation of 76 acres for open space including agriculture, reuse of Lee Chapel in the center of the campus as a cultural center, and potential development of the area south of Hospital Road for a publicly owned and operated parks and recreation facility. In addition, the SRMP contemplated historic rehabilitation and reuse of 28 buildings using historic tax credits and selective in-fill new construction to create a mixed-use development with a variety of housing types, including senior housing with continuing care and affordable housing for persons of all ages, along with commercial spaces for restaurants, small businesses, offices, services and an inn with meeting and gathering spaces. The SRMP called for redevelopment and new construction spanning 661,000 sf of building space amongst 44 existing and new buildings north of Hospital Road. Sixteen new buildings could have been erected, including homes in the Arboretum area, a new nursing and memory care facility, and two new market rate residential condominium buildings. Implementation of the SRMP would require significant private investment.

The land north of Hospital Road was rezoned by the Town in 2019 to provide for the following six sub-zones which describe areas for development density based on existing context and potential uses specified in the SRMP:

A. The Green is a broad open space defining the entry to the MSH campus. Permitted uses by right are limited to open space/arboretum and passive recreation. This area will remain open space and will be retained by the Town.
B. The Cottage/Arboretum is an area in the southeast corner of the site currently occupied by

[2] It is presumed that the area in which Building 13 is located is considered "buildable".
[3] The 2023 NPC included discrepancies as to the exact acreage; it also notes this area as 134 acres and 134.94 acres.

deteriorating, wood frame dwellings and the location of a number of historic and rare specimen trees and shrubs. Single cottage, two and three family dwellings are allowed as of right. This area will be retained by the Town in its current condition and that the Town will not engage in any activities that will impact the use of the Proponent's federal or state historic tax credits.

C. The Core Campus is the central hilltop campus quadrangle consisting of 26 brick buildings. Multiple family dwellings, elderly housing, live/work dwellings, mixed use, and some commercial uses are allowed as of right. The majority of the 2023 Project will occur in this sub-zone. The Single EIR confirms that 23 buildings in this parcel will be rehabilitated by the Proponent, and one building (27B) will be demolished by the Proponent. The Cultural Arts Center of Medfield will develop its BAC in Buildings 24 and 25.
D. The North Field is a rolling field to be maintained as passive open space, and possible agricultural use. Limited additional uses are allowed by Special Permit. Potential alternative future uses, such as residential or commercial development, would require the Town to approve an additional zoning change, which is not encouraged. The area is mostly to remain open space, but zoning provides an exception to allow a multiple family dwelling in Building 13. As noted, the Proponent will redevelop Building 13 as part of the 2023 Project, and the Town will retain the North Field as public open space. There is currently a Paint Shop on the land that the Town is retaining, which is expected to remain in its current condition and the Town will not engage in any activities that will impact the use of the Proponent's federal or state historic tax credits.
E. The West Slope is an area to the west of the main quadrangle overlooking the wooded Medfield Charles River State Reservation with three existing historic brick buildings, one non-contributing historic building, and open land areas.
F. The Water Tower Parcel is an open area surrounding the existing Town water tower, currently partially paved for water tower access. Open space, and shared use parking and off-site parking are allowed by right. As noted, the Proponent will build a public parking area within this parcel as part of the public infrastructure scope of work for the 2023 Project, and the Town will maintain ownership of the parcel.

Description of Project Change in 2023 NPC

As previously described in the 2023 NPC, Trinity Acquisitions LLC (the Proponent) filed the NPC due to lapse of time and to request an updated Scope for further MEPA review. The Proponent is proposing the redevelopment of a ±48-acre portion of the historic MSH Campus (the Proponent's Site and subject of LDA-2) located at 45 Hospital Road. As noted above, it is expected that the remaining ±39 acres of the redevelopment areas subject to the Town's 2021 RFP and "LDA-1" land disposition will be owned, maintained, or leased by the Town, Proponent, or other party. Other redevelopment areas transferred under LDA-1 but not included in the RFP, will be reserved for future potential development. The Town also separately acquired the Water Tower Parcel from DCAMM for future development for public water supply.

The 2023 NPC and Single EIR focus on the Proponent's proposed development, which includes the preservation and rehabilitation of 401,421 sf of existing buildings on what comprises the previous MSH core campus, to create 334 units of multifamily mixed-income housing units (25% affordable[4]) to

[4] Affordable up to 80% of Area Median Income

achieve historic preservation, create diverse housing types, with related open space, amenities, pedestrian and traffic circulation, and parking.[5] As noted, the Cultural Alliance of Medfield holds a 99-year lease from the Town of Medfield signed in 2020, on two buildings (Buildings 24 and 25) on the Proponent's Site, and will undertake development of the BAC. The BAC development will involve the renovation of each of these buildings and the construction of 55 parking spaces.[6]

Residential units will be combined with artist-focused amenities to complement the new Bellforge Arts Center. Open spaces will be improved to create more publicly accessible areas and connections across MSH grounds. Twenty-seven contributing, existing historic buildings are proposed for reuse (excluding Buildings 24 and 25, which are targeted for redevelopment for the Bellforge Arts Center). The following is a break-down of land use per building, as proposed by the 2023 Project:

- 25 historic, contributing buildings will be used for residential homes (Buildings 1-9, 11-22, 22A, 23, 27A and 29)
- 2 historic, contributing buildings will be used for amenity features including fitness, management, amenity space (Buildings 26 and 28)
- Non-contributing historic structures and Building 10 may be used for maintenance, storage and repairs, a potential "comfort station" and select community-oriented uses

The Proponent may also find use for surplus basement and attic space as residential and mechanical storage areas. All housing will be designed to meet the needs of "adaptability" with 5% considered Group 2 accessible under Massachusetts Architectural Access Board (MAAB) regulations.

The 2023 Project includes redevelopment of Buildings 1 through 29 and demolition of Building 27B and the Shed. The Town will retain ownership of Buildings 30 through 36 and the Paint Shop; therefore, for the purposes of the utility capacity analysis only, the analysis assumed that those buildings are re-purposed by others to the program use identified in the SRMP. Otherwise, Buildings 30 through 36 and the Paint Shop are excluded from the scope of design.

Remedial activities in the C&D Area described in the 2010 EENF and the 2014 NPC were permitted and have largely been completed. Wetland restoration and remedial activities are now in the monitoring and maintenance phase. DCAMM is working with the Town and stakeholders on development of a revised comprehensive monitoring and maintenance plan to ensure the long-term efficacy of the wetland restoration and remediation. DCAMM submitted a request to MassDEP on November 21, 2022, requesting a two-year extension of the SPD permit, which contained twelve conditions, the majority of which have been completed with ongoing activities associated with several of the conditions. There will be continued filings to MassDEP regarding ongoing response actions under the SPD permit until all releases have been fully assessed and/or remediated and any MassDEP audit findings have been fully addressed. Additional assessment activities outside of the current SPD area are not anticipated. DCAMM continues to conduct assessment activities in the SPD Area to evaluate volatile organic compounds and metals in groundwater. There are no continuing active remedial activities with associated wetland impacts at the site. DCAMM anticipates submitting a Notice of Intent

[5] The Proponent will seek approval from the Massachusetts Department of Housing and Community Development (DHCD) to allow for 10% of the affordable housing units to have a preference for artists.
[6] For completeness of disclosures, the environmental impacts from the BAC development are incorporated into the cumulative project impacts summary below.

to the Medfield Conservation Commission requesting approval to control small areas of invasive plants within the wetland restoration area. The impact to the wetland resource area is anticipated to be minimal, within the area previously reviewed, and the work will promote growth of native plants species and improve wildlife habitat.

As explained above, since issuance of the EENF Certificate in 2010, land transfers were effectuated from DCAMM to the Town to allow for redevelopment of a 134-acre portion of the Original Project site. The 2023 Project reviewed herein falls within an 87-acre portion of this redevelopment area including all or portions of the sub-zones identified above (i.e., Core Campus, North Field, and West Slope) as identified in the SRMP released in 2018. The Certificate on the 2023 NPC indicated that the 2023 Project constitutes the primary component of the redevelopment contemplated by the SRMP, and that future potential projects on other parcels—including the Laundry Parcel, Arboretum Parcel, and other sub-zones identified in SRMP—are not yet planned. The Certificate indicated that the original master redevelopment plan contemplated in the 2010 EENF has now lapsed and is superseded by the SRMP, which is a planning document that contemplated preferred development projects. As noted in the Certificate, only the current 2023 Project is prepared to move forward, and other projects are speculative with no plans or details available. Given these circumstances, the Proponent disclosed in the 2023 NPC only the project change and associated impacts related to the 2023 Project, with the understanding that future projects will be filed as separate NPCs by other proponents. The 2023 NPC indicated that impacts associated with future projects are likely to be modest, since redevelopment in sub-zones other than the Core Campus are largely intended to remain as open space or small-scale developments. Based on the foregoing, the Certificate on the 2023 NPC rescinded the prior Scope issued in the 2010 EENF Certificate, and issued a revised Scope for the 2023 Project. Other future projects within the Original Project site shall be filed as separate NPCs.

DCAMM is not aware of any plans by other Commonwealth agencies that own, control, or operate land within the original MSH property, which may require additional MEPA review.

Changes Since the 2023 NPC

Since the filing of the 2023 NPC, the 2023 Project received approval from the Medfield Planning Board to reduce the required width of on-site roads from 24 feet to 18-20 feet (a reduction of approximately 1 acre of impervious area compared to the 2023 NPC). In addition, the 2023 Project has also added 98 additional subsurface chambers and will expand one bioretention basin at the northwest corner of the Proponent's Site. With these additions, the 2023 Project's stormwater system will be able to accommodate the 2070 5-year storm (24-hr precipitation depth of 9.9 inches), as further discussed below. All other 2023 Project components remain unchanged since the 2023 NPC, and the Single EIR also confirms the inclusion of the components listed above, including construction of public parking in the Water Tower Parcel and Building B in the North Field.

Environmental Impacts and Mitigation

Potential environmental impacts for the Original Project were identified in the EENF based on assumed uses over a 136-acre redevelopment area, and included 440 units (32 single-family homes, 197 apartments, 43 age-restricted apartments, and 168 age-restricted condominiums), a 28,325-sf office building, and a 12,000-sf community center. Estimated impacts included ±7.2 acres of new land alteration, 2.3 acres of new impervious area, 2,700 new average daily trips (adt), 115 new parking

spaces (total onsite of 825 spaces), and ±93,400 gallons per day (gpd) of new water usage and 84,900 gpd of new wastewater generation. The Original Project also included the construction of new water and sewer mains on-site. Wetlands impacts associated with the remediation activities were identified as temporary alteration of 500 linear feet (lf) of Bank, 2,500 sf of BVW, and 43,700 sf of Riverfront Area (RFA). It was also noted that the Original Project involved the demolition of state-listed historic and/or archaeological resources.

The 2nd NPC provided an updated estimate of impacts to wetland resource areas. Overall impacts increased compared to what was described in the 2010 EENF; however, these impacts are associated with the remediation of the site and its restoration, most of which are now complete. Impacts included alteration of 3,750 sf of BVW, 11,350 sf of LUW, and 104,500 sf of RFA. Restoration will include 32,000 sf of BVW, 55,000 sf of LUW, and 104,500 sf of RFA.

Compared to the Original Project, the 2023 Project is expected to alter an additional 20 acres[7] of land (total alteration on-site of 27.2 acres) and require 1.2 additional miles and 1.4 additional miles of new water and sewer mains, respectively. Compared to the EENF, the 2023 Project will reduce unadjusted vehicular trips by 484 adt (2,216 adt total); parking spaces by 33 (792 total spaces); water use by 29,990 gpd (63,410 gpd total); wastewater generation by 27,555 gpd (57,645 gpd total); and impervious area by 9.8 acres (bringing total impervious area on-site to 19.8 acres).[8] The 2023 Project will not alter any wetland resource areas.

Measures to avoid, minimize and mitigate these impacts include implementation of a Transportation Demand Management (TDM) plan to reduce single-occupancy vehicles trips and installation of a stormwater management system consistent with the Stormwater Management Standards (SMS) of the Wetlands Regulations (310 CMR 10.00). The proposed buildings will enhanced envelopes and will utilize efficient, all electric systems for heating and cooling.

Jurisdiction and Permitting

The Original Project was not subject to a mandatory EIR based on the MEPA regulations. However, due to the potential environmental impacts of the project, and the unique nature of the project site, a discretionary EIR was required.

The Original Project was required to undergo MEPA review pursuant to 301 CMR 11.03(3)(b)(1)(b), 11.03(3)(b)(1)(f), 11.03(6)(b)(13), and 11.03(10)(b)(1) of the MEPA regulations because it was being undertaken by an Agency and would alter 500 or more linear feet of inland bank and one-half or more acres of other wetlands (RFA), generate 2,000 or more new adt on roadways providing access to a single location, and demolish a Historic Structure listed in or located in any Historic District listed in the State Register of Historic Places, respectively. The Original Project required a Sewer Connection Permit from MassDEP; review by the Natural Heritage and Endangered Species Program (NHESP); review by the Massachusetts Historical Commission (MHC); and a National

[7] This is an increase of 14.6 acres compared to what was reported in the 2023 NPC. The increase is due to previously altered land not being included in the land alteration calculations in the 2023 NPC.

[8] Impacts to impervious area were incorrectly reported in the 2023 NPC. The 2023 NPC reported a reduction of impervious area compared to the Original Project by 8.8 acres. The Single EIR indicates that the 2023 Project will further reduce impervious area by 1 acre from what was reported in the 2023 NPC due to a narrowing of project roadways at the request of the Town.

Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA). It was also subject to the MEPA Greenhouse Gas Emissions Policy and Protocol (GHG Policy). The Original Project received an Order of Conditions from the Medfield Conservation Commission in 2010. With the addition land alteration required for the 2023 Project, the Original Project now exceeds the threshold at 301 CMR 11.03(1)(b)(1) direct alteration of 25 or more acres of land.

Additional Agency Action associated with the 2011 NPC included a Section 401 Water Quality Certification (401 WQC) from MassDEP. The 2011 NPC change required a Category 2 Programmatic General Permit from the U.S. Army Corps of Engineers (ACOE) and review in accordance with the MCP by MassDEP, including, but not limited to, a Phase III Remedial Action Plan (RAP). Additional Agency Action associated with the 2014 NPC included a Chapter 91 (c.91) Dredging Permit from MassDEP. The 2011 NPC also received an Order of Conditions from the Medfield Conservation Commission in 2014.

The 2023 Project does not require any new Permits. According to the Single EIR, land transfers identified in EENF have been completed or subject to an LDA; however, MEPA review of the redevelopment was required as set forth in the 2010 EENF Certificate. The current project is seeking funding through the Community One Stop for Growth Programs administered by MassDevelopment and the Executive Office of Housing and Economic Development (EOHED) for remediation and rehabilitation of underutilized properties and public infrastructure.

The Original Project was undertaken and financed by DCAMM and involved a Land Transfer from DCAMM. As noted, the 2023 Project also requires Financial Assistance from an Agency. Therefore, MEPA jurisdiction is broad and extends to all aspects of the 2023 Project that are likely, directly or indirectly, to cause Damage to the Environment, as defined in the MEPA regulations.

Review of the Single EIR

The Single EIR was responsive to the Scope issued on the EENF. The Single EIR included an updated 2023 Project description, existing and proposed conditions plans, revised estimates of project-related impacts and additional measures to avoid, minimize and mitigate environmental impacts. The Single EIR provided a response to comments on the EENF and draft Section 61 Findings. During the review period, the Proponent provided supplemental information regarding the alternative analysis. For purposes of clarity, all supplemental materials are included in references to the "Single EIR," unless otherwise indicated.

I note comments from the Charles River Watershed Association indicating that groundwater sampling adjacent to the Proponent's Site conducted in May 2025 identified the presence of PFAS, lead, and zinc above applicable state standards in several monitoring wells. The proximity of these monitoring wells to Charles River triggered an Immediate Response Action (IRA) for PFAS contamination. Comments note that this is an evolving situation and more information is needed to identify potential sources of PFAS contamination, evaluate the extent of the contamination, and determine whether additional remedial activities are necessary. The Proponent indicates that although future testing is proposed outside of the Proponent's Site and is not expected to affect the proposed 2023 Project, they will coordinate with DCAMM, the Town and the Licensed Site Professional (LSP) as needed and will continue to remain informed of the situation as an abutter.

Other comments from members of the public, including CRWA, express strong support for the 2023 Project and commend the Proponent for the proposed redevelopment of the MSH site.

*Alternatives Analysis*

As described in the 2023 NPC and prior EENF, the Proponent began planning with the Town for the disposition and redevelopment of the core buildings and immediately surrounding land in 2003. Most of the site is part of an historic district and extensive discussions were held and planning undertaken with MHC, the Medfield Historic District Commission, and the Medfield Historic Commission, as well as a Reuse Committee. Studies were undertaken before and during the planning process considering historic preservation, financial and physical feasibility, hazardous materials, traffic, and fiscal impacts. Through this planning process and numerous public meetings, the Medfield Board of Selectmen and DCAMM reached agreement on the programmatic redevelopment of the site as stated in a Reuse Plan. Nevertheless, as the 2023 NPC did not provide further explanation of alternatives explored prior to determining the development program, the Scope issued with the NPC Certificate required a more comprehensive evaluation of all feasible alternatives that were considered for the 2023 Project and the reasons for selecting the Preferred Alternative.

As required by the Scope, the Single EIR included a series of alternative to achieve the 2023 Project's goals including the No Build Alternative, the 2010 Project Alternative, the Townhome Alternative, the Townhome/ Low-Rise Apartment, the Townhome/Low-Rise/High-Rise Apartment Alternative and the Preferred Alternative.[9]

The No-Build Alternative would leave the historic buildings on the Proponent's Site in their current state of disrepair. The filing notes that many of the buildings have cracks in the brick walls, flooding in their basements, missing or broken slate roof shingles, and boarded up windows. The No-Build Alternative would not realize the benefits of the redevelopment of the site which includes the restoration of historic buildings and the creation of of 334 mixed-income multifamily units; therefore, this alternative was dismissed.

The 2010 Project Alternative, which was proposed in the 2010 EENF consisted of the rehabilitation of the campus and the construction of several new buildings to provide 440 dwelling units and 41,000 sf of office. Although the 2010 project would provide more housing compared to the Preferred Alternative, it increased impervious area by 9.8 acres, trips by 484 adt, parking spaces by 33, water use by 29,990 gpd and wastewater generation by 27,555 gpd. In addition, this alternative proposed to demolish 14 historic buildings. For these reasons, the 2010 Project Alternative was dismissed from consideration.

The Townhome Alternative consisted of the demolition of existing historic buildings and the construction of 73 residential townhome with 54 market-rate residences and 19 affordable-rate residences. Each townhome will be two-or-three-bedroom residences with each townhome having a two-car garage and driveway parking. Although this alternative would reduce environmental impacts to

[9] The Townhome, Townhome/Low-Rise Apartment, and the Townhome/Low-Rise/High-Rise Apartment were included as proposals in the 2021 RFP issued by the Town. These alternatives were never developed to the point where specific impacts were identified or quantified.

impervious area, parking spaces, adt, water use and wastewater generation, it would provide 261 fewer housing units and involves the demolition of state-listed historic and resources. For these reasons, the Townhome Alternative was dismissed.

The Townhome/Low-Rise Apartment Alternative consists of the demolition of existing historic buildings and the construction of 602 units comprised of 450 low-rise apartments (consisting of approximately 455,956 sf of residential space in nine garden-style buildings) and 152 townhomes. The Townhome/Low-Rise/High-Rise Alternative consists of the demolition of existing historic buildings and the construction of 702 units consisting of 350 low-rise apartments, 152 townhomes, and 200 apartment rentals. Although both alternatives propose to provide significantly more housing (268 and 368 additional units, respectively, compared to the Preferred Alternative), these alternatives will have greater impacts to land alteration, impervious area, adt, parking spaces, water use and wastewater generation. In addition, both proposals involve the demolition of state-listed historic resources and did not propose to reuse the existing historic buildings on site. For these reasons, both alternatives were dismissed.

As noted above, the Preferred Alternative consists of the reuse and renovation of 401,421 sf of existing buildings to create 334 apartments. The Preferred Alternative accomplishes the Town's goals of providing housing, minimalizing environmental impacts while achieving historic preservation through the rehabilitation of 23 historic buildings.10

As required by the Scope, the Single EIR provided a discussion of additional mitigation the 2023 Project is incorporating to address the project's environment impacts. As noted above, the 2023 Project received approval from the Medfield Planning Board to reduce the required width of roads on site from 24 feet to 18-20 feet (a reduction of approximately 1 acre of impervious area compared to the 2023 NPC for a total of 19.8 acres of impervious on site). In addition, the 2023 Project will include low flow and high efficiency water fixtures and systems.

As required by the Scope, the Single EIR examined the feasibility of incorporating further LID techniques stormwater BMPs into the 2023 Project design. As noted above, the 2023 Project has added 98 additional subsurface chambers and expanded the one bioretention basin at the northwest corner of the Proponent's Site. With these additions, the 2023 Project's stormwater system will be able to accommodate the 2070 50-year storm (24-hr precipitation depth of 9.9 inches).

As required by the Scope, the Single EIR examined the use of stormwater as an alternative to additional water usage. The filing states that the 2023 Project considered the incorporation of rain barrels to capture roof runoff for storage and reuse by the 2023 Project's irrigation system. However, this was deemed infeasible due to the need to design the campus to replicate the existing building drainage of the original historic program. The existing buildings discharge rain runoff by using rain leader downspouts to an underground drainage and infiltration system. The 2023 Project will be replacing downspouts and gutters in kind per National Park Service (NPS)/MHC standards. The filing concludes that the historic requirements, makes the use of rain barrels is infeasible for the 2023 Project. The filing also considered the use of a greywater system for the reuse of wastewater; however, the filing dismissed this due to concerns regarding elevated levels of fecal-borne pathogens typically found in greywater.

10 The Preferred Alternative does not propose the construction of any new buildings. All proposed units will be housed in the existing historic buildings on site, which are proposed to be renovated and restored.

*Land Alteration and Stormwater*

As noted above, the 2023 Project will alter approximately 20 acres of land beyond the Original Project, bringing total project impact to 27.2 acres of land alteration; the majority of the impact affects previously disturbed land. The 2023 Project will also create approximately 1.2 acres of new impervious area (bringing site total to 19.8 acres). In accordance with the Scope, the Single EIR clarified the location, type, and extent of land alteration. According to the Single EIR, buildings account for 5.1 acres of the Proponent Site; roadways account for 9.8 acres; sidewalks account for 3.5 acres; recreational areas account for 0.7 acres; open space lawns account for 1.3 acres; landscaping accounts for 6.2 acres; and natural vegetative cover/undisturbed existing vegetation account for 19.2 acres. As required by the Scope, the Single EIR clarifies the location, type and amount of alteration in previously undisturbed areas. The filing states that of the approximately 10 acres of alterations to undisturbed areas, 1.3 acres will be converted to lawn, 6 acres will be converted to landscaped areas, 0.7 acres will be converted to recreational areas, and 2 acres will be converted to sidewalks.

As required by the Scope, the Single EIR confirmed that the 2023 Project will increase impervious area by 1.2 acres. In order to mitigate increases in peak discharge rates as a result of the new impervious surfaces, a comprehensive stormwater management system has been designed that includes a combination of Best Management Practices (BMPs) and Low Impact Design (LID) strategies consisting of subsurface chambers and the one bioretention basin at the northwest corner of the Proponent's Site. According to the Single EIR, the stormwater management system has been designed to comply with the Stormwater Management Standards (SMS), including standard requirements for groundwater recharge, removal of at least 80 percent of the TSS from runoff and maintenance and reduction of pre-construction peak runoff rates under post-construction conditions for the present-day 2-, 10-, 25- and 100-year storms. In addition, the system has been designed to meet the Phosphorus Reduction Target of 65% for the Charles River Watershed. The most current NOAA Atlas 14 precipitation data was used to evaluate peak runoff. As noted below, the stormwater management system will have sufficient capacity to handle projected increased precipitation under future climate conditions.

The Single EIR states that the stormwater system does not discharge directly to wetlands, rivers, or streams, but will discharge treated stormwater to seven Design Points. All proposed stormwater outlets from closed drainage systems have been designed with flared end sections and stone protection to dissipate discharge velocities. Overflows from BMPs that impound stormwater have been designed with stone to protect downgradient areas from erosion. Stormwater from the 2023 Project will not impact hydrology, water quality of local river systems, public water supplies, vernal pools, or other wetlands resources proximate to the site. As required by the Scope, the Single EIR included a Stormwater Management System Operations and Maintenance Manual that contained clear commitments to ensure effective long-term operation and maintenance of the stormwater system.

*Open Space*

As required by the Scope, the Single EIR clarified that approximately 28 acres will be open space, 19 acres of which will remain undisturbed. According to the Single EIR, public access to open space will continue to be ensured throughout the Proponent's Site via a public access easement across the Core Campus along with public roads and sidewalks. In addition, Buildings 24 & 25 (the former Chapel and Rectory), will be developed into the BAC, which will be open to the public.

As required by the Scope, the Single EIR provided details regarding the long-term preservation of the site's open space. According to the filing, the Proponent does not plan to develop a conservation restriction (CR) for the open space on the Proponent's Site. According to the Single EIR, further development of the site is restricted as the Proponent's Site is subject to a Memorandum of Agreement (MOA) (dated December 2, 2014) among the Town, DCAMM, and MHC, which documents the stipulations for historic preservation on the entire former MSH property. As the MOA currently stands, if the owner intends to rehabilitate buildings, structures, and landscape features, the rehabilitation should conform to the Secretary of the U.S. Department of Interior's Standards for Rehabilitation of Historic Properties (DOI Standards), which outline strict standards regarding new construction on the Proponent's Site.[11] In addition, the Proponent is seeking state and federal historic tax credits, and the 2023 Project is subject to review by the MHC and NPS. According to the filing, just as for the MOA, the program specifies the rehabilitation must conform to the DOI Standards for rehabilitation of historic property. The federal Historic Preservation Tax Incentives program encourages private sector investment in the rehabilitation and re-use of historic buildings. As further explained below, the 2023 Project also needs to go through a stringent local process to approve any development on the property.

As required by the Scope, the Single EIR provided a discussion of how the 2023 Project will connect to and enhance DCR's existing trail network adjacent to the site. According to the filing, DCR's Medfield Charles River Reservation (MCRR) is located adjacent to the Proponent's Site with state forest blocks to the southeast and directly abutting the 2023 Project on the western side. MCRR includes an extensive trail network that connects with the Bay Circuit Trail, which connects from the northwestern corner of the Proponent's Site to the adjacent side of Hospital Road and Medfield's McCarthy Park where public parking is available. According to the filing, proposed on-site pedestrian networks will connect to the larger existing recreational trail network including the DCR Charles River Reservation, including the Charles River Overlook and the Charles River Link Trail, which connects to the greater Bay Circuit Trail. The filing states that the Proponent met with DCR in June 2025 to discuss trail connections to the Proponent's Site and is committed to continuing conversations with DCR to ensure public use of these resources is enhanced and encouraged and not disturbed by the redevelopment of the Proponent's Site. Comments from DCR express support for the 2023 Project and satisfaction that the project will enhance publicly accessible trail opportunities.

As noted in the Certificate on the 2023 NPC, the Massachusetts Department of Agricultural Resources (DAR) submitted comments on the 2010 EENF, which identified plans for separate MOUs between DAR and the designated developer, and DAR and the Town to allow for the continued agricultural use of the larger agricultural fields within the area slated to be transferred to DCR. As required by the Scope, the Single EIR noted that DCAMM has reported that the transfer has not happened, nor has an MOU been executed. As noted above, these portions of the Original Project site are outside the areas slated for development by the Proponent as part of the 2023 Project.

*Water*

The 2023 Project includes an all new water distribution system, with infrastructure designed and installed to the Medfield Board of Water & Sewage's standards and fed via the existing water storage tank located in the Water Tower sub-district and existing 16" water main that extends within Hospital

[11] https://www.nps.gov/articles/000/treatment-standards-rehabilitation.htm

Road. This new system includes the installation of a new 8" ductile iron water distribution loop system with associated copper building service connections, gate valves, hydrants, and a minimum of two connections back to the active portion of existing 16" water main located at the eastern portion of the Proponent's Site. As required by the Scope, the Single EIR confirmed, through discussions with the Town and a 3rd party peer review, that Medfield has sufficient capacity for the proposed water demand of the 2023 Project.

As required by the Scope, the Single EIR verified that the 2023 Project will be in compliance with the public water system's Water Management Act (WMA) permit and all applicable regulations. The Single EIR clarified that the 2023 Project is not connecting to the hospital well field and that source approval for the well field is not required as it has been abandoned and is not a viable source for water. Comments from MassDEP state that the Town Water Department's 2024 Annual Statistical Report indicated that it has ample WMA permitted capacity to serve this project.

As required by the Scope, the Single EIR detailed that the water system improvements include fire service connections to the renovated buildings as required to support the building life safety systems. According to the Single EIR, spacing and location of fire hydrants is proposed in accordance with National Fire Protection Association (NFPA) and the Medfield Fire Department regulations throughout the development. The Single EIR states that the Master Electrician Plumbing and Fire Protection (MEPFP) engineer ran a building calculation to support that the expected water service pressure will satisfy the pressure needed for the fire protection systems.

The Single EIR clarified that outdoor water supply will come from the municipal system. The Single EIR estimates that the 2023 Project's outdoor water use for the first growing season will be 40,000 – 50,000 gpd and 20,000 gpd in subsequent years. As noted above, the filing examined the use of rain barrels to capture roof runoff for storage and reuse by the 2023 Project's irrigation system. The Single EIR states that this is not feasible due to the historic rehabilitation of the buildings and the campus. The filing states that the Proponent is designing, planning, and reconstructing the campus to replicate the existing building drainage of the original historic program. The existing buildings discharged rain runoff by using rain leader downspouts to an underground drainage and infiltration system. The 2023 Project will be replacing downspouts and gutters in kind per NPS/MHC standards. In addition, new equipment serving the historic buildings must be offset from the building footprint and screened to protect the overall historic campus. The filing concludes that due to the requirement to replicate the existing drainage system of the historic buildings, the use of rain barrels is infeasible for the 2023 Project. In addition, the Single EIR assessed the feasibility of using well water for landscape irrigation in lieu of domestic municipal water for the 2023 Project; however, filing states that there are no existing onsite wellheads. Comments from MassDEP encourage the Proponent to identify an alternative source of water for irrigation. According to the filing, the Proponent will continue investigation of alternative sources for irrigation supply prior to the start of construction.

*Wastewater*

The Scope required the Proponent to confirm if a MassDEP Sewer Connection Permit is required for the 2023 Project. However, comments from MassDEP state that MassDEP no longer issues Sewer Connection Permit. Comments state that the 2023 Project requires a connection permit from the Town of Medfield.

According to the Single EIR, the estimated wastewater generation amount is calculated in accordance with MassDEP's 310 CMR 15 (Title 5), which requires the wastewater be calculated using a rate of 110 GPD/bed. Based on this, the 2023 Project will generate 57,645 gpd of water use (including BAC). As noted in the Certificate on the 2023 NPC, there is sufficient capacity in the existing municipal collection system to accommodate the estimated wastewater flow from proposed uses onsite (including BAC).

According to the filing, due to concerns with combined sewer systems, aged infrastructure/clay pipe, and sources of inflow and infiltration (I/I), the 2023 Project will provide a network of completely new PVC sanitary sewer mains/services and precast sanitary sewer manholes to support the redevelopment. The system will be designed and installed to Medfield Board of Water & Sewage standards. The 2023 Project also includes installation of approximately 1,250 linear feet of sanitary sewer down Hospital Road to Copperwood Road. The proposed on-site sanitary sewer system includes two wastewater pumping stations for the residential flows from Building 10 and Building 7. Aside from these two building connections, the remainder of the proposed sanitary sewer system will be gravity. Comments from MassDEP request that the design of the municipal gravity sewer extension account for future sewer connections or potential extensions. Comments state that the installation of the private sewer system and pump stations constitutes a major modification under 314 CMR 12.00. Accordingly, MassDEP comments note that the Town of Medfield must file a WM16 Permit to MassDEP for review. This submittal, which must also include detailed information regarding the demolition of the existing system, is required to ensure compliance with 314 CMR 7.06(1) and 314 CMR 12.00.

The Scope required a description of the proposed wastewater mitigation, including measures to meet I/I removal requirements and water conservation commitments. The Single EIR states that the 2023 Project is anticipated to provide a near total reduction of I/I into the sanitary sewer system as the existing sewer system is being replaced, removing any sources of inflow/infiltration or illicit connections. Sources of I/I will be eliminated through a network of completely new PVC sanitary sewer mains/services and precast sanitary sewer manholes to support the redevelopment, all installed to Medfield Board of Water & Sewage standards. This reduction in I&1 continues off site through new infrastructure installation of approximately 1,250 linear feet of sanitary sewer down Hospital Road to Copperwood Road. In addition, the 2023 Project will achieve reduced wastewater flows by incorporating low flow plumbing fixtures to decrease water consumption.

*Traffic and Transportation*

The Single EIR states that there have been no updates to the TIAS; however; the Proponent has worked with the Town of Medfield to finalize interior site circulation and to advance the design of improvements to three intersections (Harding Street/North Street, Harding Street/West Street and Hospital Road/Harding Street). The Single EIR states that access to the site was previously provided at Cottage Street. Based on discussions with the Town, the Single EIR states that site access will be provided via Stonegate Drive (formerly Service Road), with Cottage Street designated for emergency access only. According to the filing, Stonegate Drive will be upgraded to provide sidewalks to connect to the off-site town owned sidewalk north side of Hospital Road.

As noted in the Certificate on 2023 NPC, the 2010 TIAS suggested improvement to three offsite intersections at Hospital Road intersecting Harding Street, Harding Street at West Street, and Harding Street at North Street. The 2023 TIAS identified the same intersections as needing improvement. The

filing states that the intersection of Hospital Road at Harding Street geometry has deficiencies with numerous conflict points and only allows a short queue for the southbound through movement. The intersection of Harding Street at North Street has a crash rate over the MassDOT District 3 average. The geometry of the intersection Harding Street at West Street as a triangle with two-way legs increases the number of conflict points at the intersection. In addition, long queues for the southbound through movement can block the eastbound left-turn movement. At the intersection of Hospital Road and Harding Street improvements will create a T intersection with Hospital Road intersecting Harding Street from the west and placing the intersection under all-way stop control. The intersection at Harding Street and West Street will maintain West Street as the stop-controlled leg, but the alignment will be reconfigured to be more perpendicular to Harding Street. The intersection of Harding Street at North Street will have the existing island removed and a roundabout will replace the existing configuration. The filing states that the Medfield Select Board has approved the design of all proposed intersection improvements.

As required by the Scope, the Single EIR provided an explanation for why the plans to improve sigh-distance on Hospital Road/Service Road in the 2010 EENF are no longer proposed. The filing states that in order to shift Service Road to improve sigh-distance, t the buildings at the southwest corner of the Proponent's Site would need to be reconfigured, which would require substantial tree clearing. Because the proposed town endorsed site plan involves maintaining all existing buildings on site, the plan to improve sigh-distance on Hospital Road/Service Road was removed. In addition, the Single EIR notes that the existing driveway exceeds the minimum sight distance requirements.

As required by the Scope, the Single EIR included TDM to reduce the overall number of automobile trips to and from the Proponent's Site and to promote the use of alternative modes of transportation. Specific TDM measures include:

- Disseminate information on alternate modes of transportation
- Provide bicycle racks and storage on-site
- Provide dedicated parking for low-emitting fuel-efficient vehicles and/or electric vehicle charging stations
- Develop transportation-related marketing and education materials; and
- Host an annual mobility management educational meeting for residents.

*Cultural Resources*

As required by the Scope, the Single EIR provided an update on consultations with MHC and others regarding cultural resources. According to the filing, the Town and the Proponent submitted a Project Notification Form (PNF) and received a determination in August, 2025 from MHC that the 2023 Project will have "no adverse effect" (950 CMR 71.07(2)(b)(2)) on Medfield State Hospital.

The Single EIR states that the 2023 Project is located within the Town of Medfield's Hospital Farm Historic District and is subject to review by the Medfield Historic District Commission to determine whether buildings or structures will be altered in any way that affects exterior architectural features. In accordance with Town of Medfield Bylaw §150-6, the 2023 Project is required to provide a Certificate of Appropriateness for approved alterations and new construction signed by the chair of the Historic District Commission before the Building Inspector will issue a building permit for the work. In February 2025, the Medfield Historic District Commission held a public hearing, unanimously approved

the application, and issued a Certificate of Appropriateness.

According to the Single EIR, the 2023 Project also needs approval from the Medfield Historical Commission, which works to identify and protect Medfield's historical and archaeological assets. The Medfield Historical Commission administers the Town's Demolition Delay Bylaw, which intends to protect the Town's archeologic, historic, and aesthetic resources. In June 2025, the Medfield Historical Commission in a written statement to the Planning Board affirmed the historical and archaeological importance of the Medfield State Hospital location and endorsed the 2023 Project's plan to reuse and rehabilitate nearly all of the Proponent's Site's buildings while also retaining the layout of the campus grounds.

*Climate Change*

*Adaptation and Resiliency*

Effective October 1, 2021, the MEPA Interim Protocol on Climate Change Adaptation and Resiliency, new project filings are required to include a copy of the output report from the Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Standards Tool"),[12] together with information on climate resilience strategies to be undertaken by the project. While the Original Project was not subject to the interim protocol, the Scope on the 2023 NPC requested an output report from the tool be included with the Single EIR.

Based on the output report attached to the Single EIR, the 2023 Project has a "High" exposure rating based on the 2023 Project's location for the extreme precipitation (stormwater flooding) and extreme heat climate parameters. Based on the 50-year useful life and the self-assessed criticality identified for the 2023 Project, the MA Resilience Design Tool recommends a planning horizon of 2070 and a return period associated with a 50-year (2% chance) storm event. It also recommends planning for the 50$^{th}$ percentile for applicable extreme heat parameters (referring to the number of days over 90 degrees in 2070 as compared to a baseline).

The MA Resilience Design Tool output indicates that the Proponent's Site has a maximum annual daily rainfall that exceeds 10 inches within the overall 2023 Project's useful life, existing impervious area of the Proponent's Site is greater than 50% and the 2023 Project is creating additional impervious area. These factors are indicated in the Tool as contributing to the "High" exposures for the extreme precipitation (stormwater flooding) parameter. According to the MA Resilience Design Tool output report, the projected 24-hour precipitation depth associated with a 2070 50-year storm event is 9.9 inches. As noted above, the 2023 Project proposes a comprehensive stormwater management system that has been designed to attenuate peak runoff associated with present-day 2-, 10-, 25- and 100-year storms. The Single EIR indicates that the stormwater design has been expanded since the filing of the 2023 NPC and will now also achieve peak attenuation up to the 2070 50-year storm event (9.9 inches). The most current NOAA Atlas 14 precipitation data was used to evaluate peak runoff.

The Single EIR clarified that the 2023 Project is not located with a Federal Emergency Management Agency (FEMA) floodplain. According to the filing, the closest floodplain (Flood Insurance Rate Map (FIRM) Panel 25021C0154F (effective July 8, 2025)) is approximately 530 feet

[12] Available at: https://resilientma.mass.gov/rmat_home/designstandards/

away from the Proponent's Site with a base flood elevation (BFE) of 122 feet NAVD88. To assess the 2023 Project's resiliency against future flooding, the Single EIR provided a model for future storm events using the Intensity Duration Frequency (IDF) Projections from Cornell University. The model predicts that the 2070 predicted 1% storm BFE is 133 feet. The filing states that the lowest first floor elevation of the 2023 Project is 205.4 (over 83 feet higher than the current BFE and over 72 feet higher than the 2070 BFE).

In addition, the Proponent's Site is anticipated to have a 30+ day increase in days over 90 degrees Fahrenheit within the 2023 Project's useful life and the project is removing existing trees. These factors are indicated in the Tool as contributing to the "High" exposures for the extreme heat climate parameter. The Single EIR states that the 2023 Project is proposing to remove 86 trees but notes that 50 of these trees are considered deceased. To mitigate for the loss of trees on site, the 2023 Project proposes to plant 366 trees on the site. The filing also notes that 2023 Project proposes to maintain 168 mature trees on site that will be trees treated to protect and promote health through pruning, cabling, or bracing. In addition, the 2023 Project proposes to use native and adaptive plants in the landscape design and keep 28 acres of the Proponent's Site as open space. As noted above, the 2023 Project is narrowing roadway designs compared to what was proposed in the 2023 NPC to minimize impervious cover, which will help to mitigate stormwater runoff, flooding, and heat impacts.

*GHG Emissions*

Comments from DOER commend the 2023 Project's efforts to upgrade the energy efficiency of these existing buildings within the constraints of the historic regulations. The 2023 Project is committing to an improved building envelope and efficient electrification with no gas. Details of the efficiency strategy are as follows:

- Air source heat pump space heating
- Air source heat pump water heating
- Improved wall assembly to reduce air infiltration to 0.35 cfm/sf
- Improved building thermal envelope via cavity insulation to realize a factor of U-0.137
- ERV at 77% efficiency

*Construction Period*

The Single EIR clarified that construction activities will be managed in accordance with applicable MassDEP regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). As required by the Scope, the Single EIR notes that the 2023 Project will be conducted in compliance with Massachusetts Contingency Plan (MCP) requirements under 21E regulations. The Single EIR included a detailed plans to mitigate construction period impacts including a Construction Management Plan (CMP) and a Stormwater Pollution Prevention Plan (SWPPP) as well as plan to mitigate air quality during construction, traffic safety and congestion, construction scheduling, waste management, pest management, a demolition plan and a noise mitigation plan.

The Scope required the Sing EIR to address management of asbestos during construction. The Singe EIR, states that a licensed asbestos company has been contracted for the 2023 Project and has performed all the building asbestos surveys. The abatement contractor will submit AQ04 and AQ06 forms as required by MassDEP prior to commencing the abatement work. According to the filing, the

regulatory requirements for asbestos-containing waste materials will be included in the contract specifications. The Single EIR states that all asphalt, brick, and concrete (ABC) debris from demolition will be disposed of per MassDEP requirements. Any ABC material considered for re-use on-site will be filed for a crushing permit within 30 days of the work to MassDEP and Medfield Board of Health as required.

Mitigation & Section 61 Findings

The Single EIR provided draft Section 61 Findings for use by Agencies with respect to the 2023 Project, which are summarized below. As described in prior Certificates related to the Original Project, including the EENF Certificate dated April 2, 2020 and FRODs dated September 1, 2011 as amended on March 7, 2014, mitigation commitments for earlier phases consisted of wetlands replication and other requirements consistent with DCAMM's obligations under the Massachusetts Contingency Plan (MCP), M.G.L. c. 21E. Prior certificates made clear that the ensuing Single EIR would focus on the redevelopment of the 134-acre portion of the site (subject of LDA-1), of which the 2023 Project is the primary phase. The following Section 61 Findings for the 2023 Project will be supplemented as further projects are proposed on the LDA-1 portion of the site.

The following Section 61 Findings should be provided to Agencies to assist in the permitting process and issuance of final Section 61 Findings for the 2023 Project. Mitigation commitments by the Proponent are listed below.

*Land Alteration and Stormwater*

- Implement stormwater Best Management Practices (BMPs), including subsurface chambers and a bioretention basin.
- The 2023 Project includes installation of a new stormwater management system that will fully comply with MassDEP's SMS for a new development, including standard requirements for groundwater recharge, removal of at least 80% of the TSS from runoff and maintenance and reduction of pre-construction peak runoff rates under post-construction conditions for the present-day 2-, 10-, 25- and 100-year storms.
- The stormwater system has been designed to meet the Phosphorus Reduction Target of 65% for the Charles River Watershed.
- The 2023 Project will utilize erosion and sedimentation controls.
- The 2023 Project is committing to plant 366 trees.

*Transportation*

- The 2023 Project will include sidewalks and bike lanes
- Improvement to three offsite intersections at Hospital Road intersecting Harding Street, Harding Street at West Street, and Harding Street at North Street to help mitigate impact from the 2023 Project's vehicular traffic
- Implement a Transportation Demand Management (TDM) program, including:
    - Disseminate information on alternate modes of transportation
    - Provide bicycle racks and storage on-site
    - Provide dedicated parking for low-emitting fuel-efficient vehicles and/or electric vehicle charging stations

  - Develop transportation-related marketing and education materials; and
  - Host an annual mobility management educational meeting for residents.

*Water/Wastewater*

- The 2023 Project will include low flow and high efficiency water fixtures and systems.
- The 2023 Project is anticipated to provide a near total reduction of I/I into the sanitary sewer system as the existing sewer system is being replaced, removing any sources of inflow/infiltration or illicit connections. Sources of I/I will be eliminated through a network of completely new PVC sanitary sewer mains/services and precast sanitary sewer manholes to support the redevelopment, all installed to Medfield Board of Water & Sewage standards.
- The 2023 Project will comply with the Water Management Act.
- The Proponent indicates that the project will coordinate with DCAMM, the Town and the Licensed Site Professional (LSP) as needed and will continue to remain informed of the going PFAS contamination on the abutting DCAMM property.

*Cultural Resources*

- The 2023 Project is subject to a Memorandum of Agreement (MOA) (dated December 2, 2014) among the Town, DCAMM, and MHC, which documents the stipulations for historic preservation on the entire former MSH property. The 2023 Project will comply with the condition of the MOA, including and will conform to the Secretary of the U.S. Department of Interior's Standards for Rehabilitation of Historic Properties (DOI Standards).
- The 2023 Project will adhere to all local historical requirements.

*Climate Change Adaptation and Resiliency*

- The 2023 Project's stormwater system will achieve peak attenuation consistent with the 24-hour rainfall volumes (9.9 inches inches) for the 2070 50-year storm event.
- The 2023 Project is not proposing any work within a floodplain, and the Proponent's Site is approximately 0.1 miles away from the nearest 100-year floodplain and approximately 83 feet above the closest floodplain's BFE of 122 feet NAVD88 and over 72 feet higher than the 2070 BFE of 133 feet NAVD88.
- The 2023 Project is incorporating native and drought-tolerant species will be incorporated into landscaping plan.
- The 2023 Project is planting 366 trees on site.

*GHG Emissions*

- Air source heat pump space heating
- Air source heat pump water heating
- Improved wall assembly to reduce air infiltration to 0.35 cfm/sf
- Improved building thermal envelope via cavity insulation to realize a factor of U-0.137
- ERV at 77% efficiency
- Inclusion of 23 EV charging parking spaces, an additional 21 EV ready spaces
- Implementation of solar energy on building roofs and over parking lots

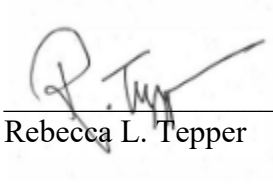
*Construction Period*

- Construction activities will be managed in accordance with applicable MassDEP regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017).
- The 2023 Project includes a Construction Management Plan (CMP) and a Stormwater Pollution Prevention Plan (SWPPP) as well as plan to mitigate air quality during construction, traffic safety and congestion, construction scheduling, waste management, pest management, a demolition plan and a noise mitigation plan.
- A licensed contractor will remove asbestos containing material and other hazardous building materials in accordance with state regulations.

Conclusion

Based on a review of the Single EIR and consultation with Agencies, I find that the Single EIR adequately and properly complies with MEPA and its implementing regulations. The 2023 Project may proceed to permitting. Participating Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12. As noted, further development of the Original Project site may require the filing of additional NPCs in the future.

October 17, 2025
Date



Rebecca L. Tepper

Comments received:

10/08/2025 Massachusetts Climate Action Network (MCAN)
10/09/2025 Bill Massaro
10/09/2025 John Thompson
10/10/2025 James Nail
10/10/2025 Anonymous
10/10/2025 Hildrun Passas
10/10/2025 Charles River Watershed Association (CRWA)
10/10/2025 Massachusetts Department of Conservation and Recreation (DCR)
10/14/2025 Massachusetts Department of Environmental Protection (MassDEP)
10/17/2025 Massachusetts Department of Energy Resources (DOER)

RLT/NSP/nsp

MEPA Comment October 10, 2025

The Massachusetts Climate Action Network (MCAN) is a 25 year old organization representing over 5,000 climate advocates statewide. MCAN's major educational and advocacy initiatives over the past three years have focused on the crucial need to minimize embodied carbon. With our comment, we will highlight the important issue of embodied carbon minimization in relation to the Medfield State Hospital Cleanup and Redevelopment Project, particularly the areas for improvement. Thank you for this opportunity to comment.

Embodied carbon refers to the total greenhouse gas (GHG) emissions generated by the manufacturing, transportation, installation, maintenance, and disposal of construction materials used in buildings and infrastructure. Embodied carbon contributes significantly to the worsening climate crisis. According to the Carbon Leadership Forum (CLF), an embodied carbon research and advocacy non-profit, about 17% of global annual GHG emissions in 2019 resulted from the industrial production of construction materials for buildings (7%) and infrastructure (10%).[1] The emissions from these construction materials enter the atmosphere before a building or a piece of infrastructure even comes into use. This makes embodied carbon an important sunk cost that requires short term addressing to meet our climate targets. MCAN urges Trinity Acquisitions, LLC in coordination with the Town of Medfield and the relevant state agencies to ensure the minimization of embodied carbon during the redevelopment of the Medfield State Hospital.

MCAN recognizes and applauds the actions proposed under the current project plan that will reduce embodied carbon. The rehabilitation of the historic buildings existing on the hospital campus is preferable to their demolition and reconstruction. Rehabilitation will reduce the total quantity of construction materials needed for this project and significantly save embodied

[1] Lambert, Michelle, and Meghan Lewis. "1-Embodied Carbon 101." With Sindhu Raju. The Carbon Leadership Forum, 06/24. https://carbonleadershipforum.org/embodied-carbon-101-v2/, 2.

carbon. Additionally, MCAN supports the prioritization of diverting demolition waste from landfills through reuse and recycling. Reusing and recycling construction materials wherever possible will reduce the embodied carbon of this project and others.

However, the project can take further steps to ensure embodied carbon minimization. MCAN urges Trinity Acquisitions, LLC in coordination with the Town of Medfield and any relevant state agencies to incorporate the following strategies into the project development process:

- **Conduct lifecycle assessment (LCA)** to identify and incorporate additional lower embodied carbon design strategies
- **Procure products with low Global Warming Potential (GWP)** by requesting product Environmental Product Declarations (EPDs) from suppliers, and selecting lowest possible GWP

Planning for and employing these strategies early in the design process will greatly increase the likelihood of identifying significant and cost effective embodied carbon reductions.

The Medfield Hospital redevelopment project should use lifecycle assessment (LCA), the principal methodology for quantifying embodied carbon, to identify opportunities for:

- Strategic reuse
- Building lighter, optimizing space, and ensuring interior efficiencies
- Material and building systems substitutions

The incorporation of these strategies to the fullest extent possible into the final design will ensure the minimization of embodied carbon. Applicable types of LCA for this project are an upfront carbon analysis or a whole building lifecycle assessment (WBLCA). An upfront carbon analysis measures the emissions from the production, transportation, and installation of the construction materials used during rehabilitation. This type of LCA is used to reveal embodied carbon hotspots that inform further design revisions to minimize embodied carbon. MCAN recommends pursuing upfront carbon analyses in accordance with the LEED v.5 credit "Quantify and Assess

Embodied Carbon".[2] WBLCA is a more effective and preferable LCA option because it creates a more comprehensive picture of the project by measuring the total environmental impacts over the duration of the building's entire lifespan (cradle to grave). WBLCA can also model a baseline building as a reference for the project building to identify the quantity of embodied carbon reduced by subsequent design alterations to the baseline building. If following this most preferred approach, the project should strive to obtain the greatest reduction achievable. Creating this model baseline building should be conducted as specified by the LEED v.5 credit "Reduce Embodied Carbon".[3]Additionally, based on draft recommendations presented to the public, the state Embodied Carbon Intergovernmental Coordinating Council (ECICC) will likely soon propose WBLCA requirements for the Division of Capital Asset Management and Maintenance (DCAMM) on large projects.[4] This illustrates the suitability of conducting WBLCA on the larger structures existing on the Medfield State Hospital campus. MCAN urges the project to, at a minimum, conduct an upfront carbon analysis of each building type targeted for rehabilitation, and to use WBLCA wherever possible, especially for larger buildings.

The Medfield State Hospital redevelopment project should also prioritize the procurement of lower-carbon products. Construction materials of the same product type can vary in their carbon-intensiveness or global warming potential (GWP) based on manufacturing practices. GWP metrics can be ascertained through Environment Product Declarations (EPDs), and the project should proactively review these as available. Free tools such as EC3[5]or BEAM[6]

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[2] Read more: https://www.usgbc.org/credits/new-construction-core-and-shell/v5/mrp2?return=%2Fcredits%2FNew%20Construction%2Fv5%2FMaterial%20&%20resources=.
[3] Read more: https://www.usgbc.org/credits/new-construction/v5/mrc2?return=/credits/New%20Construction/v5/Material%20&%20resources.
[4] Hoffer et al., "Embodied Carbon Intergovernmental Coordinating Council: Public Hearing #2 Draft: Proposals for Feedback," https://www.mass.gov/doc/ecicc-public-hearing-presentation-september-9-2025/download, 5.
[5] Read more: https://www.buildingtransparency.org/tools/ec3/
[6] Read more: https://www.buildersforclimateaction.org/beam-estimator.html

can assist in identifying and comparing EPDs. This project should actively seek to procure products with a below average GWP by referencing the product type averages in the "2025 Carbon Leadership Forum Material Baselines for North America Report".[7]At minimum the project should align with the proposed targets of the ECICC, while still seeking the lowest GWP materials as feasible.[8] For all building and hardscape materials the project should focus on at minimum:

- Asphalt
- Concrete
- Masonry
- Steel
- Insulation
- Aluminum
- Wood and composites
- Cladding
- Glass

Through proactively identifying lower-carbon products and reaching out early to product suppliers, procuring lower-carbon products can often have no associated higher cost.

MCAN urges the project to take embodied carbon into greater consideration through pursuing the above recommended approaches. Please reach out with any questions to MCAN's Embodied Carbon Director, Jack Lundgren, at jack@massclimateaction.net. Thank you again for this opportunity to provide comment.

[7] Read more: https://carbonleadershipforum.org/2025-clf-north-american-material-baselines/
[8] Hoffer et al., "Embodied Carbon Intergovernmental Coordinating Council: Public Hearing #2 Draft: Proposals for Feedback," https://www.mass.gov/doc/ecicc-public-hearing-presentation-september-9-2025/download, 8.

By Email



To: Mr. Nicholas Perry
Energy & Environmental Affairs MEPA Office

Subject: Trinity Acquisitions SEIR EEA No. 14448R

Dear Mr. Perry,

This letter is written in enthusiastic support of Trinty Acquisition's proposed project as described in the Single Environmental Impact Report published in the September 10, 2025 issue of the MEPA Environmental Monitor.

However, it also conveys my comments on the SEIR's listing of the Project's compliance to applicable MassDEP regulations and my comments on some descriptions of how the subsequent detailed "evolving", [i.e. reactive], final Construction Management Plan, will comply with them during construction and management of the materials and "potential" pollutants associated with the redevelopment.

Specifically, I am concerned about the incomplete identification of all the regulations applicable to the Chapter 9 Construction Period activities, and that several activities are conditioned with statements of "may"/"as needed"/if required"/ "upon discovery of" related to Ambient Air Pollution, Dust Control Measures, proactive Air Monitoring, Truck Decontamination/Wash, and indefinite duration of on-site storage of known ACM-contaminated material and debris.

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## I. My Background with Medfield State Hospital Issues and EEA No. 14448R

I am a 49 -year direct abutter of the former Medfield State Hospital (MSH). In 2009 after having been notified of DCAMs Release Abatement Plan for the former Hospital's Salvage Yard (RTN 2-0017471), I initiated a petition which resulted in that disposal area being classified as a Public Involvement Plan (PIP) site.

The PIP Group's primary concern was the potential release into the abutting residential area of airborne asbestos fibers during demolition of confirmed asbestos- contaminated wood-framed shops, sheds and the excavation of asbestos and lead contaminated soil and debris.

DCAM agreed to add continuous ambient air monitoring for particulates outside of the work area, establishing an air monitoring station closest to the residential neighborhood. Particulate data from downwind monitors was compared daily with upwind (background) monitors. Monitoring for airborne asbestos fibers in the work area during excavation and loading of containers and in perimeter air was included. Analyses of air samples were done on- site so that needed corrections in work practices could be immediately made. Eight-foot fencing with wind barrier/dust screens were installed, and a decontamination/truck wash station was established.

In 2010 the Salvage Yard was combined under Special Project Designation RTN 2 - 3020799 with four MCP release areas on the MSH site. As the PIP Group lead I subsequently submitted comments/concerns on DCAMM's 2010 EIR; 2011 and 2012 proposed C&D Area remediation proposals; represented the public in the Town/DCAMM 2013 C&D Area Mediated Settlement Agreement; and as a member of the Town's 2014

MSH Purchase Committee, participated in negotiations with DCAMM and in the drafting of the LDA for the sale to the Town.

MSH PIP Group efforts continue for remaining RTN 2-3020799 DCAMM activity and, most recently, for C&D Area IRA RTN 2-52059.

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II. My Comments & Requested Changes/Additions-- SEIR Chapter 9: Construction Period

A. Incomplete Applicable MassDEP Regulations

Section 9.1 Introduction:

*"…construction activities will be managed in accordance with applicable Mass DEP regulations for Air Pollution Control (310 CMR 7.10, 7.09,7.10) and Solid Waste Facilities ( 310 CMRR 16.00 and 310 CMR 19.00, including the waste ban Provision at 310 CMR 19.17)."*

Comments: There is no reference to asbestos regulations anywhere in the SEIR of 310 CMR 7.15 which was specified in DEP BWSC letter of July 7, 2023 re: Trinity's Notice of Project Change EEA#14448R--- "*The removal of asbestos from the building must adhere to the special safe guards defined in the Air Pollution Control regulations (310 CMR 7.15.).*

Construction activity will require asbestos removal.
DCAMM & Town Warning Signs are posted on Historic MSH Buildings. All of the Project's buildings which abut residential dwellings have these signs ( example shown below):



In 1998, responding to a DEP Administrative Consent Order citing violation of the State's environmental laws, the Mass Department of Mental Health commissioned ATC Associates to perform an Asbestos-Containing Building Materials Survey:

Summary of Aug 1998 Survey Results:

Confirmed ACM

- 29 Historic Buildings surveyed
  - 535,323 SF
  - 22,124 LF Pipe & Tank Insulation & Debris
  - 11,340 SF Duct Insulation
  - 81,395 sg. ft. 12x12 Asbestos floor covering & mastic

These were the survey results for one typical MSH building that abuts Residential Homes:

Bldg 18 (F-1):

Confirmed ACM:

- 2,540 LF Pipe & Tank Insulation & Debris
- 6,005 SF Duct Insulation
- 3,700 SF 12x12 Asbestos floor covering & mastic

Presumed /Suspect ACM:

- Black Ceiling Tar Paper
- Textured Ceiling Plaster Skim Coat
- Textured Ceiling Plaster Base Coat
- Rough Plaster Skim Coat
- Rough Plaster Base Coat
- Smooth Plaster Skim Coat
- Smooth Plaster Base Coat
- Horsehair Plaster Skim Coat
- Horsehair Plaster Base Coat,
- Sheetrock Wallboard
- Joint Compound
- 2' x 4' White Ceiling Tile
- 9" x 9" Floor Tile & mastic
- Carpet Mastic
- Cove Base
- Cove Base Mastic
- Red Leveling Compound
- Associated Mastic
- Exterior Window Glazing
- Exterior Window Caulking
- Exterior Door Caulking

Skim Coat Covering (brick)

ATC's Comments

- *"The roofing system was not included in the survey. Any suspect roofing materials, uncovered during future renovation activities, should be considered to be asbestos containing, unless future bulk sampling reveals otherwise."*:
- " …*since the asbestos survey activities did not include complete destructive investigative techniques, any suspect materials uncovered under multiple layers of flooring or under fiberglass insulation, and not identified in this report, should be assumed to be asbestos-containing unless future bulk sampling determines otherwise. Similarly all other suspect materials uncovered during demolition/renovation activities, should be assumed to be asbestos containing unless future bulk sampling determines otherwise."*

Add : DEP BWSC cited 310 CMR 7.15 to the Detailed Construction Management Plan's applicable regulations

..

B.. Sections 9.2- Construction Management Plan & 9.4 Air Quality Management Plan

1.). "Conditional" Air Monitoring Control Measures

9.2. 3.b." *Monitor…air quality as needed to ensure compliance with Town of Medfield bylaws".*

9.4. 5.b." *If required, air quality monitoring equipment may be deployed to ensure compliance with public health standards".*

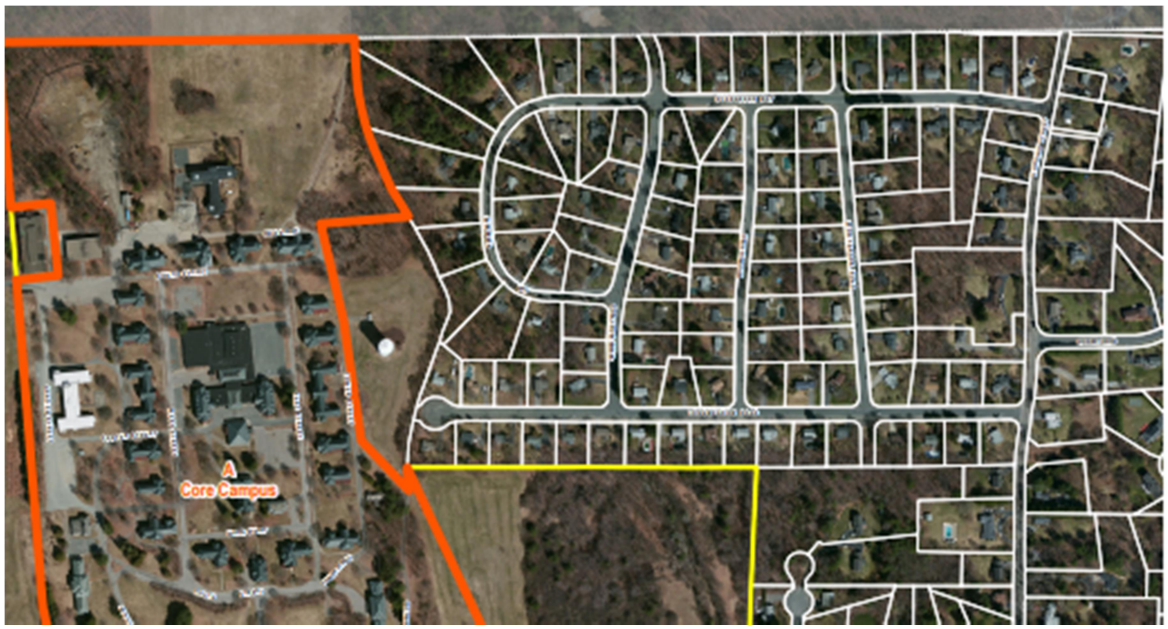
Comments: Infrastructure installation will most likely require excavation across existing asbestos-insulated steam pipelines.

Water Tower Parking Lot grading & construction may disturb lead particles from decades of original water tower sandblasting and repainting.

Gut rehab of buildings will remove and disturb both confirmed asbestos-insulated basement piping & heating systems, as well as presumed plaster, gypsum wall panels, textured ceilings, ceiling tiles, floor tiles, and window caulking which should be considered as asbestos-containing or asbestos contaminated. .

The Harding Estates development with more than 100 homes is the only residential neighborhood abutting the proposed Trinity Project. There are 29 homes within 1000 ft of MSH Buildings 14,15, 16, 17, 18, 19, 20, 21, 22 and 28..

There are 54 homes within 1500 ft..



Add : Statement on Equipment and procedures in the Detailed Construction Management Plan for ambient air monitoring of asbestos and lead particulates between work area perimeter and the abutting residences.

Air Monitoring Plan to be reviewed and overseen by a licensed asbestos technician.

Conduct two rounds of monitoring per 8-hour day..

2.). "Conditional" Fugitive Dust Control

9.4.b. "*Construction fencing may also include wind screens to limit dust migration beyond the site boundary."*

Comment: During initial infrastructure installation, construction of the Water Tower Parking Lot and during the gut rehab and remediation phases of the buildings, the public, e.g. dog walkers, hikers, will have continued access to the North Field, the Charles River Overlook and the Trails.

:

Add: Detailed Construction Plan description to include wind barrier/dust screens on pedestrian- accessible perimeter fencing to minimize wind erosion and transport of dust from open excavations as well as to limit trespassing in work areas during non- work hours.

3. "Conditional " Truck Wash/Decontamination

9.4.4.c. Material Handling & On-Site Mgt

" *Wheel- wash stations may be installed at site exits to prevent dust and soil from being transported off site by vehicles."*

Comment: Add:

Construction of a station to decontaminate equipment and vehicles prior to their exiting the Site. Wash water will be collected and discharged on site through a 5- micron filter prior to discharge.

Decontamination derived soil and debris from the decontamination station will be collected and disposed of as ACM.

C . Stockpiling of Hazardous Material

Section 9.10 Demolition Plan

Item 2 Material Sorting and On-Site Management

*" a. Demolition debris will be segregated at the source to facilitate… identification and separation of:*

*b. Hazardous materials (e.g. asbestos, lead paint, contaminated soils*.)"

Comment: Add:

Stockpiled Asbestos Contaminated Material, and Asbestos/Lead- Contaminated Soil will be transported off-site as soon as possible after removal/excavation.

Thank you for this opportunity to comment on Trinity's SEIR.

William Massaro
36 Evergreen Way
Medfield, MA 02052-1013

Town of Medfield cc:

Kristine Trierweiler, Town Administrator
Gus Murby, Select Board Chair
Osler Peterson, Select Board
Eileen Murphy, Select Board
Maria De La Fuente, Land Use & Planning Director
Teresa James, Planning Board Chair
Steve Resch, Public Health Director
Carol Read, Board of Health Chair

October 10, 2025

*Via email*

Nicholas Perry
MEPA Office, Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Nicholas.Perry@mass.gov

**Re: Medfield State Hospital SEIR**

Dear Nicholas,

Charles River Watershed Association ("CRWA") submits the following comments on the Single Environmental Impact Report ("SEIR") for the proposed Medfield State Hospital Clean Up and Redevelopment project in Medfield filed with the MEPA Office on September 2, 2025. This SEIR followed a 2023 Notice of Project Change ("NPC").

CRWA has previously commented on this project and is generally supportive of redevelopment at the former state hospital. We recognize the project proponent's efforts to improve the site, while at the same time, continue to emphasize the importance of stormwater management, flood mitigation, water quality protection, preservation and enhancement of tree canopy, minimization of overall impervious cover, adaptation to extreme heat and drought, and overall climate resilience. We offer the following comments on the SEIR.

**PFAS & Heavy Metals Contamination Concerns**

The project proponent should continue to be mindful of the project's proximity to the remediated former state hospital construction and debris ("C&D") area and take mitigation actions as needed. The response to comments in the SEIR indicates that remedial activities have been completed; however, groundwater sampling conducted in May 2025 identified the presence of PFAS, lead, and zinc above applicable state standards in several monitoring wells. The proximity of these monitoring wells to the Charles River triggered an Immediate Response Action ("IRA") for PFAS contamination, and the area subject to the planned IRA assessment activity is located along the south bank of the Charles River and includes restored wetland from the former C&D area remediation, as well as undeveloped upland areas outside of the former

C&D area. The assessment activities will attempt to ascertain potential sources of PFAS contamination and develop a human and environmental risk characterization for the site. Our comments on the draft IRA are attached for reference.

This is an evolving situation and much more information is needed to identify potential sources of PFAS contamination, evaluate the extent of the contamination, and determine whether additional remedial activities are necessary to protect human and environmental health. We request that the proponent monitor the situation carefully, assist/cooperate with DCAMM as needed, assess what implications the assessment's findings may have for the redevelopment project, and take appropriate mitigation actions if warranted.

**Protection and Enhancement of Tree Canopy**

CRWA reiterates that trees and other vegetation improve air and water quality, help control stormwater runoff and flooding, and provide natural cooling. We appreciate the proponent will be preserving many existing trees, but the current proposal anticipates removing about a third of the existing tree cover on site. It is not clear from Figure 5-5 which trees are proposed for removal and where they are located (there is no legend associated with Figure 5-5). While the SEIR provides more detail than the NPC in terms of the total number of trees and total diameter at breast height proposed for removal, there is still no information about tree species and age. And although the proponent plans to plant hundreds of new trees, we note (as the proponent has acknowledged),[1] that the benefits of new saplings will not be the same as any mature trees removed, and it will take decades for those benefits to be realized.

The RMAT report listed the project's vulnerabilities as including high exposure to stormwater flooding during extreme precipitation events and extreme heat. In addition to the other stormwater management measures proposed for the project, preservation of existing mature trees provides critical stormwater management. Mitigation for extreme heat does not appear to be addressed in the SEIR, but preservation of healthy, mature trees is an important component of heat mitigation—particularly trees near impervious areas—as these trees provide important cooling and shade benefits that will take decades for new trees to achieve.

CRWA continues to urge that as many existing trees as possible—particularly trees located in close proximity to impervious surfaces—be preserved.

[1] "Many of the removed trees are mature and very large and planted trees would be small saplings. Hence, the mitigation would not be realized for several decades." SEIR at 8-11.

**The SEIR is Missing Required, Critical Information**

The SEIR appears to be missing certain critical information required by the Secretary in her Certificate on the NPC.

The Secretary's NPC Certificate instructed that the SEIR "should demonstrate that the Proponent is developing appropriate strategies to adapt to extreme heat conditions and drought conditions throughout the useful life of the project."[2] Aside from a reference to proposed landscaping being native drought tolerant species,[3] and several acknowledgments throughout the SEIR of the project area's vulnerability to extreme heat, there is no specific discussion of strategies the proponent is taking to adapt to extreme heat and drought. This is especially problematic given the RMAT report identifying the project's vulnerability to extreme heat, and drought becoming increasingly common in this region.

The Certificate also instructed that the SEIR "should document all efforts taken to maximize the use of LID strategies for stormwater management, including rain gardens, bioretention areas, tree box filters, pervious pavement, water quality swales and green roofs."[4] With the exception of bioretention areas and references to LID strategies generally, there is no mention in the SEIR of any of these other specific LID strategies. As a result, we do not know if the proponent has considered them or whether they could be feasibly implemented on the site. As mentioned above, the RMAT report indicated that this project is highly vulnerable to stormwater flooding during extreme precipitation events and extreme heat, both of which are further exacerbated by climate change. In addition to improving stormwater management, many of these strategies promote overall climate resilience, and should be given thorough consideration.

It is not possible to understand and provide feedback on the full impacts and benefits of this project without this critical information.

**We support the following project elements, as described in the SEIR:**

- Narrower roadway designs, as minimizing impervious cover will help to mitigate stormwater runoff, flooding, and heat impacts;

- Use of low-flow water fixtures to reduce water demand, though we urge the proponent to continue looking for ways to minimize irrigation water demand—especially

[2] NPC Certificate (July 14, 2023) at 19.
[3] SEIR at 4-13.
[4] *Id*.

considering that this region has been experiencing drought conditions more and more frequently (and we are currently in a drought), non-essential outdoor water uses like lawn watering should not be a priority use of limited water resources;

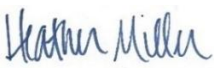
- Implementation of solar energy on building roofs and over parking lots;

- Provision of electric vehicle charging stations beyond the minimum required by the Town; and

- Inclusion of affordable housing.

Overall, the Town and Trinity have put great effort into creating a plan for the redevelopment of Medfield State Hospital that attempts to accommodate the needs of both the public and the environment. Thank you for considering these comments, and please feel free to reach out with any questions.

Sincerely,



Heather Miller
General Counsel

Attachment

Charles River Watershed Association

September 9, 2025

*Via email*

Jonathan Moore, Project Manager
Division of Capital Asset Management & Maintenance (DCAMM)
Jonathan.Moore@mass.gov

**Re: Draft Immediate Response Action (IRA) Plan for Release Tracking Number (RTN) 2-52059 (PFAS detection at the former Medfield State Hospital site)**

Dear Jonathan,

Charles River Watershed Association (CRWA) submits the following comments on the draft Immediate Response Action (IRA) Plan for Release Tracking Number (RTN) 2-52059, associated with the detection of per- and polyfluoroalkyl substances (PFAS) in groundwater samples collected within a portion of the former Medfield State Hospital (MSH) property located at 45 Hospital Road, along the Charles River in Medfield. "The objective of the IRA is to preliminarily evaluate the nature and extent of the PFAS impacts in Site groundwater and to evaluate the need for potential future response actions for PFAS."[1]

PFAS are persistent "forever chemicals"—they do not break down and will remain in the environment for long periods of time, if not indefinitely. PFAS are highly mobile in water and can quickly migrate long distances away from their original sources. PFAS have been found to be toxic to people at extremely low levels. Health concerns associated with PFAS exposure include changes to metabolism, decreased fertility, reduced ability of the immune system to fight infections, and cancer. Impacts from PFAS can be particularly harmful to vulnerable populations such as fetuses, infants, and children. Studies have found that Perfluorooctanoic acid ("PFOA") and

[1] IRA at 8.

Perfluorooctanesulfonic acid ("PFOS") can have significant and lasting impacts on children's health at levels as low as 1 part per trillion ("ppt"). Although the health impacts of PFOA and PFOS are the most widely studied, there is evidence to support that due to structural similarities, the health concerns of PFOA and PFOS are representative of PFAS as a class of chemicals. Thousands of distinct PFAS chemicals have been produced, and these chemicals can have cumulative impacts on human health.

Surface waters like the Charles River and its tributaries are inextricably linked to groundwater and drinking water. PFAS enter surface water through groundwater discharge, runoff from contaminated land, and discharges from industrial sites and wastewater treatment plants. Surface waters in turn, along with groundwater, are sources of drinking water. And much of the drinking water used in our homes eventually makes its way back to surface waters, whether through treatment and discharge from a wastewater treatment plant or because it is used for irrigation or other outdoor uses and migrates back into the soils, groundwater, and then surface waters.

Groundwater sampling conducted in May 2025 at the MSH site identified the presence of PFAS above the applicable state standards in three monitoring wells. The proximity of these monitoring wells to the Charles River triggered this Immediate Response Action. The area subject to the planned IRA assessment activity is located along the south bank of the Charles River and includes restored wetland from the former construction and demolition area (C&D area, which contained C&D debris, other debris, and ash from the former on-site power plant) remediation and undeveloped upland areas outside of the former C&D area.

As part of the IRA, DCAMM will research properties adjacent to the MSH site to evaluate for potential upgradient PFAS sources (e.g., upstream on the Charles River), evaluate available background data for the Charles River, perform forensic evaluation to identify and compare the chemical fingerprint of PFAS compounds in groundwater and surface water to identify potential sources and evaluate differences in PFAS compound ratios, perform hydrogeologic desktop review to evaluate potential connections between MSH site groundwater and nearby public water supply wells, and conduct additional groundwater sampling.[2] The draft IRA indicates that if it is "deemed necessary," surface water sampling and groundwater sampling from

[2] IRA at 8.

additional existing or new monitoring wells will also be performed.[3] Based on the assessment data, DCAMM will develop a human and environmental risk characterization.[4]

CRWA strongly recommends that surface water sampling and groundwater sampling from additional existing/new monitoring wells be planned as proactive measures in the IRA—not only "if deemed necessary." In particular, surface water sampling should be required in order to assess whether PFAS are present in the Charles River at this location, and at what levels. The IRA does not specify the circumstances under which such additional sampling would be considered necessary, and we do not have confidence in DCAMM or their consultant to make this determination accurately. We note that in their January 2025 memo to DCAMM, Weston & Sampson indicated that they did not believe there was a need for *any* groundwater sampling of PFAS on the MSH site; however, once sampling was conducted—at the urging of the Town, public, and MassDEP—PFAS were detected at levels above the state standards. DCAMM should not take the same flawed approach here and assume the absence of PFAS; they should be proactive and conduct both surface water and additional groundwater sampling to confirm or rule out the presence of PFAS and take appropriate action accordingly.

Thank you for considering these comments.

Sincerely,

Heather Miller

Heather Miller, General Counsel

cc: Susan Ruch, DCAMM
Kristine Trierweiler, Town of Medfield Administrator
Jessica Wall, Medfield Environmental Counsel
Bill Massaro, PIP Group Leader
Mark Baldi, MassDEP Deputy Regional Director

[3] IRA at 8-9.
[4] IRA at 9.

*The Commonwealth of Massachusetts*
*Department of Conservation and Recreation*

State Transportation Building | 10 Park Plaza | Suite 6620 | Boston, MA 02116
www.Mass.gov/DCR | **Tel:** (617) 626-1250

| Maura T. Healey | Kimberley Driscoll | Rebecca L. Tepper | Nicole LaChapelle |
|---|---|---|---|
| ***Governor*** | ***Lieutenant Governor*** | ***Secretary*** | ***Commissioner*** |

October 10, 2025

Secretary Rebecca L. Tepper
Executive Office of Energy and Environmental Affairs
Attn: Nicholas Perry, MEPA Office
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Re: EEA#14448R – Medfield State Hospital Single EIR

Dear Secretary Tepper:

The Department of Conservation and Recreation ("DCR" or "the Department") is pleased to submit the following comments in response to the Single Environmental Impact Report ("SEIR") filed by Trinity Financial, LLC (the "Proponent") for the proposed residential development (the "Project").

As described in the SEIR, development will be focused on the 48-acre Core Campus of the former Medfield State Hospital that will be transferred to the Proponent. The Project includes the construction of 334 multifamily units, with related open space, amenities, pedestrian and traffic circulation and parking.

DCR's Medfield Charles River Reservation ("MCRR") is located adjacent to the Project site with state forest blocks to the southeast and directly abutting the Project on the western side. MCRR includes an extensive trail network that connects with the Bay Circuit Trail, a long-distance hiking trail maintained by the Appalachian Mountain Club ("AMC"). The Bay Circuit Trail / Charles River Trail Link connects from the northwestern corner of the Project site to the adjacent side of Hospital Road and Medfield's McCarthy Park where public parking is available.

The Proponent intends to enhance publicly accessible trail opportunities. DCR appreciated the chance to meet and discuss trail connections with the Proponent in June 2025. DCR requests the opportunity to continue working with the Proponent to ensure that DCR staff and visitors will continue to have roadway access through the Project site and ensure the best results for future use of the public trail system. A management agreement with AMC related to connecting with the Bay Circuit Trail is advisable.

The Proponent is directed to coordinate with Senior Trails and Greenways Planner Ale Echandi Alexandra.Echandi2@mass.gov and Central Valley District Manager Kevin Hollenbeck kevin.hollenbeck@mass.gov related to public trail connection planning efforts.

Sincerely,

Nicole LaChapelle

Nicole LaChapelle
Commissioner

cc: Priscilla Geigis, Patrice Kish, Bob Fitzgerald, Ale Echandi, Kevin Hollenbeck

Thank you for giving me the opportunity to submit comments as you are reviewing the single environmental impact of the Medfield State Hospital (MSH) redevelopment, File EEA 14448R.

I have been a resident of Medfield since 2003 and live close to the MSH. I am submitting comments here as a private resident, not on behalf of any organization. Over the years, I have been following the fate of the MSH closely, both as an interested resident and as a member of the Medfield Energy Committee.

Firstly, I would like to emphasize that I, like most of the town residents, want this project to move forward and am excited that Trinity is working to redevelop the MSH campus with a view to retaining the historical character of the site. I applaud that Trinity, in the current version of the project, will limit the lifecycle green house gas (GHG) emissions by rehabbing the existing building (lower embodied carbon), committing to all-electric buildings (no fossil fuel), adding more EV chargers than required by code, and using energy efficient ERVs and HP water heaters. I recognize that this is a massive, complicated and expensive redevelopment for Trinity, especially at this time.

My comments are grounded in the desire to help make this huge project a redevelopment that future generations of Medfielders and tenants of the campus can enjoy, a point of pride to the town of Medfield, and another unique asset to the historical treasure chest of Massachusetts, all while keeping the future GHG pollution to a minimum.

The redevelopment of the MSH, which has been closed for more than 20 years, will greatly increase the town's GHG emissions. To meet the town's and the state's goal of becoming net zero emissions by 2050, every reasonable effort should be made to minimize future emissions. I am especially concerned about the minimal nature of the proposed envelope insulation, both in the walls, the attics and the use of double paned windows. I want to be sure that the envelope is well insulated and assume that the historical exemption does not apply to those specific features as such insulation would not be visible. According to the 2010 rules, there is no blanket historical exemption, but it '..only exempts historic buildings from those provisions that would cause damage to the historic character of the building..' (see attached MassSave technical solutions sheet).

My concern is

1. Affordability
    a. If the current levels of energy inefficiency are kept, future tenants will have to pay for the high utility cost either in rents or utility bills. This is clearly a concern for the Commonwealth and should also concern the developer.

2. Tenant comfort and retention
    a. Highly energy efficient buildings have documented higher tenant satisfaction in term of comfort and affordability, leading to longer-term tenant retention, which the developer should welcome.

3. High future GHG emission
    a. Unless there is a commitment to choosing 100% renewable energy throughout the campus, the projected high energy use will result in higher than desirable GHG

emissions. Choosing better envelope efficiency at this time will be more cost effective than having to add it later on.

In addition, I would like to encourage the developer to re-examine the addition of PV systems where possible (tiles or over parking spaces) and the deployment of ground-source HPs, potentially also discussing with the town the use of the undeveloped part of the property (parking lot at the water tower, North Field).

There are many wonderful aspects to this project and I am very supportive of it moving forward.

Comments submitted by:

Fred Davis, a 36-year resident of Medfield, MA, commenting as and individual, not on behalf of any organization. Mr. Davis has a 40-year career in building energy efficiency, including auditing, retrofitting, insulation, solar, and especially lighting; spanning residential, multifamily, municipal, commercial sectors. A leader and speaker at programs and professional conferences. For the last decade, a leader in regional climate organizations; presenter and convenor providing programs and training in lowering carbon in facilities. Current affiliations: President, Massachusetts Climate Action Network; member, Medfield Environment Action. Previous affiliations: member, Medfield Energy Committee from its inception, Chair 2019-22; organized or attended most Medfield meetings related to energy at Medfield State Hospital redevelopment, 2019-2023.

Jim Nail, a 30-year resident of Medfield, MA, commenting as an individual, not on behalf of any organization. As a former member of the Medfield Energy Committee (MEC), Mr. Nail led MEC's work on this project, studying the proposal closely and attending numerous hearings, both during the RFP process and following the award of the project. He attended the Special Town Meeting where the RFP responses were presented to the Town, spoke in favor of the Trinity proposal, and voted in favor of it. Over the past 20 years, Mr. Nail has been deeply engaged in decarbonization efforts, focusing on the under-served building sector of houses of worship with Massachusetts Interfaith Power & Light. He has helped 60 houses of worship install solar panels (many in historic districts) and developed "Net Zero Over Time" plans for 40. In 2019, he formalized his knowledge of building science by successfully completing the HERS Rater Training course, earning provisional certification.

**Introduction**

Thank you for the opportunity to comment on the redevelopment of the Medfield State Hospital campus. Our comments will focus on the impact of this development on the ability of the town of Medfield and the Commonwealth of Massachusetts to meet the goal of a 50% reduction in carbon emissions by 2030 and to achieve net zero emissions by 2050. We will primarily focus on the estimated direct and indirect carbon emissions from Stationary Sources in the Proposed Mitigation Scenario.

As long-time residents of Medfield, we are excited at the potential of seeing the Medfield State Hospital property being preserved and restored as a unique cultural and historical asset of the Town.

As citizens concerned about the climate emergency, our hope is that the development can be a model of balancing the needs of preserving historic features with the need to minimize its carbon footprint, all while meeting the financial goals of Trinity and its investors. No easy task but exactly the type of situation we, as a society, must face as the impacts of climate change demand more action and more creative approaches.

The proposal already includes many strong climate benefits in its favor:

- **Lower embodied carbon:** Rehabilitation of the buildings should have a far lower embodied carbon footprint than the alternative of demolishing these buildings and constructing new ones.
- **All-electric strategy:** Trinity's commitment to an all-electric strategy (and not bringing a natural gas line onto the campus) will have a lower carbon footprint than had natural gas been included in the development. This was a significant factor in our decision to vote in favor of their proposal.
- **Heat pump water heaters:** We believe these are an excellent choice due to their higher efficiency than electric resistance water heaters.
- **ERV efficiency improvement.** The Proposed Mitigation Scenario upgrades the ERV from 50% efficient to 77% efficient.
- **EV chargers.** We applaud Trinity for going above code requirements to install 140 EV or EV ready parking spaces, encouraging residents to drive electric vehicles which will have the subsequent effect of lowering the carbon emissions of the transportation associated with the development.

We also acknowledge that this is an extremely challenging project for Trinity both financially and logistically, while requiring a balance of historic preservation with the needs of 21st century inhabitants. Further, we acknowledge it will not be possible to bring energy efficiency up to the level that new construction could achieve. But this trade-off is worthwhile both from the perspective of preserving a valuable historical asset and given the higher embodied carbon emissions that new construction would represent.

That said, we further believe there are a number of affordable and feasible actions that can be taken to lower the carbon footprint of the development that should be explored more fully.

**Clarification Questions**

The Code Compliant scenario states that it was modeled to the MA 2023 Massachusetts Stretch code (IECC 2021with MA Amendments) and states, "the assemblies of the code-compliant models meet the minimum R-value requirement according to IECC 2021." Other statements appear to be in conflict with this:

- **Inconsistent statements about the level of insulation.** On page 7-7, it states "the proposed mitigation design increased the overall wall U-factor from U-0.272 to U-0.137", i.e., the Proposed Mitigation Scenario increased insulation. Then on page 8-11, it says "the proposed mitigation model includes envelope R-values that are slightly below current energy code requirements." In short, page 7-7 says the proposed mitigation scenario increased insulation while page 8-11 says it is below code.
- **Discrepancy between claims of the relationship of planned insulation values and code requirements.** As noted above, the plan states the overall U-factor for the wall assembly in the code compliant scenario of .272 which equates to R-3.67, while U-factor of 0.137 which equates to R-7.3. IECC 2021 code requires R-17 for a mass wall without exterior insulation https://codes.iccsafe.org/s/IECC2021P2/chapter-4-re-residential-energy-efficiency/IECC2021P2-RE-Ch04-SecR402.1.3 Similarly, the roof is stated to have R-41 insulation, significantly below code R-49.
- **No description of insulation strategies or materials.** The U-factors noted above are consistent with the insulation values of the brick walls by themselves. Since there is no information about the materials or insulation techniques, it is difficult to evaluate this part of the proposal.

The next draft of the report should correct or explain these inconsistencies.

**Observations**

Before presenting suggestions, here are some facts about the energy usage of the campus:

- **It will have high energy use relative to other multi-family apartments.** I calculated the Energy Use Intensity (EUI) of the Proposed Mitigation Scenario to be **63.1** (see Appendix 1). This is 50% higher than the **41.6** EUI level which is the average of apartment buildings with 5+ units in the Northeast. (Source: The Residential Energy Consumption Survey (2020) of the Energy Information Administration, Table CE1.2).
- **Residents will face expensive utility bills or rents.** Whether utilities are included in the rent or paid directly by the residents, this inefficiency will hit their wallets. Based on the projected annual electricity consumption, the electricity for a 1000 sq. ft. apartment would cost $4000 annually or about $340 per month at the current rate of approximately $.30/kwh (see Appendix 2). This

high energy use increases the importance of finding all opportunities to increase the energy efficiency of the buildings.

- **Any development on the site is a net addition to the carbon emissions of the town and the Commonwealth.** The Existing Scenario modeled for the report is not an accurate representation of the current situation. While using this scenario as the baseline allows the claim of a 29% reduction in carbon emissions, it does not reflect the reality of the property for the past 22 years or a likely alternative development scenario. The hospital was officially closed in 2003 thus in the past 22 years, the property generated essentially zero carbon emissions. Further, this scenario models restoring the buildings to their use as a fully-occupied residential hospital facility with no energy performance improvements, an unlikely prospect. The report notes the existing buildings are not in compliance with current energy codes and could not reopen without significant improvement.

  As the Commonwealth strives to achieve its carbon reduction goals, it should account for the addition of the roughly 6500 tons of carbon emissions that this development will generate. We acknowledge that increasing housing availability is another critical goal of the Commonwealth and suggest that this development be viewed as a new housing development and consider strategies to offset the increased carbon emissions in accordance with policies that apply to these developments.

**Opportunities to Decrease Carbon Emissions**

We propose there are three paths to explore that would achieve the dual goals of promoting the redevelopment of MSH and further lowering carbon emissions.

**#1 – Require the campus to consume only renewable electricity**

Because the campus will be all electric, the carbon emissions attributable to stationary sources can be eliminated if 100% of that electricity is sourced from renewable generation. And 100% renewable electricity can be lower cost than the Eversource Standard R-1 rate, making it a win both financially and environmentally. The project has three options to pursue renewable electricity:

1. **Join the Medfield Community Electricity Medfield 100 program.** Medfield's Community Aggregation program offers a 100% renewable electricity option. Not only does this program provide carbon-free electricity, Medfield 100 is currently $.00776/kwh less expensive than the Eversource Basic Rate, so it is a win both for the environmental sustainability of the project and also for the wallets of residents. Also, adding the substantial MSH load to this program could give the town greater leverage in future rate negotiations.
2. **Procure renewable energy on its own:** With this large load, Trinity could likely directly procure electricity from solar or wind farms.

3. **Install solar panels on the campus.** The filing notes that Trinity has evaluated 5 locations for solar panels that Public Archeology Laboratory indicated may be approved within the restrictions of the NPS. Trinity could engage a solar developer in a power purchase agreement model that would not require them to finance the installation themselves. This has the added benefit of providing 20 or more years of stable, known electric rates which generally begin 10 – 20% below current utility rates and typically include only a 1 – 2% "escalator", (i.e., annual inflation factor). We acknowledge that current federal policy for renewable energy tax credits complicates decision-making around solar installations, but the significant amount of electricity these 5 sites would generate merits continued effort to incorporate them into the campus.
4. **Explore feasibility of Tesla solar tiles, or another suitable building-integrated PV roofing system.** Since the NPS is allowing the use of synthetic slate in the rehabilitation, this may be a viable option that would enable most roofs on the campus to produce solar energy. Tesla originally offered a solar tile that mimicked slate and perhaps could be special-ordered for a project of this size (see this Scientific American article, https://www.scientificamerican.com/article/will-tesla-rsquo-s-tiles-finally-give-solar-shingles-their-day-in-the-sun/).

**#2 Identify further energy efficiency improvement options**

At this stage of design, many details of the specific energy efficiency tactics and materials are yet to be determined. The report notes on page 8-11 "at the building permitting stage, the code officers may reduce the code compliant requirements for the MSH buildings." This would increase EUI and carbon emissions further so it is important that Trinity be encouraged to explore further energy efficiency opportunities beyond the commendable steps they have already taken. As the project moves to the next stage of design, there are a number of specific opportunities that merit evaluation:

1. **Engage New Ecology (NEI) in a more detailed review of building plans to identify other energy efficiency options.** In the RFP, Trinity included New Ecology as their sustainability consultant. At a hearing in 2023 following Trinity's release of initial building plans, Mr. Nail attended a hearing and asked if Trinity had engaged NEI in providing energy efficiency suggestions. The Trinity representative said this had not been done and stated that NEI's role would only be to prepare environmental compliance reports like MEPA. There is no indication in this draft that NEI was tasked with exploring other energy efficiency options. Giving NEI this assignment would be consistent with the Expanded NPC's statement on page 15 "…I strongly encourage the Proponent to incorporate commitments to green building and other sustainable design elements…" Possible improvements that could be evaluated:

a. **Improve attic insulation**. Current plans state that the newly-constructed roofs will have R-41 insulation, below code of R-49. But since Trinity is reconstructing all the roofs of the buildings, they should be able to design for a higher level of insulation at little incremental cost. We had the opportunity to inspect building 22 and noted that the beams supporting the roof are quite large and so should be able to accommodate higher levels of insultion.
b. **Evaluate higher wall insulation levels.** The report notes that the historic designation and the masonry brick construction limits the ability to add wall insulation. Typically, interior wall insulation in brick buildings is limited due to risks of damage: any water absorbed by the brick could freeze in cold weather without heat being conducted through the walls. However, this is highly dependent on the quality of the brick, as noted in this paper by Joe Lstiburek of Building Science Corporation https://buildingscience.com/documents/insights/bsi-047-thick-as-brick The article describes testing to determine the "degree of critical saturation" which determines a brick's vulnerability to damage. However, Mr. Lstiburek also suggests visual examination as an appropriate method to determine the brick's resistance to damage. A visual examination suggests that the brick in the MSH buildings is high quality and not subject to damage: despite the buildings being unheated for over 20 years – and thus without heat transfer through the walls to dry them out -- there is virtually no damage to brick, even in areas where gutters have failed and there is evidence of extensive water exposure. This suggests that higher levels of insulation could be introduced to the walls without risking damage.
c. **Upgrade to triple pane windows.** Triple pane windows have a U-Factor of 0.12 – 0.15 compared to the U-Factor of 0.30 of the double pane windows described in the filing. European Architectural Supply in Littleton MA imports highly energy efficient windows from Europe, stating that they can deliver them at the same cost as American-made double-pane windows. In addition, there is no charge for custom sizes. A first step might be for Trinity to provide the specs of the windows that meet NPS standards to EAS to see if this company can provide them cost effectively.

**#3 Conduct a more comprehensive analysis of a geothermal district heating system.** Ground source heat pumps can have COP values between 4.0 and 5.0 compared to 2.7 for air source heat pumps, suggesting a 50% - 85% reduction in electricity usage for space heating, a benefit to both the carbon footprint of the development and the pocketbooks of residents.

The Medfield Energy Committee (MEC) analysis of Trinity's preliminary feasibility study referenced on page 8-4 addressed the issues raised in this study – of hazardous site conditions, insufficient space for boreholes, and cost. Trinity acknowledges the MEC's critique and alludes that "Trinity looked further into the alternatives" but does not answered in this filing:

1. **Co-location of geothermal piping with other infrastructure being installed minimizes risks of underground hazards.** The engineering evaluation Trinity commissioned stated that one of the major impediments to a geothermal system is "Installation of this piping is likely to encounter numerous active and abandoned below-grade structures and utilities, some of which likely contain ACM." However, given the need to install new water, sewer and utility lines, they are likely to run into this situation anyway. The geothermal piping could be co-located with this infrastructure thus minimizing any additional exposure to these hazards.
2. **Additional area for boreholes is available.** The other major impediment cited was insufficient space to allow for the number of boreholes required to serve the entire project. The engineering evaluation Trinity commissioned limited the area evaluated to the parcel being transferred to Trinity but the feasibility study did suggest discussing with the Town locating additional boreholes outside this area. However, the town is allowing Trinity to build a parking lot outside this area (eg, near the water tower) so this is a conversation the Town should be open to. Once drilling is complete and the land restored, there is no evidence of the presence of boreholes so other areas outside the parcel being transferred could also be used with no detriment to the town's interest. Even so, new drilling technologies may make this unnecessary (see the discussion of Celsius Energy following these bullet points).
3. **Federal tax credits and state incentives pay for up to 50% of the cost.** The filing cites a cost of $50 million for a geothermal system on the site. This would be offset by the 30% federal tax credit for geothermal projects which remains in effect and generous incentives available through MassSave. Together, these could cover potentially half the cost of this installation, significantly decreasing the cost difference between air source heat pumps and the geothermal system. At the Northeast Sustainable Energy Association Conference in 2022, I attended 3 sessions in which experts stated that after these incentives, geothermal systems can be the lowest installation cost option. The engineering team noted the availability of these incentives but suggested Trinity consult experts in these benefits to quantify them. There is no evidence they have pursued this.
4. **Geothermal systems have longer expected useful life thus a lower lifecycle cost**. Equipment replacement costs will be higher with an air source heat pump system than a geothermal system. The engineering evaluation Trinity

commissioned stated "three (3) replacements [of outdoor air source heat pump equipment] will be required before the loop warranty [of the geothermal system] expires." Each replacement cycle of air source heat pumps is likely to cost millions of dollars, helping offset the higher first-installation costs for geothermal.

5. **Third-party ownership and operation of the geothermal system removes the capital cost from the project**. Analogous to a power purchase agreement for solar, this approach removes the first-cost from Trinity's balance sheet for the project. In fact, this solution removes all the cost of the heat pump equipment from Trinity's balance sheet, presumably improving first-cost financials of the project. At the time, the Medfield Energy Committee had presented several case studies and a list of companies that had installed such systems.

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A geothermal district system also has significant benefits to historic preservation. The campus had a district heating system and this would modernize that feature of campus operations. More importantly, this would likely allow all HVAC equipment to be located in the basements of the buildings whereas and air-source heat pump system will require locating potentially hundreds of heat pump compressors outside of the buildings which would not be in keeping with the historic fabric of the campus.

In addition, I'd like to draw attention to new diagonal drilling technology that significantly lowers the cost of boreholes, the largest cost of a geothermal project. Eversource deployed this technology in their Framingham pilot district geothermal energy system, hiring Celsius Energy, a spinoff of oil field services company Schlumberger (see https://www.celsiusenergy.com/us/our-portfolio/first-utility-scale-geothermal-heating-and-cooling-network-in-the-us/ ). The case study cites a 42% reduction in the number of boreholes required, reducing both construction time and costs; this would also likely address the concern about the limited space available in the parcel to be transferred to Trinity. Celsius Energy's US office is in Cambridge, MA.

Given the already-complicated nature of this project, we would like to suggest that the EOEEA, DOER, or other agencies consider how they might assist the developer financially, technically, or otherwise to make this district heating system possible. In addition to the benefits to the residents and the historic fabric of the campus, it would give the Commonwealth a major showcase of our low carbon innovation.

**Conclusion**

The redevelopment of the Medfield State Hospital property will be a wonderful place to live for the fortunate future residents, a source of pride for the town of Medfield, and an asset to the Commonwealth's history. We commend Trinity on the many energy

efficiency improvements already planned for the development. We hope the suggestions we have made will be seen as additional steps to further improve on Trinity's commitment to sustainable development of the Medfield State Hospital property.

**Appendix 1 – Energy Use Intensity of MSH Proposed Mitigation Scenario**

Using the data and assumption below, we calculated the Energy Use Intensity under the Proposed Mitigation Scenario to be **63.1**.

The Residential Energy Consumption Survey 2020 (Table CE 1.2) shows the average EUI of buildings with 5+ residential units in the Northeast Census division to be **41.6**

**Conclusion: As proposed in the Proposed Mitigation Scenario, the MSH buildings will be 50% less efficient than the average comparable building.**

**Energy Use Intensity Calculation**

**Calculation of EUI**

25,256,862 Total kBTU divided by 400,094 sq. ft conditioned space = 63.1 kbtu/sq ft/year

**Supporting Calculation #1: Calculation of Total BTU base on electricity consumption**

5,429,000 kwh total annual electric use of MSH buildings

- 4,000,000 kwh used for non-heating purposes @3214 BTU/kwh = 12,856,000,000 BTU
- 1,429,000 kwh used for space and water heating @2.7 COP(=8678 BTU/kwh) = 12,400,862,000 BTU
- **Total BTU 12,856,000,000+12,400,862,000 = 25,256,862,000 = 25,256,862 kBTU**

**Appendix 1 – Energy Use Intensity of MSH Proposed Mitigation Scenario (continued)**

**Supporting Calculation #2: Derivation of this BTU allocation based on energy usage as reported by the Residential Energy Consumption Survey, 2020**

BTU (non-heating) = 51% of total BTU

BTU (space and water heating) = 49% of total BTU

Energy use data for Apt. Buildings with 5+ units, Northeast Census division (Source: Residential Energy Consumption Survey, 2020, Table CE4.2)

- Total: 184 trillion BTU annually – 49% of this total is for space heating and water heating
- Total Energy consumption for Space heating 46 trillion btu, **25% of total BTU**
  - Electricity: 12 trillion BTU
  - Natural Gas: 26 trillion BTU
  - Propane: 1 trillion BTU
  - Heating oil: 7 trillion BTU
- Total Energy consumption for Water heating 45 trillion btu, **24% of total BTU**
  - Electricity: 11trillion BTU
  - Natural gas: 36 trillion BTU
  - Propane: 1 trillion BTU
  - Heating Oil: 7 trillion BTU

**Appendix 2 – Calculation of electricity cost for a 1000 sq ft apartment**

Data used in calculations:

Total electricity use for the campus per year: 5429 MWH = 5,429,000 kwh

Total square footage of conditioned space: 400,094

Electricity use per square foot per year

- Calculation: 5,429,000 divided by 400,094 = 13.6 kwh per square foot per year

Electricity use and cost for a 1000 square foot apartment

- 13.6 kwh per square foot per year X 1000 square feet = 13,600 kwh/year
- 13,600 kwh x $.30/kwh = $4080 annual electricity cost
- $4080 divided by 12 months = $340/month

October 9, 2025

Massachusetts Secretary of
Environmental Affairs
Attention: MEPA Office
Nicholas Perry
100 Cambridge Street
Boston, Massachusetts 02114

RE: Medfield State Hospital
Single Environmental Impact Report
EEA No. 14448R
September 2, 2025

Dear Mr. Perry:

Thank you for the opportunity to comment on the SEIR for redevelopment of the former Medfield State Hospital.

I have more than 25 years of involvement with the State Hospital, reaching back to my time as Chairman of the Medfield Conservation Commission in the 1990s, Chairman of the Medfield Archaeology Advisory Committee under the Medfield Historical Commission, as a member of the original reuse committee, as Chairman of the State Hospital Environmental Review Committee, Chairman of the Mediation Committee for the cleanup of the hospital landfill on the floodplain of the Charles River, and creation of the Overlook Park, resource to the Master Planning Committee and Chairman of the Buildings and Grounds Committee between 2014 and 2023. I have donated more than 20,000 hours of volunteer time to Medfield State Hospital since being requested by the Selectmen in 1999 to get involved. During my time managing the buildings and grounds, and as a stakeholder in the cleanup of the Charles River and floodplain, I developed a good working relationship with DCAMM and the DMH.

I have been a practicing Licensed Site Professional since 1993, the first year that licensing was created.

As a result of my passion for the history of the Hospital, I have met many past employees, including nurses, staff and psychologists and psychiatrists that were employed there. I also

have met and am acquainted with several former patients that obtained treatment at the hospital.

I have given numerous historical tours of the hospital, and made presentations (on YouTube), on the history of the hospital and the campus to the town of Medfield through the Historical Society. I have also given tours to Boston College Graduate School of Nursing (Psychiatric), Simmons College School Nursing (Psychiatric), Framingham State University Department of Psychology, and Curry College Psychology Department.

In my conversations with past staff and former patients, a guiding principle relayed to me is "about us, with us", this should be kept in mind for certain planning steps, and any programmatic events or communication related to the hospital.

As manager of the grounds, I was involved with the production of seven films. With each one, I obtained more knowledge of the campus and its infrastructure. Some of the infrastructure is significant in and of itself:

- Metcalf & Eddy, founders of the Massachusetts company of the same name, individually designed the original water system and wastewater system;
- Samuel Woodbridge, MIT professor and a designer of the HV system for the US Capitol building, designed the HV for the hospital: and
- Stone & Webster, founders of the Massachusetts company with the same name, individually designed the electrical infrastructure for the hospital.

**Chapter 1 Comments**

Project Summary

1.2 bullet 2: "deteriorating, wood framed dwellings".

The employee "cottages", were built between 1907 and 1914, and were designed by Robert E. Kendall, who also designed buildings (NR Listing Numbers) 25, 27, 29, and 30. These dwellings were built to house nurses who became married (nurses were not allowed to be married while employed due to the hourly schedule that nursing required when the hospital opened). Later, Ward attendants with families were also allowed to live in these dwellings. More recently these houses were used as part of the quarterway program of halfway housing prior to the hospital closing in 2003.

Other dwellings in this area are the superintendents house (NR #46), the Bishop House (original landowner of the hospital property) which became the Assistant Superintendents house (NR #48), later used as the Engineers house, and the Steward's residence (NR #50). I point out this history to express my concern and comment that these buildings are of historic significance to the overall history of the property. A concern of mine is that absent any planning since the town requested that the developer obtain the property without these buildings being included will cause them to deteriorate beyond repair. As with decision making for any property of historic significance, how many examples of buildings with similar history are extant in Massachusetts? The answer will support the importance of future MEPA filings for the reuse of these buildings and the property upon which they are located.

1.3 Existing conditions

DCR land, and other forested land around the campus is actively used for hunting (Mass.gov/wildlife-lands) - there is no mention of the potential for policy change because of this land use in this section, it may be important to address this with input from MADF&W.

One of the historic buildings (NR #21) is planned for reuse. This building is historically significant as the former TB cottage for women and should be retained as more likely than not it is the only remaining structure with this history extant in Massachusetts.

1.4 Project Description

I am in full support of the Trinity Plan for redevelopment of the historic buildings in the core campus.
Based upon my knowledge of the infrastructure I make the following comments:

1. There is old direct burial cable across the campus that may have lead jacketing, when identified this should be removed and properly disposed of;
2. The distribution of heat, and condensate return, was from the power plant to the underground space beneath NR building #57. The piping is asbestos jacketed and is inside a tunnel measuring 7 feet tall by 6 feet wide. Part of the tunnel is shallow and beneath current and proposed roadways. Since the current tunnel was built in 1938/9, it is advisable to remediate this infrastructure. The tunnel was built from the power plant located adjacent to the Charles River to NR #27 and because it was part

of the DCAMM (formerly DMH) property, DCAMM should incur the cost for the remediation of the tunnel as it was part of the hospital infrastructure.

3. Small raceways (approximately 2 feet by 3 feet) run from the middle of the campus beneath NR #57 to each of the buildings, including the Cottages. These small raceways should also be remediated, if ACM jacketing is identified during construction.
4. Each of the buildings around the core had a substantial settling basin installed in the 1920s time frame due to odor complaints, the associated piping and basin itself may be identified during construction. There are some areas of related ground settling visible (see NW corner of NR #15, and NW corner of NR #6).
5. Pare Corporation on behalf of DCAMM rendered the underground system of septic and stormwater conveyance inoperable by filling and demolishing certain parts of the infrastructure. However, a significant set of stormwater conveyance piping underlies field A-2. Will this be left abandoned or will any further work be performed in the interest of safety and prevention of I & I? Some of the system and related piping is on site next to NR #49.
6. The last paragraph indicates that PVC will be used to convey sanitary sewage. A simple Google query indicates that PVC contains PFAS. For over 100 years, building materials have turned out to contain toxic compounds (lead paint, asbestos, solvents etc.), considering that PFAS is toxic in the PPT range, how might the use of PVC for stormwater conveyance cause a release of PFAS to the Charles River via the wastewater plant? There is over one mile of PVC stormwater conveyance piping shown on Table 4-4.

1.7.2 Onsite traffic Mitigation-Single Access Road

I would prefer that the Service Road not be renamed Stonegate Drive because from the original main entrance to the Hospital north past the cottages is identified as Stonegate Drive on the East side of the campus, where the 1901 Stone Gate (still extant) was constructed. This would be a substantial deviation. Stonegate drive is currently identified as such on Google maps, between Cottage Street and Canal Street, running up to the intersection with Tower Street.

1.8 State Actions Update for the 2025 SEIR

There is mention in this section of the need for EPA notification with respect to Asbestos, but no text describing any testing related to PCBs and EPA approval for remediation of PCBs in building materials. More likely than not, any demolition work at

NR #57 and NR #58 (the 1964 cafeteria), and NR #74 will result in identification of PCBs in caulking materials. If PCBs were identified in any other window caulking, I would have a concern on the impact to historical integrity should a 1 foot or more removal of building be required around rough openings, this would cause significant damage to original brick work, especially to the vertical soldier course over window openings, original to construction of the buildings. Since there are over 3,000 windows on the campus, this could result in significant cost if other buildings require this remedial action.

1.8.1 Public Funding

FY 2023
It was my understanding from communication with the Town that the use of these funds to remediate Building #6 (NR #16) was supposed to have been started over a year ago. As this entire project takes place, how or where can the public find out the schedule of initiation and completion of project activities - in one place?

1.9 Public and Community Benefits
Currently there are 3 town owned abandoned buildings with Asbestos that is in the open – NR #45 (siding), NR #63(roof), and NR #29(siding). From an environmental perspective it follows that these materials should be removed in the near term. Leaving this material as is to a date uncertain may pose a risk of exposure to human health.

2.2.3 Stormwater

My concern for stormwater is less so with volume, and more so with time of concentration, and loading by pollutants. Of greatest concern is suspended solids, bacterial loading from unmanaged dog waste (this has been confirmed in some communities by DNA analysis, which ruled out migratory geese as a source of coliform in surface waters), and ponding of water in retention/detention/rain gardens, that can become breeding grounds for mosquitoes.

Many of the catch basins on the property in my experience, have become a significant source for mosquito breeding. Will this be a concern to the future development? What steps might prevent or lessen the potential for mosquito impact to residents? This comment applies to the entire LID aspects of stormwater management, rain gardens etc.

While the SEIR notes that shallow bedrock isn't a concern due to the shallow burial of new infrastructure, I have noted that shallow bedrock is present near NR #18, and outcrops in the basement. When the hospital was built, some areas were blasted to install infrastructure. How will the project manage shallow bedrock if observed? Shallow bedrock can also affect infiltration rate calculations.

Where will winter salt be stored? Will alternative deicing chemicals be considered?

How will the proposed infrastructure manage total suspended solid loading?

2.2.5 Water Use and Wastewater Generation

This section is difficult to understand without knowing what the limits of the Medfield water supply are, and the limits for capacity at the wastewater treatment plant. The limits for water supply and wastewater capacity should be revealed by the town to the proponent and stated herein so that the public understands the budget (non-fiscal) for these resources.

2.2.6 Historic and Archaeological Resources

I especially appreciate the time and effort that Trinity has invested in the historic resources of the Hospital property and grounds.

Careful consideration should be given with respect to the composition of the synthetic materials used for roof replacement. As with my comment with the use of PVC, the replacement materials for the roof should not contain PFAS, otherwise the storm water and the receiving water will more likely than not be contaminated.

No mention is made of the two buildings with flat rooftops – NR #19 and NR #20. The project should detail any different treatment of these buildings with respect to the roof architecture. Each of these buildings has an attic space of no more than 4 feet, NR #20 has planks to walk on, but no actual flooring.

Chapter 3 Traffic and Transportation

It should be noted that in my significant experience spending time with volunteer work, event work, and movie filming, there is a significant concern with cars speeding on Hospital Road. Immediately west of the Service Road entrance the land dips towards

the railroad crossing. Cars coming up this rise sometimes are caught off-guard by pedestrian traffic coming from the sledding hill. I have unfortunately seen pet dogs hit by cars more than once at this location. This could become a public safety concern as significant numbers of people enjoy the open space on both sides of Hospital Road.

I also believe more consideration of connecting the senior center to the project location should be made, including a cross walk across Hospital Road that would benefit people parking for events at McCarthy Park, in addition to seniors having access to the campus and grounds.

School bus parking in front of the property is an eyesore and should be moved to a paved location away from an aquifer recharge area. Runoff concerns at the edge between the unpaved bus lot, the Service Road, and Hospital Road need repair.

Chapter 4
Land Use and Alteration

4.3 Alteration of Previously Undisturbed Areas

It should be noted that across the front of the project area, extending to NR #21, and east of NR #24, there is significant fill from the original construction. These platform areas were created using the excavated soil from construction of the basements of the adjacent buildings using steam shovels.

5.3 Open Space Management

I am very much in favor of the proposed open space management plan. There are a few significant trees that should be maintained:

1. The tree inside the Service Road entrance gate immediately on the left;
2. The Siberian Elm on the SW corner of NR #15;
3. The four Paperbark maples north of NR #58 these trees were imported from China in the late 1930s with a group sent to the Arnold Arboretum (pers comm);
4. The massive oak on the east side of the original soccer field adjacent to NR #58;
5. The large magnolia variant on the SW corner of NR #2; and
6. American Beech trees adjacent to NR #58 and NE of NR #11

I would be more than willing to assist with any programming related to wayfinding and storytelling around the unique nature of the property, at no cost. The property is significant to the history of the town, the state, and the nation. I appreciate all that Trinity is doing to preserve this significant historic property.

5.7 Long Term Preservation Plans

Areas of special concern are the Green (a watershed infiltration area), the Arboretum, the North Field, and Parcel B across Hospital Road. In addition to the importance to the history of the hospital as a self-sustaining farm property, each area has inherent importance to the nature of the open space surrounding the project and should be managed as such.

Chapter 6 Cultural Resources

I am in full support of the approach by Trinity herein to the preservation and protection of cultural resources as stated in the SEIR.

Chapter 8
8.2.5 Solar Feasibility Study

I am in full agreement with PAL advising against the use of solar panels. In fact, I have the following additional concerns with solar panels:

1. Potential impacts to groundwater, surface water and drinking water supplies from bis-2-ethylhexyl phthalate and other plasticizers;
2. potential impacts from PFAS in material components to groundwater and surface water, and drinking water supplies; and
3. potential impacts to surface water (cold water fisheries) as a result of substantial increases to stormwater runoff temperatures during summer precipitation events.

9.11 Unidentified Hazardous Conditions

There are certain spaces where a concern regarding mold and bird waste (exclusive), are evident. These potential environmental contaminants should be reviewed and incorporated into the site safety plan and mitigation strategy.

Thank you for the opportunity to comment on this important project. I look forward to seeing this project become reality as would all the people who worked and lived on the property in the past. The hospital was home to more than 60,000 people between 1896 and 2003, and several thousand people were employed there across the time that it served the community. More than 126 farms in the greater Boston area were reviewed by the original building committee, and they settled upon Medfield as the best site for the care of the needy because it best met the requirements for moral treatment: fresh air and sunshine were (and still are) of greatest importance to mental health. I would not hesitate to live at the redeveloped campus.

I'm certain this project will be a model for other similar reuse projects across the country.

Best Regards,

John Thompson
PO Box 40
Medfield, MA 02052

# Commonwealth of Massachusetts
# Department of Environmental Protection

Central Regional Office
**Address:** 8 New Bond St, Worcester, MA 01606
**Phone:** 508-792-7650

| Maura T. Healey | Kim Driscoll | Rebecca Tepper | Bonnie Heiple |
|---|---|---|---|
| **Governor** | **Lieutenant Governor** | **Secretary** | **Commissioner** |

October 14, 2025

Secretary Rebecca Tepper
Executive Office of Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114
Attention: MEPA Unit – Nicholas Perry

Re: Single Environmental Impact Report (SEIR)
Medfield State Hospital Clean Up and Redevelopment Project
Medfield
EEA #14448R

Dear Secretary Tepper,

The Massachusetts Department of Environmental Protection's ("MassDEP") Central Regional Office has reviewed the SEIR for the Medfield State Hospital Clean Up and Redevelopment Project (the "Project"), which is located at 45 Hospital Road. Trinity Acquisitions LLC (the "Proponent") is proposing the redevelopment of a 48-acre portion (the "Proponent Site") of the former 269-acre Medfield State Hospital Campus. The Project includes the preservation and rehabilitation of 401,421 square feet (sf) of 27 existing

buildings which will be developed into 334 housing units. These units will range in size from 350 to 1,400 sf and will include a mix of studio, one-, two-, and three-bedroom layouts. The Project site is also referred to as the Core Campus. The Project includes the renovation of the Lee Chapel and Infirmary for conversion into the Bellforge Art Center, a multi-cultural arts and entertainment venue. Surrounding areas will be redeveloped to create green space for outdoor performances, community events, and public use.

Planning for redevelopment at the Project site has been in process since 2009. In 2009, the Massachusetts Division of Capital Asset Management and Maintenance (DCAMM) submitted an Environmental Notification Form (ENF) for the Project, which was published in the Environmental Monitor (the "Monitor") on July 8, 2009. DCAMM withdrew the ENF on August 25, 2009. On February 10, 2010, an Expanded ENF (EENF) for a cleanup and redevelopment Project was published in the Monitor. The Project included redevelopment of a 94.2-acre portion of the Medfield State Hospital Campus and cleanup of debris and hazardous waste sites on the property. The Secretary of Environmental Affairs (the "Secretary") required DCAMM to prepare an EIR for the original Project although it was not subject to a mandatory EIR. DCAMM requested permission to prepare an SEIR. On April 2, 2010, the Secretary issued a Certificate on the EENF granting permission to prepare an SEIR. On June 22, 2011, an NPC with a Phase 1 Waiver for the Project (NPC2011) was published in the Monitor, seeking permission to undertake cleanup of several hazardous waste sites before completing the SEIR. On September 1, 2011, the Secretary issued a Final Record of Decision granting the Phase 1 Waiver. On March 7, 2014, the Secretary approved an amendment of the Phase 1 Waiver to allow revisions to the remediation approach for the contaminated sites.

The Proponent filed an NPC (NPC2023), which was published in the Monitor on June 7, 2023. Due to the lapse in time and the completion of previously identified State Actions, the Proponent requested that the Secretary update the Scope for the Project and requested permission to prepare a Single EIR. The Secretary issued a Certificate on the NPC on July 14, 2023 granting permission for the Single EIR and providing an updated Scope.

The original Project met or exceeded the following review thresholds:

301 CMR 11.03(3)(b)(1)(f) - alteration of ½ or more acres of any other wetlands;

301 CMR 11.03(6)(b)(13) - Generation of 2,000 or more New adt on roadways providing access to a single location;

301 CMR 11.03(10)(b)(1) - demolition of all or any exterior part of any Historic Structure listed in or located in any Historic District listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth.

The Project requires the following State Agency Permits:

MassDEP – Chapter 91 Dredging Permit (NPC2014-work already completed);

MassDEP - 401 Water Quality Certificate (NPC2014-work already completed);

MassDEP -Treatment Works Plan Approval for New/Modified Facility associated with Surface Water (NPDES) Individual Permits (WM16 [Town of Medfield]);

MassDEP- Permit for Reclaimed Water Use (WP84) [if needed];

Massachusetts Department of Transportation – State Highway Access Permit.

The Proponent is seeking funding through the Community One Stop for Growth Programs administered by MassDevelopment and the Executive Office of Housing and Economic Development (EOHED), so jurisdiction is broad. MassDEP offers the following comments:

**Water Supply**

The Project will include the installation of a new 8" ductile iron water distribution loop system with associated copper building service connections, gate valves, hydrants, and a minimum of two connections back to the active portion of existing 16" water main owned by the Medfield Water Department and located at the eastern portion of the Project site. The Project water mains will provide fire flows and irrigation supply as well. There is a 16" water main and storage tank already located on the property.

The Scope in the Certificate on the NPC (the "Scope") required the SEIR to discuss the impact of the proposed water demand on the current water supply, especially during peak demand periods, and to confirm that sufficient capacity is available from the Town to accommodate the Project and identify upgrades. The SEIR dis not include confirmation from the Town of Medfield that the Town's system has sufficient capacity to meet the proposed demands. Other than a statement based on an engineering report, the Proponent provided no details about the water system from which MassDEP could

determine if the Town's water system can accommodate the Project's water demands. MassDEP is concerned in particular that the SEIR's repeated references to water (and wastewater) calculations based on only 50% of MassDEP's required design flows indicate that incorrect flow volumes were used. Projected demand volumes must be calculated using 110 gallons per day per bedroom; any calculation of more "realistic" volumes is irrelevant.

The Scope stated that the SEIR should verify compliance with the public water system's Water Management Act (WMA) permit and all applicable regulations and discuss any Source Approval requirements for the Hospital wellfield, which is included in the WMA permit. The Proponent noted that they are not proposing to connect to the Hospital Well Field as part of the Project and that source approval for the wellfield is not required because it has been abandoned and is not a viable source for water. The Town Water Department's 2024 Annual Statistical Report indicated that it has ample WMA permitted capacity to serve this Project. The Project is in the Charles River Basin. MassDEP renewed Medfield's permit in the Charles River Basin in 2025. Medfield is authorized to withdraw up to 1.46 million gallons per day (mgd) system-wide between its withdrawals in the Boston Harbor Basin and Charles River Basin. Actual system-wide withdrawals in the last two years were 1.25 mgd in 2024 and 1.11 mgd in 2023. An additional 0.063 mgd withdrawal for the Project does not appear to put them in danger of exceeding either their individual basin allocations or the system-wide total.

The Scope required the SEIR to include consideration for requirements for fire flow, minimum distribution system pressure, and storage capacity. The Proponent indicated that water system improvements include fire service connections to the renovated buildings as required to support the building life safety systems. Spacing and location of fire hydrants is proposed in accordance with National Fire Protection Association and the Medfield Fire Department regulations throughout the development. The onsite storage should provide adequate fire storage capacity. Onsite flow testing was done to ensure that the expected water service pressure will satisfy the pressure needed for the fire protection systems as well as domestic demands.

The Scope required the SEIR to provide a description of the new water supply system that will be installed onsite as part of the Project. The SEIR did not provide any plans or details of the proposed water distribution system to serve the Project. In review of the Town's Water Distribution Map, MassDEP noticed that there is an existing water main at the end of Longmeadow Road which is about 200' from the existing 16" water main on Tower Road.

Connecting these two water mains would provide improved flows throughout that portion of Town.

The Scope stated that the SEIR should include a detailed estimation of water demand for the Project, including an estimation of the outdoor water use demand, and should detail the water conservation measures to be implemented for the Project and steps taken by the Proponent to meet the applicable 2006 Massachusetts Water Conservation Standards. The SEIR noted that the Proponent conducted an alternatives analysis and the only viable option for outdoor water supply was from the municipal system. MassDEP believes that the use of municipal drinking water for irrigation does not mitigate potential Damage to the Environment to the maximum extent feasible. As noted above, the repeated references to more "realistic" design flow values calls into question the accuracy of the demand calculations. In addition, the SEIR states, "After establishment of the lawn approximately 20,000 gallons per day may be needed when nature does not provide enough rain." Periods in which "nature does not provide enough rain" may represent drought conditions, during which non-essential water uses would be restricted or prohibited. MassDEP encourages the Proponent to identify an alternative source of water for irrigation.

Because there will only be new water mains and associated valves/hydrants installed for this Project, there would be no required permits related to drinking water required for this Project, as currently submitted.

**Wastewater**

The Scope required the Proponent to clarify if the Project will require a MassDEP Sewer Connection Permit. MassDEP no longer issues sewer extension permits, so the connection permit from the Town of Medfield is all that is required for the sewer connections. The SEIR indicates that the municipal sewer will be extended approximately 1,250 feet, seemingly from Manhole 3-49 on Hospital Road (specific engineering plans for the proposed sewer system were not provided in the SEIR), to accommodate the private connection from the campus system.

The Scope also required the Proponent to provide an update on the volume of wastewater generated by the Project. As noted, various estimates of wastewater flow are noted in the SEIR and previous MEPA submittals. Current estimates of wastewater generation for this Project range from 59,534 to 69,648 gpd. The SEIR did not provide a detailed breakdown of anticipated wastewater flows by bedroom count and other

proposed campus uses. Additionally, allowable I/I per TR-16 (between 250 and 500 gallons per day per inch diameter mile) should also be included in the breakdown of anticipated wastewater flows. This information is needed to clarify projected flows to the municipal sewer system and ensure accurate planning and design.

The Scope specifically requires the SEIR to discuss the installation of either a new pump station or the installation of a gravity system. The SEIR states that the proposed on-site sanitary sewer system will include two wastewater pumping stations for the residential flows from Building 10 and Building 7. Aside from these two residential building connections, the remainder of the proposed sanitary sewer system will be gravity. MassDEP requests that the design of the municipal gravity sewer extension account for future sewer connections or potential extensions. Particular consideration should be given to areas such as Cottage Street, Cleversee Circle, and other locations within Drainage Area 3 that may ultimately require sewer service.

Additionally, installation of the private sewer system and pump stations constitutes a major modification under 314 CMR 12.00, as these components are defined as part of the overall "Treatment Works." Accordingly, the Town of Medfield must file a WM16 Permit to MassDEP for review. This submittal, which must also include detailed information regarding the demolition of the existing system, is required to ensure compliance with 314 CMR 7.06(1) and 314 CMR 12.00.

Unless the Town of Medfield assumes ownership and control of the campus sewer system, the system will remain classified as a private treatment works and therefore subject to regulation under 314 CMR 12.00. An Operation and Maintenance Manual must be prepared in accordance with these regulations as well as TR-16 for review by overseeing agencies to include the Town and MassDEP.

If the proposed entertainment center construction includes any type of industrial kitchen facility, it is recommended that all cafeteria and kitchen waste generated by the proposed Project shall have grease traps compliant with the requirements within 310 CMR 15.000 prior to discharging to the sewers.

The Scope required a description of the proposed wastewater mitigation, including measures to meet I/I removal requirements and water conservation commitments. In the Alternatives Analysis, the SEIR states that the Project will achieve reduced wastewater flows by incorporating low flow plumbing fixtures to decrease water consumption.

Additionally, the Scope required the SEIR to address the potential for wastewater reuse in accordance with 314 CMR 20.00, but this issue does not appear to have been addressed in the SEIR. Should the Proponent decide to construct, install, modify, operate, or maintain a reclaimed water system, per 314 CMR 20.00, the submittal of a WP84 for a reclaimed water permit would be required.

**Air Quality**

The Scope required the SEIR to describe how construction activities will be managed in accordance with applicable MassDEP regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10). In its Response to Comments, the Proponent stated that during building demolition, the contractor will be required to use dust suppression with a dust boss from fire hoses, fire hydrants, and water trucks as needed, which will control potential fugitive dust when doing demolition and earth work. The Proponent is required to do this according to EPA Construction General Permit and the DEP guidelines. The Project LSP will be present as needed per state requirements to monitor air quality during the demolition phase.

MassDEP requested that all non-road diesel equipment rated 50 horsepower or greater meet EPA's Tier 4 emission limits, and that the Proponent maintain a list of the engines, their emission tiers, and, if applicable, the best available control technology installed on each piece of equipment on file for Departmental review. The SEIR stated that all off-road engines will adhere to the Tier 4 emission limits, including excavators, dump trucks, trailers, and generators. The Proponent will maintain a list of all the engines and their emission tiers as required for reporting to MassDEP. The SEIR did not address the issue of Ultra Low Sulfur Diesel Fuel but stated that blasting will not occur.

**Asbestos**

The Scope required the SEIR to address management of asbestos during construction. The SEIR, in the Response to Comments, states that a licensed asbestos company has been contracted for the Project and has performed all the building asbestos surveys. The abatement contractor will submit AQ04 and AQ06 forms as required by MassDEP prior to commencing the abatement work. The regulatory requirements for asbestos-containing waste materials will be included in the contract specifications.

**Commonwealth of Massachusetts**
**Department of Environmental Protection**

Central Regional Office
**Address:** 8 New Bond St, Worcester, MA 01606
**Phone:** 508-792-7650

All asphalt, brick, and concrete (ABC) debris from demolition will be disposed of per MassDEP requirements. Any ABC material considered for re-use on-site will be filed for a crushing permit within 30 days of the work to MassDEP and Medfield Board of Health as required.

MassDEP appreciates the opportunity to comment on the new scope for the Project. If you have any questions regarding these comments, please do not hesitate to contact JoAnne Kasper-Dunne, Central Regional Office MEPA Coordinator, at Joanne.Kasper-Dunne@mass.gov.

Very truly yours,

Mary Jude Pigsley
Regional Director

cc: Commissioner's Office, MassDEP

COMMONWEALTH OF MASSACHUSETTS
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**Maura Healey**
Governor

**Kim Driscoll**
Lt. Governor

**Rebecca Tepper**
Secretary

**Elizabeth Mahony**
Commissioner

16 October 2025

Rebecca Tepper, Secretary
Executive Office of Energy & Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02114
Attn: MEPA Unit

RE: Medfield State Hospital, Medfield, MA, EEA #14448R

cc: Jo Ann Bodemer, Director of Energy Efficiency, Department of Energy Resources
Elizabeth Mahony, Commissioner, Department of Energy Resources

Dear Secretary Tepper:

We've reviewed the Single Environmental Impact Review (SEIR) for the proposed project. The project includes:

- 334 mixed-income multifamily units, spread across 27 existing historic buildings.
- 3 existing historic buildings will serve as amenity space for the residential units.
- 3 existing historic buildings will be used by the non-profit Bellforge Arts Center.

Medfield is a Stretch Code community.

We commend the project's efforts to upgrade the energy efficiency of these existing buildings within the constraints of the historic regulations. The project is committing to an improved building envelope and efficient electrification with no gas. Details of the efficiency strategy are as follows:

- Air source heat pump space heating
- Air source heat pump water heating

- Improved wall assembly to reduce air infiltration to 0.35 cfm/sf
- Improved building thermal envelope via cavity insulation to realize a factor of U-0.137
- ERV at 77% efficiency

The DOER supports all the above measures which would deliver significant emissions reduction. If the project can also commit to no gas use, and utilize all electric cooking and clothes drying, the DOER would have no further comments and our review would be complete.

Sincerely,
Massachusetts Department of Energy Resources

Becca Edson
Decarbonization Architect

Paul F. Ormond, P.E.
Energy Efficiency Engineer