Kristine Trierweiler
Town Administrator

TOWN OF MEDFIELD

Office of the Select Board

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Via Email (ConservationCommission@medfield.net)

April 3, 2024

Deborah Bero, Chair
Medfield Conservation Commission
459 Main Street
Medfield, MA 02052

Re: Former Medfield State Hospital
DCAMM Notice of Intent and Request for Certificate of Compliance

Dear Ms. Bero,

The Town, together with a group of stakeholders for the former Medfield State Hospital, have reviewed DCAMM's Notice of Intent ("NOI") and Request for Certificate of Compliance ("RCOC"). Those stakeholders include the Charles River Watershed Association, and designated citizen-representative William Massaro. This letter sets forth our collective comments on the proposed NOI and RCOC.

In short, we support what DCAMM is proposing, but we believe it should be done in two separate phases as explained further below.

We believe the Commission should move quickly to approve DCAMM's invasive vegetation mitigation proposal. The proposed treatment is needed to save a wetland of great ecological value on the banks of the Charles River that was restored over the past decade at great expense. That restoration was the result of a collaborative effort by DCAMM and many partners and stakeholders, including the Commission. In terms of the treatment methodology DCAMM is proposing, we would have much preferred an approach based on earlier intervention, hand-pulling and very limited use of herbicides. However, we concede that at this point the aggressive infestation of the Mile-a-Minute poses a dire threat to the wetland and probably does warrant the herbicide-focused mitigation program DCAMM is proposing.

With respect to the second part of DCAMM's proposal, aimed at "closing out" the previous 2014 Order of Conditions for activities at the former state hospital, we are generally supportive but are concerned about the time it will take for the Commission to do what DCAMM is asking. Several important obligations under that 2014 OOC remain unfinished, and DCAMM proposes to "carry forward" those unfinished obligations into the new OOC for invasive species mitigation. We see the value in touching base with the Commission, reviewing progress under the 2014 OOC, and re-stating in a current Order what remains to be done and under what conditions. However, we don't see how that review could possibly be thoughtfully completed within a short time. Given the very tight timeframe for setting up invasive vegetation treatment this spring, we recommend doing the RCOC review as a second phase, so the Commission can give the proposal the attention it deserves.

In short, we propose that DCAMM's requests be addressed as follows: First, review the NOI and issue an OOC for time-critical treatment of invasive species; Second, review DCAMM's RCOC, and identify all unfinished work from the 2014 OOC, along with conditions that are are ongoing or perpetual; Third, issue the COC while bringing forward all unfinished work and ongoing/perpetual conditions into a current OOC, by *amending* the OOC for invasives; this may require DCAMM to submit a NOI requesting such an amendment.

The benefit of this approach would be to consolidate all remaining work at the site into a single OOC, without delaying the proposed invasive vegetation mitigation effort.

We appreciate DCAMM's efforts at the site, and their ongoing cooperation with the Town and stakeholders. We are all working toward the same goal, which is to preserve the restored wetland and adjacent areas. Those resources were restored at great expense and, if managed correctly, will be a treasured resource for generations to come.

Thank you for your consideration of these comments, and of the further comments that Mr. Massaro and CRWA may submit under separate cover.

Sincerely,

Kristine Trierweiler
Town Administrator

cc: Susan Ruch, DCAMM (susan.Ruch2@mass.gov)
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