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January 20, 2012

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS  
ON THE  
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Worcester State Hospital, Clock Tower Demolition  
PROJECT MUNICIPALITY : Worcester  
PROJECT WATERSHED : Blackstone River  
EEA NUMBER : 14839  
PROJECT PROPONENT : Division of Capital Asset Management (DCAM) and  
Department of Mental Health (DMH)  
DATE NOTICED IN MONITOR : December 21, 2011

Pursuant to the Massachusetts Environmental Policy Act (M.G. L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** the preparation of an Environmental Impact Report (EIR).

Project Description

The project, as described in the Environmental Notification Form (ENF) and additional information submitted during the MEPA review process<sup>1</sup>, consists of the demolition of the Administration Building, also known as the Clock Tower Building, at the Worcester State

<sup>1</sup> Letter from the Division of Capital Asset Management (DCAM) dated January 10, 2012 and letter to Charles Wilse, DCAM, from Ellenzweig Architecture/Planning providing an assessment of risks associated with restoration.

Hospital. The project is proposed jointly by the Division of Capital Asset Management (DCAM) and the Department of Mental Health (DMH).

The Worcester State Hospital campus was listed on the National Register of Historic Places in 1980. It is included in the State Register of Historic Places and the MHC Inventory of Historic and Archaeological Assets of the Commonwealth. The Hospital was constructed between 1874 and 1877. The wings of the original building and the interior of the Administration Building/Clock Tower were damaged by a fire in 1991. The western wings, with the exception of the Hooper Turret, were demolished after the fire. The eastern wings and several structures located north of the Administration Building were demolished in 2008 to prepare the site for the construction of the Worcester Hospital and Recovery Center.<sup>2</sup> Impacts associated with this demolition were reviewed by MHC and mitigation commitments were stipulated in a 2007 Memorandum of Agreement (Appendix B) between DCAM, DMH, MHC, Preservation Worcester and the Worcester Historical Commission. The MOA required DCAM and DMH to prepare a Reuse and Redevelopment Feasibility Study for the Worcester State Hospital Campus to identify redevelopment potential for portions of the campus and the historic Administration Building/Clock Tower, Hooper and Hale buildings.

The Administration Building is a detailed, five-story masonry building with a basement and attic. It is an example of High Victorian Gothic style. It includes a massive clock tower, visible from miles away, on the south elevation that extends 1 ½ stories above the fifth floor with a bell platform and clockworks. It was constructed of exterior brick masonry walls faced with cut and fitted granite face stones. The stone is a ferruginous gneiss bordered with red brick and granite ornamentation. It has a steeply pitched slate roof, seven brick chimneys and several skylights. The footprint of the building is approximately 7,935 square feet (sf) and it has a gross square footage (sf) of approximately 52,000 sf. The building has been unoccupied since 1979.

The ENF includes detailed structural analysis of the Clock Tower (Appendix C). It indicates that the state roof and framing need replacement and that deterioration of masonry is extensive on the North elevation, gable wall tops and the cornice at the roofline of the entire perimeter. A significant portion of the north façade is bowing noticeably above the main roof. It identifies interior structural deficiencies, water damage and extensive bird droppings.

A Draft Memorandum of Agreement (MOA) (Appendix E) is included in the ENF and identifies measures to address adverse impacts of this project, including documentation of the exterior of the structure and salvaging of architectural elements for incorporation into a commemorative installation on the site. The ENF includes a Draft Final Reuse and Redevelopment Feasibility Study/December Development Options Study Update for the Worcester State Hospital Campus which identifies redevelopment potential for portions of the campus and the historic Clock Tower, Hooper and Hale buildings. It describes alternatives for adaptive reuse of the Clock Tower, restoration of the building as a monument and demolition. The study identifies criteria for a feasible reuse and includes preliminary (2008) and updated

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<sup>2</sup> A MEPA Advisory Opinion dated February 8, 2008 indicated that MEPA review of the project was not required because the proponents consulted with MHC and entered into an MOA with the concurrence of the Worcester Historical Commission and Preservation Worcester; therefore, the project did not exceed any MEPA review thresholds.

(2011) cost estimates for each alternative. It indicates that the cost of stabilizing the Clock Tower is significantly higher than initial estimates made in 2008. This is attributed to a more thorough inspection (the initial report included a survey from the ground only) and the continued degradation of the building. The updated estimate for stabilization as an architectural monument is approximately \$15.7 million.

It indicates that the costs of redevelopment would exceed the value of the completed project by approximately \$16.8 million. The National Park Service (NPS) has indicated that the building does not qualify for historic tax credits. If state tax credits could be secured, the gap is estimated at \$12.4 million.

Another significant concern is coordination of the schedule for the Administration Building and new hospital. DCAM and DMH have expressed concerns that the stabilization of the Clock Tower could delay the occupation of the psychiatric hospital. They indicate that the State Building Inspector has communicated that the Clock Tower would need to be fully stabilized (in the case of redevelopment) or demolished prior to occupation of the hospital because of the proximity of the structure to the entrance of the new hospital.

#### Project Site

The project site is within the grounds of the Worcester State Hospital in Worcester. At one time, the State Hospital complex consisted of 275-acres that extended to the shore of Lake Quinsigamond. Large portions of the complex have been transferred for use by the University of Massachusetts Medical School (EEA #13098) and the Massachusetts BioTech Park (EEA #4251).

The existing 110-acre campus currently includes DMH facilities, the Community Health Link medical office building, Seven Hills Camp Joy special needs day care facility, Massachusetts Department of Developmental Services offices, UMass Medical School offices, UMASS Memorial Health Care offices and several former Worcester State Hospital buildings. In addition, it includes the Worcester Recovery Center and Hospital which is under construction. It is located on 26 acres adjacent to the remaining Worcester State Hospital Administration building. The Administration Building/Clock Tower is located approximately 151 feet to the south of the new psychiatric facility and to the east of the Bryan building.

#### Permits and Jurisdiction

The project is undergoing MEPA review and is subject to preparation of an Environmental Notification Form (ENF) pursuant to 301 CMR 11.03 (10)(b) because it is proposed by a state agency, includes use of state funds and consists of 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 will require a Demolition Permit from the State Building Inspector.

The project is subject to MHC review and consultation. This review is not considered a State Agency Action within the context of the MEPA process; however, the process often

coincides with or follows MEPA review. In this case, a Project Notification Form (PNF) was filed with MHC concurrent with the ENF filing.

Because the project includes state funding, MEPA jurisdiction is broad in scope in extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations.

### Environmental Impacts

Potential environmental impacts are limited to air quality and construction period impacts and the loss of historic resources. The ENF identifies measures to avoid, minimize and mitigate these impacts.

### *Historic Resources*

MHC comments indicate that the project will have an "adverse effect" on the Administration Building/Clock Tower. The ENF describes the following measures to avoid, minimize and mitigate impacts to historic resources: analysis of alternatives including reuse of the structures and restoration or reconstruction of the Clock Tower as a monument; documentation of the exterior of the structure in accordance with MHC Digital Recordation requirements; salvage of components of the Clock Tower above the roof cornice of the main body of the existing Clock Tower; salvage will be performed by a prequalified masonry restoration subcontractor; materials will be cataloged and stored systematically to support future incorporation into a commemorative installation on the site; and consultation with MHC, the Worcester Historical Commission and Preservation Worcester in the development of the concept and design of the commemorative installation which will compliment the interpretive exhibit that was agreed to in the 2007 MOA.

Comments from Preservation Worcester and many individual commentors describe the historic relevance of the Clock Tower and its important role in Worcester's history and future. The letters reflect strong community support for this iconic structure and they urge DCAM and DMH to avoid its demolition.

Prior to the MEPA filing and during MEPA review, Preservation Worcester advocated for restoration of the Clock Tower portion of the Administration Building (but not the remaining wings of the Administration building) as a monument. At the MEPA site visit on January 6, 2012, DCAM/DMH presented another alternative for consideration. They proposed to reconstruct the Clock Tower portion of the building, in its current location, using salvaged material from careful and selective demolition and new materials where necessary, including new brick and slate. Under both proposals, the building would be unoccupied and no access would be permitted. Routine maintenance would include exterior work to ensure the building remains watertight and secure. DCAM indicated that it has identified funds that could be used to support a reconstruction. In a letter dated January 10, 2012, DCAM indicates that it is committed to advance this concept through design and construction as a fitting and acceptable memorial to Worcester's legacy as a pioneer in the treatment of the mentally ill and to the historic architecture of the former Worcester State Hospital. In addition, the letter indicates DCAM will

continue to consult with MHC, Preservation Worcester and the Worcester Historical Commission in developing the MOA to include language reflecting DCAM's commitment to reconstruct the clock tower.

Preservation Worcester has requested that DCAM and DMH analyze the restoration alternative in more detail to provide a balanced comparison of the engineering, schedule, costs and logistics of these two alternatives. In addition, they urge DCAM and DMH to consider alternatives to address public safety concerns that do not require demolition of the building prior to occupancy of the new hospital.

DCAM has identified multiple safety, cost and design concerns associated with the restoration of the Clock Tower including coordination with the occupancy of the hospital. In addition to the cost and extensive degradation of the building, they have expressed strong concern with the unpredictability of a restoration alternative in terms of schedule and costs.

Comments from Senator Harriette L. Chandler express her support for rebuilding a commemorative Clock Tower using components of the original structure and note her prior efforts to support adaptive reuse of the structures.

MHC comments indicate agreement with the assertion by DCAM and DMH that there are no feasible or prudent alternatives to eliminate the adverse effect of demolition. This conclusion is based on a review of the information submitted, including the Reuse and Redevelopment Feasibility Study Draft Final Report. MHC comments indicate that mitigation should be memorialized through an amendment to the 2007 MOA rather than a new MOA and notes that an opportunity to further discuss alternatives is presented by the January 24, 2012 Global Workshop.

I appreciate the strong and heartfelt support expressed by many Worcester residents that would like to preserve this historic and iconic building as a testament to Massachusetts leadership in use of asylums to provide effective and humane treatment to the mentally ill. I am pleased that state agencies have consulted with MHC and the community to develop alternative ways of preserving this history. The consultation process, led by MHC, will provide an appropriate and constructive venue for further exploration of the reconstruction/restoration alternatives and consider the feasibility and advisability of these mitigation approaches.

#### *Construction Period Impacts/Air Quality*

The management of construction period impacts, including measures to minimize emissions of air pollutants, is particularly important because of the project's proximity to several health and research facilities. The ENF indicates that the demolition of the Clock Tower will be conducted in compliance with regulations for the removal, storage and disposal of asbestos containing materials. Measures to avoid, minimize and mitigate other construction period impacts include: use of wetting agents, covered trucks, tire cleaning area, street and sidewalk cleaning, muffling enclosures on continuously operated equipment; and prohibitions on idling equipment. Comments from the Massachusetts Department of Environmental Protection (MassDEP) address compliance with Air Pollution Control regulations regarding asbestos (310

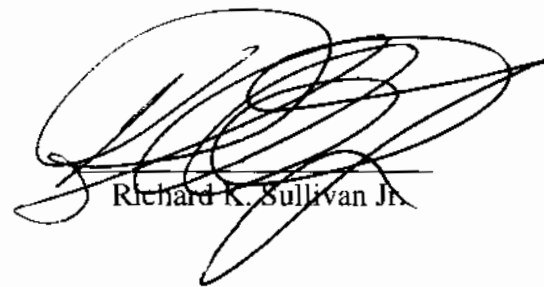
CMR 7.15) and demolition (310 CMR 7.01, 7.09 and 7.10). Any asbestos containing material must be removed from the facility prior to commencing demolition or renovation. In addition, storage and disposal of asbestos containing materials must be conducted in accordance with the Solid Waste Regulations (310 CMR 19.00). In addition to the measures noted above, DCAM and DMH should participate in MassDEP efforts to minimize diesel emissions by retrofitting equipment.

### Conclusion

The review of the ENF has served to adequately disclose the potential impacts associated with this project. Based on review of the ENF, consultation with relevant state agencies, and a review of comment letters, I find that no further MEPA review is warranted. I am confident that the development of appropriate mitigation for historic resources will be addressed adequately through the MHC Consultation process.

January 20, 2012

Date



Richard K. Sullivan Jr.

### Comments received:

1/11/12	Massachusetts Department of Environmental Protection (MassDEP)/Central Regional Office (CERO)
1/10/12	Massachusetts Historical Commission (MHC)
1/10/12	Senator Harriette L. Chandler
1/5/12	Canal District Business Association
1/7/12	New England Chapter of the Society of Architectural Historians, Inc.
1/6/12	Preservation Worcester
1/10/12	Preservation Worcester (second letter)
1/10/12	Michael Henry Adams
1/5/12	Marilynn H. Borst
1/9/12	Carolyn
1/9/12	Susan McDaniel Ceccacci
1/10/12	Jacqueline Clark
1/10/12	Chuck Cooper
1/10/12	Elizabeth Coppola
1/10/12	Vincent Lawrence Dixon
1/10/12	Gerald Ebbeling
1/10/12	Daniel A. Gehrich

1/7/12	Jeffrey Geller
1/9/12	Laurie Guptill
1/15/12	Peggy Scott Hammond
1/10/12	Kim Houde
1/10/12	Suzanne Howatt
1/10/12	Stephen Jerome
1/10/12	Brian Jones
1/10/12	Jane Jung
1/9/12	Carol Kozlowski
1/10/12	Jennifer Larese
1/5/12	Mark Twombly Lee
1/6/12	Patrick T. Maloney
1/9/12	Ethan McElroy
1/9/12	Michelle McElroy
1/6/12	James McKeag
1/9/12	Dr. and Mrs. Leonard J. and Maxine K. Morse
1/6/12	Paula Murphy
1/6/12	Richard J. Patient
1/10/12	Brian Pohlen
1/9/12	Taylor W. Raab
1/10/12	Lois Regestein
1/9/12	Robbin Scelso
1/6/12	Chad Shonbeck
1/6/12	Phil Thomas
1/9/12	Patricia Cushman Ton
1/9/12	John Waters
1/10/12	Holmes Wilson
1/9/12	Diane Witt
1/10/12	Carla Yanni
1/10/12	Allen Young
1/10/12, 1/12/12	Five form letters "I am writing to express my great concern...."

RKS/CDB/cdb