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**By Certified Mail and Email**

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**Re: Massachusetts School Building Authority and Medfield School Building Committee**

To Whom It May Concern:

I represent the Keep Dale at Dale Coalition in Medfield, a ballot question committee organized pursuant to M.G.L. chapter 55. I am writing to you today to highlight several questionable aspects of the site selection process which has been undertaken by the Medfield School Building Committee pursuant to M.G.L. chapter 70B and associated regulations with regard to the so-called Wheelock site at 17 Elm Street. Before proceeding any further in the process, the Medfield School Committee, Medfield School Building Committee and the Massachusetts School Building Authority (MSBA) should further investigate and address the issues raised in this letter prior to the MSBA Board of Directors voting on the project on Feb. 11, 2021.

The purpose of the Massachusetts School Building Authority and its grant programs is in part to promote the thoughtful planning and construction of school facility space in order to insure safe and adequate plant facilities for the public schools. Several of the missteps made by the Medfield School Building Committee have been contrary to that goal.

The Medfield School Building Committee has not yet fulfilled the requirements under the site standards regulations under 963 CMR 2.05 (1) and (2). These regulations require that the site selected minimize adverse impacts such as the need to provide new sewers, roads, transportation facilities, water supply, water connections, and other public infrastructure.



Additionally, the regulations require that to the extent feasible, the site selected shall be proximate to community facilities such as libraries, museums, parks, natural resources, nature study areas, and businesses, which would enhance the proposed educational program.

The Wheelock site will require installation of water, sewerage, gas and telecommunications infrastructure to serve the projected enrollment, whereas the existing Dale site infrastructure would require far less infrastructure improvements.

The existing Dale Street location is proximate to numerous community resources such as the Medfield Public Library, the Dwight-Derby House museum, Vine Lake Cemetery, Meetinghouse Pond and Park, Vine Brook, plus numerous businesses, as well as Town Hall. The fire and police stations are located directly across the street from Dale Street School. This location provides fast response times for fire, and serves as a crime deterrent thanks to 24-hour police presence. Despite 963 CMR 2.05 noting the importance of proximity to other town/community facilities as important, that criteria was not included in the Site Selection Matrix used by the School Building Committee in making its selection. With its physical distance far from the center of Medfield, the Wheelock site is unable to offer students easy access during the school day to any of the noted community resources.

Only preliminary traffic studies have been conducted at the Wheelock site, so the extent of new transportation infrastructure that will be required is speculative at best. Proponents of the Wheelock site have suggested that there would be a commensurate increase in traffic along North Street and Adams Street (proximate to the Dale site) but because there has not been a thorough traffic analysis this statement is also speculative at best.

With regard to negative social and economic impacts on the community, the existing Dale Street School is located a mile or less from virtually all of the legally designated affordable housing for families in Medfield. Moving the Dale Street School for 4th and 5th graders to a more remote location nearly twice the distance from these homes may result in inequity and environmental justice issues, and likely higher personal transportation costs for low-income families.

There is also concern that the relative costs of the Wheelock and Dale sites have not been fully transparent with both the community and MSBA. When costs such as mothballing/demolition of the existing school, new utility infrastructure beyond water lines, field replacements (deemed critical), site improvements and traffic mitigation beyond one traffic light, and further site analysis (including an archaeological study) are factored in, the cost of keeping Dale Street School at its current location is at least five million dollars less expensive than building at the Wheelock site. That five-million dollar difference is also apparent when comparing a new building at Dale Street to a new building at the Wheelock site, according to district documents. While none of the "alternative" costs are reimbursable by MSBA, they do contribute significantly to the cost of the overall project, the town debt to be borrowed, and impact on the Medfield taxpayer.

The Medfield School Building Committee has not followed the proper procedures outlined in the regulations. 963 CMR 2.10(4)(d) requires that the local school committee vote to approve, among other items, the Design and Educational Program and the Budget Statement for Educational Objectives. Based on a review of Medfield School Committee meetings and documents it appears that the School Committee did not vote on the Budget Statement for Educational Objectives.

There is also concern that the Medfield School Building Committee was not formed pursuant to Medfield School Policy. The Medfield School Committee Public Schools Facilities Management/Facilities Planning Policy section FB appears to require input from the Town Moderator in formation of building committees for



building projects. The Town Moderator was not consulted in forming the Medfield School Building Committee.

963 CMR 2.10(8)(j) requires that the Medfield School District provide the MSBA with the results of environmental assessments and that the District provide the public with a reasonable opportunity to comment on those assessments. Additionally, the District is required to provide the MSBA with a summary of the comments received with regard to environmental assessments.

An environmental assessment was conducted by the School Building Committee with a report delivered in late August 2020. At its September 9, 2020 meeting where the School Building Committee had anticipated voting on site selection, it incorporated some key points from the study into the designer presentation, but did not release the entire report to the public at that time. The original meeting agenda for the September 9<sup>th</sup> meeting (posted on September 2) did not note opportunity for public input; one day before the scheduled meeting, the agenda was amended to include public input. When the September 9<sup>th</sup> meeting did occur (by video conferencing technology) it was cut short due to a malfunction of that technology.

A follow-up meeting was scheduled for September 16, with public input included. However, the 992-page environmental assessment report was not posted with that meeting's agenda. The report was only posted to the project website approximately one hour before the meeting. The September 16<sup>th</sup> meeting agenda covered numerous items, with little to no time devoted specifically to address public concerns about the environmental report.

The public did not have time to digest the nearly one-thousand-page report and to ask informed questions and express concerns with it before the September 16 meeting. The Medfield School Building Committee's handling of the environmental assessment was a clear violation of 963 CMR 2.10(8)(j).

It should be noted that the Wheelock site survey, which would help to delineate project boundaries in relation to wetland resource areas, has yet to be made public. Information about wetland delineation was not confirmed prior to Site Selection. This is an especially important point given the site location in a Zone 1 Aquifer Protection Zone and Well Protection District. Independent of the Dale Street project, Neponset River Watershed Association has expressed concerns about the health of Mine Brook in the watershed.

The Medfield School Building Committee has consistently stated in its documents to MSBA that phasing challenges and lack of swing space for housing students during construction are primary reasons why the current Dale Street School site was not selected. However, no data can be found in the Preliminary Design Program documents or Preferred Schematic Report documents submitted to the MSBA regarding current capacity in existing schools beyond the elementary level. Blake Middle School (grades 6-8) was designed for 900 students; based on 2019-20 Massachusetts Department of Elementary and Secondary Education (DESE) enrollment numbers, it housed 575 students, so it has the potential for accommodating a full fifth grade (estimated 200 students) during the construction period. At times of actual peak enrollment (versus design enrollment) Wheelock School housed 500-600 students over a number of years; Massachusetts DESE enrollment for 2019-20 indicates 388 students were enrolled. With just 1-2 modular classrooms, Wheelock School may have the capacity to house the fourth grade during the short construction time period. Making use of swing space in other schools would provide students with access to a cafeteria, gym and library. Data on school capacity across the district was never discussed by the School Building Committee as part of the Site Selection process.

The stated purpose of the feasibility study as outlined in the Medfield 2018 Warrant Article that authorized the current feasibility study process pursuant to M.G.L. chapter 70B was to "...review potential solutions to the problems identified in the Dale Street Elementary School Statement of Interest... for the addition and/or renovation to or replacement of the Dale Street Elementary School, located at 45 Adams Street, Medfield, MA..." Although the Warrant Article mentioned replacement of the Dale Street Elementary School it noted the specific location of the Dale Street Elementary School, implying that the school would be replaced in its current location. The Warrant Article made no mention of alternate sites. Thus, the alternate siting process that has been conducted under the auspices of M.G.L. chapter 70B exceeds the authority that was originally granted under the 2018 Warrant Article.

The Medfield School Building Committee has not addressed the issues outlined in this letter fully and moving forward with the process without fully addressing these issues may be a costly and potentially environmentally damaging misstep that will burden Medfield for decades. These issues should be more fully explored, discussed and documented by the community before the project is advanced any further.

Yours Truly,



Benjamin H. Dowling

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