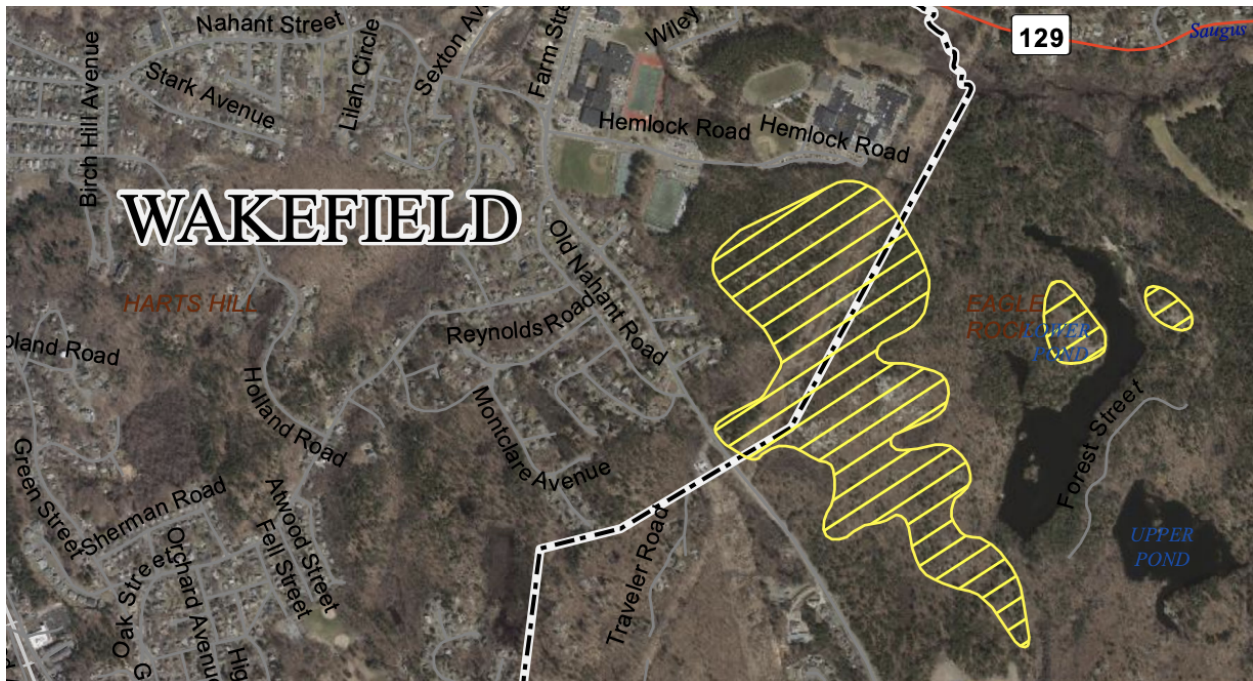


Subject: Northeast Metro Tech Vocational School New Building location, Wakefield, MA  
February 1, 2023

Dear Mr. McCarthy,

The Sierra Club, Massachusetts Chapter, is concerned about the siting of the new Northeast Metro Tech school at 100 Hemlock Rd, Wakefield, MA. We are troubled for a number of reasons, the top three being: environmental destruction of an important habitat; building accessibility and safety; and equity of the decision-making processes.

From an environmental perspective, the siting of the new building in an urban area with significant habitat and biodiversity is deeply disturbing. Having viewed the property and, more importantly, looked at the siting alternatives, we do not understand this choice. The proposed site contains mature oak and pine forests, forest core habitat, and rare species habitat listed in [BioMap3](#). Construction of the school on over 13-acres of rock outcrop forest will involve removing over 2000 trees and centuries-old root systems in water-filled bedrock. Removal of these trees will impact a vernal pool cluster, springs, seeps, ephemeral streams, isolated and bordering vegetated wetlands and amphibian migration pathways. The forested hilltop is documented Priority Habitat 1550 (see below) for Hentz's Red-bellied Tiger Beetle and supports a newly documented population of state-listed Eastern Whip-poor-will, in addition to a number of [Species of Greatest Conservation Need](#). Siting a 5-story building on the hilltop lacking bird-safe glass and illuminated at night for adult evening classes will pose an ongoing risk to birds and nocturnal wildlife.



[Priority Habitat 1550 Natural Heritage Atlas, 15th Edition, Town Priority Habitat Maps](#)

We also are concerned about potentially serious accessibility and safety issues. The way we understand this project, it is not a spatially inclusive design. For example, due to extreme elevation difference between the playing fields and parking lots designated for students at the base of the hill and the closest entrance to the building, there will be over 100 stairs creating a hardship for many building users. Furthermore, the north-facing orientation of the stairs and the 735 ft ADA ramp will most likely create icing in the winter and dangerous conditions.

Additionally, we understand that this site has not been reviewed by the Massachusetts Historical Commission for cultural significance, despite it being an area known by the Department of Conservation and Recreation (DCR) for archaeological sensitivity and early Indigenous sites. At the very least, this should require an on-location archaeological survey to document and mitigate the archaeological resources that will otherwise be lost to blasting.

Finally, we question the process by which this forested hilltop was selected. We are told that initially three sites were under consideration. The current site was selected because it had the least impact on athletic facilities and preserves space for a future ice rink. We can appreciate the desire to ensure optimal (and competitive) athletic facilities, but the decision has unrealistically minimized the consequences of selecting the hilltop. It is important to weigh not only the benefits, but also the enormous negative outcomes for this choice. More importantly, this process should involve all stakeholders that will be utilizing and paying for the project. For example, sending-communities' disability commissions, town councils, planning boards, conservation commissions, etc., as well as individual residents in surrounding areas, should all be aware of the project and alternatives, and should have an authentic voice. It does not appear as though the public was brought into this conversation until after the site was selected, at which time they were only told why they should vote "yes."

In moving forward with this location, the already high sitework costs, which now exceed 20% of the building costs, are likely to go even higher once blasting begins- funds that could be better spent on the school itself. Massachusetts School Building Authority (MSBA) reimbursement only allows for 8% of building costs going to sitework. It makes more sense to change location to one of the other two locations that also fulfill the District's educational program goals than to go ahead with a potentially catastrophic project.

Collectively these conditions not only needlessly destroy sensitive wildlife habitat, but they create issues of equity for students, staff and faculty as well as the taxpayers who

ultimately pay for this, particularly given that there are other options. Our children deserve not only the best schools that we can provide, but they are entitled to inherit a world in which we have intentionally reduced our impact on the very ecosystems that sustain life, including our own.

The Massachusetts Sierra Club therefore requests that the School Building Committee along with the Massachusetts School Building Authority (MSBA) and relevant oversight authorities (i.e. MSBA Board of Directors), place a moratorium on this project until such time that they can conduct a thorough review and inclusive stakeholders assessment to ensure that the broadest set of needs are met.

Thank you for your consideration.

Deb Pasternak

State Director

**Sierra Club Massachusetts Chapter**

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